

**FIDEURAM FUND**

***LUXEMBOURG MUTUAL INVESTMENT FUND  
WITH MULTIPLE SUB-FUNDS***

***PROSPECTUS***

**17 June 2026**

## **IMPORTANT INFORMATION**

The present Prospectus must be accompanied by the latest available annual report as well as the latest semi-annual report in the event the latter is published after the last annual report. These reports form part of the present Prospectus.

No information other than that contained in this Prospectus, the Key Information Documents (the “KIDs”), the Management Regulations, the periodic financial reports, as well as in any other documents mentioned in the Prospectus and which may be consulted by the public, may be given in connection with the offer.

In addition to the full Prospectus, the Management Company has issued a KID that contains fundamental information in reference to FIDEURAM FUND, in particular on the performance of each sub-fund, the description of the risk profile of each sub-fund, and information on the risk profile of a typical investor. The KID must be offered free of charge to each subscriber before making their investment. The KID may be obtained free of charge at the registered office of the Management Company, of the Administrator and from authorized distributors of units of the Fund, as well as on the following website: [http://www.fideuramireland.ie/en/legal\\_documentation](http://www.fideuramireland.ie/en/legal_documentation).

This Prospectus does not constitute an offer or solicitation by anyone in any jurisdiction in which such offer is unlawful or in which the person making such offer or solicitation is not qualified to do so or to anyone to whom it is unlawful to make such offer or solicitation.

Units of FIDEURAM FUND shall not be purchased or held, directly or indirectly, by investors who are citizens or residents of the United States of America or their sovereign territories; in addition, the transfer of FIDEURAM FUND’s units to such persons is not authorized.

Units of FIDEURAM FUND are not listed on the Luxembourg Stock Exchange.

Units of certain sub-funds of FIDEURAM FUND are intended for retail and/or Institutional Investors whereas units of certain other sub-funds are intended exclusively for Institutional Investors. Investors should understand that their investment is not secured against any possible loss.

Units of certain sub-funds of FIDEURAM FUND are marketed by the Management Company exclusively to Institutional Investors.

The Board of Directors of the Management Company has taken all reasonable care to ensure that the facts stated herein are true and accurate in all material respects and that there are no other material facts, the omission of which would make misleading any statement herein whether of fact or opinion. All the Directors accept responsibility accordingly.

## TABLE OF CONTENTS

<b>GLOSSARY</b> .....	5
<b>1) ORGANISATION</b> .....	12
<b>2) WHAT IS THE FUND</b> .....	18
<b>3) HOW THE FUND IS MANAGED</b> .....	18
<b>4) RISKS RELATING TO AN INVESTMENT IN THE FUND</b> .....	23
<b>5) HOW TO INVEST IN THE FUND</b> .....	39
<b>6) REDEMPTION OF UNITS</b> .....	42
<b>7) SWITCH OF UNITS</b> .....	44
<b>8) CHARGES AND EXPENSES BORNE BY THE UNITHOLDERS</b> ..	45
<b>9) CHARGES AND EXPENSES BORNE BY THE FUND</b> .....	45
<b>10) INVESTOR'S RIGHTS</b> .....	49
<b>11) MANAGEMENT COMPANY</b> .....	50
<b>12) DEPOSITARY BANK – ADMINISTRATOR AND PAYING AGENT</b> .....	51
<b>13) DISTRIBUTORS</b> .....	58
<b>14) INVESTMENT MANAGERS – SUB-INVESTMENT MANAGERS</b>	58
<b>15) NET ASSET VALUE AND DEALING PRICES</b> .....	60
<b>16) DATA PROTECTION</b> .....	69
<b>17) BENCHMARK REGULATION</b> .....	69
<b>18) MONEY LAUNDERING PREVENTION AND BENEFICIAL OWNERS</b> .....	72
<b>19) TAXATION</b> .....	73
<b>20) DISSOLUTION OF THE FUND – DISSOLUTION OF SUB-FUNDS – MERGER OF SUB-FUNDS</b> .....	83
<b>21) INVESTMENT POLICY</b> .....	84
<b>22) INVESTMENT RESTRICTIONS</b> .....	97
<b>APPENDIX I – SUB-FUNDS OF THE FUND</b> .....	107
<b>APPENDIX II - PRE-CONTRACTUAL DISCLOSURES</b> .....	164

## GLOSSARY

2010 LAW	The Law of 17 December 2010 regarding undertakings for collective investment, as amended.
ADDITIONAL PAYMENTS	These are additional payments carried out after the initial payment. These payments can be for any amount, provided that they are equal to, or higher than, 100. - EURO.
ARTICLES OF INCORPORATION	The Management Company's articles of incorporation, as may be amended from time to time.
BENCHMARK	<p>An index which describes the evolution of the financial markets of certain assets. The benchmark may be used for the portfolio construction and performance measurement of the sub-funds.</p> <p>The sub-funds are actively managed and do not aim at tracking the benchmark. The benchmark index is used for the screening process and the portfolio construction, but investments outside the benchmark are possible. The objective of the sub-funds is always, without guarantee, to outperform the benchmark.</p> <p>For each sub-fund the relative risk to the benchmark and the positioning relative to the benchmark are monitored, as well as the performance against the benchmark. In certain circumstances the sub-fund composition and its performance can be closer to the benchmark than in normal circumstances, while maintaining an active management style.</p>
BOARD OF DIRECTORS	The Management Company's board of directors.

BUSINESS DAY	Any full day on which the banks are open for normal business banking in Luxembourg. For clarification purposes, 24 December and 31 December will be considered Business Days, unless they fall on the weekend.
CALCULATION DAY	The first Business Day (other than days when the calculation of the Net Asset Value is suspended) following the Valuation Day, on which the Net Asset Value is calculated by the Administrator on the basis of the prices on the Valuation Day, unless otherwise specified in the Sub-Fund Particular.
CASH	The concept of cash, as included in the investment policies and objectives of each Sub-fund specifically includes term or sight deposits and money-market instruments with a maturity of less than 12 months, issued by top-tier entities, including OECD Member States and entities of those States.
CASH AND SECURITIES	QUASI-CASH Cash, bank deposits, short-term deposits or other short-term instruments (including money-market UCIs) and money-market instruments issued by sovereign issuers or companies with a residual maturity not exceeding 397 days. Floating-rate bonds where the coupon is reset frequently, i.e. once a year or more often, will be considered as a passive alternative to short-term instruments, on condition that their maximum residual maturity is 762 days.
CSSF	<i>Commission de Surveillance du Secteur Financier</i> , the Luxembourg supervisory authority.
DEPOSITARY BANK	State Street Bank International GmbH, Luxembourg Branch.
DIRECTOR	A member of the Fund Management Company's Board of Directors.

“EUR” or “EURO”	The currency of European Union Member Countries that are part of the single currency.
ESMA	The European Securities and Markets Authority.
FUND	Short term used in the text to refer to FIDEURAM FUND, a mutual investment fund with multiple sub-funds.
INITIAL PAYMENT	Payment carried out with the initial subscription of an investment in FIDEURAM FUND.
INITIAL SUBSCRIPTION PERIOD	The initial launch period for the Sub-fund in question, as defined by the Fund Management Company's Board of Directors, during which the Units are offered for subscription at the price determined in the Prospectus.
INSTITUTIONAL INVESTOR	Means an institutional investor within the meaning of Article 174 of the 2010 Law, as interpreted by the CSSF.
INVESTOR	Means the owner of units of the Fund.
MANAGEMENT COMPANY	Means FIDEURAM ASSET MANAGEMENT (IRELAND) DESIGNATED ACTIVITY COMPANY, in abbreviation “Fideuram Asset Management (Ireland) dac” in charge of the management of the sub-funds of the Fund.
MANAGEMENT REGULATIONS	Means the management regulations of the Fund, as may be amended from time to time and available on the website of the Management Company at <a href="https://www.fideuramassetmanagement.ie/">https://www.fideuramassetmanagement.ie/</a>

MEMBER STATE	Means a Member State of the European Union. The States that are contracting parties to the Agreement creating the European Economic Area other than the Member States of the European Union, within the limits set forth by this Agreement and related acts, are considered as equivalent to Member States of the European Union.
NET ASSET VALUE	Indicates, for each one of the sub-funds or for each class of Units, the value, expressed in EURO, of the respective Units. This value is made available in accordance with the Management Regulations and the Prospectus and is available each Business Day at the registered office of the Depositary Bank and on the website of the Management Company at <a href="https://www.fideuramassetmanagement.ie/">https://www.fideuramassetmanagement.ie/</a> and at the registered offices authorized distributors.
OECD	Organisation for Economic Cooperation and Development.
PROSPECTUS	The Fund's prospectus, as may be amended from time to time.
RATING METHODOLOGY	The Management Company and the Investment Manager uses an internal credit rating methodology which is able to cover debt securities using quantitative and qualitative components. Such methodology will use inter alia the ratings issued by the rating agencies but will not over rely on it.
REFERENCE CURRENCY	The currency in which the accounts of each sub-fund are held, as specified in the Sub-Fund Particulars.

## REGULATED MARKET

According to Directive 2014/65/EC, as amended (MiFID), a multilateral system operated and/or managed by a market operator, which brings together or facilitates the bringing together of multiple third party buying and selling interests in financial instruments in the system and in accordance with its nondiscretionary rules in a way that results in a contract, in respect of the financial instruments admitted to trading under its rules and/or systems, and which is authorised and functions regularly and in accordance with Title III of MiFID.

The list of regulated markets recognized by the Management Company is composed by the following sub-lists:

- the official list published in the MiFID database;
- the list of exchanges which participate to the World Federation of Exchanges;
- the list of exchanges maintained by the Italian association of investment managers Assogestioni;
- any other market listed in the Fund's Prospectus which complies with the principles listed in Title III of MiFID.

## SFDR

Regulation (EU) 2019/2088 on sustainability-related disclosures in the financial services sector, as amended from time to time.

## SUB-FUNDS

Subdivisions of the Fund in order to offer to the investors portfolios of specific securities. Each sub-fund is managed in an autonomous and distinct manner from the other sub-funds, as if it was a separate mutual investment fund.

## SUB-FUND PARTICULARS

Part of the Prospectus containing information relating to each Sub-Fund.

## SUSTAINABILITY FACTORS

Means environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters, such in accordance with SFDR.

SUSTAINABILITY RISK	Has the meaning given to it by article 2(22) of the SFDR and as further outlined in section “Risks relating to an investment in the Fund”.
SWITCH	Transaction carried out by the investor that modifies the composition of the investment amongst the various sub-funds of the Fund or that moves from one class of units to another.
TAXONOMY REGULATION	Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment, as amended from time to time.
UCI	Undertaking for collective investment.
UCITS	Undertaking for collective investment in transferable securities governed by Directive 2009/65/EC, as amended.
UNI	Indicates the unique investment type by which it is possible to invest in the Fund. The UNI investment provides for an initial payment of at least 2,000. - EURO – minimum which may be increased in some sub-funds – and for additional payments.
UNIT	Unit in which the assets and liabilities of each sub-fund are subdivided. In the same sub-fund classes of units may co-exist.
UNIT CLASSES	The Management Company may issue one or several unit classes that display one or several characteristic features that are different from that or those of the other classes, like, for instance, a specific sale or redemption fee structure, a specific advisory or management fee structure, a policy to hedge or not to hedge currency risk, a specific distribution policy, the fact that some Unitholders will benefit from a Guarantee, or any other criterion, as

specified in the “How to Invest in the Fund” Chapter and in the Sub-fund Particulars.

VALUATION DAY

Every Business Day.

## **1) ORGANISATION**

### **MANAGEMENT COMPANY**

FIDEURAM ASSET MANAGEMENT (IRELAND) DESIGNATED ACTIVITY COMPANY,  
in abbreviation “Fideuram Asset Management (Ireland) dac”  
2nd Floor, International House  
3 Harbourmaster Place, IFSC  
Dublin 1, D01 K8F1  
IRELAND

### **COMPOSITION OF THE BOARD OF DIRECTORS OF THE MANAGEMENT COMPANY**

1. Victoria PARRY  
Irish Independent Director  
Ireland  
Chair of the Board of Directors
2. Matteo CATTANEO  
CEO and Managing Director – Fideuram Asset Management (Ireland) dac  
Ireland  
Director
3. Clara DUNNE  
Irish Independent Director  
Ireland  
Director
4. William MANAHAN  
Irish Independent Director  
Ireland  
Director
5. Elisabetta PAGNINI  
Group General Counsel, Head of Group Legal – Intesa Sanpaolo  
Italy  
Director
6. Giuseppe RUSSO  
Economist  
Italy  
Director

7. Davide ELLI

Co-General Manager and Head of Investment Center Fideuram  
– Intesa Sanpaolo Private Banking S.p.A.  
Italy  
Director

**DEPOSITARY BANK**

STATE STREET BANK INTERNATIONAL GmbH, Luxembourg Branch  
49, Avenue J.F. Kennedy  
L – 1855 Luxembourg  
GRAND DUCHY OF LUXEMBOURG

As from 1 July 2026, the new address of STATE STREET BANK  
INTERNATIONAL GmbH, Luxembourg branch will be:  
17, Boulevard de Kockelscheuer  
L-1821 Luxembourg  
GRAND DUCHY OF LUXEMBOURG

**ADMINISTRATOR AND PAYING AGENT**

STATE STREET BANK INTERNATIONAL GmbH, Luxembourg Branch  
49, Avenue J.F. Kennedy  
L – 1855 Luxembourg  
GRAND DUCHY OF LUXEMBOURG

As from 1 July 2026, the new address of STATE STREET BANK  
INTERNATIONAL GmbH, Luxembourg branch will be:  
17, Boulevard de Kockelscheuer  
L-1821 Luxembourg  
GRAND DUCHY OF LUXEMBOURG

**INVESTMENT MANAGERS**

for FIDEURAM FUND – BOND GLOBAL HIGH YIELD:

FIL Pensions Management  
Beech Gate Millfield Lane  
Lower Kingswood Tadworth  
Surrey, KT20 6RP  
UNITED KINGDOM

for FIDEURAM FUND – BOND US PLUS:

PIMCO Europe GmbH  
Seidlstraße 24-24a  
80335 München  
GERMANY

for FIDEURAM FUND –EQUITY MARKET NEUTRAL STAR:

MAN ASSET MANAGEMENT (IRELAND) LIMITED  
70 Sir John Rogerson's Quay  
Dublin, D02 R296  
IRELAND

**SUB – INVESTMENT MANAGERS**

for FIDEURAM FUND – BOND GLOBAL HIGH YIELD:

FIDELITY INVESTMENTS CANADA ULC  
483 Bay Street, Suite 300  
Toronto ON M5G 2N7  
CANADA

FIL INVESTMENTS INTERNATIONAL  
Beech Gate Millfield Lane  
Lower Kingswood Tadworth  
Surrey, KT20 6RP  
UNITED KINGDOM

for FIDEURAM FUND – BOND US PLUS:

Pacific Investment Management Company LLC  
650 Newport Center Drive  
Newport Beach (CA)  
UNITED STATES OF AMERICA

PIMCO Europe Ltd  
11 Baker Street  
London, W1U 3AH  
UNITED KINGDOM

for FIDEURAM FUND – EQUITY MARKET NEUTRAL STAR:

MAN SOLUTIONS LIMITED  
Riverbank House, 2 Swan Lane  
London EC4R 3AD  
UNITED KINGDOM

**SUB – SUB INVESTMENT MANAGERS**

for FIDEURAM FUND – EQUITY MARKET NEUTRAL STAR:

GLG PARTNERS LP  
Riverbank House, 2 Swan Lane  
London EC4R 3AD  
UNITED KINGDOM

NUMERIC INVESTORS LLC  
c/o Maples Fiduciary Services (Delaware) Inc.  
4001 Kennett Pike, Suite 302  
UNITED STATES OF AMERICA

AHL PARTNERS LLP  
Riverbank House  
2 Swan Lane  
London EC4R 3AD  
UNITED KINGDOM

**SUB – SUB – SUB – INVESTMENT MANAGERS**

for FIDEURAM FUND – EQUITY MARKET NEUTRAL STAR:

GLG LLC  
C/O Maples Fiduciary Services Delaware Inc  
4001 Kennett Pike, Suite 302  
19807 Wilmington  
UNITED STATES OF AMERICA

Man Investments Australia Limited  
Level 21 Gosvenor Place 225 George Street  
Sydney, 2000  
AUSTRALIA

Man Investments (Hong Kong) Limited  
2206-2207, 22/F, Man Yee Building  
68 Des Voeux Road Central  
HONG KONG

**AUDITOR OF THE FUND**

Ernst & Young, *société anonyme*  
35E, Avenue John F. Kennedy  
L – 1855 Luxembourg  
GRAND DUCHY OF LUXEMBOURG

**AUDITOR OF THE MANAGEMENT COMPANY**

Ernst & Young  
Harcourt Centre, Harcourt Street  
Dublin 2  
IRELAND

**DISTRIBUTOR IN ITALY**

for FIDEURAM FUND – EQUITY MARKET NEUTRAL STAR,  
FIDEURAM FUND – COMMODITIES, FIDEURAM FUND – EQUITY  
GLOBAL EMERGING MARKETS, FIDEURAM FUND – GLOBAL EQUITY  
and FIDEURAM FUND – GLOBAL BOND

FIDEURAM ASSET MANAGEMENT (IRELAND) DESIGNATED ACTIVITY  
COMPANY,

in abbreviation “Fideuram Asset Management (Ireland) dac”

2nd Floor, International House

3 Harbourmaster Place, IFSC

Dublin 1, D01 K8F1

IRELAND

**DISTRIBUTOR IN LUXEMBOURG**

Intesa Sanpaolo Wealth Management

28, boulevard de Kockelscheuer

L-1821 Luxembourg

GRAND DUCHY OF LUXEMBOURG

**LEGAL ADVISERS**

for the Management Company and Irish matters:

A&L Goodbody

3 Dublin Landings, IFSC, North Wall Quay

Dublin 1

IRELAND

for the Fund and Luxembourg matters:

Elvinger Hoss Prussen, *société anonyme*

2, Place Winston Churchill

L-1340 Luxembourg

GRAND DUCHY OF LUXEMBOURG

## **2) WHAT IS THE FUND**

FIDEURAM FUND was created on March 30, 1999 in Luxembourg, by the "Management Company of the Mutual Investment Fund Fideuram Fund" subsequently absorbed by FIDEURAM GESTIONS S.A., itself absorbed by FIDEURAM BANK (LUXEMBOURG) S.A. on January 1, 2015, itself absorbed by Fideuram Intesa Sanpaolo Private Banking, launching Intesa Sanpaolo Wealth Management, with effect as from January 1, 2023. FIDEURAM FUND is currently managed by the Management Company.

The initial Management Regulations, which regulate the activities of the Fund, were published in the Memorial C of May 4, 1999, and were deposited with the Register of Commerce and Companies of Luxembourg (the "RCS") on April 14, 1999. The Management Regulations were subsequently amended and deposited with the RCS, where they may be inspected and copies may be obtained.

FIDEURAM FUND is a mutual investment fund under Luxembourg law governed by Part I of the law of December 17, 2010 relating to undertakings for collective investment (the "2010 Law") which makes it possible to choose between various investment alternatives on the financial markets. FIDEURAM FUND is registered with the RCS under number K1224.

The Management Company may at any time resolve to set up new sub-fund(s) and/or create within each sub-fund one or more classes. The Management Company may also at any time resolve to close a sub-fund, or one or more classes within a sub-fund, to further subscriptions.

The Fund constitutes a single legal entity, but the assets of each sub-fund are segregated from those of the other sub-fund(s) in accordance with the provisions of Article 181 of the 2010 Law. This means that the assets of each sub-fund shall be invested for the unitholders of the corresponding sub-fund and that the assets of a specific sub-fund are solely accountable for the liabilities, commitments and obligations of that sub-fund.

## **3) HOW THE FUND IS MANAGED**

The Fund is managed by a duly authorized and regulated Irish Management Company that pursues this activity under the freedom to provide services, not only for this Fund but also for other undertakings for collective investment in transferable securities (UCITS) in Luxembourg (Fonditalia, Interfund, Ailis and Willerfunds).

Fideuram Asset Management (Ireland) dac is a management company duly authorized in accordance with the Directive 2009/65/EC, as amended (the "UCITS Directive").

The objective of the Fund is to increase over time the value of the invested capital of the investors.

This goal is pursued by the Management Company - according to criteria of diligence and by comparison with financial market evolution - through the investment of the assets of each sub-fund in transferable securities issued or traded on the respective market of reference or in other financial liquid assets.

### **Sustainability and Responsible Policy:**

The Management Company adopted a Sustainable and Responsible Investment Policy (the “**Policy**”) which integrates environmental, social and governance (“**ESG**”) and sustainability risks as well as factors and opportunities into research, analysis and investment decision-making processes.

The Management Company considers the integration of sustainability risks as well as of ESG and sustainability factors in its own investment process as crucial, believing that these elements besides facilitating a sustainable economic and social development, can positively contribute to the financial results of the Fund’s sub-funds, while reducing their risks.

The integration of sustainability risks as well as of ESG and sustainability factors within the investment processes may generate sustainable profits over time and, consequently, originate a solid prospective of value creation for all stakeholders. This also allows for a more efficient management of risks, including environmental, social and reputational risks, which might have a negative impact on the evaluation of issuers.

To this end, the Management Company adopts exclusion criteria of issuers operating in non-socially responsible sectors, and / or having high ESG and sustainability risks exposure, which may generate a negative impact on the sub-funds’ performances, as well as the engagement and stewardship activities. In addition, the Management Company combines the financial analysis on third-party asset managers and funds with ESG or SRI considerations with regards to the adoption of policies on the integration of sustainability risks under the SFDR and verifying the ESG investment policies of the single sub-fund.

The Management Company’s approach to sustainable and responsible investment is inspired by the principles included in documents among which: UN Global Compact Principles (UNGC), UN Guiding Principles on Business and Human Rights (UNGPs), OECD Guidelines for multinational enterprises, International Labour Organization Conventions, United Nations Convention Against Corruption (UNCAC).

The Policy is reviewed and updated at least on an annual basis or whenever required due to changes of general principles set out in the Policy or in case of regulatory changes. Further information on Management Company's Sustainable and Responsible Investment Policy are available at <https://www.fideuramassetmanagement.ie/> in the "Policy" section.

As at the date of this Prospectus, all SFDR article 6 sub-funds do not consider principal adverse impacts on sustainability factors within the investment processes applicable to these sub-funds as the investment policies of those sub-funds do not promote any environmental and/or social characteristics. The situation may however be reviewed going forward.

Each sub-fund that has environmental and/or social characteristics or has the objective of sustainable investment discloses whether it considers principal adverse impacts on sustainability factors and how in the pre-contractual disclosures for each sub-fund in the Appendix to the Prospectus.

#### **Sustainability classification:**

In accordance with the provisions of the SFDR, the sub-funds can be classified in one of the below three categories:

- “Neutral Strategy” approach:

A sub-fund qualified as Neutral Strategy is a sub-fund which does not have a Sustainable Objective nor an ESG Promotion Strategy approach. The investments underlying of these sub-funds do not take into account the EU criteria for environmentally sustainable economic activities set out in the Taxonomy Regulation, and the ESG aspects are not binding for these sub-funds' investment decision process.

- “Promotion of environmental or social characteristics” or “ESG Promotion Strategy” approach:

A sub-fund qualified as ESG Promotion Strategy is a sub-fund that (i) does not have a Sustainable Objective, (ii) that promotes ESG and Sustainability Factors, which shall be a binding elements for the securities selection and investment decision making process, and (iii) the companies in which the sub-fund shall invest in need to follow good governance practices, in accordance with **article 8 of the SFDR**.

- “Sustainable Objective” approach:

A sub-fund qualified as Sustainable Objective is a sub-fund that (i) has a sustainable investment as its objective and (ii) the companies in which the sub-fund shall invest in need to follow good governance practices, in accordance with **article 9 of the SFDR**.

In accordance with article 2(17) of the SFDR, a “sustainable investment” means “an investment in an economic activity that contributes to an environmental objective, as measured, for example, by key resource efficiency indicators on the use of energy, renewable energy, raw materials, water and land, on the production of waste, and greenhouse gas emissions, or on its impact on biodiversity and the circular economy, or an investment in an economic activity that contributes to a social objective, in particular an investment that contributes to tackling inequality or that fosters social cohesion, social integration and labour relations, or an investment in human capital or economically or socially disadvantaged communities, provided that such investments do not significantly harm any of those objectives and that the investee companies follow good governance practices, in particular with respect to sound management structures, employee relations, remuneration of staff and tax compliance.”

**More information relating to the environmental and social characteristics or sustainable investment objective (as applicable) of the sub-funds is provided in the Appendix to the Prospectus in accordance with SFDR and Commission Delegated Regulation (EU) 2022/1288.**

At the date of the Prospectus, the sub-funds have been classified as follows:

<b>ESG Promotion Strategy sub-fund(s)</b>	FIDEURAM FUND – GLOBAL EQUITY; FIDEURAM FUND – GLOBAL BOND; FIDEURAM FUND - EURO CORPORATE BOND; FIDEURAM FUND – MILLENNIALS EQUITY USA.
<b>Neutral Strategy sub-fund(s)</b>	FIDEURAM FUND - EURO SHORT TERM; FIDEURAM FUND - EURO BOND LOW RISK; FIDEURAM FUND - EURO BOND MEDIUM RISK; FIDEURAM FUND - EURO BOND LONG RISK; FIDEURAM FUND - BOND GLOBAL HIGH YIELD; FIDEURAM FUND - BOND US PLUS; FIDEURAM FUND - BOND YEN; FIDEURAM FUND - EQUITY EUROPE; FIDEURAM FUND - EQUITY USA; FIDEURAM FUND - EQUITY JAPAN; FIDEURAM FUND - BOND GLOBAL EMERGING MARKETS; FIDEURAM FUND - EQUITY PACIFIC EX JAPAN;

FIDEURAM FUND - EQUITY GLOBAL EMERGING  
MARKETS;  
FIDEURAM FUND – EURO DEFENSIVE BOND;  
FIDEURAM FUND – INFLATION LINKED;  
FIDEURAM FUND – COMMODITIES;  
FIDEURAM FUND – EQUITY MARKET NEUTRAL  
STAR;  
FIDEURAM FUND – EQUITY USA VALUE;  
FIDEURAM FUND - ZERO COUPON 2026;  
FIDEURAM FUND - ZERO COUPON 2027;  
FIDEURAM FUND - ZERO COUPON 2028;  
FIDEURAM FUND - ZERO COUPON 2029;  
FIDEURAM FUND - ZERO COUPON 2030;  
FIDEURAM FUND - ZERO COUPON 2031;  
FIDEURAM FUND - ZERO COUPON 2032;  
FIDEURAM FUND - ZERO COUPON 2033;  
FIDEURAM FUND - ZERO COUPON 2034;  
FIDEURAM FUND - ZERO COUPON 2035;  
FIDEURAM FUND - ZERO COUPON 2036;  
FIDEURAM FUND - ZERO COUPON 2037;  
FIDEURAM FUND - ZERO COUPON 2038;  
FIDEURAM FUND – ZERO COUPON 2039;  
FIDEURAM FUND – ZERO COUPON 2040;  
FIDEURAM FUND – ZERO COUPON 2041;  
FIDEURAM FUND – ZERO COUPON 2042;  
FIDEURAM FUND – ZERO COUPON 2043;  
FIDEURAM FUND – ZERO COUPON 2044.

Unless otherwise provided in the Appendix to the Prospectus in respect of each sub-fund that has environmental and/or social characteristics or has the objective of sustainable investment, the investments underlying the sub-funds mentioned above do not take into account the EU criteria for environmentally sustainable economic activities as set out in the Taxonomy Regulation

#### **4) RISKS RELATING TO AN INVESTMENT IN THE FUND**

The inherent risks with the subscription of units of the Fund are represented by the fluctuations of quotations of the transferable securities and other financial assets that consist of the assets and liabilities of the Fund itself. With regard to stocks, such fluctuations will reflect the general market evolution and the economical-financial evolution of the issuing companies; with regard to fixed income securities, the fluctuations are in general more limited, and reflect the general evolution of the interest rates as well as the degree of reliability of the issuing entities.

The Fund will be able to use techniques and instruments for purposes other than hedging within the limits provided for by the Prospectus. These techniques and instruments present a higher degree of economic risk than the investments in transferable securities due to their greater volatility and their possible lack of liquidity. These techniques and instruments will be used only insofar they do not interfere with the investment policy of the Fund.

The use of financial derivative instruments as part of the investment strategy presents a higher risk level. Indeed, such an investment can involve an increase of the leverage and increase the total risk exposure as well as the volatility of the net asset value. Consequently, a fluctuation of the quotes relatively low in a contract on a derivative product can involve major losses – more than the invested amount - for the investor. Consequently, the Management Company must use a risk management method which makes it possible to control and to at any time measure the risk associated with the positions and the contribution of those to the general risk profile in the portfolio of each sub-fund of the Fund, and will employ a method allowing an accurate and independent valuation of the value of the derivative instruments by private contract.

Added to these risks, concerning investments expressed in currencies other than Euro, come risks, which arise from exchange rate fluctuations, as well as possible restrictions on the convertibility of the currencies in which they are expressed. If the investments have as an aim securities, which are not officially quoted, and other financial instruments, it is also necessary to account for their reduced negotiability compared to that of the listed securities. Moreover, with regard to the non-listed securities, there is an added risk element related to the discretionary character of their valuation.

Furthermore, concerning the possible investment in mortgage-related securities, it must be noted that such investment is subject to certain specific risks. Rising interest rates tend to extend the duration of mortgage-related securities, making them more sensitive to changes in interest rates. As a result, in a period of rising interest rates, a sub-fund that holds mortgage-related securities may exhibit additional volatility. This is known as extension risk. In addition, mortgage-related securities are subject to prepayment risk. When interest rates decline, borrowers

may pay off their mortgages sooner than expected. This can reduce the returns of a sub-fund because the sub-fund will have to reinvest that money at the lower prevailing interest rates.

### **Counterparty Risk**

Sub-funds of the Fund may invest in instruments, such as derivatives or may use efficient portfolio management techniques, by entering into contracts with first class financial counterparties specialized in this type of transaction, and in doing so exposes themselves to the risk that these said counterparties may generate financial damage to the relevant sub-funds by not fulfilling their obligations in the future, exposing the relevant sub-funds to financial losses in the process.

In the event of default, the counterparties would forfeit the collateral on the transaction. However if a transaction is not fully collateralised, the collateral may not cover the credit exposure to the counterparty. Collateral may be held either by the Depositary Bank or by a third party custodian and there is a risk of loss if the Depositary Bank or third party custodian are negligent or become insolvent.

To reduce counterparty risks, all financial assets talking apart in the EMT program are required to be over-collateralized, taking into account appropriate haircut levels, where applicable.

Furthermore, the relevant sub-funds may be exposed to finance sector companies in their role as service providers and in times of extreme market volatility such companies might be adversely affected which in turn could have a harmful effect on the activities of the relevant sub-fund.

### **Collateral Management risk**

Collateral is used to mitigate counterparty risks. There is a risk that the collateral taken, especially where it is in the form of securities, when realized does not raise sufficient cash to settle the counterparty's liability. This may be due to factors including risk of pricing volatility (mitigated to a reasonable degree by the application of appropriate haircuts, requiring the counterparty posting assets of greater value than the economic exposure), adverse market movements in the value of collateral, a deterioration in the credit rating of the issuer of the collateral, or the illiquidity of the market in which the collateral is traded.

Where a particular sub-fund is in turn required to post collateral with a counterparty, there is a risk that the value of the collateral placed is higher than the cash or investments received by the sub-fund. In either case, where there are delays or difficulties in recovering assets or cash, collateral posted with counterparties, or realising collateral received from counterparties, the sub-fund may face difficulties in meeting redemption or purchase requests or in meeting delivery or purchase obligations under other contracts.

### **Cash Collateral Reuse risk**

Cash received as collateral may be reused and reinvested, in compliance with the diversification rules specified in the CSSF's Circular 14/592. There is a risk that the value on return of the reinvested cash collateral may not be sufficient to cover the amount required to be repaid to the counterparty. In this circumstance, the relevant sub-fund would be required to cover the shortfall.

Re-invested cash collateral may also expose the sub-fund to a risk of failure or default of the issuer of the relevant security in which the cash collateral has been invested.

### **Liquidity Risk**

Despite the heavy volume of trading in securities, the markets for some securities have limited liquidity and depth. This is particularly the case for developing markets which, while generally growing in volume, have, for the most part, substantially less volume than more developed markets, and securities of many companies are less liquid and their prices more volatile than securities of comparable companies in more sizable markets. This lack of depth could be a disadvantage to the concerned sub-fund of the Fund, both in the realization of the prices which are quoted and in the execution of orders at desired prices.

### **Risks linked to non-investment grade bonds (High-yield bonds)**

Certain high-yielding bonds are very speculative and involve comparatively greater risks than higher quality securities. Compared to higher-rated securities, lower-rated high yield price fluctuations are larger and high yield securities prices are more affected by changes in the financial condition of their issuers; besides, high yield bonds have a higher incidence of default and they are less liquid.

### **Total Return Swap and/or Excess Return Swap**

Some sub-funds may enter into a total return swap/and or excess return swap in which one party receives payments on a reference asset plus any capital gains and losses over the payment period, while the other receives a specified fixed and/or floating cash flow unrelated to the performance of the reference asset. Where a sub-fund uses total return swaps or a similar type of instrument for investment purposes, the strategy and the underlying to which the sub-fund takes exposure are those described in the investment strategy of the relevant sub-fund.

## **Legal Risks**

There is a risk that agreements, securities lending, repurchase agreements and derivatives techniques are terminated due, for instance, to bankruptcy, supervening illegality or change in tax or accounting laws. In such circumstances, a sub-fund may be required to cover any losses incurred.

Furthermore, certain transactions are entered into on the basis of complex legal documents. Such documents may be difficult to enforce or may be the subject of a dispute as to interpretation in certain circumstances. Whilst the rights and obligations of the parties to a legal document may be governed by Luxembourg law, in certain circumstances (for example insolvency proceedings) other legal systems may take priority which may affect the enforceability of existing transactions.

## **Operational risk**

The sub-funds' operations (including investment management, derivatives techniques, securities lending and repurchase agreements) are carried out by the service providers mentioned in this Prospectus. In the event of a bankruptcy or insolvency of a service provider, investors could experience delays (for example, delays in the processing of subscriptions, conversions and redemption of units) or other disruptions.

## **Custody risk**

The sub-funds' assets (including collateral) are held in custody by the Depositary Bank or agents, which exposes the sub-funds to custodian risk. This means that the sub-funds are exposed to the risk of loss of assets placed in custody as a result of insolvency, negligence or fraudulent trading by the Depositary Bank.

## **Securities lending risk**

The principal risk when engaging in securities lending transactions is the risk of default by a counterparty who has become insolvent or is otherwise unable or refuses to honor its obligations to return securities or cash to the sub-fund as required by the terms of the transaction. Counterparty risk is mitigated by the transfer or pledge of collateral in favor of the sub-fund.

Securities lending transactions also entail operational risks such as the non-settlement or delay in settlement of instructions and legal risks related to the documentation used in respect of such transactions.

### **Repurchase / reverse repurchase agreements risk**

The principal risk when engaging in repurchase/reverse repurchase transactions is the risk of default by a counterparty who has become insolvent or is otherwise unable or refuses to honor its obligations to return securities or cash to the sub-fund as required by the terms of the transaction. Counterparty risk is mitigated by the transfer or pledge of collateral in favor of the sub-fund.

Although repurchase agreements are over collateralized, the sub-fund could incur a loss if the value of the securities sold has increased in value relative to the value of the cash or margin held by the sub-fund; while in a reverse repurchase transaction, the sub-fund could incur a loss if the value of the purchased securities has decreased in value relative to the value of the cash or margin held by the sub-fund.

### **Exchange Traded Funds (ETF)**

ETFs are investment funds whose shares represent an interest in a portfolio of underlying assets. They are subject to market risk, including the possible loss of principal. The value of the portfolio will fluctuate with the value of the underlying securities. ETFs trade like a stock, and there will be brokerage commissions associated with buying and selling exchange traded funds unless trading occurs in a fee-based account. ETFs may trade for less than their net asset value.

### **Leverage Risk**

Investment in financial derivative instruments can introduce significant leverage risks and lead to high volatility. This is because typically such instruments require very low margin payment in relation to the amount of underlying exposure, and hence a small price movement in the value of the underlying security may lead to a significant loss or gain on the money actually invested in the derivative.

### **Risks linked to the investments in Emerging Markets**

Potential investors should note that investments in emerging markets carry risks additional to those inherent in other investments. In particular, potential investors should note that investment in any emerging market carries a higher risk than investment in a developed market; emerging markets may afford a lower level of legal protection to investors; some countries may place controls on foreign ownership; and some countries may apply accounting standards and auditing practices which do not necessarily conform with internationally accepted accounting principles.

## **Risks linked to investments in hybrid securities**

Hybrid securities combine generally both debt and equity characteristics. “Equity” features can be (i) no final maturity; (ii) no on-going payment that could lead to default if missed; and (iii) loss absorption in the case of a bankruptcy. “Debt” features can be instead a schedule of regular coupons and, often, the presence of a call option by which the issuer can redeem the security at a certain time.

## **Risks linked to Contingent Convertible Bonds investments (“CoCos”)**

CoCos are a form of contingent hybrid securities, usually subordinated, that behave like debt securities in normal circumstances but which either convert to equity securities or have write down (full or partial, permanent or temporary) loss absorption mechanisms on the occurrence of a particular ‘trigger’ event. A write down means that some or all of the principal amount of the CoCo bond will be written down. The trigger events may, for example, be based on a mechanical rule (e.g. the issuer’s regulatory capital ratios) or a regulatory supervisor’s discretion (e.g. the relevant regulatory authority deems the banking institution to be non-viable).

CoCos are innovative and complex; investing in such securities may expose the Sub-fund to different risks. The main risks linked to CoCos investments are:

- (i) **Conversion risk:**  
In case of conversion into equity, there may be the need to sell these new equity shares because of the investment policy of the sub-fund that does not allow equity in its portfolio. This forced sale may itself lead to liquidity issue for the related sub-fund’s shares.
- (ii) **Trigger level event risk:**  
Trigger levels (as determined in the issuing document of each relevant CoCo) differ and determine exposure to conversion risk depending on the distance of capital ratio of the issuing institution to the trigger level. Trigger event may lead to a partial or even total loss of capital for CoCos’ holders. The investor needs an ongoing understanding of the capital ratio of the issuing institution has in place relative to the trigger level. The capital ratio of the issuing institution varies depending on the issuer while trigger levels differ depending on the specific terms of issuance. The trigger could be activated either through a material loss in capital as represented in the numerator or an increase in risk weighted assets as measured in the denominator. Transparency is critical to mitigating the risk.
- (iii) **Coupon Cancellation:**  
For some Cocos, coupons’ payments are entirely discretionary and may be cancelled by the issuer of the CoCos at any point, for any reason, and for any length of time. Cancelled payments do not accumulate and are

instead written off. This significantly increases uncertainty in the valuation of such type of CoCos and may lead to mispricing of risk.

**(iv) *Call extension risk:***

Certain CoCos are issued as perpetual instruments, callable at pre-determined levels only with the approval of the competent authority. It cannot be assumed that the perpetual CoCos will be called on call date. The investor may not receive return of principal if expected on call date or indeed at any date.

**(v) *Capital Structure inversion risk:***

Contrary to classic capital hierarchy, holders of CoCos may suffer a loss of capital when equity holders do not. In certain scenarios, holders of CoCos will suffer losses ahead of equity holders. These cuts against the normal order of capital structure hierarchy where equity holders are expected to suffer the first loss.

**(vi) *Unknown risk:***

The structure of CoCos is innovative yet untested. In a stressed environment, when the underlying features of these instruments will be put to the test, it is uncertain how they will perform. In the event a single issuer activates a trigger or suspends coupons, will the market view the issue as an idiosyncratic event or systemic. In the latter case, potential price contagion and volatility to the entire asset class is possible. This risk may in turn be reinforced depending on the level of underlying instrument arbitrage. Furthermore in an illiquid market, price formation may be increasingly stressed.

**(vii) *Industry concentration risk:***

CoCos are issued by banking/insurance institutions. If a sub-fund invests significantly in CoCos, its performance will depend to a greater extent on the overall condition of the financial services industry than a sub-fund following a more diversified strategy.

**(viii) *Yield/ Valuation risk:***

CoCos may have an attractive yield which may be viewed as a complexity premium. The sub-fund is also exposed to liquidity risk and concentration risk as described above in the present section.

**(ix) *Write down risk:***

CoCos may be written down upon the occurrence of a pre-determined trigger event (the trigger events may, for example, be based on a mechanical rule (e.g. the issuer's regulatory capital ratios) or a regulatory supervisor's discretion (e.g. the relevant regulatory authority deems the banking institution to be non-viable), as determined in the issuing document of each CoCo.

## **Risks linked to asset backed securities - mortgage backed securities**

An asset-backed security (“**ABS**”) or mortgage-backed security (“**MBS**”) are generic terms for debt securities issued by corporations or other entities (including public or local authorities) backed or collateralized by the income stream from an underlying pool of assets. The underlying assets typically include the following:

Consumer loans and receivables:

- Mortgage loans;
- Home-equity loans;
- Manufacturing housing contracts;
- Student loans;
- Credit Card receivables;
- Auto, boat, recreational vehicle loans

Business receivable:

- Trade receivables;
- Equipment leases.

ABS/MBS are usually issued in a number of different classes with varying characteristics depending on the riskiness of the underlying assets assessed by reference to their credit quality and term and can be issued at a fixed or a floating rate. The higher the risk contained in the class, the more the asset-backed security pays by way of income. The obligations associated with these securities may be subject to greater credit, liquidity and interest rate risk compared to other fixed income securities such as government issued bonds. The average life of each individual security may be affected by a large number of factors such as the existence and frequency of exercise of any optional redemption and mandatory prepayment, the prevailing level of interest rates, the actual default rate of the underlying assets, the timing of recoveries and the level of rotation in the underlying assets.

ABS and MBS are often exposed to two relevant risk factors: (i) Extension risk: The risk of a security's expected maturity lengthening in duration due to the deceleration of prepayments. Extension risk is mainly the result of rising interest rates. As interest rates may rise due to different economic factors, the likelihood of prepayment decreases as people will be less likely to refinance their Real Estate Investment, (ii) Prepayment Risk: The risk associated with the early unscheduled return of principal on a fixed-income security. On a mortgage/asset-backed security, the higher the interest rate relative to current interest rates, the higher the probability that the underlying mortgages will be refinanced. Investors who pay a premium for a callable bond with a high interest rate take on prepayment risk. In addition to being highly correlated with falling interest rates, mortgage prepayments are highly correlated with rising home values, as rising home values provide incentive for borrowers to trade up in homes or use cash-out re-finances, both leading to mortgage prepayments.

## **Sustainability Risk**

Sustainability risk refers to “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 the investment”, in accordance with article 2 (22) of the SFDR.

The sustainability risk can affect the value of financial instruments and contribute to its major fluctuations due to different situations including the involvement of the issuer in controversies and investments in sectors with high environmental and social risks. Some of these factors would reduce the investor confidence and consequently the market value of the financial instrument.

Sustainability risks, if not properly managed, may affect companies in which the sub-fund invests, potentially causing different negative consequences, like lower revenues, higher costs, damages and reduction in the value of assets, as well as regulatory risks.

Consequently, unmanaged or unmitigated sustainability risks can distress returns of the investment in financial instruments of issuers that do not comply with ESG standards, causing potential reductions on the value of the investments.

The integration of the sustainability risk in the sub-funds’ investment and risk monitoring processes on a continuous basis, as described in the Sustainable and Responsible Investment Policy adopted by the Management Company, can led to the mitigation of the negative impacts of the risk and positively contribute to the investor long-term returns.

Sustainability risks are integrated into the decision making and risk monitoring processes to the extent that they represent a potential or actual material risk and/or opportunities to maximize the long term returns.

## **ESG data risk**

ESG (environmental, social and governance) information from third-party data providers may be incomplete, inaccurate or unavailable. As a result, there is a risk that the Management Company or the Investment Manager may incorrectly assess a security or issuer, resulting in the incorrect inclusion or exclusion of a security in the portfolio of a Sub-fund.

## **Investments in the People’s Republic of China (PRC)**

Investing in the PRC is subject to the risks of investing in emerging markets and additional risks, which are specific to the PRC market.

The economy of the PRC is in a state of transition from a planned economy to a more market oriented economy and investments may be sensitive to changes in law and regulation together with political, social or economic policy which includes possible government intervention.

In extreme circumstances, the sub-funds may incur losses due to limited investment capabilities, or may not be able to fully implement or pursue its investment objectives or strategy, due to local investment restrictions, illiquidity of the Chinese domestic securities market, and/or delay or disruption in execution and settlement of trades.

### **Shanghai-Hong Kong Stock Connect**

The Shanghai-Hong Kong Stock Connect program is a securities trading and clearing linked program developed by Hong Kong Exchanges and Clearing Limited (“HKEx”), the Hong Kong Securities Clearing Company Limited (“HKSCC”), Shanghai Stock Exchange (“SSE”) and China Securities Depository and Clearing Corporation Limited (“ChinaClear”) with an aim to achieve mutual stock market access between mainland China and Hong Kong. This program will allow foreign investors to trade certain SSE listed China A-Shares through their Hong Kong based brokers.

The sub-funds seeking to invest in the domestic securities markets of the PRC may use the Shanghai-Hong Kong Stock Connect and, thus, are subject to the following additional risks:

**General Risk:** The relevant regulations are untested and subject to change. There is no certainty as to how they will be applied which could adversely affect the sub-funds. The program requires use of new information technology systems, which may be subject to operational risk due to its cross-border nature. If the relevant systems fail to function properly, trading in both Hong Kong and Shanghai markets through the program could be disrupted.

**Clearing and Settlement Risk:** The HKSCC and ChinaClear have established the clearing links and each will become a participant of each other to facilitate clearing and settlement of cross-boundary trades. For cross-boundary trades initiated in a market, the clearing house of that market will on one hand clear and settle with its own clearing participants, and on the other hand undertake to fulfil the clearing and settlement obligations of its clearing participants with the counterparty clearing house.

**Legal/Beneficial Ownership:** Where securities are held in custody on a cross-border basis, there are specific legal/beneficial ownership risks linked to compulsory requirements of the local central securities depositories, HKSCC and ChinaClear.

As in other emerging and less developed markets, the legislative framework is only beginning to develop the concept of legal/formal ownership and of beneficial ownership or interest in securities. In addition, HKSCC, as nominee holder, does not guarantee the title to Shanghai-Hong Kong 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. Consequently, the courts may consider that any nominee or depository bank as registered holder of Shanghai-Hong Kong Stock Connect securities would have full ownership thereof, and that those Shanghai-Hong Kong Stock Connect securities would form part of the pool of assets of such entity available for distribution to creditors of such entities and/or that a beneficial owner may have no rights whatsoever in respect thereof. Consequently, the sub-funds and the depository cannot ensure that the sub-funds ownership of these securities or title thereto is assured.

To the extent that HKSCC is deemed to be performing safekeeping functions with respect to assets held through it, it should be noted that the depository and the sub-funds will have no legal relationship with HKSCC and no direct legal recourse against HKSCC in the event that the sub-funds suffer losses resulting from the performance or insolvency of HKSCC.

In the event ChinaClear defaults, HKSCC's liabilities under its market contracts with clearing participants will be limited to assisting clearing participants with claims. HKSCC will act in good faith to seek recovery of the outstanding stocks and monies from ChinaClear through available legal channels or the liquidation of ChinaClear. In this event, the sub-funds may not fully recover their losses or their Shanghai-Hong Kong Stock Connect securities and the process of recovery could also be delayed.

**Operational Risk:** The HKSCC provides clearing, settlement, nominee functions and other related services of the trades executed by Hong Kong market participants. PRC regulations, which include certain restrictions on selling and buying will apply to all market participants. In the case of sale, some operating models could require pre-delivery of shares to the broker, increasing counterparty risk. Because of such requirements, the sub-funds may not be able to purchase and/or dispose of holdings of China A-Shares in a timely manner.

**Quota Limitations:** The program is subject to quota limitations, which may restrict the sub-funds ability to invest in China A-Shares through the program on a timely basis.

**Investor Compensation:** The sub-fund will not benefit from local investor compensation schemes.

Shanghai-Hong Kong Stock Connect will only operate on days when both the PRC and Hong Kong markets are open for trading and when banks in both markets are open on the corresponding settlement days. There may be occasions when it is a normal trading day for the PRC market but the sub-funds cannot carry out any China A-Shares trading. The sub-funds may be subject to risks of price fluctuations in China A-Shares during the time when Shanghai-Hong Kong Stock Connect is not trading as a result.

**Currency Risk:** Investing in products/shares denominated in Renminbi- the Chinese currency (“RMB”) involves currency risk. Fluctuation in the exchange rate of RMB may result in losses in the event that the customer subsequently converts RMB into another currency. Exchange controls imposed by the relevant authorities may also adversely affect the applicable exchange rate. RMB is currently not freely convertible and conversion of RMB may be subject to certain policy, regulatory requirements and/or restrictions (which are subject to changes from time to time without notice). The actual conversion arrangement will depend on the policy, regulatory requirements and/or restrictions prevailing at the relevant time.

**CNH** is the offshore RMB, accessible outside the PRC and traded primarily in Hong Kong.

**CNY** is the Chinese onshore RMB accessible within the PRC.

Investments through Stock Connect are quoted in CNY (*onshore RMB*) whereas the settlement currency is CNH (*offshore RMB*).

The convertibility from CNH (*offshore RMB*) to CNY (*onshore RMB*) is a managed currency process subject to foreign exchange control policies of and repatriation restrictions. The conversion rate between CNH (*offshore RMB*) and CNY (Onshore RMB) is currently 1 (one) but there is no guarantee that this rate remains unchanged. Any potential conversion costs would be supported by the investors. It is possible that the availability of CNH (*offshore RMB*) to meet redemption payments immediately may be reduced and such payments may be delayed.

### **China Interbank Bond Market (the “CIBM”)**

The CIBM is an OTC market established in 1997, executing the majority of CNY (*Onshore RMB*) bond trading. The main products traded in this market include government bonds, central bank papers, policy bank bonds and corporate bonds. The CIBM is in a stage of development and the market capitalisation and trading volume may be lower than those of the more developed markets. Market volatility and potential lack of liquidity due to low trading volume may result in prices of debt securities traded on such market fluctuating significantly. The sub-fund

investing in such market is therefore subject to liquidity and volatility risks and may suffer losses in trading Mainland China bonds. The bid and offer spreads of the prices of the Mainland China bonds may be large, and the relevant sub-fund may therefore incur significant trading and realization costs and may even suffer losses when selling such investments. The CIBM is also subject to regulatory risks. Due to irregularities in the CIBM trading activities, the China Government Securities Depository Trust & Clearing Co. (the central clearing entity) suspended new account opening on the CIBM for specific types of products. Although investment funds that are mutual funds offered to the public were not affected, there is no assurance that future regulatory actions will not affect such funds. If accounts are suspended, or cannot be opened, the sub-fund's ability to invest in the CIBM will be limited and it may suffer substantial losses as a result.

### **Bond Connect Program**

Bond connect is a cross-border bond trading and settlement scheme that provides a link between the Mainland China central securities depositories, China Central Depository & Clearing Co., Ltd (“CCDC”) and Shanghai Clearing House (“SHCH”), and the Central Moneymarkets Unit in Hong Kong (“CMU”), allowing investors from Mainland China and overseas to trade in each other’s bond markets through connection between the Mainland and Hong Kong financial infrastructure institutions.

Investments made through the Bond Connect program are subject to the following risks:

**Regulatory risk:** Any laws, rules, regulations, policies, notices, circulars or guidelines published or applied by any of the Bond Connect Authorities (as defined below) are subject to change from time to time in respect of Bond Connect or any activities arising from Bond Connect (the “**Applicable Bond Connect Laws and Rules**”) and there can be no assurance that Bond Connect will not be abolished. Investments through Bond Connect may be adversely affected as a result of any change in the Applicable Bond Connect Laws and Rules. “Bond Connect Authorities” refers to the exchanges, trading systems, settlement systems, governmental, regulatory or tax bodies which provide services and/or regulate Bond Connect and activities relating to Bond Connect, including, without limitation, the People’s Bank of China (“PBOC”), the Hong Kong Monetary Authority (“HKMA”), the Hong Kong Exchanges and Clearing Limited, the China Foreign Exchange Trading System (“CFETS”), the CMU, the CCDC and SHCH and any other regulator, agency or authority with jurisdiction, authority or responsibility in respect of Bond Connect.

**Taxation risk:** PRC tax applicable are subject to uncertainties.

**Liquidity risk:** investments may be subject to liquidity risk.

**No off-market transfer:** Pursuant to the Applicable Bond Connect Laws and Rules, the transfer of Bond Connect Securities between two (2) members of CMU and between two (2) CMU sub-accounts of the same CMU Member is not allowed.

**No amendment of orders, limited cancellation of orders:** Pursuant to the Applicable Bond Connect Laws and Rules, instructions relating to sell and buy orders for Bond Connect Securities may only be cancelled in limited circumstances pursuant to the Applicable Bond Connect Laws and Rules and that instructions may not be amended.

#### **Investment in CIBM via Northbound Trading Link under Bond Connect**

Under the prevailing regulations in Mainland China, eligible foreign investors will be allowed to invest in the bonds circulated in the CIBM through the northbound trading of Bond Connect (“Northbound Trading Link”). There will be no investment quota for Northbound Trading Link.

Under the Northbound Trading Link, eligible foreign investors are required to appoint the CFETS or other institutions recognised by the PBOC as registration agents to apply for registration with the PBOC.

Pursuant to the prevailing regulations in Mainland China, an offshore custody agent recognised by the Hong Kong Monetary Authority (currently, the Central Moneymarkets Unit) shall open omnibus nominee accounts with the onshore custody agent recognised by the PBOC (currently, the China Securities Depository & Clearing Co., Ltd and Interbank Clearing Company Limited). All bonds traded by eligible foreign investors will be registered in the name of Central Moneymarkets Unit, which will hold such bonds as a nominee owner. For investments via Bond Connect, the relevant filings, registration with PBOC and account opening have to be carried out via an onshore settlement agent, offshore custody agent, registration agent or other third parties (as the case may be). As such, the concerned sub-fund is subject to the risks of default or errors on the part of such third parties. Investing in the CIBM via Bond Connect is subject to the risks mentioned above in relation to Bond Connect and notably to regulatory risks. The relevant rules and regulations on these regimes are subject to change which may have potential retrospective effect. In the event that the relevant Mainland Chinese authorities suspend account opening or trading on the CIBM, the sub-fund’s ability to invest in the CIBM will be adversely affected. In such event, the sub-fund’s ability to achieve its investment objective will be negatively affected.

#### **Risks in relation to Emerging Markets**

The investment in emerging markets implies a greater risk than that usually associated with the investment in securities of developed countries. The risk is in the fact that the performance of the emerging countries and their markets tends to fluctuate more sensibly, the degree of volatility of the markets being higher. This increased volatility is due to a certain number of political, monetary and economic

factors, in particular a political and economic system less stable and less reliable financial data, relating to the securities of the companies dealt in on these markets. The settlement systems for transactions in the emerging countries can be less well organized than that in developed countries. As a result there is a risk that the settlement of the transactions be delayed and that liquidities of securities of the sub-funds be threatened because of the failures of such systems.

### **Indian Capital Gains Tax (CGT) and tax on other income**

Currently, the tax provision policy of the Management Company is to fully provide for both CGT and tax on other income (i.e. dividend income, interest income, surcharge and cess) on a cash basis for realized gains or through accruals on unrealized gain basis, where it is not already withheld at source. The tax provision liability accruals will be reflected in the net asset value of the relevant sub-fund.

The Management Company, after seeking professional advice, may decide to make or not to make any tax provisions in respect of a sub-fund in scope for Indian CGT and tax on other income. Even if tax provisions are made, such provisions may be more than or less than a sub-fund's actual Indian tax liabilities calculated on actual assets selling prices and it is possible that such tax provisions made by the Management Company may be insufficient. In case of a difference between the sub-fund's provision for taxes and its actual Indian tax liabilities, the relevant amounts shall be credited to or debited from the sub-fund's assets as the case may be.

As a result, the income from the securities held and hence the performance of the sub-fund, may be adversely affected. The degree of impact on individual unitholders of the sub-fund may vary, depending on factors such as the level of the sub-fund's provision for taxes (if any), the difference between tax provisions on unrealized gains and tax applied at the relevant time, etc. The impact will also depend on when the relevant unitholders subscribed for and/or redeemed their Units in the sub-fund.

In the event the Management Company considers it necessary to adopt or to adjust any tax provision (whether in respect of CGT or any other applicable tax regulation/laws in India) on a retrospective basis, the prevailing and/or future net asset value of the sub-fund may be negatively impacted. The magnitude of such potential negative impact on the performance of the sub-fund may not correspond to the gains over an investor's holding period due to the retrospective nature of the tax provision.

The Management Company will review and make adjustments to its tax provision policy as and when it considers necessary from time to time and as soon as practicable upon issuance of further notices or clarification issued by the Indian tax authority in respect of the application of CGT and/or any other applicable tax regulations/laws and the respective implementation rules.

There is a possibility that the current tax laws, rules, regulations and practice in India and/or the current interpretation or understanding thereof may change in the future and such change(s) may have retrospective effect. The sub-fund could become subject to additional taxation that is not anticipated as at the date hereof or when the relevant investments are made, valued or disposed of. Any increased tax liabilities on the relevant sub-fund may adversely affect the sub-fund's net assets and may reduce the income from, and/or the value of, the relevant investments in the sub-fund.

### **Conflicts of interest**

The Management Company and any Investment Manager, the distributors, the Administrator, the Depository Bank may from time to time act as management company, investment manager or adviser, distributor, administrator, or depository bank in relation to, or be otherwise involved in, other funds or collective investment schemes which have similar investment objectives to those of the Fund or any sub-fund. It is therefore possible that any of them may, in the due course of their business, have potential conflicts of interest with the Fund or any sub-fund.

In such event, each will at all times have regard to its obligations under any agreements to which it is party or by which it is bound in relation to the Fund or any sub-fund. In particular, but without limitation to its obligations to act in the best interests of the unitholders when undertaking any dealings or investments where conflicts of interest may arise, each will respectively endeavour to ensure that such conflicts are resolved fairly.

There is no prohibition on the Fund entering into any transactions with any specific sub-fund Investment Manager, the distributors, the Administrator, the Depository Bank or with any of their affiliates, or investing the assets of or reinvest the cash collateral received by any sub-fund in any investment products or funds managed, launched or offered by any of the above-mentioned entities, provided that such transactions are carried out as if effected on normal commercial terms negotiated at arm's length. The Investment Managers or any affiliates acting in a fiduciary capacity with respect to client accounts may recommend to or direct clients to buy and sell Units of the Fund. Specific limitations regarding the transactions of the Management Company, are provided for in order to limit:

- the possible realization of conflicts of interest, i.e. the possibility that the Management Company has a direct or indirect interest in the investments carried out by the Fund;
- the concentration of risks arising from a reduced geographical diversification or from investment of a too extensive portion of the assets in securities of the same type;

- the acquisition by the Fund of a control participation in the issuing entities of the securities in which the Fund invests;
- the use for purely speculative purposes of financial derivative instruments (options, futures, swaps).

All the above risks are correctly identified and monitored according to CSSF's Circular 11/512 and 14/592 and ESMA Guidelines 2014/937. The use of efficient portfolio management techniques will not result in a change to the investment policy of a sub-fund and should not add substantial supplementary risk to the original risk policy of the relevant sub-fund.

In order to follow the evolution of the management of the Fund, the net asset value of the units of each sub-fund is made available in accordance with section "Net Asset Value and Dealing Prices" of the Prospectus. In exceptional cases (closing of the markets, impossibility of carrying out the valuation of the Fund, and other events of force majeure), the calculation of the net asset value, the subscriptions and the redemptions can be suspended as set out in the sub-section "Suspensions" of the section 15) "Net Asset Value and Dealing Prices".

## **5) HOW TO INVEST IN THE FUND**

**THE SUBSCRIPTIONS, REDEMPTIONS AND SWITCHES ARE CARRIED OUT AT UNKNOWN NET ASSET VALUE.**

**THE MANAGEMENT COMPANY DOES NOT AUTHORIZE PRACTICES ASSOCIATED WITH MARKET TIMING AND THE MANAGEMENT COMPANY RESERVES THE RIGHT TO REJECT SUBSCRIPTION AND SWITCH ORDERS COMING FROM AN INVESTOR WHICH THE MANAGEMENT COMPANY SUSPECTS TO EMPLOY SUCH PRACTICES AND TO TAKE, IN SUCH A CASE, THE MEASURES NECESSARY TO PROTECT THE OTHER INVESTORS OF THE FUND. IN THE CASE OF A REDEMPTION ORDER OF AN INVESTOR SUSPECTED OF PRACTICING MARKET TIMING, THE MANAGEMENT COMPANY RESERVES THE RIGHT TO REJECT ANY SUBSEQUENT SUBSCRIPTION ORDER OF THIS INVESTOR.**

The quality of unitholder in a sub-fund of the Fund is established by way of nominative registration in the register of units. On the request of a unitholder, a written confirmation of the registration shall be sent to the unitholder. The Management Company acting on behalf of the Fund no longer issues bearer units; however, there may still remain holders of bearer certificates some sub-funds. Bearer units which have not been deposited have been automatically cancelled and their counter value have been deposited in escrow with the *Caisse de Consignation* and the beneficial owners must prove their rights in front of it in the terms foreseen by the Luxembourg law.

## ***THE CLASSES OF UNITS***

The Management Company shall issue different classes of units in each sub-fund:

<b>Classes</b>	<b>Description</b>
<b>Class I</b> <b>Class IH</b>	<p>The units of class I and the units of class IH may be acquired by Institutional Investors and are respectively characterised as follows:</p> <ul style="list-style-type: none"><li>- units of class I non-covered against the risk related to the fluctuations of exchange rates and</li><li>- units of class IH with coverage of the risks related to the fluctuations of exchange rates.</li></ul> <p>The units of the Fund may be subscribed with investment contracts, which provide for unique payments (hereafter UNI) with a minimal initial payment of 2,000.- EURO; each possible additional payment must be at least equal to 100.- EURO.</p>

## ***CO-OWNERSHIP***

The quality of holder of units or fractions of units confers on the assets of the sub-fund a right of co-ownership proportional to the number of units or fractions held.

Fractions of units may be issued until a thousandth of unit.

The unitholder, his heirs or his successors in title, trustees, managers or legal representatives cannot require the dissolution nor the division of the Fund.

## ***THE PAYMENTS***

The sub-funds FIDEURAM FUND – EQUITY USA, FIDEURAM FUND – EQUITY JAPAN, FIDEURAM FUND – EQUITY PACIFIC EX JAPAN and FIDEURAM FUND – GLOBAL EQUITY provide for issuance of two (2) classes of units: Class I units and Class IH units. Class I units as well as Class IH units can be acquired by Institutional Investors.

The sub-funds “Zero Coupon” are offered exclusively for subscription to Institutional Investors who are entities within the Intesa Sanpaolo group and who acquire the units exclusively in their name and on their own behalf. Retail investors cannot subscribe to these sub-funds directly or indirectly to these entities.

One can invest in the Fund through one type of investment, a UNI investment, which provides, in addition to an initial payment with a minimum of 2,000.- Euro (or with a higher minimum amount as specified by the Management Company for

some sub-funds), for additional payments of a certain size at a minimum of 100.-Euro.

To subscribe to the Fund, one has to address to the Management Company at its registered office in Ireland or to STATE STREET BANK INTERNATIONAL GmbH, Luxembourg Branch and to complete the subscription form.

The Initial Subscription Period is of ten (10) days starting from the launch date of a new sub-fund except for the “Zero Coupon” sub-funds for which the Initial Subscription Period is of four (4) days starting from their launch date. To all subscriptions and switches relative to these sub-funds, which are entitled to a referred Net Asset Value during this initial period of subscription, shall be attributed a subscription price fixed at ten (10) EURO. The effective payment will have to be made at the latest on the last day of this period. At the expiration of such period, the subscriptions will be based on the Net Asset Value.

In the event of default of the final payment, the Management Company is authorized to request the liquidation of units and to refinance with the income, save its right to claim indemnities for potential subsequent damages. In case of a partial liquidation, it shall be made proportionally to the counter-value held by the unitholder in each sub-fund on the basis of the latest known net asset value.

The unitholder forwards the subscription form to the Management Company or to STATE STREET BANK INTERNATIONAL GmbH, Luxembourg Branch and credits in the same context in favour of the Depositary Bank the amount of the acquisition of units of the Fund on the Business Day that follows the latest date of the three following dates:

- the value date recognized to the means of payment used, or
- in case of switch or wire order, the date of receipt of the accounting notice, by the Management Company or by STATE STREET BANK INTERNATIONAL GmbH, Luxembourg Branch, or
- in case of receipt of the subscription form removed from the means of payment or separate from the accounting notice (in case of switch or wire order), the date of receipt of the subscription form by the Management Company or by STATE STREET BANK INTERNATIONAL GmbH, Luxembourg Branch.

The day determined according to the above criteria shall be the day of “settlement of the corresponding amounts”.

Each time that the unitholder will use various means of payment for the same transaction, one should take into account the availability by date of value or the receipt of the accounting notice, for the wire order and the “switch”, the latter of such means of payment.

Criteria for the determination of the valuation date are indicated in the subscription form.

The subscription forms must be received by the Management Company or by STATE STREET BANK INTERNATIONAL GmbH, Luxembourg Branch no later than 2:00 p.m. CET in order to be dealt with on the basis of the Net Asset Value per Unit calculated on that Business Day. Any subscription form received after the applicable deadline will be deemed to be received on the next Business Day. Payment for subscribed Units has to be made no later than 2 Business Days after receipt of such subscription form.

In case of subscriptions carried out by financial intermediaries or other authorized investors by the Management Company, STATE STREET BANK INTERNATIONAL GmbH, Luxembourg Branch forwards to the Management Company the data contained in the subscription form and STATE STREET BANK INTERNATIONAL GmbH, Luxembourg Branch credits in the same context in favour of the Fund the amount of the acquisition of the units of the Fund on the Business Day that follows the date of receipt of the subscription form by STATE STREET BANK INTERNATIONAL GmbH, Luxembourg Branch.

In such a case, the subscription price of the units is determined on the basis of the net asset value calculated on the day on which STATE STREET BANK INTERNATIONAL GmbH, Luxembourg Branch forwards to the Management Company the subscription form provided that it is forwarded to the Management Company before 2:00 p.m. CET.

In any case, the Administrator will make sure that it receives all subscription forms.

Subscriptions can be done in amount and number of units.

The fee system is fixed as follows:

- administrative costs.

## **6) REDEMPTION OF UNITS**

Any unitholder of the Fund may, at any time, request from the Management Company or STATE STREET BANK INTERNATIONAL GmbH, Luxembourg Branch to redeem all or part of the units held and obtain payment of the counter value equal to the net asset value calculated pursuant to the rules set-out in the Prospectus on the first Business Day following the receipt of the redemption request. The redemption requests are addressed to the Management Company or to STATE STREET BANK INTERNATIONAL GmbH, Luxembourg Branch. The redemption request must be received by the Management Company or by STATE STREET BANK INTERNATIONAL GmbH, Luxembourg Branch no later than 2:00 p.m. CET in order to be dealt with on the basis of the Net Asset Value per

Unit calculated on that Business Day. Any applications received after the applicable deadline will be deemed to be received on the next Business Day. Payment for redeemed Units has to be made no later than 2 Business Days after the receipt of such order.

The request must be made in writing and must indicate the identity of the requesting investor, the amount or the number of units to be redeemed and the instructions for the modalities of redemption; if it is not a full redemption, it must in addition specify:

- the class(es) of units/sub-funds to be redeemed;
- the amount or the number of units to be redeemed for each of these classes of units and for each of these sub-funds.

When a partial redemption request indicates only the amount, one ensures to redeem such amount by spreading it out over each sub-fund/ class subscribed by the unitholder in the investment contract, proportionally to the counter value held in each sub-fund, respectively in each class of units, on the basis of the last known net asset value.

There are no redemption fees. Possible taxes, stamp duties and other charges due in relation to the redemption of units of the Funds are borne exclusively by the unitholder and shall be deducted from the proceed of redemption.

The obligation of redemption ends at the time of the sending of mean of payment to the unitholder.

Specific reasons, such as change restrictions or circumstances outside the control of the Depositary Bank, may render impossible the transfer of redemption amount pursuant the conditions described below in the country where the redemption is requested.

The redemption price may, depending on the evolution of the net asset value, be higher or lower than the paid issue price.

In case of mass redemptions, the Management Company may decide to suspend the redemptions until it has sold the necessary assets.

### ***REDEMPTION GATE***

If any application for, redemption or conversion is received in respect of any one Valuation Day, which either singly or when aggregated with other such applications so received, represents more than 25% of the total net assets of any one sub-fund, the Management Company, in accordance with its internal procedures and governance, reserves the right, in its sole and absolute discretion

and without liability (and in the reasonable opinion that to do so is in the best interests of the remaining unitholders), to scale down pro rata each application with respect to such Valuation Day so that no more than 25% of the total net assets of the relevant sub-fund be redeemed or converted on such Valuation Day.

To the extent that any application for redemption or conversion is not given full effect on such Valuation Day by virtue of the exercise by the Management Company of its power to pro-rate applications, such application shall be treated with respect to the unsatisfied balance thereof as if a further request had been made by the unitholder in question in respect of the next Valuation Day and, if necessary, subsequent Valuation Days, until such application shall have been satisfied in full.

With respect to any application for redemption or conversion received in respect of such Valuation Day, to the extent that subsequent applications shall be received in respect of following Valuation Days, such later applications shall be postponed in priority to the satisfaction of applications relating to such first Valuation Day, but subject thereto shall be dealt with as set out above.

## **7) SWITCH OF UNITS**

Each unitholder may request the switch of all or part of units held in a units class into another class of units in the same or another sub-fund as well as to switch all or part of units held in a sub-fund into units of another sub-fund subject to fulfilling the conditions possibly required at the level of certain sub-funds or classes (such as defined in the sales prospectus). That consists of an order to disinvest from one or several sub-funds or classes of units and to invest in others.

The switch request shall be carried out in writing to the Management Company or to STATE STREET BANK INTERNATIONAL GmbH, Luxembourg Branch with mandatory indication of the class of units/the sub-fund to be liquidated and the class of units/the sub-fund to be subscribed, as well as the amount to be switched when it is not a full switch.

The switch requests are to be carried out by applying to the units to be liquidated as well as to those to be subscribed, the net asset value per unit calculated on the first Business Day following the receipt by the Management Company or STATE STREET BANK INTERNATIONAL GmbH, Luxembourg Branch.

The switch request must be received by the Management Company or by STATE STREET BANK INTERNATIONAL GmbH, Luxembourg Branch no later than 2:00 p.m. CET in order to be dealt with on the basis of the Net Asset Value per Unit calculated on that Business Day. Any switch request received after the applicable deadline will be deemed to be received on the next Business Day. Settlement of switch requests shall be no later than 2 Business Days after the receipt of such requests.

The method, which determines the number of units of each sub-fund to be subscribed in the switch process, is expressed by the following formula:

$$A = \frac{B \times C \times (1-D)}{E}$$

where:

- A** = is the number of units of the new sub-fund;
- B** = is the number of units of the sub-fund to be liquidated;
- C** = is the net asset value of units of the sub-fund to be liquidated;
- D** = is the fee rate which is referred to in the section on “Charges and expenses borne by the unitholders” concerning the tariff “by transaction”;
- E** = is the net asset value of units of the sub-fund to be subscribed.

The unitholder may also request at the same time the switch of units held in one or several sub-funds in units of one or several other sub-funds subject to complying with the provisions required at the level of certain sub-funds. The method of switch to be used shall be based on the same criteria than above adopted accordingly.

For each switch made, the Management Company, STATE STREET BANK INTERNATIONAL GmbH, Luxembourg Branch or the authorized distributors ensure to send to the unitholder a letter with the data in relation to the units switched and their nominal value. Investors should consult their distributor before making an application for switches to ensure that the transactions will not be rejected for technical reasons.

## **8) CHARGES AND EXPENSES BORNE BY THE UNITHOLDERS**

Faced with a subscription or a switch, the Management Company has the right to recoup:

- the administrative expenses relating to the subscription, repurchase and switch confirmations;
- the possible tax expenses related to those confirmations.

## **9) CHARGES AND EXPENSES BORNE BY THE FUND**

**I.** The charges and expenses borne by each sub-fund which is not a “Zero Coupon” sub-fund, are:

- a)** The management fee of the Management Company calculated daily on the global net value of each sub-fund and deducted from the net assets of each sub-fund at the beginning of the following month.

The management fee is up to:

- 1/12 monthly of the annual rate of 0.65% for the sub-fund FIDEURAM FUND – GLOBAL BOND;

- 1/12 monthly of the annual rate of 0.50%) for the sub-fund FIDEURAM FUND – EURO SHORT TERM;

- 1/12 monthly of the annual rate of 0.85% for the sub-fund FIDEURAM FUND – EURO DEFENSIVE BOND;

As from 1 July 2026, the new management fee will be:

- 1/12 monthly of the annual rate of 0.75% for the sub-fund FIDEURAM FUND – EURO DEFENSIVE BOND;

- 1/12 monthly of the annual rate of 1% for the sub-fund FIDEURAM FUND – EURO BOND LOW RISK;

As from 1 July 2026, the new management fee will be:

- 1/12 monthly of the annual rate of 0.75% for the sub-fund FIDEURAM FUND – EURO BOND LOW RISK;

- 1/12 monthly of the annual rate of 1.10% for the sub-funds FIDEURAM FUND – EURO BOND MEDIUM RISK, FIDEURAM FUND – EURO BOND LONG RISK and FIDEURAM FUND – INFLATION LINKED;

As from 1 July 2026, the new management fee will be:

- 1/12 monthly of the annual rate of 0.90% for the sub-fund FIDEURAM FUND – INFLATION LINKED;

- 1/12 monthly of the annual rate of 1.12% for the sub-fund FIDEURAM FUND – EURO CORPORATE BOND;

As from 1 July 2026, the new management fee will be:

- 1/12 monthly of the annual rate of 0.95% for the sub-fund FIDEURAM FUND – EURO CORPORATE BOND;

As from 1 July 2026, the new management fee will be:

- 1/12 monthly of the annual rate of 1.10% for the bond sub-fund FIDEURAM FUND – BOND YEN;

- 1/12 monthly of the annual rate of 1.20% for the other bonds' sub-funds;

- 1/12 monthly of the annual rate of 1.00% for the sub-funds FIDEURAM FUND – EQUITY MARKET NEUTRAL STAR, and FIDEURAM FUND – GLOBAL EQUITY, FIDEURAM FUND – EQUITY GLOBAL EMERGING MARKETS;

As from 1 July 2026, the new management fee will be:

- 1/12 monthly of the annual rate of 0.80% for the sub-fund FIDEURAM FUND – EQUITY GLOBAL EMERGING MARKETS;

- 1/12 monthly of the annual rate of 1.80% for the equities' sub-funds FIDEURAM FUND - EQUITY EUROPE, FIDEURAM FUND - EQUITY USA, FIDEURAM FUND - EQUITY JAPAN, and FIDEURAM FUND - EQUITY PACIFIC EX JAPAN and for the sub-fund FIDEURAM FUND – COMMODITIES;

- 1/12 monthly of the annual rate of 2% for the equities' sub-funds FIDEURAM FUND – MILLENNIALS EQUITY USA, FIDEURAM FUND – EQUITY USA VALUE.

As from 1 July 2026, the new management fee will be:

- 1/12 monthly of the annual rate of 1.60% for the equity sub-fund EQUITY USA VALUE.

**b)** The fee of 0.135% per year, payable to the Management Company for the activity of Central Administration, calculated on the basis of the latest net asset value of each sub-fund for each month, payable monthly and deducted at the beginning of the following month.

**c)** The fee payable to the Depositary Bank for the safekeeping of the assets of sub-funds will not exceed 0.045% per year (excluded VAT), calculated on the basis of the last net asset value of each sub-fund for each month, and payable monthly and paid at the beginning of the following month. The fee is not inclusive of the costs related to the transaction fees and any applicable value added tax undertaken by the Depositary Bank in relation with depositary activities.

**d)** A subscription tax of 0.05% per year, payable quarterly and calculated on the basis of the net assets of each sub-fund of the Fund at the end of each quarter.

**II.** The charges to be borne by each “Zero Coupon” sub-fund are:

**a)** The management fee of the Management Company of 0.5% per year calculated daily on the net global value of each sub-fund and deducted yearly on the net assets of each sub-fund at the beginning of the month following the annual maturity date.

**b)** The fee of 0.008% per year (excluded VAT), payable to the Depositary Bank for the safekeeping of the assets of sub-funds, calculated on the basis of the last net asset value of each sub-fund for each month, and payable monthly and paid at the beginning of the following month. The fee is not inclusive of the costs related to

the transaction fees and any applicable value added tax undertaken by the Depository Bank in relation with depository activities.

c) A subscription tax of 0.01% per year payable quarterly and calculated on the basis of the net assets of each sub-fund of the Fund at the end of each quarter.

**III.** Moreover, each sub-fund shall bear the following expenses and charges:

- all taxes payable on the assets and income of the Fund.
- standard brokerage and bank fees originating from the Fund's transactions; customary custody rights.
- publication fees relating to the press releases.
- printing fees of the Prospectus, Management Regulations, KIDs and publication and distribution costs of periodic information on the Fund.
- other operation expenses, including without limitation administrative, legal and audit expenses, fees payable to service providers (e.g. OTC derivatives evaluation and collateral management).
- all the costs related to securities lending and/or repo / reverse repo transactions (e.g. agency fees and transaction costs).

All periodic expenses shall be directly charged on the assets of the Fund. The non periodic expenses may be amortized over a period of five (5) years.

All expenses, which are directly and exclusively attributable to a specific sub-fund of the Fund, will be charged to that sub-fund. In case where it cannot be established what expenses are directly and exclusively attributable to a specific sub-fund, they shall be charged proportionally to each sub-fund.

The actual fees are disclosed in the annual and semi-annual reports of the Fund.

The formation costs of the sub-funds shall be borne by the Management Company.

The necessary sums to cover the expenses aforementioned shall be paid by the Management Company by way of withdrawal from the account of the Fund.

The Management Company and/or the Investment Managers may be entitled to receive soft commissions in the form of supplemental goods and services such as consultancy and research, information-technology material associated with specialist software, performance methods and instruments for setting prices, subscriptions to financial information or pricing providers. Brokers who provide supplemental goods and services to the Management Company and/or the

Investment Managers may receive orders for transactions by the Fund. The following goods and services are expressly excluded from the soft commissions definition: travel, accommodation costs, entertainment, current goods and services connected with the management, the offices, the office equipment, staff costs, clerical salaries and all financial charges. Soft commission services so received by the Management Company and/or the Investment Managers do not concur to replace the tasks required to be performed by the Management Company and/or the Investment Managers. Therefore, the fees of the Management Company and/or the Investment Managers will not be reduced as a result of the receipt of such soft commissions. The Management Company and/or the Investment Managers, in using a broker who provides soft commission services, will do so only on the basis that the broker is not a physical person and is able to execute the relevant transactions on a best execution basis and that there will be no comparative price disadvantage in using that broker. The Management Company and/or the Investment Managers or anyone connected to them shall not personally benefit from any financial return on the soft commissions granted by brokers or dealers. The Management Company and/or the Investment Managers will provide the Fund with the details of the soft commissions effectively received on an annual basis.

## **10) INVESTOR'S RIGHTS**

Once the subscription is made, the investor acquires the following rights as specified in the Prospectus:

- the right of co-ownership, by the intermediary of the units, of the assets of the sub-fund;
- the right to redeem, at any moment, the units;
- the right to convert the units held in one class of units in the other class of units in the same or in another sub-fund(s);
- the right to convert units held in one sub-fund into units of a different sub-fund subject to meeting the required possible conditions in certain sub-funds;
- the right to transfer the ownership of the units. If this transfer should take place abroad, it will have to be done by approved distributor;
- the right to access information regarding the investment activities, published in the periodic reports.

The Management Company draws the investors' attention to the fact that any investor will only be able to fully exercise his investor rights directly against the Fund if the investor is registered himself and in his own name in the unitholders' register of the Fund. In cases where an investor invests in the Fund through an intermediary investing into the Fund in his own name but on behalf of the investor, (i) it may not always be possible for the investor to exercise certain unitholder rights directly against the Fund, and (ii) investors' rights to indemnification in the event of errors / non-compliance within the meaning of CSSF Circular 24/856 may be impacted. Investors are recommended to take advice on their rights.

## 11) MANAGEMENT COMPANY

The Management Company of the Fund is Fideuram Asset Management (Ireland) dac (hereafter the "**Management Company**") is a designated activity company limited by shares under Irish law, incorporated in Dublin, on October 18, 2001 and authorized as a management company, since May 15, 2013, by the Central Bank of Ireland under the European Communities (Undertakings For Collective Investment in Transferable Securities) Regulations, 2011. Its capital is at 1,000,000.- EURO. The registered office is 2nd Floor, International House 3 Harbourmaster Place, IFSC Dublin 1, D01 K8F1.

Fideuram Asset Management (Ireland) dac is a management company duly authorized in accordance with the UCITS Directive. Fideuram Asset Management (Ireland) dac is active in the management of UCITS and other UCIs.

Its object is the constitution, the administration and the management of undertakings for collective investments and the distribution of those undertakings under its management, as well as the provision of administrative services to undertakings for collective investment

Fideuram Asset Management (Ireland) dac is responsible for the daily management of the investments of each sub-fund of the Fund. The Management Company may at its own costs and under its own control and its own responsibility, appoint one or several advisers and/or investment managers.

The Management Company is authorized to delegate certain functions to third parties and it retains the responsibility for the supervision on the delegated entities in respect of the activities carried out by the latter on its behalf.

The accounts of the Management Company are supervised by an auditor, namely Ernst & Young, Ireland.

The Management Company may be advised, under the responsibility of the Board of Directors, for its choices, by an investment committee or external advisors.

Copies of the periodic reports on the activities of the Fund are at the disposal of the public at the registered office of the Management Company as well as at the registered office of STATE STREET BANK INTERNATIONAL GmbH, Luxembourg Branch.

The Management Company applies a Group remuneration policy and practices that are consistent with, and promote, sound and effective risk management and that neither encourage risk taking which is inconsistent with the risk profiles, rules, this Prospectus or the Management Regulations nor impair compliance with the Management Company's obligation to act in the best interest of the Fund (the "**Remuneration Policy**").

The Remuneration Policy includes fixed and variable components of salaries and applies to those categories of staff, including senior management, risk takers, control functions and any employee receiving total remuneration that falls within the remuneration bracket of senior management and risk takers whose professional activities have a material impact on the risk profiles of the Management Company, the Fund or the sub-funds.

The Remuneration Policy is in line with the business strategy, objectives, values and interests of the Management Company, the Fund and the investors. The Management Company's policies include measures to avoid conflicts of interest.

In particular, the Management Company will ensure that:

- (a) the assessment of performance is set in a multi-year framework appropriate to the holding period recommended to the investors of the Fund in order to ensure that the assessment process is based on the longer-term performance of the Fund and its investment risks and that the actual payment of performance-based components of remuneration is spread over the same period;
- (b) the fixed and variable components of total remuneration are appropriately balanced and the fixed component represents a sufficiently high proportion of the total remuneration to allow the operation of a fully flexible policy on variable remuneration components, including the possibility to pay no variable remuneration component;

Details of the Remuneration Policy, including the persons in charge of determining the fixed and variable remunerations of the staff, a description of the key remuneration elements and an overview of how remuneration is determined, are available on the website <https://www.fideuramassetmanagement.ie/en/policy/>.

A paper copy of the summarised Remuneration Policy is available free of charge to the investors upon request.

## **12) DEPOSITARY BANK – ADMINISTRATOR AND PAYING AGENT**

### **The Depositary Bank**

STATE STREET BANK INTERNATIONAL GmbH, acting through its Luxembourg Branch, is acting as the depositary bank of the Fund as from April 1, 2021 (the “**Depositary Bank**”), State Street Bank International GmbH is a limited liability company organized under the laws of Germany, having its registered office at Brienner Str. 59, 80333 München, Germany and registered with the commercial register court, Munich under number HRB 42872. It is a credit institution supervised by the European Central Bank (ECB), the German Federal Financial Services Supervisory Authority (BaFin) and the German Central Bank.

STATE STREET BANK INTERNATIONAL GmbH, Luxembourg Branch is authorized by the CSSF in Luxembourg to act as depositary and is specialized in depositary, fund administration, and related services.

STATE STREET BANK INTERNATIONAL GmbH, Luxembourg Branch is registered in the Luxembourg Commercial and Companies' Register (RCS) under number B 148 186.

State Street Bank International GmbH is a member of the State Street group of companies having as their ultimate parent State Street Corporation, a US publicly listed company. The relationship between the Management Company acting on behalf of the Fund and the Depositary Bank is subject to the terms of the Depositary Bank Agreement.

### **Depositary Bank's functions**

Under the terms of the Depositary Bank Agreement, the Depositary Bank is entrusted with following main functions:

- ensuring that the sale, issue, repurchase, redemption and cancellation of units are carried out in accordance with applicable laws, the Prospectus and the Management Regulations.
- ensuring that the value of the units is calculated in accordance with applicable laws, the Prospectus and the Management Regulations.
- carrying out the instructions of the Management Company unless they conflict with applicable laws, the Prospectus and the Management Regulations.
- ensuring that in transactions involving the assets of the Fund any consideration is remitted within the usual time limits.
- ensuring that the income of the Fund is applied in accordance with applicable laws, the Prospectus and the Management Regulations.
- monitoring of the Fund's cash and cash flows
- safe-keeping of the Fund's assets, including the safekeeping of financial instruments to be held in custody and ownership verification and record keeping in relation to other assets.

Furthermore, the Depositary Bank shall, on instructions received from the Management Company and insofar as there are available funds, make payments on behalf of the sub-funds.

The Depositary Bank shall also receive, collect and deposit in the sub-funds' accounts all revenue, interest and other payments relating to the transferable securities held by the Depositary Bank and payments made by investors for the sub-funds' units, to this extent the Depositary Bank shall deliver certificates of ownership for tax purposes within the framework of collecting interest on the assets and shall also carry out any other necessary duties for their collection, receipt and deposit.

The Depositary Bank has the function to keep the securities and other values in which the assets of the Fund are invested and to carry out the instructions of the Management Company, by making sure that the Prospectus, the Management Regulations and the standards in force are complied with.

In carrying out its duties, the Depositary Bank shall act honestly, fairly, professionally, independently and solely in the interests of the Fund and its unitholders.

### **Depositary Bank's liability**

In the event of a loss of a financial instrument held in custody, determined in accordance with the UCITS Directive, and in particular article 18 of the Commission Delegated Regulation (EU) 2016/438 with regard to obligations of depositaries, the Depositary Bank shall return financial instruments of identical type or the corresponding amount to the Fund acting on behalf of the Fund without undue delay.

The Depositary Bank shall not be liable if it can prove that the loss of a financial instrument held in custody has arisen as a result of an external event beyond its reasonable control, the consequences of which would have been unavoidable despite all reasonable efforts to the contrary pursuant to the UCITS Directive.

In case of a loss of financial instruments held in custody, the unitholders may invoke the liability of the Depositary Bank directly or indirectly through the Fund provided that this does not lead to a duplication of redress or to unequal treatment of the unitholders.

The Depositary Bank is indemnified by the Fund against all liabilities suffered or incurred by the Depositary Bank by reason of the proper performance of the Depositary Bank's duties under the terms of the Depositary Bank Agreement save where any such liabilities arise as a result of the Depositary Bank's negligence, fraud, bad faith, wilful default or recklessness of the Depositary Bank or the loss of financial instruments held in custody. The Depositary Bank will be liable to the Management Company, acting on behalf of the Fund for all other losses suffered by the Fund as a result of the Depositary Bank's negligent or intentional failure to properly fulfill its obligations pursuant to the UCITS Directive.

The Depositary Bank shall not be liable for consequential or indirect or special damages or losses, arising out of or in connection with the performance or non-performance by the Depositary Bank of its duties and obligations.

## **Delegation**

The Depositary Bank has full power to delegate the whole or any part of its safe-keeping functions but its liability will not be affected by the fact that it has entrusted to a third party some or all of the assets in its safekeeping. The Depositary Bank's liability shall not be affected by any delegation of its safe-keeping functions under the Depositary Bank Agreement.

The Depositary Bank has delegated those safekeeping duties set out in Article 22(5)(a) of the UCITS Directive to State Street Bank and Trust Company with registered office at One Congress Street, Suite 1, Boston, Massachusetts 02114-2016, USA, with an office at 20 Churchill Place, Canary Wharf, London E14 5HJ, United Kingdom, whom it has appointed as its global sub-custodian. State Street Bank and Trust Company as global sub-custodian has appointed local sub-custodians within the State Street Global Custody Network.

Information about the safe-keeping functions which have been delegated and the identification of the relevant delegates and sub-delegates are available at the registered office of the Fund or at the following internet site:

<http://www.statestreet.com/about/office/locations/luxembourg/subcustodians.html>

## **Conflicts of interest**

The Depositary Bank is part of an international group of companies and businesses (“**State Street**”) that, in the ordinary course of their business, act simultaneously for a large number of clients, as well as for their own account, which may result in actual or potential conflicts. Conflicts of interest arise where the Depositary Bank or its affiliates engage in activities under the Depositary Bank Agreement or under separate contractual or other arrangements.

Such activities may include:

- (i) providing nominee, administration, registrar and transfer agency, research, agent securities lending, investment management, financial advice and/or other advisory services to the Fund;
- (ii) engaging in banking, sales and trading transactions including foreign exchange, derivative, principal lending, broking, market making or other financial transactions with the Fund either as principal and in the interests of itself, or for other clients.

In connection with the above activities the Depositary Bank or its affiliates:

- (i) will seek to profit from such activities and are entitled to receive and retain any profits or compensation in any form and, except as required by law, the Depositary Bank is not bound to disclose to the Fund any such profits or compensation in any form earned by affiliates of the Depositary Bank or the Depositary Bank when acting in any other capacity;

- (ii) may buy, sell, issue, deal with or hold, securities or other financial products or instruments as principal acting in its own interests, the interests of its affiliates or for its other clients;
- (iii) may trade in the same or opposite direction to the transactions undertaken, including based upon information in its possession that is not available to the Fund;
- (iv) may provide the same or similar services to other clients including competitors of the Fund and the fee arrangements it has in place will vary;
- (v) may be granted creditors' and other rights by the Fund, e.g. indemnification which it may exercise in its own interest. In exercising such rights the Depository Bank or its affiliates may have the advantage of an increased knowledge about the affairs of the Fund relative to third party creditors thus improving its ability to enforce and may exercise such rights in a way that may conflict with the Fund's strategy.

The Fund may use an affiliate of the Depository Bank to execute foreign exchange, spot or swap transactions for the account of the Fund. In such instances the affiliate shall be acting in a principal capacity and not as a broker, agent or fiduciary of the Fund. The affiliate will seek to profit from these transactions and is entitled to retain any profit. The affiliate shall enter into such transactions on the terms and conditions agreed with the Fund. The Depository Bank will not, except as required by law, disclose any profit made by such affiliates.

Where cash belonging to the Fund is deposited with an affiliate being a bank, cash is not segregated from its own assets and a conflict arises in relation to the interest (if any) which the affiliate may pay or charge to such account and the fees or other benefits which it may derive from holding such cash as banker.

The Management Company may also be a client or counterparty of the Depository Bank or its affiliates and a conflict may arise where the Depository Bank refuses to act if the Management Company directs or otherwise instructs the Depository Bank to take certain actions that might be in direct conflict with the interests of the investors in a Fund.

The types and levels of risk that the Depository Bank is willing to accept may conflict with the Fund's preferred investment policy and strategy.

Conflicts that may arise in the Depository Bank's use of sub-custodians include the following broad categories:

- (i) the global custodian and sub-custodians seek to make a profit as part of or in addition to their custody services. Examples include profit through the fees and other charges for the services, profit from deposit taking activities, revenue from sweeps and repo arrangements, foreign exchange transactions, contractual settlement, error correction (where consistent with applicable law) and commissions for sale of fractional shares;
- (ii) the Depository Bank will typically only provide depository services where global custody is delegated to an affiliate of the Depository Bank. The global

custodian in turn appoints a network of affiliated and non-affiliated sub-custodians. Multiple factors influence the determination of our global custodian to engage a particular sub-custodian or allocate assets to them, including their expertise and capabilities, financial condition, service platforms and commitment to the custody business as well as the negotiated fee structure (which may include terms that result in fee reductions or rebates to the global custodian), significant business relationships and competitive considerations;

(iii) sub-custodians, both affiliated and non-affiliated, act for other clients and in their own proprietary interest, which might conflict with clients' interests and the fee arrangements they have in place will vary;

(iv) sub-custodians, both affiliated and non-affiliated, have only indirect relationships with clients and look to the Depository Bank as its counterparty, which might create incentive for the Depository Bank to act in its self-interest, or other clients' interests to the detriment of clients; and

(v) sub-custodians may have creditors' rights against client assets and other rights that they have an interest in enforcing.

The Depository Bank has functionally and hierarchically separated the performance of its depository tasks from its other potentially conflicting tasks. The system of internal controls, the different reporting lines, the allocation of tasks and the management reporting allow potential conflicts of interest to be properly identified, managed and monitored.

Additionally, in the context of the Depository Bank's use of sub-custodians, the Depository Bank imposes contractual restrictions to address some of the potential conflicts and maintains due diligence and oversight of sub-custodians. The Depository Bank makes available frequent reporting on clients' activity and holdings, with the underlying sub-custodians subject to internal and external control audits. Finally, the Depository Bank segregates the Fund's assets from the Depository Bank's proprietary assets and follows a Standard of Conduct that requires employees to act ethically, fairly and transparently with clients.

### **Global Conflicts of Interest policy**

State Street has implemented a global policy laying down the standards required for identifying, assessing, recording and managing all conflicts of interest which may arise in the course of business. Each State Street business unit, including the Depository Bank, is responsible for establishing and maintaining a Conflicts of Interest Program for the purpose of identifying and managing organizational conflicts of interest that may arise within the business unit in connection with providing services to its clients or in delivering its functional responsibilities.

Up-to-date information on the Depository Bank, its duties, any conflicts that may arise, the safe-keeping functions delegated by the Depository Bank, the list of delegates and sub-delegates and any conflicts of interest that may arise from such a delegation will be made available to unitholders on request.

## **The Administrator and Paying Agent**

The Management Company has appointed STATE STREET BANK INTERNATIONAL GmbH, acting through its Luxembourg Branch, as the administrator and paying agent of the Fund as from April 1, 2021 (the “**Administrator and Paying Agent**”).

STATE STREET BANK INTERNATIONAL GmbH, Luxembourg Branch is authorised by the CSSF in Luxembourg to act as administration agent of UCITS and AIFs.

The Administrator is responsible for all administrative duties required in respect of the Fund by Luxembourg law, including calculation of the Net Asset Value and accounting function, registrar function (including notably the processing of issue, redemption, conversion and transfer of Units), and client communication function, in accordance with the Administration Agreement.

The Administrator shall not, in the absence of fraud, negligence or willful default, be liable to the Fund or any unitholders for any act or omission in the course of or in connection with the discharge by the Administrator of its duties.

The Fund has agreed to indemnify the Administrator or any persons appointed by it from and against any and all liabilities, obligations, losses, damages, penalties, actions, judgments, suits, costs, expenses or disbursements of any kind or nature whatsoever (other than those resulting from the fraud, negligence or willful default on the part of the Administrator), which may be imposed on, incurred by or asserted against the Administrator in performing its obligations or duties hereunder.

The Administrator will have no decision-making discretion relating to the Fund's investments.

The Administrator is a service provider to the Fund and is not responsible for the preparation of the Fund's Prospectus and Management Regulations or the activities of the Fund and therefore accepts no responsibility for the accuracy of any information contained in the Fund's Prospectus and Management Regulations.

The Administration Agreement may be terminated by either the Management Company or the Administrator giving not less than three (3) months' notice or such shorter notices as the parties may agree in writing (or earlier on certain breaches of the Administration Agreement including the insolvency of any of them).

The Administrator is responsible for handling the processing of subscriptions for units and dealing with any transfers or redemptions of units, in each case in accordance with the Fund's Management Regulations.

STATE STREET BANK INTERNATIONAL GmbH, Luxembourg Branch, in its capacity as Administrator will furthermore accept transfers of funds, maintain the register of unitholders, organize the mailing of statements, reports, notices and other documents to the unitholders, and maintain the records of the commitments and the contributed capital in relation to each unit class.

As Paying Agent in Luxembourg, STATE STREET BANK INTERNATIONAL GmbH, Luxembourg Branch is responsible for the payment of dividends (if any) to the unitholders.

### **13) DISTRIBUTORS**

Pursuant to article 113 of the 2010 Law, the Management Company markets the units of FIDEURAM FUND - EQUITY MARKET NEUTRAL STAR, FIDEURAM FUND – COMMODITIES, FIDEURAM FUND - EQUITY GLOBAL EMERGING MARKETS, FIDEURAM FUND – GLOBAL EQUITY and FIDEURAM FUND – GLOBAL BOND sub-funds in Italy.

The Management Company will market the units of sub-funds in Italy exclusively to Institutional Investors.

*The units of these sub-funds are to be subscribed to at the registered office of the Management Company in Ireland or STATE STREET BANK INTERNATIONAL GmbH, Luxembourg Branch in Luxembourg or through the authorized distributors appointed by the Management Company in the countries where the units of the Fund are distributed.*

### **14) INVESTMENT MANAGERS – SUB-INVESTMENT MANAGERS**

The Management Company has designated several companies as investment managers (hereafter the "**Investment Managers**") for the performance of investment management activity in relation to specific sub-funds, as specified here below.

The Management Company has appointed, pursuant to an investment management agreement entered into on April 23, 2012, as amended from time to time, FIL Pensions Management as Investment Manager for an indefinite duration for the sub-fund FIDEURAM FUND – BOND GLOBAL HIGH YIELD. Each party may terminate the said agreement by providing a minimum of three (3) months' written notice. Its registered office is located at Beech Gate Millfield Lane, Lower Kingswood, Tadworth, Surrey, KT20 6RP, United Kingdom.

FIL Pensions Management has in its turn delegated management functions related to the investment mandate of FIDEURAM FUND – BOND GLOBAL HIGH YIELD to FIL INVESTMENTS INTERNATIONAL pursuant to an agreement dated July 11, 2022, and to FIDELITY INVESTMENTS CANADA ULC pursuant

to an agreement dated July 11, 2022, in order to harness local expertise and research with the approval of the Management Company.

The Management Company has appointed, pursuant to an investment management agreement entered into on October 26, 2010, as amended from time to time, PIMCO Europe Ltd as Investment Manager for an indefinite duration for the sub-fund FIDEURAM FUND – BOND US PLUS. Each party may terminate the said agreement by providing a minimum of three (3) months' written notice. Its registered office is located at 11 Baker Street, London, W1U 3AH, United Kingdom.

As from July 29, 2022, the investment management of the sub-fund FIDEURAM FUND – BOND US PLUS has been transferred from PIMCO Europe Ltd to PIMCO Europe GmbH, having its registered office at Seidlstraße 24-24a, 80335 München, Germany.

PIMCO Europe GmbH has in its turn delegated management functions related to the investment mandate of FIDEURAM FUND – BOND US PLUS to Pacific Investment Management Company LLC and to PIMCO Europe Ltd in order to harness local expertise and research with the approval of the Management Company and pursuant to an agreement dated 19 December 2017.

The Management Company has appointed pursuant to the terms of an investment management agreement entered into on 29 April 2024, as amended from time to time, MAN ASSET MANAGEMENT (IRELAND) LIMITED as Investment Manager for an indefinite period for the sub-fund FIDEURAM FUND – EQUITY MARKET NEUTRAL STAR. Each party may terminate the agreement by providing a (3) three months' written notice. Its registered office is located at 70 Sir John Rogerson's Quay, Dublin, D02 R296, Ireland.

Under the investment management agreements, each Investment Manager will be responsible for the management of the assets of the specific sub-funds for which it is appointed as investment manager. Each Investment Manager undertakes to manage the investment and the reinvestment of the assets of the relevant sub-fund under their management under the control and responsibility of the Management Company.

Each Investment Manager will determine which investments can be bought, sold or exchanged as well as what portion of the assets of relevant sub-fund is held in transferable securities and other financial liquid instruments in compliance with the provisions of the Prospectus and the Management Regulations in force.

In consideration for its services, each Investment Manager shall receive a fee paid by the Management Company.

## **15) NET ASSET VALUE AND DEALING PRICES**

### ***NET ASSET VALUE CALCULATION***

The net asset value (“Net Asset Value”) per unit of co-ownership of each class and each sub-fund shall be determined on each Valuation Day.

The Net Asset Value per unit of each class of units in each sub-fund will be expressed in the reference currency of the relevant sub-fund. The Board of Directors may however decide to calculate the Net Asset Value per unit for certain sub-funds/classes of units in in another denomination currency, in which case the Prospectus will be amended accordingly. The Net Asset Value calculated in the other denomination currency is the equivalent of the Net Asset Value in the reference currency of the sub-fund converted at the prevailing exchange rate.

The Net Asset Value per unit of each class of units in each sub-fund on any Valuation Day is determined by dividing the value of the total assets of that sub-fund properly allocable to such class less the liabilities of such sub-fund properly allocable to such class by the total number of units of such class outstanding on such Valuation Day. The resulting sum may be rounded to the nearest three decimal places.

The subscription price and the redemption price of the different classes of units will differ within each sub-fund as a result of the differing fee structure and/or distribution policy for each class.

The Board of Directors of the Management Company reserves the right to allow the Net Asset Value per Unit of each class to be calculated more frequently than once daily or to otherwise alter dealing arrangements on a permanent or a temporary basis, for example, where the Board of Directors of the Management Company considers that a material change to the market value of the investments in one or more sub-funds so demands. The Prospectus will be amended, following any such permanent alteration, and unitholders will be informed accordingly.

The valuation of the Net Asset Value of the different classes of units shall be made in the following manner:

The assets of the Fund shall include:

- (1) all cash on hand or on deposit, including any interest accrued thereon;
- (2) all bills and demand notes payable and accounts receivable (including proceeds of securities sold but not delivered);
- (3) all bonds, time notes, certificates of deposit, shares, stock, debentures, debenture stocks, subscription rights, warrants, options and other securities, financial instruments and similar assets owned or contracted for by the Fund (provided that the Management Company acting on behalf of the Fund may make

adjustments in a manner not inconsistent with paragraph (1) below with regards to fluctuations in the market value of securities caused by trading ex-dividends, ex-rights, or by similar practices);

(4) all stock dividends, cash dividends and cash distributions receivable by the Fund to the extent information thereon is reasonably available to the Fund;

(5) all interest accrued on any interest bearing assets owned by the Fund except to the extent that the same is included or reflected in the principal amount of such asset;

(6) the preliminary expenses of the Fund, including the cost of issuing and distributing units of the Fund, insofar as the same have not been written off;

(7) the liquidating value of all forward contracts, swaps, and all call or put options the Fund has an open position in;

(8) all other assets of any kind and nature including expenses paid in advance.

The value of such assets shall be determined as follows and the assets denominated in a currency other than EURO shall be converted on the basis of the last known market rate.

The selected methodologies for each asset category are listed below:

- a) Securities which are listed or traded on a regulated market where the market price is significant/representative.

Listed instruments include all instruments which are regularly traded on regulated markets or MTFs for which a significant and publicly available price is formed at least on a daily basis as a result of trading activity. These instruments are valued with market approach at closing or last known market price. This price can assume the form of closing bid, last bid, the last traded price, closing mid-market price, latest mid-market price, or the official closing price published by an exchange.

Where a security is listed on several exchanges, the relevant market shall be the one:

- Which constitutes the primary market, or
- The one which the Management Company and the Administrator determine it provides the fairest criteria in a value for the security.

Securities listed or traded on a regulated market, but acquired or traded at a premium or at a discount outside or off the relevant market may be valued taking into account the level of premium or discount at the date of the valuation, where it is considered more representative.

- b) Securities which are listed or traded on a regulated market where the market price is unrepresentative or not available and unlisted securities

Due to the absence of representative quotation, these securities shall be valued on the basis of the last known commercial value or, in the absence thereof, on the basis of the probable realisation value, which is assessed with diligence and in good faith by the Administrator.

c) Collective investment schemes

Valuation is based on the latest published net asset value. The use of market prices may be appropriate where the collective investment scheme in which the investment is made is listed on a regulated market, in accordance with point a).

Amortized cost may be used to price holdings in funds which are categorized as Public Debt Constant Net Asset Value (all holdings) or Low Volatility Net Asset Value under the Money Market Regulation.

Feeder UCITS investments into Master UCITS will be valued at the latest available net asset value per share as published by the Master UCITS

d) Cash (in hand or deposit)

Value is the nominal/face value plus accrued interest.

e) Exchange traded futures and options contracts, including index futures

Valuation is based on the settlement price (market approach) as determined by the market in question. If a settlement price is not available, they may be valued in accordance with b) like Income approach.

f) Over-the-counter (OTC) derivative contracts

OTC derivatives can only be negotiated with brokers that can perform a daily valuation of the contracts and that are part of Management Company's Authorised Broker List.

The Management Company may choose to value an OTC derivative using either the counterparty valuation or an alternative valuation, such as valuation calculated by the Risk Management Desk of the Management Company or an adequate independent pricing vendor.

Where the counterparty valuation is used, the following requirements apply:

- The valuation must be approved or verified by a party who is approved for the purpose and who is independent of the counterparty.
- The independent verification must be carried out at least weekly.

Where an alternative valuation method is used, the following requirements apply:

- The valuation follows the international best practice and adhere to the principles established by bodies such as IOSCO and AIMA.
- The alternative valuation is provided by a competent figure appointed by the Management Company or a valuation by any other means provided that the value is approved by the Management Company.
- The alternative valuation must be reconciled to the counterparty valuation on a monthly basis. Where significant differences arise, these must be promptly investigated and explained.

Fair value of OTC derivatives is subject to validation. Validation methodologies are selected by the Risk Management Desk of the Management Company proportionately to the nature and complexity of the OTC derivatives.

- g) Forward foreign exchange and interest rate swap contracts

Valuation of these OTC derivative contracts can be performed in accordance with point (f) or, if strong non-arbitrage relationships exist, with point (a).

In the presence of stressed market conditions and less liquid assets, the Management Company performs an additional quality check on the applied methodology and in case deemed necessary, the Management Company chooses an alternative valuation methodology which is more representative of the fair value.

(1) the Net Asset Value per unit of any sub-fund of the Fund may be determined by using an amortised cost method for all investments with a known short term maturity date. This involves valuing an investment at its cost and thereafter assuming a constant amortisation to maturity of any discount or premium, regardless of the impact of fluctuating interest rates on the market value of the investments. While this method provides certainty in valuation, it may result in periods during which value, as determined by amortisation cost, is higher or lower than the price such sub-fund would receive if it sold the investment. The Board of Directors of the Management Company will continually assess this method of valuation and recommend changes, where necessary, to ensure that the relevant sub-fund's investments will be valued at their fair value as determined in good faith by the Board of Directors. If the Board of Directors of the Management Company believes that a deviation from the amortized cost per unit may result in material dilution or other unfair results to unitholders, the Board of Directors shall take such corrective action, if any, as they deem appropriate to eliminate or reduce, to the extent reasonably practicable, the dilution or unfair results.

(2) the relevant sub-fund shall, in principle, keep in its portfolio the investments determined by the amortisation cost method until their respective maturity date.

(3) interest rate swaps will be valued at their market value established by reference to the applicable interest rates curve. Index and financial instruments related swaps will be valued at their market value established by reference to the applicable index or financial instrument. The valuation of the index or financial instrument related swap agreement shall be based upon the market value of such swap transaction established in good faith pursuant to procedures established by the Board of Directors of the Management Company.

(4) all other assets will be valued at fair market value as determined in good faith pursuant to procedures established by the Board of Directors of the Management Company;

(5) the Board of Directors of the Management Company, in its discretion, may permit some other method of valuation to be used if it considers that such valuation better reflects the fair value of any asset of the Fund.

The liabilities of the Fund shall include:

(1) all loans, bills and accounts payable;

(2) all accrued interest on loans of the Fund (including accrued fees for commitment for such loans);

(3) all accrued or payable administrative expenses (including the aggregate fee and any other third party fees);

(4) all known liabilities, present and future, including all matured contractual obligations for payment of money or property, including the amount of any unpaid dividends declared by the Fund;

(5) an appropriate provision for future taxes based on capital and income to the relevant Valuation Date, as determined from time to time by the Fund, and other reserves, if any, authorized and approved by the Board of Directors of the Management Company; and

(6) all other liabilities of the Fund of whatsoever kind and nature except liabilities represented by units of the Fund. In determining the amount of such liabilities, the Fund shall take into account all expenses payable and all costs incurred by the Fund, which shall comprise the management fee, the management company, investment advisors (if any), investment or sub-investment managers, accountants, the Depositary Bank, the administrative agent, corporate agents, domiciliary agents, paying agents, registrars, transfer agents, permanent representatives in places of registration, distributors, trustees, fiduciaries, correspondent banks and any other agent employed by the Management Company acting on behalf of the Fund, fees for legal and auditing services, costs of any

proposed listings and of maintaining such listings, promotion, printing, reporting and publishing expenses (including reasonable marketing and advertising expenses and costs of preparing, translating and printing in different languages) of prospectuses, KID, addenda, explanatory memoranda, registration statements, annual reports and semi-annual reports, all taxes levied on the assets and the income of the Fund (in particular, the «*taxe d'abonnement*» and any stamp duties payable), registration fees and other expenses payable to governmental and supervisory authorities in any relevant jurisdictions, insurance costs, costs of extraordinary measures carried out in the interests of unitholders (in particular, but not limited to, arranging expert opinions and dealing with legal proceedings) and all other operating expenses, including the cost of buying and selling assets, customary transaction fees and charges charged by depositary banks or their agents (including free payments and receipts and any reasonable out-of-pocket expenses, i.e. stamp taxes, registration costs, scrip fees, special transportation costs, etc.), customary brokerage fees and commissions charged by banks and brokers for securities transactions and similar transactions, interest and postage, telephone, facsimile, telex charges and all the costs related to securities lending transactions (agency fees and transactions costs). The Management Company acting on behalf of the Fund may calculate administrative and other expenses of a regular or recurring nature on an estimated figure for yearly or other periods in advance, and may accrue the same in equal proportions over any such period.

The net assets of the Fund are at any time equal to the total of the net assets of the various sub-funds.

In determining the Net Asset Value per units, income and expenditure are treated as accruing daily.

### ***SWING PRICING***

In order to protect existing unitholders from dilution of value caused by trading costs incurred as a result of subscription, redemption or conversion activity on a sub-fund on a particular Valuation Day, the Management Company has adopted a swing pricing mechanism that allows price adjustments as part of the regular daily valuation process.

Trading costs are defined as explicit transaction costs, which are directly borne by a sub-fund for the acquisition or disposal of assets and usually are stable in amount and quantifiable in advance of the transaction and implicit transaction costs borne indirectly by a sub-fund upon acquisition or disposal of assets, which primarily arise from the bid-ask spread and market impact. Those implicit transaction costs may vary depending on the type of underlying assets and market conditions.

This mechanism is implemented at fund level across all of the sub-funds' unit classes and is not tailored to individual investor circumstances.

The mechanism consists in the application of a swing factor to the original Net Asset Value, which will be swung upwards when the net aggregate transactions result in net subscriptions flows and downwards when the net aggregate transactions result in net redemption flows. The adjusted asset value will be applicable to all transactions on that Valuation Day.

The calibration of the swing factor is carried out in accordance with the internal procedures of the Management Company.

On any given Valuation Day, this swing factor generally does not exceed 2,50% of the NAV. However, the Board of Directors of the Management Company may authorize a higher swing factor in abnormal market conditions (e.g. high net dealings, significant market volatility, market disruption or significant economic contraction) to protect unitholder interests. In such a case, a communication to investors will be published on the Management Company's website <https://www.fideuramassetmanagement.ie/>.

The Management Company is responsible for ordinary swing pricing decisions and reviews them regularly in line with its internal processes.

The mechanism implemented by the Management Company is partial swing pricing. In partial swing pricing adjustment, the pricing adjustment may be triggered when the difference between subscriptions and redemptions, as a percentage of the sub-fund's Net Asset Value, exceeds the threshold on any particular dealing day. Until the threshold rate is triggered, no swing factor is applied and the transaction costs will be borne by the sub-fund. This will result in a dilution (reduction in the Net Asset Value per Unit) to existing unitholders. The threshold is set by the Management Company taking into account factors such as the prevailing market conditions, including any significant market impact of the trades. Partial swing pricing will be triggered mechanically and on a consistent basis.

For the avoidance of doubt, it is clarified that fees other than the sales charge will continue to be calculated on the basis of the unswung Net Asset Value.

### ***SUSPENSIONS***

The Management Company may suspend or defer the determination of the Net Asset Value per Unit of one or more sub-funds and the issue, the redemption and conversion of any classes of units in the following circumstances:

- a)** during any period when any of the principal stock exchanges or other markets on which a substantial portion of the investments of the Fund attributable to such sub-fund from time to time is quoted or dealt in is closed otherwise than for ordinary holidays, or during which dealings therein are restricted or suspended, provided that such restriction or suspension affects the valuation of the investments of the Fund attributable to such sub-fund quoted thereon;
- b)** during any period when the determination of the Net Asset Value per Unit of and/or the redemptions in the underlying Investment Funds representing a material part of the assets of the relevant sub-fund is suspended;
- c)** during the existence of any state of affairs which constitutes an emergency in the opinion of the Board of Directors of the Management Company as a result of which disposal or valuation of assets owned by the Fund attributable to such sub-fund would be impracticable;
- d)** during any breakdown in the means of communication or computation normally employed in determining the price or value of any of the investments of such sub-fund or the current price or value on any stock exchange or other market in respect of the assets attributable to such sub-fund;
- e)** during any period when the Fund is unable to repatriate funds for the purpose of making payments on the redemption of Units of such sub-fund or during which any transfer of funds involved in the realization or acquisition of investments or payments due on redemption of Units cannot, in the opinion of the Board of Directors of the Management Company, be effected at normal rates of exchange;
- f)** when for any other reason the prices of any investments owned by the Fund attributable to a sub-fund cannot promptly or accurately be ascertained;
- g)** if the Fund or a sub-fund is being or may be wound up or put into liquidation;
- h)** when the Board of Directors of the Management Company has determined that there has been a material change in the valuations of a substantial proportion of the investments of the Fund attributable to a particular sub-fund in the preparation or use of a valuation or the carrying out of a later or subsequent valuation;
- i)** during any other circumstance or circumstances where a failure to do so might result in the Fund or its unitholders incurring any liability to taxation or suffering other pecuniary disadvantages or any other detriment, which the Fund or its unitholders might so otherwise have suffered; or
- j)** during any period where circumstances exist that would justify the suspension for the protection of unitholders in accordance with the law.

In case of master-feeder structure adopted by the Fund, if the Master UCITS temporarily suspends the repurchase, redemption or subscription of its shares, whether at its own initiative or at the request of its supervisory authority, each of its Feeder UCITS will be entitled to suspend the repurchase, redemption or subscription of its Units within the same period of time as the Master UCITS.

The suspension of a sub-fund shall have no effect on the determination of the Net Asset Value per Unit or on the issue, redemption and conversion of units of any other sub-fund that is not suspended.

Any request for subscription, redemption or conversion shall be irrevocable except in the event of a suspension of the determination of the Net Asset Value per Unit.

Moreover, in accordance with the provisions on mergers of the 2010 Law, the Management Company may temporarily suspend the subscription, the redemption or the repurchase of units, provided that any such suspension is justified for the protection of unitholders.

Unitholders will be informed of any suspension as appropriate. The Luxembourg regulatory authority, and the relevant authorities of any member states of the European Union in which units of the Fund are marketed, will be informed of any such suspension.

In accordance with the 2010 Law, the issue and redemption of units shall be prohibited:

- (i) during any period where the Fund has no management company or depositary; and
- (ii) where the Management Company or the Depositary Bank is put into liquidation or declared bankrupt or seeks an arrangement with the creditors, a suspension of payment or a controlled management or is the subject of similar proceedings.

### ***ISSUE PRICE OF UNITS***

The issue price per unit of a sub-fund is determined by the Administrator on behalf of the Management Company on the basis of the net asset value calculated on the day of settlement of the corresponding amounts.

To determine the issue price, to the net asset value as referred to above, charges, taxes and stamp duties required may be added, as the case may be.

The issue price of units of any sub-fund is ten (10.-) EURO during the initial period of subscription such as determined by the Management Company and published by STATE STREET BANK INTERNATIONAL GmbH, Luxembourg Branch on behalf of the Management Company.

Units will be redeemed at a price based on the NAV calculated for the relevant valuation date less any applicable redemption charge.

Data relating to the determination of the net asset value as well as to the issue, redemption and switch prices and potential suspension of net asset value are made available every Business Day at the office of the Depository Bank and on the website of the Management Company at <https://www.fideuramassetmanagement.ie/en/products/funds/>. The Management Company may discontinue such publication or undertake publications in other media at its sole discretion.

Historical performance is available at the registered office of the Management Company during normal business hours.

## **16) DATA PROTECTION**

In accordance with the provisions of the personal data protection laws (Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (or “GDPR”) entered into force on May 25, 2018, and any Luxembourg relevant laws), investors are informed that the Management Company collects, uses, stores and otherwise processes personal data as described in the Information Notice with respect to natural persons pursuant to Articles 13 and 14 of the GDPR, available on <https://www.fideuramassetmanagement.ie/en/policy/>.

More information about how personal data are processed, as well as the relevant contact details, are disclosed in the Subscription Form for each authorized distributor.

## **17) BENCHMARK REGULATION**

The Board of Directors of the Management Company decides the investment policy of each sub-fund, taking into account for certain of them, specific reference parameters (referred to as “benchmark”), mentioned in the investment policy, made up of an index worked out by widely recognized providers allocated to most of the sub-funds.

When mentioned in the investment policy unless otherwise specified, the benchmark is used for both performance measurement and portfolio construction of the relevant sub-funds as further described in the investment policy.

Regulation (EU) 2016/1011 on indices used as benchmarks in financial instruments and financial contracts or to measure the performance of investment funds, as amended (the “**Benchmark Regulation**”) introduces a requirement for all benchmark administrators providing indices which are used or intended to be used as benchmarks (within the meaning of the Benchmark Regulation) in the European

Union to be authorized or registered by the competent authority. In respect of the sub-funds, the Benchmark Regulation prohibits the use of benchmarks unless they are produced by a European Union administrator authorized or registered by the ESMA or are non-EU benchmarks that are included in ESMA's register under the Benchmark Regulation's third country regime.

As of the date of this Prospectus, the administrators of benchmarks used by a Sub-fund are as follows:

Benchmark administrator	Location	Benchmark	Sub-fund(s)	Benchmark Regulation purpose
FTSE International Limited	United Kingdom	FTSE EMU GBI 3 - 5 years Total Return	Fideuram Fund - Euro Bond Low Risk	Asset allocation
FTSE International Limited	United Kingdom	FTSE EMU GBI 5 - 10 years Total Return	Fideuram Fund - Euro Bond Medium Risk	Asset allocation
FTSE International Limited	United Kingdom	FTSE EMU GBI 10+ years Total Return	Fideuram Fund - Euro Bond long Risk	Asset allocation
ICE Data Indices LLC	United States of America	ICE BofAML Global High Yield Constrained Total Return	Fideuram Fund – Bond Global High Yield	Asset allocation
Bloomberg Index Services Limited	United Kingdom	Bloomberg US Aggregate Index Total Return	Fideuram fund - Bond US Plus	Asset allocation
FTSE International Limited	United Kingdom	FTSE Japan GBI Total Return	Fideuram fund - Bond Yen	Asset allocation
MSCI Limited	United Kingdom	MSCI Europe Net Total Return	Fideuram fund - Equity Europe	Asset allocation
S&P DJI Netherlands B.V.	The Netherlands	iBoxx Euro Corporates Overall Total Return	Fideuram fund – Euro Corporate Bond	Asset allocation
MSCI Limited	United Kingdom	MSCI USA Net Total Return	Fideuram Fund – Equity USA	Asset allocation
MSCI Limited	United Kingdom	MSCI Japan Net Total Return	Fideuram Fund – Equity Japan	Asset allocation
JP Morgan Securities LLC	United Kingdom	J.P. Morgan EMBI Global Diversified Total Return	Fideuram Fund – Bond Global Emerging Markets	Asset allocation

MSCI Limited	United Kingdom	<ul style="list-style-type: none"> <li>- For Class I shares: MSCI Pacific Free ex Japan Net Total Return</li> <li>- For Class IH shares: MSCI Pacific ex Japan Net Total Return</li> </ul>	Fideuram Fund – Equity Pacific Ex Japan	Asset allocation
MSCI Limited	United Kingdom	MSCI Emerging Markets ex controversial weapons 10/40” Net Total Return	Fideuram Fund – Equity Global Emerging Markets	Asset allocation
FTSE International Limited	United Kingdom	FTSE EMU GBI 1-3 years Total Return	Fideuram Fund – Euro Defensive Fund	Asset allocation
ICE Data Indices LLC	United States of America	ICE BofAML Global Inflation-Linked Government Total Return	Fideuram Fund – Inflation Linked	Asset allocation
MSCI Limited	United Kingdom	MSCI USA Growth 4% issuer capped Net Total Return	Fideuram Fund – Millenials Equity USA	Asset allocation
Bloomberg Index Services Limited	United Kingdom	Bloomberg Commodity Index Euro Hedged Total Return	Fideuram Fund - Commodities	Asset allocation
MSCI Limited	United Kingdom	MSCI Value USA Net Total Return in EUR	Fideuram Fund – Equity USA Value	Asset allocation
MSCI Limited	United Kingdom	MSCI World Net Total Return	Fideuram Fund – Global Equity	Asset allocation
Bloomberg Index Services Limited	United Kingdom	Bloomberg Barclays Global Aggregate Treasuries Total Return	Fideuram Fund – Global Bond	Asset allocation

The benchmark administrators listed above are included in the ESMA register, have submitted either an application for recognition or an application for approval before December 31, 2025 or do not provide critical benchmarks, significant benchmarks, EU Climate Transition Benchmarks or EU Paris-aligned Benchmarks (as defined in Benchmark Regulation) referenced by the sub-funds.

In accordance with the Benchmark Regulation, the Management Company has put in place a plan setting out the actions to be followed in the event that a benchmark materially changes or ceases to be provided (“**Benchmark Continuity Plan**”).

Details of the Benchmark Continuity Plan are available on the website: <https://www.fideuramassetmanagement.ie/en/policy/>

With the purpose of optimizing the management of these sub-funds, the Management Company may substitute the benchmark already allocated with another one linked to the same investment policy.

## **18) MONEY LAUNDERING PREVENTION AND BENEFICIAL OWNERS**

### ***ANTI-MONEY LAUNDERING AND PREVENTION OF TERRORIST FINANCING***

In accordance with international regulations and Luxembourg laws and regulations (including, but not limited to, the Law of 12 November 2004 on the fight against money laundering and financing of terrorism, as amended the Grand Ducal Regulation dated 1 February 2010, CSSF Regulation 12-02 of 14 December 2012, CSSF Circulars 13/556 and 15/609 concerning the fight against money laundering and terrorist financing, and any respective amendments or replacements) (the “**AML Rules**”), obligations are imposed inter alia on the Fund, the Management Company and its service providers as applicable (the “**AML Obligations**”). Each of them have in place their AML policy.

In accordance with the AML Rules and AML policy, a “*responsable du contrôle du respect des obligations*” (the “**RC**”) is appointed to ensure the compliance of the Fund with the AML Rules.

The AML Obligations include among others, identification procedure which will be apply by STATE STREET BANK INTERNATIONAL GmbH, Luxembourg Branch in its capacity of Administrator and Paying Agent in the case of subscriptions received by the Administrator and Paying Agent, and in the case of subscriptions received by the distributors or the Paying Agent or by any intermediary.

The Administrator and Paying Agent may request any such additional documents, as it deems necessary to establish the identity of investors or beneficial owners.

Any information provided to the Management Company, the Administrator, Paying Agent, or the authorized distributors in this context is collected for anti-money laundering compliance purposes only.

### ***LUXEMBOURG REGISTER OF BENEFICIAL OWNERS***

The Luxembourg law of 13 January 2019 creating a register of beneficial owners (the “**RBO Law**”) entered into force on 1 March 2019. According to the provisions

of the RBO Law, each entity registered in Luxembourg with the Luxembourg companies register (*Registre de Commerce et des Sociétés*), including the Fund, has to identify its beneficial owners (“**Beneficial Owners**”). The Fund must register Beneficial Owner-related information with the Luxembourg register of beneficial owners, which is established under the authority of the Luxembourg Ministry of Justice. To the extent required by, and subject to the conditions of Luxembourg anti-money laundering and countering the financing of terrorism laws and regulations, such information shall be made available to certain professionals (as defined in the RBO Law), as well as certain other persons with a legitimate interest.

The RBO Law broadly defines a Beneficial Owner as any natural person(s) who ultimately owns or controls the relevant entity through direct or indirect ownership of a sufficient percentage of the units (more than 25%) or voting rights or ownership interests in the entity (as applicable), or through control via other means, other than a company listed on a regulated market that is subject to disclosure requirements consistent with European Union law or subject to equivalent international standards which ensure adequate transparency of ownership information.

In case the Beneficial Owner criteria are fulfilled by an investor with regard to the Fund, this investor and/or nominee is obliged by the RBO Law to provide the required supporting documentation and information necessary for the Fund to fulfil its obligations under the RBO Law.

Failure by the Fund and the relevant Beneficial Owners to comply with their respective obligations deriving from the RBO Law will be subject to criminal fines.

## **19) TAXATION**

The following information is based on the laws, regulations, decisions and practice currently in force in Luxembourg and is subject to changes therein, possibly with retrospective effect. This tax section is a short summary of certain Luxembourg tax principles that may be or may become relevant with respect to the investments in the Fund. IT DOES NOT PURPORT TO BE A COMPREHENSIVE DESCRIPTION OF ALL LUXEMBOURG TAX LAWS AND CONSIDERATIONS THAT MAY BE RELEVANT TO A DECISION TO INVEST IN, OWN, HOLD, OR DISPOSE OF UNITS. IT DOES NOT CONSTITUTE AND SHOULD NOT BE CONSIDERED AS TAX ADVICE TO ANY PARTICULAR INVESTOR OR POTENTIAL INVESTOR. Prospective Investors should consult their own professional advisers as to the implications of buying, holding or disposing of Units and to the provisions of the laws of the jurisdiction in which they are subject to tax. This summary does not describe any tax consequences arising under the laws of any state, locality or other taxing jurisdiction other than Luxembourg.

## ***A.) CONCERNING THE FUND***

- in the Grand Duchy of Luxembourg:

The Fund is, in principle, only subject to a subscription tax (*taxe d'abonnement*) levied at the rate of 0.05% *per annum* based on its net asset value at the end of the relevant quarter, calculated and paid quarterly.

A reduced subscription tax rate of 0.01% *per annum* is applicable to:

- the Fund provided its exclusive object is the collective investment in money market instruments, the placing of deposits with credit institutions, or both;
- the Fund's sub-funds or classes of Units where the Units of those sub-funds or classes are only held by one or more Institutional Investors within the meaning of article 174 of the 2010 Law.

The Fund or its sub-funds, may benefit from reduced subscription tax rates depending on the value of its net assets invested in economic activities that qualify as environmentally sustainable within the meaning of Article 3 of EU Regulation 2020/852 of 18 June 2020 (the “**Qualifying Activities**”) except for the proportion of net assets of the Fund or of a sub-fund invested in economic activities as referred to in sections 4.26, 4.27, 4.28, 4.29, 4.30, 4.31 of the annexes I and II to Commission Delegated Regulation (EU) 2021/2139 of 4 June 2021 supplementing Regulation (EU) 2020/852. The reduced subscription tax rates would be of:

- 0.04% if at least 5% of the total net assets of the Fund, or of its sub-fund, are invested in Qualifying Activities;
- 0.03% if at least 20% of the total net assets of the Fund, or of its sub-fund, are invested in Qualifying Activities;
- 0.02% if at least 35% of the total net assets of the Fund, or of its sub-fund, are invested in - Qualifying Activities; and
- 0.01% if at least 50% of the total net assets of the Fund, or of its sub-fund, are invested in Qualifying Activities.

The subscription tax rates mentioned above would only apply to the net assets invested in Qualifying Activities.

A subscription tax exemption applies to:

- the portion of the Fund's assets (pro rata) invested in a Luxembourg UCI subject itself to the subscription tax;
- the Fund and its sub-funds where (i) the securities are only held by Institutional Investor(s), and (ii) the sole object is the collective investment in money market instruments and the placing of deposits with credit institutions, and (iii) the weighted residual portfolio maturity does not exceed ninety (90) days, and (iv) the securities have obtained the highest possible rating from a recognised rating agency. If several Classes of Units

are in issue in the Fund meeting (ii) to (iv) above, only those Classes of Units meeting (i) above will benefit from this exemption;

- the Fund as well as its sub-funds if their main objective is the investment in microfinance institutions;
- the Fund as well as its sub-funds if (i) the securities issued by the Fund or its sub-funds are listed or traded on at least one stock exchange or another regulated market operating regularly, recognized and open to the public and (ii) their exclusive object is to replicate the performance of one or more indices. If several Classes of Units are in issue in the Fund meeting (ii) above, only those Classes of Units meeting (i) above will benefit from this exemption; and
- the Fund if the securities issued by the Fund are reserved for (i) institutions for occupational retirement pension and similar investment vehicles, set-up on the initiative of one or more employers for the benefit of their employees and (ii) companies of one or more employers investing funds they hold to provide retirement benefits to their employees.

## **Withholding Tax**

### *Investor withholding tax*

Distributions made by the Fund as well as capital gains realised on a disposal or a redemption of Units are not subject to withholding tax in Luxembourg.

### *Withholding tax in source countries*

Interest and dividend income received by the Fund may be subject to non-recoverable withholding tax in the source countries. Furthermore, realised or unrealised capital appreciation of the Fund's assets may be subject to tax in the countries of origin. However, as a result of the tax transparency of the Fund, an exemption or a reduced tax rate may be available based on the double tax treaty entered into between the countries of the Investments and the Investor's tax residence.

- in other countries:

The Fund is subject, in the countries where it is authorized to place its shares, to the tax regime applicable to mutual investment funds; the Fund receives the benefits deriving from securities in its portfolio, net of any possible taxation at source in the various countries.

## ***B.) CONCERNING THE INVESTOR***

- Luxembourg Resident Investors:

### *Individual Investors*

A Luxembourg resident individual Investor is in principle subject to Luxembourg personal income tax levied at progressive rates in respect of his/her share of profits in the Fund.

However, as a result of the tax transparency of the Fund, dividends received through the Fund may benefit from a 50% exemption if such dividends are paid by a fully taxable company resident in a European Union (EU) Member State or a State that has concluded a tax treaty with Luxembourg.

Capital gains realised by a resident individual Investor who acts in the course of the management of his/her private wealth upon the disposal (i) of Units or (ii) by the Fund of a participation, are not subject to income tax, unless said capital gains qualify either as speculative gains or as gains on a substantial participation:

- Speculative gains are subject to income tax at progressive rates if the Units are disposed of within six (6) months after their acquisition.
- Capital gains realised on a substantial participation more than six (6) months after the acquisition thereof are taxed at half the average combined tax rate.

### *Corporate Investors*

A resident corporate Investor will in principle be subject to corporate income tax, municipal business tax and an employment fund surcharge at ordinary rates (“**Corporation Taxes**”), in respect of its share of profits in the Fund.

However, as a result of the tax transparency of the Fund, dividends received from entities held through the Fund or gains realised on the sale of participations held through the Fund may benefit from a full exemption from Corporations Taxes if the conditions of the Luxembourg participation exemption as set forth in Article 166 of the Luxembourg income tax law and Article 1 of the Grand Ducal Decree dated 21 December 2001 are met. Dividends may otherwise benefit from a 50% exemption if such dividends are paid through the Fund by a fully taxable company resident in an EU Member State or a State that has concluded a tax treaty with Luxembourg.

Luxembourg corporate resident Investors which benefit from a special tax regime, such as, for example, (i) undertakings for collective investment subject to the law of 17 December 2010 relating to undertakings for collective investments (ii) specialized investment funds subject to the law of 13 February 2007 relating to specialized investment funds, (iii) reserved alternative investment funds subject to

the law of 23 July 2016 relating to reserved alternative investment funds, (not opting for the treatment as a venture capital vehicle for Luxembourg tax purposes) or (iv) family wealth management companies subject to the law of 11 May 2007 related to family wealth management companies, are exempt from Corporation Taxes in Luxembourg and are instead subject to an annual subscription tax (*taxe d'abonnement*).

The assets held through the Fund shall be part (*pro rata*) of the taxable net wealth of the Luxembourg resident corporate Investor subject to net wealth tax levied on a yearly basis at a rate of 0.5%. A reduced rate of 0.05% is available for the part of the net wealth exceeding EUR 500,000,000.

Participations held through the Fund may be exempt from net wealth tax subject to the participation exemption conditions set forth by Paragraph 60 of the Law of 16 October, 1934 on the valuation of assets (*Bewertungsgesetz*).

Investors which are amongst others (i) undertakings for collective investment subject to the law of 17 December 2010 relating to undertakings for collective investments, (ii) a vehicle governed by the law of 22 March 2004 on securitisation, (iii) companies governed by the law of 15 June 2004 on venture capital vehicles, (iv) specialized investment funds subject to the law of 13 February 2007 relating to specialized investment funds, (v) reserved alternative investment funds subject to the law of 23 July 2016, relating to reserved alternative investment funds, (vi) family wealth management companies subject to the law of 11 May 2007 related to family wealth management companies or (vii) professional pension institutions governed by the law of 13 July 2005 on institutions for occupational retirement provision in the form of pension savings companies with variable capital and pension savings associations, are exempt from net wealth tax.

A minimum net wealth tax may however be due under certain circumstances by certain resident corporate Investors.

- Non-Resident Investors

Non-resident Investors without a permanent establishment, a permanent representative, or a fixed place of business in Luxembourg to which the Units are attributable, are not, in principle, subject to any capital gains tax, income tax, withholding tax or net wealth tax in Luxembourg.

As a result of the tax transparency of the Fund, a non-resident Investor could, however, be subject to Luxembourg taxation on capital gains (unless a tax treaty provides otherwise) if such an Investor holds a substantial participation through the Fund in a Luxembourg company which is transferred or redeemed (i) less than six (6) months after its acquisition or (ii) more than six (6) months after its acquisition, and where the Investor has been a Luxembourg resident taxpayer for more than

fifteen (15) years but became a non-resident taxpayer fewer than five (5) years before the transfer/redemption took place.

### **Residence**

An Investor will not become resident, or deemed to be resident, in Luxembourg by reason only of holding the Units.

### **Foreign Account Tax Compliance Act**

The Foreign Account Tax Compliance Act (“**FATCA**”) requires financial institutions outside the U.S. (“foreign financial institutions” or “**FFIs**”) to pass information about “Financial Accounts” held by “Specified U.S. Persons”, directly or indirectly, to the U.S. tax authorities (the Internal Revenue Service, “**IRS**”) on an annual basis. A 30% withholding tax is imposed on certain U.S. source income of any FFI that fails to comply with this requirement.

On 28 March 2014, the Grand Duchy of Luxembourg entered into a Model 1 Intergovernmental Agreement (“**Luxembourg IGA**”) with the United States of America and a memorandum of understanding in respect thereof. The Fund would hence have to comply with this Luxembourg IGA as implemented into Luxembourg law by the Law of 24 July 2015 relating to FATCA (“**FATCA Law**”) in order to comply with the provisions of FATCA rather than directly complying with the U.S. Treasury Regulations implementing FATCA. Under the FATCA Law and the Luxembourg IGA, the Fund may be required to collect information aiming to identify its financial account holders (including certain entities and their controlling persons) that are Specified U.S. Persons for FATCA purposes (“**FATCA Reportable Accounts**”). Any such information on FATCA Reportable Accounts provided to the Fund will be shared with the Luxembourg tax authorities (*Administration des Contributions Directes*) which will exchange that information on an automatic basis with the IRS.

The Fund intends to comply with the provisions of the FATCA Law and the Luxembourg IGA to be deemed compliant with FATCA and will thus not be subject to the 30% withholding tax with respect to its share of any such payments attributable to actual and deemed U.S. investments of the Fund. The Fund will continually assess the extent of the requirements that FATCA, and notably the FATCA Law, place upon it.

To ensure the Fund's compliance with FATCA, the FATCA Law and the Luxembourg IGA in accordance with the foregoing, the Management Company, in its capacity as the Fund's management company, may:

- a) request information or documentation, including W-9 or W-8 tax forms, a Global Intermediary Identification Number, if applicable, or any other valid evidence of an Investor's FATCA registration with the IRS or a corresponding exemption, in order to ascertain that Investor's FATCA status;

- b) report information concerning an Investor and his/her/its account holding in the Fund to the Luxembourg tax authorities (*Administration des Contributions Directes*) if such account is deemed a FATCA Reportable Account under the FATCA Law and the Luxembourg IGA;
- c) deduct applicable U.S. withholding taxes from certain payments made to an Investor by or on behalf of the Fund in accordance with FATCA, the FATCA Law and the Luxembourg IGA; and
- d) divulge any such personal information to any immediate payer of certain U.S. source income as may be required for withholding and reporting to occur with respect to the payment of such income.

By investing in the Fund, the Investors acknowledge that (i) the Fund is responsible for the treatment of the personal data provided for in the FATCA Law; (ii) the personal data will inter alia be used for the purposes of the FATCA Law; (iii) the personal data may be communicated to the Luxembourg tax authorities (*Administration des Contributions Directes*) and to the IRS; (iv) responding to FATCA-related questions is mandatory; and (v) the Investors have a right of access to and rectification of the data communicated to the Luxembourg tax authorities (*Administration des Contributions Directes*).

The Management Company, in its capacity as the Fund's management company, reserves the right to refuse any subscription for Units if the information provided or not provided does not satisfy the requirements under FATCA, the FATCA Law and the Luxembourg IGA.

Prospective Investors should consult their professional advisor on the individual impact of FATCA.

## **Automatic Exchange of Information**

### CRS

The Organisation for Economic Co-operation and Development (“**OECD**”) has developed a common reporting standard (“**CRS**”) to achieve a comprehensive and multilateral automatic exchange of information on a global basis.

On 29 October 2014, Luxembourg signed the OECD’s multilateral competent authority agreement (“**Multilateral Agreement**”) to automatically exchange information under the CRS. On 9 December 2014, Council Directive 2014/107/EU amending Directive 2011/16/EU as regards mandatory automatic exchange of information in the field of taxation (“**DAC2**”) was adopted to implement the CRS among the EU Member States. The CRS and the DAC2 were implemented into Luxembourg law by the law of 18 December 2015 on the automatic exchange of financial account information in the field of taxation (“**CRS Law**”).

The CRS Law requires Luxembourg financial institutions to identify their financial account holders (including certain entities and their controlling persons) and

establish if they are fiscally resident in (i) an EU Member State other than Luxembourg or (ii) a jurisdiction which has signed the Multilateral Agreement and which is identified in the list of reportable jurisdictions published by Grand Ducal Decree (“**CRS Reportable Accounts**”). The first official list of CRS reportable jurisdictions was published on 24 March 2017 and is updated from time to time. Luxembourg financial institutions will then report the information on such CRS Reportable Accounts to the Luxembourg tax authorities (*Administration des Contributions Directes*), which will thereafter automatically transfer this information to the competent foreign tax authorities on a yearly basis.

Accordingly, the Management Company, in its capacity as the Fund's management company, may require its Investors to provide information or documentation in relation to the identity and fiscal residence of financial account holders (including certain entities and their controlling persons) in order to ascertain their CRS status; and report information regarding an Investor and his/her/its account holding in the Fund to the Luxembourg tax authorities (*Administration des Contributions Directes*) if such an account is deemed a CRS Reportable Account under the CRS Law.

By investing in the Fund, the Investors acknowledge that (i) the Fund is responsible for the treatment of the personal data provided for in the CRS Law; (ii) the personal data will *inter alia* be used for the purposes of the CRS Law; (iii) the personal data may be communicated to the Luxembourg tax authorities (*Administration des Contributions Directes*) and to the tax authorities of CRS reportable jurisdictions; (iv) responding to CRS-related questions is mandatory; and (v) the Investors have a right of access to and rectification of the data communicated to the Luxembourg tax authorities (*Administration des Contributions Directes*).

The Management Company, in its capacity as the Fund's management company, reserves the right to refuse any subscription for Units if the information provided or not provided does not satisfy the requirements under the CRS Law.

Prospective Investors should consult their professional advisor on the individual impact of the CRS.

### DAC6

On 25 May 2018, the EU Council adopted a directive (2018/822 amending Directive 2011/16/EU as regards mandatory automatic exchange of information in the field of taxation) that imposes a reporting obligation on parties involved in transactions that may be associated with aggressive tax planning (“**DAC6**”). DAC6 has been implemented in Luxembourg by the law of 25 March 2020 (the “**DAC6 Law**”).

More specifically, the reporting obligation will apply to cross-border arrangements that, among others, meet one or more “hallmarks” provided for in the DAC6 Law

that is coupled in certain cases, with the main benefit test (the “**Reportable Arrangements**”).

In the case of a Reportable Arrangement, the information that must be reported includes *inter-alia* the name of all relevant taxpayers and intermediaries as well as an outline of the Reportable Arrangement, the value of the Reportable Arrangement and identification of any member states likely to be concerned by the Reportable Arrangement.

The reporting obligation in principle rests with the persons that design, market, organise make available for implementation or manage the implementation of the Reportable Arrangement or provide assistance or advice in relation thereto (the so-called “intermediaries”). However, in certain cases, the taxpayer itself can be subject to the reporting obligation.

Starting from January 1, 2021, Reportable Arrangements must be reported within thirty (30) days from the earliest of (i) the day after the Reportable Arrangement is made available for implementation or (ii) the day after the Reportable Arrangement is ready for implementation or (iii) the day when the first step in the implementation of the Reportable Arrangement has been made.

The information reported will be automatically exchanged between the tax authorities of all Member States.

In light of the broad scope of the DAC6 Law, transactions carried out by the Fund may fall within the scope of the DAC6 Law and thus be reportable.

The following documents may be consulted at the registered office of STATE STREET BANK INTERNATIONAL GmbH, Luxembourg Branch in its role as Administrator as well as at the authorized distributors’ during the office hours:

- the Articles of Incorporation of the Management Company;
- the Management Regulations;
- the KIDs;
- the Agreement between the Management Company and the Depositary Bank;
- the Agreements between the Management Company and the Administrator, and Paying Agent;
- the Agreements between the Management Company and the Investment Managers;
- the periodical financial reports.

A copy of the Management Regulations, the KIDs, the Articles of Incorporation of the Management Company and the periodic financial reports may be obtained, free of any charge, at the registered offices of the Management Company, of the Administrator as well as at the authorized distributors.

The Management Company shall publish twice a year a financial report on the transactions of each sub-fund and shall make it available to all unitholders.

The Prospectus, the Management Regulations, the KID, the audited annual report as well as all non-audited semi-annual reports will be available to the unitholders at the registered office of the Administrator, as well as at the authorized distributors, where a copy is available to the unitholders.

The Management Company shall make available to the unitholders at the registered office of the Administrator in Luxembourg in order to be reviewed, books and accounting documents, the balance sheet and the profit and loss accounts.

Notices to the unitholders are sent to the unitholders, published on a website or in newspapers, if necessary or as required.

Any relevant notifications or other communications to unitholders concerning their investments in the Fund will be published on the website [www.fideuramireland.ie/en/legal\\_documentation/](http://www.fideuramireland.ie/en/legal_documentation/). Unitholders are therefore invited to regularly consult this website. Such notifications or communications may also be communicated to a unitholder via electronic means of communication in accordance with applicable Luxembourg laws and regulations, in case the relevant unitholder has consented and provided an e-mail address to the Management Company or its delegate. In addition, and where required by Luxembourg law or the CSSF or by the law of the country(ies) in which the sub-funds are distributed, unitholders will also be notified in writing or in such other manner as prescribed under applicable law.

Data relating to the determination of the net asset value as well as to the issue price, the redemption price and the switch price and potential suspension of net asset value are made available every Business Day at the office of the Depositary Bank and on the website of the Management Company at <https://www.fideuramassetmanagement.ie/en/>.

For each payment, the Management Company or the authorised distributors shall send a confirmation letter of the realised investment to the investors, indicating, among others, the date at which the Administrator has received the proper information concerning the subscription request, the date of receipt of mean of payment by the Management Company at the Depositary Bank and the mean of payment used, the gross amount paid, the net invested amount, the date of the settlement of corresponding amounts, the number of units subscribed, the concerned sub-fund and the net asset value applied.

## **20) DISSOLUTION OF THE FUND – DISSOLUTION OF SUB-FUNDS – MERGER OF SUB-FUNDS**

The Fund is established for an unlimited duration; it may be dissolved at any time with the mutual approval of the Management Company and the Depositary Bank.

Moreover, the Fund shall be liquidated in the cases provided for in Article 22 of the 2010 Law.

The event, which entails the state of liquidation, shall be published by the Management Company in the *Luxembourg Recueil Électronique des Sociétés et Association*. It shall also be published in at least two (2) newspapers with adequate circulation, at least one of which must be a Luxembourg newspaper to be determined by the Management Company.

No unit shall be issued, redeemed or switched as from the occurrence of the event giving rise to the state of liquidation of the Fund.

The Management Company shall dispose of the assets of the Fund in the best interest of the unitholders, and the Depositary Bank shall distribute the net liquidation proceeds to the unitholders, after deducting charges and expenses for the liquidation. Such proceeds shall be distributed proportionally to the units, in accordance with the instructions of the Management Company. The net liquidation proceeds that are not distributed to the unitholders at the closing of the liquidation shall be deposited in escrow with the *Caisse de Consignation* in Luxembourg until the end of the period of the legal prescription. Amounts not claimed from escrow within the prescription period would be liable to be forfeited in accordance with the provisions of Luxembourg laws.

The Management Company may decide to liquidate a sub-fund in case of events which are out of its control, such as changes in the political, economic or monetary situation affecting the Fund or when the net asset of a sub-fund falls below 25,000,000. - EURO (twenty-five million EURO).

When the Management Company decides to liquidate a sub-fund, no units of this sub-fund shall be issued.

In waiting for the implementation of the decision of liquidation, the Management Company shall continue to redeem units of the concerned sub-fund. To do so, the Management Company shall base the redemption on the net asset value established in order to take into account the liquidation expenses but without deduction of redemption fees. The Management Company shall redeem the units of the sub-fund and shall repay the unitholders proportionally to the number of units held. The net liquidation proceeds, which shall not be distributed, shall be deposited with the *Caisse de Consignations* of Luxembourg at the expiration of a six (6) months'

delay. Within these six (6) months, the residue shall be deposited with the Depositary Bank.

The Management Company may decide to merge two (2) or several sub-funds of the Fund or to contribute one or several sub-funds to another Luxembourg or foreign UCITS in case of changes in the economic, political or monetary situation or when the net assets of a sub-fund fall below 25,000,000. - EURO (twenty-five millions EURO) and such merger/contribution will be realized in accordance with Chapter 8 of the 2010 Law. The Management Company will decide on the effective date of the merger of the Fund with another UCITS pursuant to article 66 (4) of the 2010 Law. Notice of any mergers shall be sent to unitholders. Holders of units in the sub-funds in question may, for a period established by the Board of Directors of the Management Company – which may be no less than one month and shall be indicated in the notice to unitholders – request that their units be redeemed free of charge.

## **21) INVESTMENT POLICY**

Unless otherwise provided in the Prospectus, the investment policy of the Fund shall consist in the research of the largest possible allocation of the risks related to the general evolution of individual markets, to the evolution of the individual sectors and to the reliability degree of issuers.

The Management Company may, however, not ensure any performance result.

Transferable securities and money market instruments in which the Fund may invest are admitted to the official listing of a stock exchange or dealt in on another regulated market, that operates regularly, is recognized and open to the public in a State of Europe, America, Asia, Africa or Oceania.

The Fund may hold, on an ancillary basis, the assets of a sub-fund of the Fund in current or deposit accounts in any currency.

### **Financial techniques and instruments**

The Fund is authorized to use techniques and instruments relating to transferable securities, money market instruments or other types of underlying assets always in compliance with CSSF's Circular 14/592 relating to ESMA Guidelines on ETFs and other UCITS issues as amended from time to time (the "**CSSF's Circular 14/592**") and the Regulation (EU) 2015/2365 of the European Parliament and of the Council of 25 November 2015 on transparency of securities financing transactions and of reuse and amending Regulation (EU) No 648/2012 as amended from time to time (the "**SFT Regulation**") to the extent that such techniques and instruments are used for efficient portfolio management purposes. The use of derivative instruments is subject to the requirements and limits listed in the Prospectus.

If specified in the relevant sub-fund's investment policy, a sub-fund will participate in (i) repurchase and reverse repurchase transactions and / or (ii) securities lending transactions, on a continuous basis and irrespective of specific market conditions that will occur, in order to generate additional revenue.

Entering into TRS, securities lending, repurchase/reverse repurchase transactions may increase the risk profile of the sub-funds.

None of the sub-funds will use (i) buy-sell back transaction or sell-buy back transaction nor (ii) margin lending transaction.

Eligible counterparties for OTC financial derivatives transactions and efficient portfolio management techniques (EMT) will have a public rating of at least A- from Standard & Poor's or equivalent rating from Moody's and Fitch and will be financial counterparties in accordance with article 3 of the SFT Regulation. In the event that a previously authorised counterparty is downgraded to below the minimum level required to be eligible (A-), it may nevertheless remain approved if the downgrade does not fall below the suspension threshold identified by the following two (2) circumstances:

- a) the majority of the three ratings agencies give the broker a rating of BBB- or lower;
- b) one of the three major ratings agencies downgrades the broker to BB+ or lower.

The legal form is however not a decisive criterion for the selection of the counterparty.

The eligible counterparties will be established in EU member countries, in countries member of the Organisation for Economic Cooperation and Development ("OECD"), Jersey, Hong Kong or Singapore.

### **1. Use of derivative instruments**

The use of derivative instruments is subject to the compliance with the requirements and limits below:

The Fund may carry out transactions relating to derivative products either for the purpose of efficient portfolio management or the purpose of risk hedging or, when it is specified in the investment policy of a sub-fund, for another purpose. In this case, these transactions shall not lead a sub-fund to divert from its investment objectives.

The use of derivative products may both increase (by an increase of the exposure) and reduce (by a decrease of the exposure) the volatility of the Fund.

The Fund may use forward financial instruments dealt in either on regulated markets or over-the-counter.

For example, the Fund may conclude transactions on futures, options as well as swaps.

***a) Limits***

Investments in derivative instruments will be in compliance with CSSF's Circular 14/592 and may be carried out provided that the global risk relating to the financial instruments does not exceed the total net assets of a sub-fund.

In such a context "global risk relating to financial derivative instruments does not exceed the total net value of the portfolio" means that the global risk relating to the use of financial derivative instruments shall not exceed 100% of the net asset value and that the global risk for a sub-fund shall not be higher on a long-term basis than 200% of the net asset value. The global risk for the sub-fund may not be higher than 10% by way of temporary borrowings in such a way that such global risk shall never be higher than 210% of the net asset value.

The global risk relating to financial instruments is represented by the Value at Risk approach or the commitment approach, i.e. the result of switch of positions on financial instruments into equivalent positions on the underlying assets according to their respective sensitivity, as the case may be.

This commitment conversion methodology allows in certain circumstances and in accordance with the provisions of the CSSF Circular 11/512 (i) the exclusion of certain types of non-leveraged swap transactions or certain risk free or leverage free transactions and (ii) the consideration of netting and hedging transactions to reduce the global exposure. The short and long positions on the same underlying asset or an asset having an important historical correlation, may be set off.

The short and long positions on the same underlying asset or on assets having an important historical correlation, may be set off.

When a transferable security or a money market instrument embeds a derivative product, the latter must be taken into account when complying with the provisions of the Prospectus.

When a sub-fund has recourse to derivative instruments based on an index, such investments are not combined with the limits set forth in the Prospectus.

Sub-funds having recourse to derivative instruments/TRS based on an index may pay a fixed fee to access the indices to the index sponsor (which generally also acts as counterparty to the total return swaps/derivatives). Any index rebalancing costs

are already priced into the applicable index return or covered by the fixed fee paid to the index sponsor.

***b) Special limits relating to credit derivatives***

The Fund may carry out transactions on credit derivatives:

- under an ISDA master agreement with first class counterparties specialized in that transaction, evaluated by the Management Company's internal Counterparty Risk Committee and approved by the Board of Directors of the Management Company,
- where the underlying assets comply with the investment objectives and policy of the sub-fund,
- which may be liquidated at any time at their valuation value,
- whose valuation must be reliable and periodically verifiable,
- for hedging purposes or not.

If the credit derivatives are concluded for another purpose than hedging, the following requirements must be fulfilled:

- credit derivatives must be used in the exclusive interest of the investors by assuming an interesting return balanced against the risks of the Fund and in accordance with the investment objectives,
- investment restrictions in the Prospectus shall apply to the issuer of a Credit Default Swap (CDS) and to the risk of the final debtor of the credit derivative (underlying), except if the credit derivative is based on an index,
- the sub-funds must ensure an appropriate and permanent covering of the commitments relating to CDS in order to be able at any time to meet the redemption requests from investors.

Claimed strategies relating to credit derivatives are notably the following (which may, as appropriate, be combined):

- to invest quickly the newly subscribed amounts in an UCI in the credit market via the sale of credit derivatives,
- in case of positive anticipation in the evolution of spreads, to take a credit exposure (global or targeted) thanks to the sale of credit derivatives,
- in case of negative anticipation in the evolution of spreads, to protect or take actions (globally or targeted) by the purchase of credit derivatives.

***c) Special limits relating to equity swaps and stock index swaps***

The Fund may conclude equity swaps and swaps on stock index, in accordance with the investment restrictions in the Prospectus:

- under an ISDA Master Agreement with first class counterparties specialized in that transaction, evaluated by the Management Company's internal Counterparty Risk Committee and approved by the Board of Directors of the Management Company,
- where the underlying assets comply with the investment objectives and policy of the sub-fund,
- which may be liquidated at any time at their valuation value,
- whose valuation must be reliable and periodically verifiable,
- for hedging purposes or not.

***d) Conclusion of "Contracts for Difference" ("CFD")***

Each sub-fund may enter into "contracts for difference" ("CFD"). A CFD is an agreement between two (2) parties for the exchange, at the end of the contract, of the difference between the open price and the closed price of the contract, multiplied by the number of units of the underlying assets specified in the contract. These differences in the settlements are therefore made by payment in cash more than by physical delivery of underlying assets.

When these CFD transactions are carried out for a different purpose than the one of risk hedging, the risk exposure relating to these transactions, together with the global risk relating to other derivative instruments shall not, at any time, exceed the net asset value of the concerned sub-fund.

Particularly, the CFD on transferable securities, on financial index or on swaps shall be used strictly in accordance with the investment policy followed by each sub-fund. Each sub-fund shall ensure an adequate and permanent coverage of its commitments related to CFDs in order to face the redemption requests of unitholders.

***e) Intervention on currency markets***

Each sub-fund may enter into derivative transactions on currencies (such as forwards, options, futures and swaps) for hedging purposes or intended to take exchange risks within its investment policy without however diverting from its investment objectives.

Moreover, the Fund may also purchase, respectively sell, forward contracts on currencies within an efficient management of its portfolio in order to maintain the same exposure on currencies as the one of the benchmark of each sub-fund. These forward contracts on currencies may be in principle within the limits of the benchmark of the sub-fund in the way that an exposure on a currency other than the reference currency of the sub-fund shall not, in principle, be higher than the portion of this currency being part of the benchmark. The use of these forward contracts on currencies shall be made in the best interest of the unitholders.

In addition, the Fund may also purchase, respectively sell, forward contracts on currencies in order to protect it against the risk of exchange rate fluctuations with the view to acquire future investments. The hedging purpose of these transactions presupposes the existence of a direct relationship between them and the future commitments to be covered taking into account the benchmark of the sub-funds; consequently, the transactions made in one currency may in principle not exceed the valuation of the aggregate future commitments in that currency nor exceed the presumed period during which such future commitments will be held.

***f) Special limits relating to total return swaps or other financial derivative instruments with the same characteristics***

A sub-fund may enter into a total return swap, or other financial derivative instruments with the same characteristics, for hedging or investment purposes and in compliance with the investment objective and policy of the concerned sub-fund as per set out in the Prospectus.

The underlying exposures of the financial derivative instruments shall be taken into account to calculate the investment limits laid down in Article 52 of the UCITS Directive.

Total return swaps involve the exchange of the right to receive the total return, coupons plus capital gains or losses, of a specified reference asset, index or basket of assets against the right to make fixed or floating payments.

Interest rate swaps involve the exchange by a sub-fund with another party of their respective commitments to pay or receive interest, such as an exchange of fixed rate payments for floating rate payments. Currency swaps may involve the exchange of rights to make or receive payments in specified currencies. Where a sub-fund enters into interest rate swaps or total return swaps on a net basis, the two (2) payment streams are netted out, with each sub-fund receiving or paying, as the case may be, only the net amount of the two (2) payments. Interest rate swaps or total return swaps entered into on a net basis do not involve the physical delivery of investments, other underlying assets or principal. Accordingly, it is intended that the risk of loss with respect to interest rate swaps is limited to the net amount of interest payments that the sub-fund is contractually obligated to make (or in the case of total return swaps, the net amount of the difference between the total rate

of return of a reference investment, index or basket of investments and the fixed or floating payments). If the other party to an interest rate swap or total return swap defaults, in normal circumstances the sub-fund's risk of loss consists of the net amount of interest or total return payments that the sub-fund is contractually entitled to receive. In contrast, currency swaps usually involve the delivery of the entire principal value of one designated currency in exchange for the other designated currency. Therefore, the entire principal value of a currency swap is subject to the risk that the other party to the swap will default on its contractual delivery obligations.

The sub-fund entering into a total return swap, or other financial derivative instruments with the same characteristics, may be subject to the risk of counterparty default or insolvency. Such event could affect the assets of the sub-fund and the risk profile of the sub-fund may be increased.

Unless otherwise provided for a specific sub-fund, the counterparty of a total return swap, or other financial derivative instruments with the same characteristics, has no discretion about the composition or management of the UCITS' target investments or the underlying of the financial derivative instruments.

## **2. Efficient portfolio management techniques (EMT)**

If specified in the relevant sub-fund's investment policy, a sub-fund will enter into efficient portfolio management techniques to generate additional revenues.

The maximum and expected portions of the sub-funds' assets that can be subject to i) repurchase transactions / reverse repurchase transactions and (ii) securities lending transactions are disclosed in the sub-funds' respective investment policies.

The described limits allow such transactions activities to be managed efficiently, aiming as far as possible to reach the best results in terms of additional revenues opportunities for the sub-funds, in the best interest of the sub-funds' respective investors.

The actual portion of the total net assets of a relevant sub-fund engaged into such transactions will vary over time depending, inter alia, on market conditions and the demand of the counterparties.

- ***Sale with right of repurchase transactions / Reverse repurchase and Repurchase agreement transactions***

A repurchase agreement is a transaction governed by an agreement by which a counterparty transfers securities or guaranteed rights relating to title to securities, and the agreement contains a commitment to repurchase them, or failing that, to repurchase securities with the same characteristics, at a fixed price and at a time fixed by the lender or to be fixed later.

Rights to securities will be the subject of such transaction only if they are guaranteed by a recognized exchange which holds the rights to the securities, and if the agreement does not allow one of the counterparties to transfer or pledge a particular security at the same time to more than one other counterparty; for the counterparty that sells the securities, the transaction is a repurchase agreement, and for the other party that buys it, the transaction is a reverse repurchase agreement.

Each sub-fund may, acting as buyer, agree to purchase securities with a repurchase option (consisting of the purchase of securities with a clause reserving for the seller the right to repurchase the securities sold from the sub-fund at a price and time agreed between the two (2) parties at the time when the contract is entered into) or, acting as seller, agree to sell securities with a repurchase option (consisting of the sale of securities with a clause reserving for the sub-fund the right to repurchase the securities from the purchaser at a price and at a time agreed between the two (2) parties at the time when the contract is entered into); each sub-fund may also enter into reverse repurchase agreement transactions (which consist of a forward transaction at the maturity of which the seller -counterparty - has the obligation to repurchase the asset sold and the sub-fund the obligation to return the asset received under the transaction) and into repurchase agreement transactions (which consist of a forward transaction at the maturity of which the sub-fund has the obligation to repurchase the asset sold and the buyer - the counterparty - the obligation to return the asset received under the transaction).

The involvement of each sub-fund in such transactions is however subject to the regulations set forth in CSSF Circular 08/356, CSSF Circular 14/592 and ESMA Guidelines 2014/937 concerning the rules applicable to undertakings for collective investment when they use certain techniques and instruments relating to transferable securities and money market instruments, as amended from time to time and the SFT Regulation.

Consequently, each sub-fund must comply with the following rules:

It may enter into these transactions only if the counterparties to these transactions (the “**Repo Counterparties**”) are subject to prudential supervision rules considered by the CSSF as equivalent to those prescribed by Community law. Details of the Repo Counterparties will be disclosed in the Fund’s annual report.

During the duration of a purchase with a repurchase option agreement or of a reverse repurchase agreement, it may not sell or pledge/give as security the securities which are the subject of the contract, before the counterparty has exercised its option or until the deadline for the repurchase has expired, unless it has other means of coverage.

It must ensure that it is able, at all times, to meet its redemption obligations towards its unitholders.

Securities that are the subject of purchase with a repurchase option transaction or of reverse repurchase agreements are limited to:

- (i) short term bank certificates or money market instruments such as defined in Article 2(1)(o) of the UCITS Directive, and instruments as referred to in Article 3 of Commission Directive 2007/16/EC of 19 March 2007 implementing Council Directive 85/611/EEC on the coordination of laws, regulations and administrative provisions relating to certain UCITS as regards the clarification of certain definitions as defined in the Regulation (EU) 2017/1131 of the European Parliament and of the Council of 14 June 2017 on money market funds (the “**Money Market Regulation**”);
- (ii) bonds issued or guaranteed by a Member State of the OECD or by their local public authorities or by supranational institutions and undertakings with EU, regional or world-wide scope;
- (iii) shares or units issued by money market UCIs calculating a daily net asset value and being assigned a rating of AAA or its equivalent;
- (iv) bonds issued by non-governmental issuers offering an adequate liquidity;
- (v) shares quoted or negotiated on a regulated market of a European Union Member State or on a stock exchange of a Member State of the OECD, on the condition that these shares are included in a main index.

The securities purchased with a repurchase option or through a reverse repurchase agreement transaction must be in accordance with the sub-fund investment policy and must, together with the other securities that it holds in its portfolio, globally comply with its investment restrictions.

- ***Securities lending transactions***

A securities lending transaction is a transaction whereby a counterparty transfers securities subject to a commitment that the party borrowing the securities will return the equivalent at a later date or at the request of the transferring party.

Each sub-fund in order to achieve a positive return in absolute terms may enter into securities lending transactions provided that they comply with the regulations set forth in CSSF’s Circular 08/356, CSSF’s Circular 14/592 and ESMA Guidelines 2014/937 concerning the rules applicable to undertakings for collective investment when they use certain techniques and instruments relating to transferable securities and money market instruments, as amended from time to time and the SFT Regulation.

Each sub-fund may lend the securities included in its portfolio to a borrower either directly or through a standardized lending system organized by a recognized clearing institution or through a lending system organized by a financial institution subject to prudential supervision rules considered by the CSSF as equivalent to those prescribed by Community law and must be evaluated by the Management Company's internal Counterparty Risk Committee and approved by the Board of Directors of the Management Company. In all cases, the counterparty to the securities lending agreement (i.e. the borrower) must be subject to prudential supervision rules considered by the CSSF as equivalent to those prescribed by Community law and comply with article 3 of the SFT Regulation. In case the aforementioned financial institution acts on its own account, it is to be considered as counterparty in the securities lending agreement.

Each sub-fund must ensure that the volume of the securities lending transactions is kept at an appropriate level or that it is entitled to request the return of the securities lent in a manner that enables it, at all times, to meet its redemption obligations and that these transactions do not jeopardize the management of the sub-fund's assets in accordance with its investment policy.

The Management Company of the Fund does not act as securities lending agent. The Management Company has designated Intesa Sanpaolo Wealth Management as securities lending agent for the sub-funds that engage in securities lending transactions (the "**Securities Lending Agent**"), under a securities lending authorization agreement.

The Securities Lending Agent may have securities lending agency agreement in place with sub-agents. Details of such sub-agents will be disclosed in the Fund's annual report.

The Securities Lending Agent is a related party to the Management Company, which could potentially lead to a conflict of interest.

Securities that are subject to securities lending or borrowing are: Equities and Bonds.

### **3. Sharing return generated by EMT and total return swap or similar instruments**

All revenues arising from securities lending, net of any direct or indirect operating costs and fees paid to the Securities Lending Agent shall be returned to the sub-fund and will form part of the Net Asset Value of the sub-fund.

Such remuneration paid to the Securities Lending Agent / sub-agents, as detailed in the Fund's annual report, should not exceed 25% of the gross revenues received on annual basis from the securities lending activities.

All revenues arising from repo/reverse repo shall be returned to the relevant sub-fund and will form part of the Net Asset Value of the sub-fund.

The Fund's annual report will contain information on income from efficient portfolio-management techniques and TRS or similar instruments for the sub-funds' entire reporting period, together with details of the sub-funds' direct (e.g. transaction fees for securities, etc.) and indirect (e.g. general costs incurred for legal advice) operational costs and fees (e.g. fees included in the TRS for the underlying management), insofar as they are associated with the management of the corresponding Fund/sub-fund.

The Fund's annual report will provide details on the identity of companies associated with the Management Company or the Depositary Bank of the Fund, provided they receive direct and indirect operational costs and fees.

All income arising from the use of techniques and instruments for efficient portfolio management and TRS or similar instruments, less direct and indirect operational costs, and fees profit to the Fund in order to be reinvested in line with the Fund's investment policy and consequently will positively impact on the performance of the sub-fund.

The counterparties to the agreements on the use of techniques and instruments for efficient portfolio management and TRS or similar instruments will be eligible counterparties as defined above and will be selected according to the Management Company's principles for executing orders for financial instruments (the "**best execution policy**") and will be disclosed in the Fund's annual report.

The costs and fees to be paid to the respective counterparty or other third party will be negotiated according to market practice.

In principle, and unless otherwise indicated in the Prospectus and/or Management Regulations, the counterparties are not affiliated companies of the Management Company or companies belonging to the promoter's group.

#### **4. Management of collateral for OTC financial derivatives transactions and EMT**

As security for any EMT and OTC financial derivatives transactions, the relevant sub-fund will obtain collateral that must at all times meet with the following criteria:

- (a) Liquidity: Collateral must be sufficiently liquid in order that it can be sold quickly at a robust price that is close to its pre-sale valuation.
- (b) Valuation: Collateral must be capable of being valued on at least a daily basis and must be marked to market daily and may be subject to daily variation margin requirements.

- (c) Issuer credit quality: The Fund will ordinarily only accept very high quality collateral.
- (d) Correlation – the collateral will be issued by an entity that is independent from the counterparty and is expected not to display a high correlation with the performance of the counterparty.
- (e) Collateral diversification (asset concentration) – collateral should be sufficiently diversified in terms of country, markets and issuers. The criterion of sufficient diversification with respect to issuer concentration is considered to be respected if the sub-fund receives from a counterparty of efficient portfolio management and over-the-counter financial derivative transactions a basket of collateral with a maximum exposure to a given issuer of 20% of the sub-fund’s net asset value. When a sub-fund is exposed to different counterparties, the different baskets of collateral should be aggregated to calculate the 20% limit of exposure to a single issuer. By way of derogation from this sub-paragraph, a sub-fund may be fully collateralised in different transferable securities and money market instruments issued or guaranteed by a Member State, one or more of its local authorities, a third country, or a public international body to which one or more Member States belong. Such a sub-fund should receive securities from at least six different issues, but securities from any single issue should not account for more than 30% of the sub-fund’s net asset value.
- (f) Safekeeping: As a principle, assets subject to SFTs become the property of the counterparty of the Fund and the assets of equivalent type will be returned to the Fund at the maturity of the transaction. As a consequence, during the life of the transaction, the assets will not be held by the Depositary Bank. Any collateral posted in favour of the Fund or any of its sub-funds under a title transfer arrangement should be held by the Depositary Bank. Such collateral may be held by one collateral agent or, in case of TRSs, by the Depositary Bank's correspondents or sub-custodians provided that the Depositary Bank has delegated the custody of the collateral to such collateral agent, correspondent or sub-custodian and the Depositary Bank remains liable subject to the provisions of the 2010 Law, if the collateral is lost by the collateral agent or the sub-custodian. Collateral posted in favour of the Fund or any of its sub-funds under a security interest arrangement (e.g., a pledge) can be held by the Depositary Bank or a third party custodian which is subject to prudential supervision, and which is unrelated to the provider of the collateral.
- (g) Enforceable: Collateral must be immediately available to the Fund without recourse to the counterparty, in the event of a default by that entity.
- (h) Non-Cash collateral
  - cannot be sold, pledged or re-invested;
  - must be issued by an entity independent of the counterparty; and

- must be diversified to avoid concentration risk in one issue, sector or country.
- (i) Cash Collateral can only be:
- placed on deposit with entities prescribed in Article 41(f) of the 2010 Law;
  - invested in high-quality government bonds;
  - used for the purpose of reverse repurchase transactions provided the transactions are with credit institutions subject to prudential supervision and the Fund is able to recall at any time the full amount of cash on accrued basis;
  - invested in short-term money market funds as defined in Money Market Regulation.

Re-invested cash collateral will expose the sub-fund to certain risks such as the risk of a failure or default of the issuer of the relevant security in which the cash collateral has been invested.

Re-invested cash collateral should be diversified in accordance with the diversification requirements applicable to non-cash collateral.

Each sub-fund must make sure that it is able to claim its rights on the guarantee in case of the occurrence of an event requiring the execution thereof. Therefore, the guarantee must be available at all times, either directly or through the intermediary of a first class financial institution or a wholly-owned subsidiary of this institution, in such a manner that the sub-fund is able to appropriate or realize the assets given as guarantee, without delay, if the counterparty does not comply with its obligation to return the securities.

During the duration of the agreement, the guarantee cannot be sold or given as a security or pledged.

When entering into securities lending transactions, each sub-fund must receive, during the lifetime of the lending agreement, the following type of collateral covering at least the market value of the lent securities:

- Government bonds with maturity up to 1 year: Haircut between 0 and 2%
- Government bonds with maturity of more than 1 year: Minimum haircut 2%
- Corporate bonds: Minimum haircut 6%
- Equity in the same currency as the security lent: Minimum haircut 10%
- Cash: 0%

When entering into repurchase or reverse repurchase transactions, each sub-fund will obtain the following collateral covering at least the market value of the financial instrument object of the transaction:

- Cash: 0%
- Government Bonds: 0%

The absence of haircut is mainly due to the very short term of the transactions.

When entering into OTC financial derivatives transactions each sub-fund will obtain the following collateral covering at least the market value of the financial instrument object of the OTC transaction:

- Cash: 0%
- Government bonds with maturity up to 1 year: Haircut between 0 and 2%
- Government bonds with maturity of more than 1 year: Minimum haircut 2%

The Fund must proceed on a daily basis to the valuation of the guarantee received. In addition, the Fund has implemented a haircut policy in respect of each class of bonds received as collateral in respect of each relevant sub-fund. Such policy takes account of the characteristics of the relevant asset class, including the credit standing of the issuer of the collateral, the price volatility of the collateral and the results of any stress tests which may be performed in accordance with the stress testing policy.

The Annual reports will also mention the following information:

- a) If the Collateral received from an issuer has exceeded 20% of the NAV of a sub-fund, and/or;
- b) If a sub-fund has been fully collateralised in securities issued or guaranteed by a Member State.

## **22) INVESTMENT RESTRICTIONS**

The following criteria and restrictions must be observed by the Fund for each sub-fund:

*1)* The investments of the Fund consist exclusively of:

- a)** transferable securities and money market instruments admitted to or dealt in on a regulated market;
- b)** transferable securities and money market instruments dealt in on another market in a Member State, which is regulated, operates regularly and is open to the public;

**c)** transferable securities and money market instruments admitted to an official listing on a stock exchange in a non-Member State of the European Union or dealt in on another market of a non-Member State of the European Union which is regulated, operates regularly, recognized and open to the public: namely a stock exchange or another regulated market in any country of America, Europe, Africa, Asia and Oceania;

**d)** newly issued transferable securities and money market instruments, provided that:

- the conditions of issue include an undertaking that an application will be made for admission to an official listing on a stock exchange or on another regulated market, which operates regularly, is recognized and open to the public, namely a stock exchange or another regulated market in any country of America, Europe, Africa, Asia and Oceania;

- the admission is obtained no later than before the end of the one-year period since issue;

**e)** units of UCITS authorized according to UCITS Directive and/or other UCIs within the meaning of Article 1 paragraph 2) points a) and b) of UCITS Directive, whether or not situated in a Member State, up to 10% if not expressly included among the instruments to be invested in by the investment policy of each sub-fund (in which case the limit will not apply), provided that:

- such other UCIs are authorized under laws which provide that they are subject to a supervision that the Commission de Surveillance du Secteur Financier (“CSSF”) considers to be equivalent to that laid down in Community law and that cooperation between authorities is sufficiently ensured;
- the level of secured protection for unitholders of such other UCIs is equivalent to that prescribed for the unitholders of a UCITS and, in particular, that the rules relating to assets segregation, borrowings, lending and uncovered sales of transferable securities and money market instruments are equivalent to the requirements of UCITS Directive;
- the business of such other UCIs is reported in half-yearly and annual reports to enable an assessment of the assets and liabilities, income and operations over the reporting period;
- no more than 10% of the assets of the UCITS or of the other UCIs, whose acquisition is contemplated by each sub-fund, according to their constitutional documents, can be in aggregate invested in units of other UCITS or other UCIs;

**f)** deposits with credit institutions which are repayable on demand or have the right to be withdrawn and maturing in no more than twelve (12) months, provided that the credit institution has its registered office in a Member State, or, if the registered office of the credit institution is located in a non-Member State, provided that it is

subject to prudential rules considered by the CSSF as equivalent to those laid down in Community law;

**g)** financial derivative instruments, including equivalent cash-settled instruments, dealt in on a regulated market referred to in subparagraphs a), b) and c) above, and/or financial derivative instruments dealt in over-the-counter (“OTC derivatives”), provided that:

- the underlying consists of instruments covered in the paragraph 1), items a) to f) above, financial indexes, interest rates, foreign exchange rates or currencies, in which each sub-fund may invest according to its investment objectives;
- the counterparties to OTC derivative transactions are institutions subject to prudential supervision and belonging to the categories approved by the CSSF, and;
- the OTC derivative instruments are subject to reliable and verifiable valuation on a daily basis and may, at the initiative of the Management Company, be purchased, liquidated or closed by an offsetting transaction at any time and at their fair value;

**h)** money market instruments other than those dealt in on a regulated market, provided the issue or the issuer of such instruments are themselves subject to a regulation for the purpose of protecting investors and savings, and provided that such instruments are:

- issued or guaranteed by a central, regional or local authority, by a central bank of a Member State, or by the European Central Bank, by the European Union or by the European Investment Bank, by a non-Member State or, in case of a Federal State, by one of the members making up the federation, or by a public international body to which one or more Member States of the European Union belong, or
- issued by a company the securities of which are dealt in on regulated markets referred to in the above items a), b) or c), or
- issued or guaranteed by an institution subject to a prudential supervision in accordance with the criteria defined by Community law, or by an institution which is subject to and complies with prudential rules considered by the CSSF to be at least as stringent as those laid down by Community law, or
- issued by other bodies belonging to the categories approved by the CSSF provided that investments in such instruments are subject to investor protection equivalent to that laid down in the first, second and third indents above, and provided that the issuer is a company the capital and reserves of which amount to at least 10,000,000 Euro (ten million Euros) and which presents and publishes its annual accounts in accordance with the fourth Directive 78/660/EEC, and is an entity, which, within a group of companies including one or several listed companies, is dedicated to the financing of the group or is an entity which is dedicated to the financing of securitization vehicles which benefit from a banking liquidity line.

2) However, the Fund may invest no more than 10% of the net assets of each sub-fund in transferable securities and money market instruments other than those referred to in paragraph 1).

3) The Fund may not invest in immovable property.

4) The Fund may acquire neither precious metals nor certificates representing them for any sub-fund.

5) Each sub-fund of the Fund may hold ancillary liquid assets. Liquid assets held to back-up derivatives exposure are not considered as ancillary liquid assets. Each sub-fund will not invest more than 20% of its net assets in cash and deposits at sight (such as cash held in current accounts) for ancillary liquidity purposes in normal market conditions. Under exceptionally unfavourable market conditions and on a temporary basis, unless otherwise provided for a specific sub-fund, this limit may be breached, if justified in the interest of the investors.

6) a) The Fund may invest no more than 10% of the net assets of each sub-fund in transferable securities and money market instruments of the same issuer. A sub-fund may invest no more than 20% of its assets in deposits made with the same entity. The risk exposure to a counterparty of the Fund in an OTC derivative transaction, including the securities lending transactions, sale with right of repurchase transactions and/or reverse repurchase and/or repurchase agreement transactions, may not exceed 10% of its assets when the counterparty is a credit institution referred to in paragraph 1) item g) above, or 5% of its assets in other cases. The use of collateral may reduce the risk exposure accordingly.

b) Moreover, in addition to the limit referred to in the above paragraph 6) item a), the total value of the transferable securities and money market instruments held by a sub-fund in the issuing bodies in each of which the sub-fund invests more than 5% of its net assets, may not exceed 40% of the net asset value of the concerned sub-fund.

This limit does not apply to deposits made with financial institutions subject to prudential supervision and OTC derivative transactions with these institutions.

Notwithstanding the individual limits referred to in the above paragraph 6) item a), a sub-fund may not combine:

- investments in transferable securities or money market instruments issued by a single entity,
- deposits made with a single entity, and/or
- exposures arising from OTC derivative instruments made with a single entity,

which exceed 20% of its net assets.

**c)** The limit of 10% laid down in the first sentence of paragraph 6) item a) may be of a maximum of 35% when the transferable securities or the money market instruments are issued or guaranteed by a Member State, by its regional or local authorities or by a non-Member State of the European Union, or by a State of North America, South America, Asia, Africa or Oceania or by a public international body of which one or several Member States of the European Union are members.

**d)** The limit of 10% laid down in the first sentence of the paragraph 6) item a) may be of a maximum of 25% for covered bonds as defined under article 3, point 1 of Directive (EU) 2019/2162 of the European Parliament and of the Council of 27 November 2019 on the issue of covered bonds and covered bond public supervision and amending the UCITS Directive and Directive 2014/59/EU, and for certain bonds when they are issued before 8 July 2022 by a credit institution having its registered office in a Member State and are subject, by law, to special public supervision designated to protect bondholders. In particular, sums deriving from the issue of these bonds issued before 8 July 2022 must be invested in conformity with the law, in assets which, during the whole period of validity of the bonds, are capable of covering claims attaching to the bonds and which, in case of bankruptcy of the issuer, would be used on a priority basis for the repayment of principal and payment of the accrued interest. When the Fund invests more than 5% of the net assets of each sub-fund in the bonds referred to in the present paragraph and issued by the same issuer, the total value of such investments may not exceed 80% of the net asset value of each sub-fund of the Fund.

**e)** The transferable securities and the money market instruments referred to in the above items c) and d) are not included in the calculation of the limit of 40% referred to under item b). The limits referred to under items a), b), c) and d) may not be combined and, consequently, the investments in transferable securities or money market instruments of the same issuer, in deposits or in derivative instruments made with this issuer, carried out in accordance with items a), b), c) and d) may not, in any case, exceed 35% of the net assets of each sub-fund of the Fund.

The companies which are regrouped for the purposes of consolidated accounts, as defined in accordance with Directive 2013/13/EU or in accordance with recognized international accounting rules, are regarded as a single body for the purpose of calculating the limits contained in the present paragraph 6).

Each sub-fund may invest cumulatively up to 20% of its net assets in transferable securities and money market instruments of the same group.

**ACCORDING TO ARTICLE 44 OF THE 2010 LAW, THE SUB-FUNDS OF THE FUND ARE AUTHORIZED TO INVEST NO MORE THAN 20% OF THEIR ASSETS IN SHARES AND/OR BONDS ISSUED BY THE SAME ENTITY, WHEN THE INVESTMENT POLICY OF THESE SUB-FUNDS REPLICATES THE COMPOSITION OF A SPECIFIC STOCK OR BOND INDEX THAT IS RECOGNIZED BY THE CSSF, ON THE FOLLOWING BASIS:**

- **THE COMPOSITION OF THE INDEX IS SUFFICIENTLY DIVERSIFIED,**
- **THE INDEX IS A REPRESENTATIVE STANDARD OF THE MARKET WHICH IT REFERS TO,**
- **IT IS SUBJECT TO AN APPROPRIATE PUBLICATION.**

**THIS LIMIT OF 20% MAY BE RAISED TO 35% FOR ONE ISSUER IN CASE OF EXCEPTIONAL CONDITIONS ON REGULATED MARKETS WHERE CERTAIN TRANSFERABLE SECURITIES OR CERTAIN MONEY MARKET INSTRUMENTS ARE HIGHLY DOMINANT.**

**THE INDICES TO WHICH THE RELEVANT SUB-FUND WILL TAKE EXPOSURE COMPLY WITH ARTICLE 44 OF THE 2010 LAW AND THE ARTICLE 9 OF GRAND DUCAL REGULATION DATED 8 FEBRUARY 2008. SUCH INDICES MAY HAVE DIFFERENT REBALANCING FREQUENCIES, WITH THE MOST PREVALENT REBALANCING FREQUENCY BEING MONTHLY. THE FREQUENCY OF THE REBALANCING DOES NOT AFFECT THE COSTS LINKED TO GAINING EXPOSURE TO THE INDICES. THE LIST OF INDICES TO WHICH THE SUB-FUND MAY TAKE EXPOSURE FROM TIME TO TIME IS AVAILABLE ON THE MANAGEMENT COMPANY'S WEBSITE: <https://www.fideuramassetmanagement.ie/en/>.**

**MOREOVER, ACCORDING TO ARTICLE 45 OF THE 2010 LAW, THE FUND IS AUTHORIZED TO INVEST UP TO 100% OF THE NET ASSETS OF EACH SUB-FUND IN TRANSFERABLE SECURITIES AND MONEY MARKET INSTRUMENTS ISSUED OR GUARANTEED BY A MEMBER STATE OF THE EUROPEAN UNION, BY ITS REGIONAL OR LOCAL AUTHORITIES, BY A MEMBER OF THE OECD (ORGANISATION FOR ECONOMIC CO-OPERATION AND DEVELOPMENT) OR BY A PUBLIC INTERNATIONAL BODY OF WHICH ONE OR SEVERAL MEMBER STATES OF THE EUROPEAN UNION ARE MEMBERS, PROVIDED THAT EACH SUB-FUND HOLDS SECURITIES FROM AT LEAST SIX DIFFERENT ISSUES AND THAT THE SECURITIES FROM ANY ONE ISSUE SHALL NOT ACCOUNT FOR MORE THAN 30% OF THE TOTAL NET ASSET VALUE OF THE CONCERNED SUB-FUND.**

**7) a)** The Fund may acquire units of UCITS and/or other UCIs referred to in the above paragraph 1), item e), provided that each sub-fund invests no more than 20% of its net assets in the same UCITS or other UCI.

For the purpose of the application of such investment limit, each compartment of a UCI with multiple compartments is to be considered as a separate issuer, provided that the principle of segregation of the obligations of the various compartments vis-à-vis third parties is ensured.

**b)** The investments in units of UCIs other than UCITS may not, in aggregate, exceed 30% of the net assets of a sub-fund.

When the Fund invests in units of UCITS and/or other UCIs, the assets of such UCITS and/or other UCIs are not combined for the purposes of the limits referred to in the above paragraph 6).

**c)** When the Fund invests in a UCITS and/or other UCIs that are managed, directly or by delegation, by the same Management Company or by any other management company with which the Management Company is linked by a common management or control or by a substantial direct or indirect holding, no subscription or redemption fees may be charged to the Fund on account of these investments in other UCITS and/or other UCIs.

With respect to investments of a sub-fund in other UCITS and/or other UCIs linked to the Management Company, as referred to in the above paragraph c), the maximum level of management fees that may be charged both to each sub-fund of the Fund and to the other UCITS and/or other UCIs in which it intends to invest, may not exceed 5% of the net assets of each sub-fund.

The Management Company shall indicate in its annual report the maximum percentage of management fees charged both at the level of each sub-fund and at the level of the UCITS and/or other UCIs in which each sub-fund has invested during the relevant fiscal year.

**8) a)** The Management Company may not acquire shares with voting rights which enable it to exercise significant influence over the management of an issuer;

**b)** Moreover, the Fund may not acquire more than:

**(i)** 10% of the non-voting shares of the same issuer;

**(ii)** 10% of the debt securities of the same issuer;

**(iii)** 25% of the units of the same UCITS and/or other UCI;

**(iv)** 10% of the money market instruments issued by the same issuer.

The limits laid down under (ii), (iii), (iv) may be disregarded at the time of the acquisition, if at that time the gross amount of bonds or money market instruments or the net amount of instruments in issue cannot be calculated;

**c)** paragraphs a) and b) are waived as regards:

- transferable securities and money market instruments issued or guaranteed in a Member State of the European Union or by its local authorities;

- transferable securities and money market instruments issued or guaranteed by a non-Member State of the European Union, or by a State of North America or South America, Asia, Africa or Oceania;

- transferable securities and money market instruments issued by public international bodies of which one or several Member States of the European Union are members;

- shares held by the Fund in the capital of a company incorporated in a non-Member State of the European Union which invests mainly its assets in securities of issuers having their registered office in that State where, under the legislation of that State, such participation is for the Fund the only way in which the Fund can invest in securities of issuers of that State. This derogation, however, shall apply only if the company of the non-Member State of the European Union, in its investment policy, complies with the limits laid down in the present Section.

**9)** The Fund does not have to comply with:

- a)** the previous limits in case of exercise of subscription rights related to transferable securities or money market instruments, which form part of its assets;

- b)** paragraphs 5), 6) and 7) during a period of six (6) months following the date of authorization of opening of each sub-fund provided that it ensures the observance of the risk-spreading principle;

- c)** investment limits referred to in paragraphs 6) and 7) shall apply at the time of the purchase of the transferable securities or money market instruments; if the limits referred to in the present paragraph are exceeded for reasons beyond the control of the Management Company or as a result of the exercise of subscription rights, the Management Company must adopt as a priority objective, in its sale transactions, the remedying of that situation, taking into consideration the interests of the unitholders of the Fund;

- d)** to the extent that an issuer is a legal body with multiple compartments where the assets of each compartment are exclusively reserved to the unitholders in such compartment and to those creditors whose claim has arisen in connection with the creation, operation or liquidation of such compartment, each compartment is to be

considered as a separate issuer for the purpose of the application of the risk-spreading rules set out in the above paragraphs 6) and 7).

**10)** The Fund may not borrow, for any of the sub-funds, except for:

**a)** acquisitions of currencies by means of a back-to-back loan;

**b)** borrowings up to 10% of the net assets of the sub-fund provided that the borrowing is on a temporary basis;

**c)** borrowings up to 10% of the net assets of the sub-fund, provided that the borrowing is to make possible the acquisition of immovable property essential for the direct pursuit of its business; in this case, the borrowing and that referred to in indent b) of the present paragraph may not, in any case, exceed a total of 15% of the net assets of each sub-fund of the Fund.

**11)** The Fund shall not grant loans or act as a guarantor for third parties. Such restriction does not impede acquisition by the Fund of transferable securities, money market instruments or other financial instruments referred to in the above paragraph 1) items e), g) and h), which are not fully paid up.

**12)** The Fund shall not carry out uncovered sales of transferable securities, money market instruments or other financial instruments referred to in the above paragraph 1) items e), g) and h).

**13)** The Management Company shall employ a risk-management process which enables it to monitor and measure at any time the risk of the positions and their contribution to the overall risk profile of the portfolio of each sub-fund and it shall employ a process for accurate and independent assessment of the value of OTC derivative instruments, and must communicate to the CSSF regularly, in accordance with the detailed rules the latter shall define, the types of derivative instruments, the underlying risks, the quantitative limits as well as the methods which are chosen in order to estimate the risks associated with transactions in derivative instruments.

**14)** The Management Company shall ensure that the global exposure relating to derivative instruments of each sub-fund does not exceed the total net value of its portfolio. The exposure is calculated taking into account the current value of the underlying assets, the counterparty risk, the foreseeable evolution of the markets and the time available to liquidate the positions.

Each sub-fund may, in the framework of its investment policy and within the limits referred to in the above paragraph 6) item e), invest in financial derivative instruments provided that the risk exposure relating to the underlying assets does not exceed in aggregate the investment limits referred to in the above paragraph 6). When a sub-fund invests in index-based financial derivative instruments, these investments are not necessarily combined to the limits referred to in the above

paragraph 6). When a transferable security or a money market instrument embeds a derivative instrument, this latter must be taken into account when complying with the application of the requirements in this item 14).

**15)** Each sub-fund may, subscribe, acquire and/or hold securities to be issued or issued by one or more other sub-funds of the Fund under the condition, that:

- the target sub-fund does not, in turn, invest in the sub-fund invested in the target sub-fund; and
  - no more than 10% of the assets of the target sub-fund whose acquisition is contemplated may be invested, pursuant to its constitutive documents, in units of other UCIs; and
  - voting rights, if any, attaching to the relevant securities are suspended for as long as they are held by the sub-fund concerned and without prejudice to the appropriate processing in the accounts and the periodic reports; and
  - in any event, for as long as these securities are held by the sub-fund, their value will not be taken into consideration for the calculation of the net assets of the sub-fund for the purposes of verifying the minimum threshold of the net assets imposed by the 2010 Law; and
  - there is no duplication of management/subscription or repurchase fees between those at the level of the sub-fund and the target sub-fund.
- With respect to investments of a sub-fund in other UCITS and/or other UCIs, the maximum level of management fees that may be charged both to each sub-fund of the Fund and to the other UCITS and/or other UCIs in which it intends to invest, may not exceed 5% of the net assets of each sub-fund.

Compliance with the investment limits will be made according to the provisions of the 2010 Law.

In order to assess the performance of certain sub-funds, a benchmark index is used. The benchmark index is calculated by widely recognized providers and represents the structure and the performance of specific areas of the financial markets, which are coherent with the investment policy of the sub-fund assessed.

## **APPENDIX I – SUB-FUNDS OF THE FUND**

### **1. FIDEURAM FUND – EURO SHORT TERM**

FIDEURAM FUND – EURO SHORT TERM, expressed in EURO, aims at providing stable returns by investing primarily in investment grade short term securities, issued by government and/or non-governmental entities, with a flexible approach.

The average portfolio duration of this sub-fund will not exceed four (4) years. For the purpose of the sub-fund, debt securities will not have a residual maturity exceeding seven (7) years.

These securities may include, but are not limited to: corporate debt securities, bonds, fixed and floating rate securities.

The positioning of the sub-fund in terms of duration and credit sensitivity would fluctuate, over the cycles, between two (2) strategies: the low risk strategy, which is more defensive, and the neutral strategy, with longer maturities, higher interest rate and credit risks sensitivity.

The sub-fund may residually invest in securities denominated in currencies other than the reference currency of the sub-fund (EURO) and securities issued by entities domiciled in emerging market countries. The currency exposure will be hedged back into EURO.

The sub-fund may also hold deposits. Moreover, the sub-fund may invest in money market instruments up to 10% of its net assets.

Moreover, the sub-fund may use financial derivative instruments for the purpose of risk hedging and for investment objectives. The derivatives instruments used will be, but will not necessarily be restricted to: listed derivatives (as futures and options on bonds and interest rates) and over the counter derivatives like credit default swaps (on indices, baskets and on single names), interest rate swaps, forward foreign exchange contracts.

The sub-fund is actively managed.

The sub-fund is not managed in reference to a benchmark.

The sub-fund does not fall within the scope of Regulation (EU) 2017/1131 of the European Parliament and of the Council of 14 June 2017 on money market funds.

*Securities lending:*

- Maximum portion of assets that can be subject to securities lending: 70%.
- Expected portion of assets that will be subject to securities lending: 40%.

*Risk transparency:*

- Global Exposure Determination Methodology: commitment approach

*Risk profile of the typical investor:*

This sub-fund is suitable for investors who search short-term investments. The investor seeks a relatively safe investment but understands that his investment is not guaranteed against a possible loss.

## 2. FIDEURAM FUND - EURO BOND LOW RISK

FIDEURAM FUND - EURO BOND LOW RISK, expressed in EURO, aims to outperform the benchmark by investing essentially in debt transferable securities at fixed and variable rates, denominated in EURO.

The criteria of selection are characterized by a particular interest for transferable securities having a residual average life between three (3) and five (5) years and with a moderate sensitivity to the interest rate fluctuations.

Moreover, the sub-fund may use financial derivative instruments for the purpose of risk hedging and for investment purposes.

The sub-fund is actively managed.

The benchmark of the sub-fund consists of the index “FTSE EMU GBI 3 - 5 years” Total Return in EUR, which is used in the investment screening process and for portfolio construction.

The relative risk and positioning to the benchmark is monitored. To provide a disciplined management approach, risk limits are set to contain investment risk. While maintaining an active management style, the sub-fund composition has a limited deviation from the benchmark. However, performance may differ depending on market conditions. There is discretion to invest in other securities not included in the benchmark, and to use alternative weighting of securities to the benchmark.

### *Securities lending:*

- Maximum portion of assets that can be subject to securities lending: 70%.
- Expected portion of assets that will be subject to securities lending: 40%.

### *Risk transparency:*

- Global Exposure Determination Methodology: commitment approach

### *Risk profile of the typical investor:*

This sub-fund is suitable for investors who search medium-term investments. The investor seeks a relatively safe investment but understands that his investment is not guaranteed against a possible loss.

### **3. FIDEURAM FUND - EURO BOND MEDIUM RISK**

FIDEURAM FUND - EURO BOND MEDIUM RISK, expressed in EURO, consists essentially of debt transferable securities at fixed and variable rates, denominated in EURO.

The criteria of selection are characterized by a particular interest for transferable securities having a residual average life between 5 and 10 years and, as a result, with a significant sensitivity to interest rate fluctuations.

Moreover, the sub-fund may use financial derivative instruments for the purpose of risk hedging and for investment purposes.

The benchmark of the sub-fund consists of the index “FTSE EMU GBI 5 - 10 years” Total Return in EUR.

The sub-fund is actively managed and the degree of freedom allowed within the management of the sub-fund is material.

The relative risk and positioning to the benchmark is monitored. To provide a disciplined management approach, risk limits are set to contain investment risk. It is expected that, in normal circumstances, a significant part of the investments of the sub-fund will be components of the benchmark, however there is discretion to invest in other securities not included in the benchmark.

#### *Securities lending:*

- Maximum portion of assets that can be subject to securities lending: 70%.
- Expected portion of assets that will be subject to securities lending: 40%.

#### *Risk transparency:*

- Global Exposure Determination Methodology: commitment approach

#### *Risk profile of the typical investor:*

This sub-fund is suitable for investors who search medium-term investments. The investor seeks a relatively safe investment but understands that his investment is not guaranteed against a possible loss.

#### **4. FIDEURAM FUND - EURO BOND LONG RISK**

FIDEURAM FUND - EURO BOND LONG RISK, expressed in EURO, consists essentially of debt transferable securities at fixed and variable rates, denominated in EURO.

The criteria of selection are characterized by a particular interest for transferable securities having a residual average life beyond ten (10) years and with a high sensitivity to interest rate fluctuations.

Moreover, the sub-fund may use financial derivative instruments for the purpose of risk hedging and for investment purposes.

The benchmark of the sub-fund consists of the index “FTSE EMU GBI 10+ years” Total Return in EUR.

The sub-fund is actively managed and the degree of freedom allowed within the management of the sub-fund is material.

The relative risk and positioning to the benchmark is monitored. To provide a disciplined management approach, risk limits are set to contain investment risk. It is expected that, in normal circumstances, a significant part of the investments of the sub-fund will be components of the benchmark, however there is discretion to invest in other securities not included in the benchmark.

*Securities lending:*

- Maximum portion of assets that can be subject to securities lending: 70%.
- Expected portion of assets that will be subject to securities lending: 40%.

*Risk transparency:*

- Global Exposure Determination Methodology: commitment approach

*Risk profile of the typical investor:*

This sub-fund is suitable for investors who search long-term investments. The investor seeks a relatively safe investment but understands that his investment is not guaranteed against a possible loss.

## 5. FIDEURAM FUND – BOND GLOBAL HIGH YIELD

FIDEURAM FUND – BOND GLOBAL HIGH YIELD, expressed in EURO, has as an investment objective to maximize total return through investment in fixed income transferable securities, but principally in sub-investment grade securities with a credit quality equal to BB+ or less from Standard & Poor's or equivalent rating from an internationally recognized rating agency or equivalent defined on the basis of the internal valuation model implemented by the Investment Manager. The sub-fund will invest globally mainly in high yield fixed income transferable securities with no geographical restriction. The currency exposure of the sub-fund will normally be hedged back into EURO.

Moreover, the sub-fund may use financial derivative instruments for the purpose of risk hedging and for investment purposes.

The benchmark of the sub-fund consists of the index "ICE BofAML Global High Yield Constrained" Total Return in USD Hedged in EUR.

The sub-fund is actively managed and the degree of freedom allowed within the management of the sub-fund is significant.

The relative risk and positioning to the benchmark is monitored. To provide a disciplined management approach, risk limits are set to contain investment risk. It is expected that, in normal circumstances, a significant part of the investments of the sub-fund will be components of the benchmark, however there is discretion to invest in other securities not included in the benchmark.

### *Securities lending:*

- Maximum portion of assets that can be subject to securities lending: 70%.
- Expected portion of assets that will be subject to securities lending: 40%.

### *Risk transparency:*

- Global Exposure Determination Methodology: commitment approach

### *Risk profile of the typical investor:*

This sub-fund is suitable for investors who search long-term investments. The investor seeks a relatively safe investment but understands that his investment is not guaranteed against a possible loss.

## **6. FIDEURAM FUND - BOND US PLUS**

FIDEURAM FUND - BOND US PLUS, expressed in EURO, seeks to maximize total return, consistent with preservation of capital and prudent investment management. The sub-fund will be predominantly invested in a diversified portfolio of Fixed Income Instruments of varying maturities. The sub-fund will be primarily invested in investment grade Fixed Income Instruments but may invest up to 10% of its assets in Fixed Income Instruments that are rated lower. The sub-fund may invest in USD denominated securities of non-U.S. issuers, may hold non-USD denominated Fixed Income Instruments and non-USD denominated currency positions.

The sub-fund may invest in contingent convertibles bonds (“CoCos”) up to 10% of its net assets.

The sub-fund may residually invest in equity securities, in units or shares of other collective investment schemes, in illiquid securities and in loan participations and loan assignments which constitute money market instruments. Currency hedging activities and currency positions will be implemented using spot and forward foreign exchange contracts and currency futures, options and swaps. The sub-fund may invest in emerging markets securities.

Moreover, the sub-fund may use financial derivative instruments for the purpose of risk hedging and for investment purposes.

Financial derivative instruments may include unfunded or funded TRS where underlying is indices or transferable securities.

For the attainment of its objective, the sub-fund’s assets may be allocated to and invested in mortgage backed securities (MBS), commercial mortgage backed securities (CMBS), asset backed securities (ABS) and securities equivalent in nature to such securities. The benchmark of the sub-fund measuring the strategy of the sub-fund foresees an investment in such securities at around 35% of the net assets.

The majority of ABS/MBS instruments that the sub-fund will invest in are AAA-rated or equivalent, or in any case rated not lower than the US government bonds credit rating.

ABS are securities collateralized by assets other than mortgages. The most common types of ABS are collateralized by credit card receivables, home equity loans, manufactured homes and automobile loans and are typically structured as pass through or as structures with multiple bond classes, like a CMO. Credit enhancement can take the form of over collateralization, a letter of credit, a third party guaranty, or a senior/subordinated structure.

MBS are securities whose source of repayment is a mortgage or pool of mortgages, or whose repayments are collateralized by a mortgage or pool of mortgages. Mortgage-backed securities include, but are not limited to, agency and non-agency pass through and collateralized mortgage obligations (CMOs and REMICs). A majority of the MBS sector is comprised of Agency pass through issued by government-sponsored enterprises, such as the Government National Mortgage Association (“Ginnie Mae”), the Federal National Mortgage Association (“Fannie Mae”) or the Federal Home Loan Mortgage Corporation (“Freddie Mac”). Agency pass-through are highly rated and liquid instruments and is one of the largest sectors of the US bond market.

Mortgage-related securities include mortgage pass-through securities, collateralized mortgage obligations (CMOs are debt obligations of a legal entity that are collateralised by mortgages. They are typically rated by a rating agency and registered with the SEC and are structured into multiple classes, often referred to as “tranches”, with each class bearing a different stated maturity and entitled to a different schedule for payments of principal and interest, including pre-payments), commercial mortgage-backed securities, mortgage dollar rolls, CMO residuals (which are mortgage securities issued by agencies or instrumentalities of the US Government or by private originators or of, or investors in, mortgage loans, including savings and loan associations, homebuilders, mortgage banks, commercial banks, investment banks, partnerships, trusts and special purpose entities of the foregoing), stripped mortgage-backed securities (“SMBSs”) and other securities that directly or indirectly represent a participation in, or are secured by and payable from, mortgage loans on real property. Investments in such securities carry the risk of default of the underlying collateral. Moreover, the scheduled amortization plan is subject to a certain degree of uncertainty due to the uncertainty in the timing of the cash flows of the underlying collateral. Liquidity may be limited during times of market stress. Furthermore, the sub-fund may be subject to other risks. Indeed, rising interest rates tend to extend the duration of mortgage-related securities, making them more sensitive to changes in interest rates. As a result, in a period of rising interest rates, a sub-fund that holds mortgage-related securities may exhibit additional volatility. This is known as extension risk. In addition, mortgage-related securities are subject to prepayment risk. When interest rates decline, borrowers may pay off their mortgages sooner than expected. This can reduce the returns of a sub-fund because the sub-fund will have to reinvest that money at the lower prevailing interest rates.

The value of some mortgage- or asset-backed securities may be particularly sensitive to changes in prevailing interest rates. Early repayment of principal on some mortgage-related securities may expose a sub-fund to a lower rate of return upon reinvestment of principal. When interest rates rise, the value of a mortgage-related security generally will decline; however, when interest rates are declining, the value of mortgage-related securities with prepayment features may not increase as much as other fixed Income Securities.

The rate of prepayments on underlying mortgages will affect the price and volatility of a mortgage-related security and may shorten or extend the effective maturity of the security beyond what was anticipated at the time of purchase. If unanticipated rates of prepayment on underlying mortgages increase the effective maturity of a mortgage-related security, the volatility of the security can be expected to increase. The value of these securities may fluctuate in response to the market's perception of the creditworthiness of the issuers.

Additionally, although mortgages and mortgage-related securities are generally supported by some form of government or private guarantee and/or insurance, there is no assurance that private guarantors or insurers will meet their obligations.

The benchmark of the sub-fund consists of the index "Bloomberg US Aggregate Index" Total Return in USD Unhedged, converted in EUR.

The sub-fund is actively managed and the degree of freedom allowed within the management of the sub-fund is significant.

The relative risk and positioning to the benchmark is monitored. To provide a disciplined management approach, risk limits are set to contain investment risk. It is expected that, in normal circumstances, a significant part of the investments of the sub-fund will be components of the benchmark, however there is discretion to invest in other securities not included in the benchmark.

*Total Return Swap:*

- Maximum portion of assets that can be subject to TRS: 10%.
- Expected portion of assets that will be subject to TRS: 1%.

*Repo/Reverse Repo transactions:*

- Maximum portion of assets that can be subject to repo/reverse repo transaction: 40%.
- Expected portion of assets that can be subject to repo/reverse repo transaction: 10%.

*Risk transparency:*

- Global Exposure Determination Methodology: relative VaR approach

The sub-fund will regularly monitor its leverage and the average level of leverage is expected to be approximately 700%. The sub-fund's leverage may increase to higher levels, for example, at times when the Investment Manager deems it most appropriate to use financial derivative instruments to alter the sub-fund's interest rate sensitivity. The leverage figure is calculated as the sum of the notionals of the derivatives used as is required by the applicable laws and regulations. The notional value of the investments varies significantly from their market value which is why the leverage limits are high. These leverage limits do not take into account any netting and hedging arrangements that the sub-fund has in place at any time even

though these netting and hedging arrangements are used for risk reduction purposes.

The methodology used to calculate the leverage is the sum of the absolute value of the notionals.

The reference portfolio is Bloomberg US Aggregate Index.

*Risk profile of the typical investor:*

This sub-fund is suitable for investors who search medium to long-term investments. The investor must be able to accept a certain volatility and the possibility of losing a part of the invested amount.

## 7. FIDEURAM FUND - BOND YEN

FIDEURAM FUND - BOND YEN, expressed in EURO, aims to outperform the benchmark by investing essentially in debt transferable securities at fixed and variable rates, denominated in Yen.

The investments will be carried out independently of the duration of the transferable securities.

Moreover, the sub-fund may use financial derivative instruments for the purpose of risk hedging and for investment purposes.

The sub-fund is actively managed. The benchmark of the sub-fund consists of the index “FTSE Japan GBI” Total Return in JPY Unhedged, converted in EUR, which is used in the investment screening process and for portfolio construction.

The relative risk and positioning to the benchmark is monitored. To provide a disciplined management approach, risk limits are set to contain investment risk. It is expected that, in normal circumstances, a considerable part of the investments of the sub-fund will be components of the benchmark and the extent to which the composition of the portfolio deviate from that of the benchmark in terms of weighting will be limited. However, from time to time, performance may differ, as risk limits allow to deviate from the benchmark composition, investing in securities not included in the benchmark and using alternative weighting of securities to the benchmark.

*Risk transparency:*

- Global Exposure Determination Methodology: commitment approach

*Risk profile of the typical investor:*

This sub-fund is suitable for investors who search long-term investments. The investor seeks a relatively safe investment but understands that his investment is not guaranteed against a possible loss.

## 8. FIDEURAM FUND - EQUITY EUROPE

FIDEURAM FUND - EQUITY EUROPE, expressed in EURO, consists essentially of equity transferable securities from issuers having their registered office or principal economic activity in an European country, listed on the stock exchange or dealt in on another regulated market of an European country.

Moreover, the sub-fund may use financial derivative instruments for the purpose of risk hedging and for investment purposes.

The benchmark of the sub-fund consists of the index “MSCI Europe” Net Total Return in EUR, used for portfolio construction, risk and performance measurement.

The sub-fund is actively managed and the degree of freedom allowed within the management of the sub-fund is significant.

The relative risk and positioning to the benchmark is monitored. To provide a disciplined management approach, risk limits are set to contain investment risk. It is expected that, in normal circumstances, a significant part of the investments of the sub-fund will be components of the benchmark, however there is discretion to invest in other securities not included in the benchmark.

### *Securities lending:*

- Maximum portion of assets that can be subject to securities lending: 50%.
- Expected portion of assets that will be subject to securities lending: 20%.

### *Risk transparency:*

- Global Exposure Determination Methodology: commitment approach

### *Risk profile of the typical investor:*

This sub-fund is suitable for investors who search long-term investments. The investor must be able to accept a certain volatility and the possibility of losing a part of the invested amount.

## 9. FIDEURAM FUND - EURO CORPORATE BOND

FIDEURAM FUND - EURO CORPORATE BOND, expressed in EURO, consists essentially of debt transferable securities denominated in EURO from non-governmental issuers, characterized by a limited insolvency risk, i.e. by a rating higher or equal to the “investment grade” rating on the basis of classifications carried out by two (2) of the principal independent international agencies - Moody's and Standard & Poor's - or on the basis of the internal valuation model implemented by the Management Company.

A residual portion of the sub-fund consists of debt transferable securities at fixed and variable rates, denominated in EURO and issued by governmental issuers, primarily characterized by a residual average life ranging between three (3) and five (5) years.

Moreover, the sub-fund may use financial derivative instruments for the purpose of risk hedging and for investment purposes.

Financial derivative instruments may include unfunded TRS where underlying is (without being limited to) fixed income, ETF, foreign exchange, fixed income futures, index futures or options on financial derivative instruments.

The benchmark of the sub-fund consists of the index “iBoxx Euro Corporates Overall”, Total Return in EUR.

The sub-fund is actively managed. The relative risk and positioning to the benchmark is monitored. To provide a disciplined management approach, risk limits are set to contain investment risk. While maintaining an active management style, the sub-fund composition has a limited deviation from the benchmark. However, performance may differ depending on market conditions. There is discretion to invest in other securities not included in the benchmark, and to use alternative weighting of securities to the benchmark.

The sub-fund has been categorized as an ESG Promotion Strategy Sub-fund, as promoting, among other characteristics environmental and social characteristics, which are a binding component, for the assets selection and investment decision-making process, and the companies in which the sub-fund shall invest in need to follow good governance practices, in accordance with article 8 of the SFDR. More information relating to the environmental and social characteristics of the sub-fund is provided in the Appendix to the Prospectus in accordance with SFDR and Commission Delegated Regulation (EU) 2022/1288.

### *Total Return Swap:*

- Maximum portion of assets that can be subject to TRS: 20%.
- Expected portion of assets that will be subject to TRS: 5%.

*Securities lending:*

- Maximum portion of assets that can be subject to securities lending: 70%.
- Expected portion of assets that will be subject to securities lending: 40%

*Risk transparency:*

- Global Exposure Determination Methodology: commitment approach

*Risk profile of the typical investor:*

This sub-fund is suitable for investors who search medium-term investments. The investor seeks a relatively safe investment but understands that his investment is not guaranteed against a possible loss.

## 10. FIDEURAM FUND - EQUITY USA

FIDEURAM FUND - EQUITY USA, expressed in EURO, consists essentially of equity transferable securities listed on the stock exchange or dealt in on another regulated market in the United States of America.

Moreover, the sub-fund may use financial derivative instruments for the purpose of risk hedging and for investment purposes.

The benchmark of the sub-fund consists of the index:

for class I units: “MSCI USA” Net Total Return in EUR.

for class IH units: “MSCI USA” Net Total Return Hedged in EUR.

The sub-fund is actively managed and the degree of freedom allowed within the management of the sub-fund is material.

The relative risk and positioning to the benchmark is monitored. To provide a disciplined management approach, risk limits are set to contain investment risk. It is expected that, in normal circumstances, a significant part of the investments of the sub-fund will be components of the benchmark, however there is discretion to invest in other securities not included in the benchmark.

This may impact the extent to which the composition of the portfolio and its performance deviate from that of the benchmark.

*Securities lending:*

- Maximum portion of assets that can be subject to securities lending: 50%.
- Expected portion of assets that will be subject to securities lending: 20%.

*Risk transparency:*

- Global Exposure Determination Methodology: commitment approach

*Risk profile of the typical investor:*

This sub-fund is suitable for investors who search long-term investments. The investor must be able to accept a certain volatility and the possibility of losing a part of the invested amount.

## 11. FIDEURAM FUND - EQUITY JAPAN

FIDEURAM FUND - EQUITY JAPAN, expressed in EURO, aims to outperform the benchmark by investing essentially in equity transferable securities of issuers having their registered office or their main economic activity in Japan, listed on an official stock exchange or dealt in on another regulated market in Japan.

Moreover, the sub-fund may use financial derivative instruments for the purpose of risk hedging and for investment purposes.

The Sub-fund is actively managed. The benchmark of the sub-fund consists of the index:

for the units of class I: “MSCI Japan” Net Total Return in EUR;

for units of class IH: “MSCI Japan” Net Total Return Hedged in EUR, which is used in the investment screening process and for portfolio construction.

The relative risk and positioning to the benchmark is monitored. To provide a disciplined management approach, risk limits are set to contain investment risk. It is expected that, in normal circumstances, a considerable part of the investments of the sub-fund will be components of the benchmark and the extent to which the composition of the portfolio deviate from that of the benchmark in terms of weighting will be limited. However, from time to time, performance may differ, as risk limits allow to deviate from the benchmark composition, investing in securities not included in the benchmark and using alternative weighting of securities to the benchmark.

*Securities lending:*

- Maximum portion of assets that can be subject to securities lending: 50%.
- Expected portion of assets that will be subject to securities lending: 20%.

*Risk transparency:*

- Global Exposure Determination Methodology: commitment approach

*Risk profile of the typical investor:*

This sub-fund is suitable for investors who search long-term investments. The investor must be able to accept a certain volatility and the possibility of losing a part of the invested amount.

## 12. FIDEURAM FUND - BOND GLOBAL EMERGING MARKETS

FIDEURAM FUND - BOND GLOBAL EMERGING MARKETS, expressed in EURO, consists essentially of debt transferable securities denominated in United States Dollars, of governmental issuers of emerging countries.

The investments shall be realized independently of the duration of the securities and shall be essentially covered against the exchange risks.

Moreover, the sub-fund may use financial derivative instruments for the purpose of risk hedging and for investment purposes.

The sub-fund may invest up to 10% of its net assets in debt securities issued by Mainland China issuers through Bond Connect program and/or traded on the China Interbank Bond Market (“CIBM”).

The benchmark of the sub-fund consists of the index “J.P. Morgan EMBI Global Diversified” Total Return Hedged in EUR.

The sub-fund is actively managed and the degree of freedom allowed within the management of the sub-fund is material.

The relative risk and positioning to the benchmark is monitored. To provide a disciplined management approach, risk limits are set to contain investment risk. It is expected that, in normal circumstances, a significant part of the investments of the sub-fund will be components of the benchmark, however there is discretion to invest in other securities not included in the benchmark.

### *Securities lending:*

- Maximum portion of assets that can be subject to securities lending: 70%.
- Expected portion of assets that will be subject to securities lending: 40%.

**THE INVESTMENTS IN EMERGING COUNTRIES ARE SUBJECT TO PARTICULAR RISKS AS DESCRIBED IN THE PROSPECTUS IN “GENERAL CHARACTERISTICS OF THE FUND”.**

### *Risk transparency:*

- Global Exposure Determination Methodology: commitment approach

### *Risk profile of the typical investor:*

This sub-fund is suitable for investors who search long-term investments. The investor seeks a relatively safe investment but understands that his investment is not guaranteed against a possible loss.

### 13. FIDEURAM FUND - EQUITY PACIFIC EX JAPAN

FIDEURAM FUND - EQUITY PACIFIC EX JAPAN, expressed in EURO, aims to outperform the benchmark by investing essentially in equity transferable securities of issuers having their registered office or their main economic activity in a developed country in the Pacific area, other than Japan, listed on an official stock exchange or dealt in on another regulated market of developed countries in the Pacific area, other than Japan. For example, these countries are: Australia, Hong Kong, New Zealand and Singapore.

The sub-fund may invest in China A-shares (“China A-Shares”) via the Shanghai-Hong Kong Stock Connect program (the “Stock Connect”). China A-Shares are shares of Mainland China based companies traded on Shanghai Stock exchange, denominated in Renminbi (“RMB”), and which may be purchased through the Stock Connect.

Moreover, the sub-fund may use financial derivative instruments for the purpose of risk hedging and for investment purposes.

Financial derivative instruments may include unfunded TRS where underlying is (without being limited to) equity, ETF, foreign exchange, equity futures, index futures and options on financial derivative instruments.

The sub-fund is actively managed. The benchmark of the sub-fund consists of the index:

for the units of class I: “MSCI Pacific Free ex Japan” Net Total Return in EUR;  
for the units of class IH: “MSCI Pacific ex Japan” Net Total Return, Hedged 100% to EUR;

which is used in the investment screening process and for portfolio construction.

The relative risk and positioning to the benchmark is monitored. To provide a disciplined management approach, risk limits are set to contain investment risk. It is expected that, in normal circumstances, a considerable part of the investments of the sub-fund will be components of the benchmark and the extent to which the composition of the portfolio deviate from that of the benchmark in terms of weighting will be limited. However, from time to time, performance may differ, as risk limits allow to deviate from the benchmark composition, investing in securities not included in the benchmark and using alternative weighting of securities to the benchmark.

*Total Return Swap:*

- Maximum portion of assets that can be subject to TRS: 20%.
- Expected portion of assets that will be subject to TRS: 5%.

*Securities lending:*

- Maximum portion of assets that can be subject to securities lending: 50%.

- Expected portion of assets that will be subject to securities lending: 20%.

*Risk transparency:*

- Global Exposure Determination Methodology: commitment approach

*Risk profile of the typical investor:*

This sub-fund is suitable for investors who search long-term investments. The investor must be able to accept a certain volatility and the possibility of losing a part of the invested amount.

The sub-fund may invest in China A-Shares through the Stock Connect, which is subject to regulatory change, quota limitations and also operational constraints, which may result in increased counterparty risk.

#### **14. FIDEURAM FUND - EQUITY GLOBAL EMERGING MARKETS**

**FIDEURAM FUND - EQUITY GLOBAL EMERGING MARKETS**, expressed in EURO, aims to outperform the benchmark by investing essentially in equity transferable securities either with their registered office or their main economic activity in an emerging market country, or listed on an official stock exchange, or dealt in on another regulated market – within the investment restrictions as referred to in the Prospectus – of an emerging market country as well as in countries in which such issuers are also listed (for example: New York Stock Exchange, Hong Kong Stock Exchange). The emerging market country can be located in every continent, although the sub-fund shall concentrate essentially in investment in emerging countries of Asia, Latin America and Eastern Europe.

The sub-fund may invest in China A-shares (“**China A-Shares**”) via the Shanghai-Hong Kong Stock Connect program (the “**Stock Connect**”). China A-Shares are shares of Mainland China based companies traded on Shanghai Stock exchange, denominated in Renminbi (“RMB”), and which may be purchased through the Stock Connect.

Moreover, the sub-fund may use financial derivative instruments for the purpose of risk hedging and for investment purposes.

Financial derivative instruments may include unfunded TRS where underlying is (without being limited to) equity, ETF, foreign exchange, equity futures, index futures and options on financial derivative instruments.

The sub-fund is actively managed. The benchmark of the sub-fund consists of the index “MSCI Emerging Markets ex controversial weapons 10/40” Net Total Return in EUR, which is used in the investment screening process and for portfolio construction.

The relative risk and positioning to the benchmark is monitored. To provide a disciplined management approach, risk limits are set to contain investment risk. While maintaining an active management style, the sub-fund composition has a limited deviation from the benchmark. However, performance may differ depending on market conditions. There is discretion to invest in other securities not included in the benchmark, and to use alternative weighting of securities to the benchmark.

#### **THE INVESTMENTS IN EMERGING COUNTRIES ARE SUBJECT TO PARTICULAR RISKS SUCH AS DESCRIBED BELOW.**

Concerning the definition of the notion of a state in economic development, it is referred to the majority opinion of the economic and/or financial operators.

**The investment in emerging markets implies a higher risk than the one usually associated with investments in securities in developed countries.**

**The risk is due to the fact that the performance of emerging countries and their markets tends to fluctuate more sensibly, the degree of volatility of markets being higher. Such higher volatility is due to certain number of political, monetary and economic factors notably a political and economic system less stable and financial data less reliable relating to the securities of companies dealt in on these markets. The system of settlement of transactions in emerging countries may be less organized than in developed countries. There is also a risk that the settlement of transactions is delayed and that the liquidities or securities of the sub-funds are threatened because of failures of such systems.**

**Certain emerging markets may not be qualified as regulated markets within the meaning of Article 41(1) of the 2010 Law. Investments in such markets are assimilated to investments in transferable securities or money market instruments not admitted to nor dealt in on a regulated market, that operates regularly, is recognized and open to the public and may not therefore, together with the other transferable securities or money market instruments not admitted to nor dealt in on a regulated market, that operates regularly and is recognized and open to the public, held by the sub-fund concerned exceed 10% of the assets of the sub-fund.**

*Total Return Swap:*

- Maximum portion of assets that can be subject to TRS: 20%.
- Expected portion of assets that will be subject to TRS: 5%.

*Securities lending:*

- Maximum portion of assets that can be subject to securities lending: 50%.
- Expected portion of assets that will be subject to securities lending: 20%.

*Risk transparency:*

- Global Exposure Determination Methodology: commitment approach

*Risk profile of the typical investor:*

This sub-fund is suitable for investors who search long-term investments. The investor seeks a relatively safe investment but must be able to accept the possibility of losing a part of the invested amount.

The sub-fund may invest in China A-Shares through the Stock Connect, which is subject to regulatory change, quota limitations and also operational constraints, which may result in increased counterparty risk.

## 15. FIDEURAM FUND – EURO DEFENSIVE BOND

**FIDEURAM FUND – EURO DEFENSIVE BOND**, expressed in EURO, aims to outperform the benchmark by investing essentially in debt transferable securities at fixed and variable rates, denominated in EURO.

The selection criteria are characterized by a particular interest for transferable securities having a residual average life below three (3) years and a medium sensibility to the fluctuations of interest rates.

Moreover, the sub-fund may use financial derivative instruments for the purpose of risk hedging and for investment purposes.

The sub-fund is actively managed. The benchmark of the sub-fund consists of the index “FTSE EMU GBI 1-3 years” Total Return in EUR, which is used in the investment screening process and for portfolio construction.

The relative risk and positioning to the benchmark is monitored. To provide a disciplined management approach, risk limits are set to contain investment risk. While maintaining an active management style, the sub-fund composition has a limited deviation from the benchmark. However, performance may differ depending on market conditions. There is discretion to invest in other securities not included in the benchmark, and to use alternative weighting of securities to the benchmark.

### *Securities lending:*

- Maximum portion of assets that can be subject to securities lending: 70%.
- Expected portion of assets that will be subject to securities lending: 40%.

### *Risk transparency:*

- Global Exposure Determination Methodology: commitment approach

### *Risk profile of the typical investor:*

This sub-fund is suitable for investors who search short-term investments. The investor seeks a relatively safe investment but understands that his investment is not guaranteed against a possible loss.

## 16. FIDEURAM FUND – INFLATION LINKED

**FIDEURAM FUND – INFLATION LINKED**, expressed in EURO, aims to outperform the benchmark by investing essentially in debt transferable securities characterized by the connection with the index (at the level of the interests, the nominal or both), which measures the variation of cost of living in various countries for purposes of protecting the real return of the investment.

The investments will be mainly carried out in transferable securities denominated in United States, Canadian, Australian or New Zealand Dollars, in Swedish Crowns, in Pounds Sterling, Yen or in EURO and will be carried out independently of the duration of the transferable securities.

The investment will be generally covered against exchange rate risks.

Moreover, the sub-fund may use financial derivative instruments for the purpose of risk hedging and for investment purposes.

The sub-fund is actively managed. The benchmark of the sub-fund consists of the index “ICE BofAML Global Inflation-Linked Government” Total Return in USD Hedged in EUR, which is used in the investment screening process and for portfolio construction.

The relative risk and positioning to the benchmark is monitored. To provide a disciplined management approach, risk limits are set to contain investment risk. It is expected that, in normal circumstances, a considerable part of the investments of the sub-fund will be components of the benchmark and the extent to which the composition of the portfolio deviate from that of the benchmark in terms of weighting will be limited. However, from time to time, performance may differ, as risk limits allow to deviate from the benchmark composition, investing in securities not included in the benchmark and using alternative weighting of securities to the benchmark.

### *Securities lending:*

- Maximum portion of assets that can be subject to securities lending: 70%.
- Expected portion of assets that will be subject to securities lending: 40%.

### *Risk transparency:*

- Global Exposure Determination Methodology: commitment approach

### *Risk profile of the typical investor:*

This sub-fund is suitable for investors who search long-term investments. The investor seeks a relatively safe investment but understands that his investment is not guaranteed against a possible loss.

## 17. FIDEURAM FUND – MILLENNIALS EQUITY USA

**FIDEURAM FUND – MILLENNIALS EQUITY USA**, expressed in EURO, aims to achieve long-term capital growth by investing primarily in equity transferable securities listed in the United States, as well as American depositary receipts (“**ADRs**”).

The equity securities will be mainly issued by companies whose business model is better positioned to benefit from the increasing role of the Millennial Generation in the economy and in the society in general, at a worldwide level.

The Millennial Generation comprises people born between 1980 and 1999. This generation is also known as Y Generation or Internet Generation. The main sectors where the Millennials theme has impact are inter alia technology; financials; clothing & apparel; housing & households; travel & mobility; education & employment; food, restaurant & consumer staples; health & fitness.

The sub-fund may invest without limitation in securities denominated in currencies other than the Reference Currency. The currency exposure of the sub-fund is flexibly managed.

The sub-fund can invest:

- up to 10% of its net assets in depositary receipts ADRs, European depositary receipts (“**EDRs**”) and global depositary receipts (“**GDRs**”). ADR, GDR and EDR and related underlyings will at any time comply with the eligibility criteria stated in the UCI Law, as amended from time to time,
- up to 10% of its net assets in units and/or shares of any UCITS and/or other undertakings for collective investment, including the Exchange Traded Funds (“**ETF**”).

The sub-fund may use financial derivative instruments for the purpose of risk hedging and also for investment purposes.

Financial derivative instruments may include exchange traded and over-the-counter derivatives such as options, futures, spot and forwards contracts and swaps.

The sub-fund will invest a portion of its assets in unfunded total return swaps (“**TRS**”) on indices and single stocks on a temporary basis based on market conditions. Such indices may have as underlying asset (without being limited to) equity, ETF, forward foreign exchange, equity futures, index futures and options on financial derivative instruments. In particular, TRS may be used to gain exposure to equity and for efficient management of the portfolio.

The sub-fund may hold money-market instruments and money-market funds up to 20% of its net assets.

The sub-fund will not invest more than 20% of its net assets in ancillary liquid assets, being cash and bank deposits at sight (such as cash held in current accounts), in normal market conditions. Under exceptionally unfavourable market conditions and on a temporary basis, this limit may be breached, if justified in the interest of the investors. Liquid assets used to back-up derivatives exposure are not considered as ancillary liquid assets.

The benchmark of the sub-fund consists of the index MSCI USA Growth 4% issuer capped Net Total Return in EUR.

The benchmark is not designed to ensure the promotion of, among other characteristics, environmental or social characteristics, or a combination of those characteristics.

For more details on the benchmark's methodology, please refer to [www.msci.com](http://www.msci.com).

The sub-fund is actively managed and the degree of freedom allowed within the management of the sub-fund is significant.

The relative risk and positioning to the benchmark is monitored. To provide a disciplined management approach, risk limits are set to contain investment risk. It is expected that, in normal circumstances, a significant part of the investments of the sub-fund will be components of the benchmark, however there is a discretion to invest in other securities not included in the benchmark.

The sub-fund has been categorised as an ESG Promotion Strategy sub-fund, as promoting, among other characteristics, environmental and social characteristics, which are a binding component for the assets selection and investment decision-making process, and the companies in which the sub-fund shall invest in need to follow good governance practices, in accordance with article 8 of the SFDR.

More information relating to the environmental and social characteristics of the sub-fund is provided in the Appendix to the Prospectus in accordance with SFDR and Commission Delegated Regulation (EU) 2022/1288.

*Total Return Swap:*

- Maximum portion of assets that can be subject to TRS: 10%.
- Expected portion of assets that will be subject to TRS: 0%.

The aim is to engage in securities lending on a continuous basis.

*Securities lending:*

- Maximum portion of assets that can be subject to securities lending: 50%.
- Expected portion of assets that will be subject to securities lending: 20%.

*Risk transparency:*

- Global Exposure Determination Methodology: commitment approach

*Risk profile of typical investor:*

This sub-fund is suitable for investors who search long-term investments, with an investment strategy promoting environmental and social characteristics, provided that they follow good governance practices, in compliance with Article 8 of the SFDR. The investor must be able to accept a certain volatility and the possibility of losing part of the invested amount.

## 18. FIDEURAM FUND - COMMODITIES

**FIDEURAM FUND - COMMODITIES**, expressed in EURO, has as investment objective the increase of the assets' value over time by participating indirectly to the potential growth of the international commodities markets.

To reach its investment objective, the sub-fund will primarily invest in:

- derivative instruments (including, for example – the list not being exhaustive – swaps, “contracts for difference”, futures, forward, options, certificates) having as underlying indices/sub-indices on commodities;
- units and/or shares of any UCITS and/or other undertakings for collective investment, (including the Exchange Traded Funds) with exposure to indices/sub-indices on commodities;
- structured bonds (including the Exchange Traded Commodities) linked to indices/sub-indices on commodities;
- stocks at a worldwide level listed on a stock exchange or dealt in on another regulated market in Europe, Asia, America, Africa, Oceania and in developing countries, issued by companies whose main activity is the production, extraction, trade or manufacturing of raw materials, energy resources and agricultural products;
- fast liquidity assets (governmental securities, ordinary bonds issued by non-governmental entities with low risk, money market instruments and deposits with credit institutions) with derivatives' hedging purposes;

The sub-fund may furthermore invest in:

- fast liquidity assets (governmental securities, ordinary bonds issued by non-governmental entities with low risk, money market instruments and deposits with credit institutions);
- debt securities of governmental or non-governmental issuers (without limit of duration, currency or rating);
- stocks at a worldwide level listed on a stock exchange or dealt in on another regulated market in Europe, Asia, America, Africa, Oceania and in developing countries, issued by companies which do not belong to materials sector;
- derivative instruments (including, for example – the list not being exhaustive – swaps, “contracts for difference”, futures, forward, options, certificates) on rates, indexes, credits, securities or currencies;
- convertible bonds, structured bonds at a worldwide level;
- any other authorized instruments.

The financial instruments may be issued by issuers located in any state, characterized or not by an economy defined by the World Bank or the United Nations as “emerging” or “developing”.

The sub-fund may invest in instruments denominated in any currency.

The investment will be generally covered against exchange rate risks.

The sub-fund may use financial derivative instruments for the purpose of risk hedging and for investment purposes.

Financial derivative instruments may include unfunded TRS where underlying is indices.

The sub-fund may not hold physical commodities.

The benchmark of the sub-fund consists of the index “Bloomberg Commodity Index Euro Hedged Total Return”.

The sub-fund is actively managed and the degree of freedom allowed within the management of the sub-fund is significant.

The relative risk and positioning to the benchmark is monitored. To provide a disciplined management approach, risk limits are set to contain investment risk. It is expected that, in normal circumstances, a significant part of the investments of the sub-fund will be components of the benchmark, however there is discretion to invest in other securities not included in the benchmark.

*Total Return Swap:*

- Maximum portion of assets that can be subject to TRS: 150%.
- Expected portion of assets that will be subject to TRS: 100%.

*Securities lending:*

- Maximum portion of assets that can be subject to securities lending: 70%.
- Expected portion of assets that will be subject to securities lending: 40%.

**THE INVESTMENTS IN EMERGING COUNTRIES ARE SUBJECT TO PARTICULAR RISKS AS DESCRIBED IN THE PROSPECTUS IN “GENERAL CHARACTERISTICS OF THE FUND”.**

*Risk transparency:*

- Global Exposure Determination Methodology: relative VaR approach
- Expected Level of Leverage: 250%

The methodology used to calculate the leverage is the Gross Notional leverage approach.

The reference portfolio is the Bloomberg Commodity Index Euro Hedged Total Return.

*Risk profile of the typical investor:*

This sub-fund is suitable for investors who search long-term investments. The investor must be able to accept a certain volatility and the possibility of losing a part of the invested amount.

## 19. FIDEURAM FUND – EQUITY MARKET NEUTRAL STAR

**FIDEURAM FUND – EQUITY MARKET NEUTRAL STAR**, expressed in EURO, has as investment objective to provide investors with consistent absolute returns through investing indirectly in numerous absolute return strategies primarily composed of listed equities and related instruments (the “**Exposed Strategy**”). The sub-fund seeks to maintain the value of the capital through the use of various investment strategy techniques, given its long term investment strategy.

The Exposed Strategy is composed of listed equities (inclusive of eligible ETFs up to 10% of the sub-fund’s net asset value and other equity related securities), financial derivative instruments involving (list not exhaustive) OTC, options, forward contracts and futures. The Exposed Strategy may be invested up to 20% of the sub-fund’s net asset value in China-A shares via Shanghai-Hong Kong Stock Connect.

The sub-fund may use a Portfolio Swap (which will deliver the economic performance of the Exposed Strategy) and also a Financing Swap as defined below.

The sub-fund will gain indirect exposure to the Exposed Strategy investing mainly in unfunded TRSs with the Underlying Portfolio(s) as underlying on an arm’s length basis with first class financial institutions acting as swap counterparty (collectively the “**Portfolio Swap**”).

The sub-fund will purchase Financing Assets (as detailed below) and transfer the full economic interest in such assets to first class financial institutions acting as swap counterparty pursuant to swap agreements (the “**Financing Swap**”).

The financial instruments, underlying of the TRSs mentioned above (the “**Underlying Portfolio**”), shall be listed or traded on (i) a regulated market or (ii) stock exchange at worldwide level notably in emerging markets and more particularly in the European Union, the Organisation for Economic Co-operation and Development, Hong Kong, Shanghai, Singapore and South Africa, (iii) NASDAQ, (iv) NASDAQ Europe, (v) the market in US government securities which is conducted by primary dealers which are regulated by the Federal Reserve Bank of New York, (vi) the market in transferable securities conducted by primary dealers and secondary dealers which are regulated by the US Securities and Exchange Commission and by the NASD or (vii) the over-the-counter market in Tokyo regulated by the Securities Dealers Association of Japan and (viii) any other eligible regulated exchange or market in accordance with the investment restrictions as laid down in this Prospectus.

Each Underlying Portfolio will comply with the investment policy of the sub-fund and more particularly with the Exposed Strategy. The sub-fund may be entirely invested in TRSs.

“Financing Assets” will include UCITS-eligible regulated investment funds (including money market funds and ETFs) domiciled in the EEA, Jersey, Guernsey, the Isle of Man, or the United States. Such investment funds will be UCITS funds or alternative investment funds which are equivalent to UCITS which will deliver exposure to the asset classes of equities.

They may also include equity securities, including, but not limited to, preferred stocks, warrants on equities (which gives the holder the right to buy the underlying equity at a specified price and time and will not embed leverage) and depository receipts for such securities (American depository receipts (ADR) traded in the United States markets and Global Depository Receipts (GDR) traded in other world markets), issued by companies worldwide.

The Financing Assets will have no more than 30% exposure to emerging markets.

Direct investments, for cash purpose, may include debt securities issued by governments, corporations or institutions, low risk, money market instruments and deposits with credit institutions without limit of duration or currency.

All investments are made in accordance with the investment restrictions as described in this Prospectus. In addition, the sub-fund does not invest more than 10% of its net asset value in units of other UCITS or other UCIs.

The sub-fund will not invest in Contingent Convertibles (CoCo) nor asset backed securities (ABS) or mortgage backed securities (MBS).

The sub-fund can invest up to 30% of its net asset value in non-investment grade debt securities.

Securities will be deemed non-investment grade if, at the time of purchase, they are rated below “BBB-” or equivalent and above or equal to “CCC” or equivalent and in any case within the limits of the equivalent rating defined on the basis of the internal valuation model implemented by the Investment Manager.

The sub-fund will not purchase distressed securities nor default securities, without prejudice to the fact that some “CCC” rated securities may be considered as distressed securities. In accordance with the above-mentioned prohibition, if a security eligible for the sub-fund is rated “CCC”, the Investment Manager will perform an analysis in order to determine if such security is a distressed security, if so the sub-fund will not invest in such security.

The sub-fund pursues a discretionary currency hedging policy to manage investors’ capital in line with its long-term investment strategy.

Although the investment objective of the sub-fund is to provide investors with consistent absolute returns by implementing a set of market neutral investment

strategies, the net market exposure of the sub-fund may temporarily vary according to the Investment Manager's view of market prospects and the Underlying Portfolio may be net short of markets or net long of markets. However, the overall net market exposure of the Underlying Portfolio generally does not exceed a range from 50% net short to 50% net long. The range stated above allows Investment Manager to apply appropriate risk management measures when necessary. Where the Investment Manager wishes to take short positions in equities, it does so exclusively through the use of equity derivatives. For long exposures to equities, the Investment Manager utilize equity derivatives where they consider that such instruments are the most appropriate or cost-effective means of accessing the relevant underlying equities. The Underlying Portfolio takes long and short positions over a variety of time periods, however the combination of long and short positions never results in uncovered short positions.

Leverage at the level of the Underlying Portfolio is achieved through both OTC and listed derivative contracts.

The sub-fund is actively managed.

The sub-fund is not managed in reference to a benchmark.

*Total Return Swap:*

- Maximum portion of assets that can be subject to TRS: 200%.
- Expected portion of assets that will be subject to TRS: 200%.

*Securities lending:*

- Maximum portion of assets that can be subject to securities lending: 70%.
- Expected portion of assets that will be subject to securities lending: 40%.

*Risk transparency:*

- Global Exposure Determination Methodology: absolute VaR approach
- Expected Level of Leverage: up to 700%
- The sub-fund will regularly monitor its leverage and the maximum level of leverage is approximately 700%. The sub-fund's leverage may increase to higher levels, for example, at times when the Investment Manager deems it most appropriate to use financial derivative instruments to take exposure to market opportunities or for hedging purposes or in case of volatility changes. The leverage figure is calculated as the sum of the notionals of the derivatives used as is required by the applicable laws and regulations. The notional value of the investments varies significantly from their market value which is why the leverage limits are high. These leverage limits do not take into account any netting and hedging arrangements that the sub-fund has in place at any time even though these netting and hedging arrangements are used for risk reduction purposes.

The methodology used to calculate the leverage is the Gross Notional leverage approach.

*Risk profile of the typical investor:*

This sub-fund is suitable for long term investors. The investor must be able to accept a certain level of volatility and the risk of suffering potential losses on invested capital.

## 20. FIDEURAM FUND - EQUITY USA VALUE

**FIDEURAM FUND - EQUITY USA VALUE**, expressed in EURO, aims to outperform the benchmark by investing essentially in equity transferable securities listed on a stock exchange or dealt in on an regulated market of the United States of America. This sub-fund is characterized by a management method giving preference to the investment in companies, which are undervalued in respect to their theoretical value at long term. Such valuation is expressed through the analysis of figures of the balance sheet and the fundamental ratios such as notably the “book value to price ratio” and the “dividend yield”.

Moreover, the sub-fund may use financial derivative instruments for the purpose of risk hedging and for investment purposes.

The sub-fund is actively managed. The benchmark of the sub-fund consists of the index "MSCI Value USA" Net Total Return in EUR, which is used in the investment screening process and for portfolio construction.

The relative risk and positioning to the benchmark is monitored. To provide a disciplined management approach, risk limits are set to contain investment risk. It is expected that, in normal circumstances, a considerable part of the investments of the sub-fund will be components of the benchmark and the extent to which the composition of the portfolio deviate from that of the benchmark in terms of weighting will be limited. However, from time to time, performance may differ, as risk limits allow to deviate from the benchmark composition, investing in securities not included in the benchmark and using alternative weighting of securities to the benchmark.

### *Securities lending:*

- Maximum portion of assets that can be subject to securities lending: 50%.
- Expected portion of assets that will be subject to securities lending: 20%.

### *Risk transparency:*

- Global Exposure Determination Methodology: commitment approach

### *Risk profile of the typical investor:*

This sub-fund is suitable for investors who search long-term investments. The investor must be able to accept a certain volatility and the possibility of losing a part of the invested amount.

## **21. FIDEURAM FUND – ZERO COUPON 2026**

**FIDEURAM FUND – ZERO COUPON 2026**, expressed in EURO, exclusively reserved to companies of the Intesa Sanpaolo Group, consists of debt transferable securities principally “zero coupon” maturing mainly in 2026 and in the two (2) adjacent years (2025 and 2027).

The selection criteria are characterized by a repayment guarantee of the invested capital in issues the residual maturity date of which is in 2026 or in the two (2) adjacent years (2025 and 2027).

The sub-fund is actively managed.

The sub-fund is not managed in reference to a benchmark.

### *Securities lending:*

- Maximum portion of assets that can be subject to securities lending: 70%.
- Expected portion of assets that will be subject to securities lending: 40%.

### *Risk transparency:*

- Global Exposure Determination Methodology: commitment approach

### *Risk profile of the typical investor:*

This sub-fund is suitable for investors who search long-term investments. The investor seeks a relatively safe investment but understands that his investment is not guaranteed against a possible loss.

## **22. FIDEURAM FUND – ZERO COUPON 2027**

**FIDEURAM FUND – ZERO COUPON 2027**, expressed in EURO, exclusively reserved to companies of the Intesa Sanpaolo Group, consists of debt transferable securities principally “zero coupon” maturing mainly in 2027 and in the two (2) adjacent years (2026 and 2028).

The selection criteria are characterized by a repayment guarantee of the invested capital in issues the residual maturity date of which is in 2027 or in the two (2) adjacent years (2026 and 2028).

The sub-fund is actively managed.

The sub-fund is not managed in reference to a benchmark.

### *Securities lending:*

- Maximum portion of assets that can be subject to securities lending: 70%.
- Expected portion of assets that will be subject to securities lending: 40%.

### *Risk transparency:*

- Global Exposure Determination Methodology: commitment approach

### *Risk profile of the typical investor:*

This sub-fund is suitable for investors who search long-term investments. The investor seeks a relatively safe investment but understands that his investment is not guaranteed against a possible loss.

### **23. FIDEURAM FUND – ZERO COUPON 2028**

**FIDEURAM FUND – ZERO COUPON 2028**, expressed in EURO, exclusively reserved to companies of the Intesa Sanpaolo Group, consists of debt transferable securities principally “zero coupon” maturing mainly in 2028 and in the two (2) adjacent years (2027 and 2029).

The selection criteria are characterized by a repayment guarantee of the invested capital in issues the residual maturity date of which is in 2028 or in the two (2) adjacent years (2027 and 2029).

The sub-fund is actively managed.

The sub-fund is not managed in reference to a benchmark.

*Securities lending:*

- Maximum portion of assets that can be subject to securities lending: 70%.
- Expected portion of assets that will be subject to securities lending: 40%.

*Risk transparency:*

- Global Exposure Determination Methodology: commitment approach

*Risk profile of the typical investor:*

This sub-fund is suitable for investors who search long-term investments. The investor seeks a relatively safe investment but understands that his investment is not guaranteed against a possible loss.

## 24. FIDEURAM FUND – ZERO COUPON 2029

**FIDEURAM FUND – ZERO COUPON 2029**, expressed in EURO, exclusively reserved to companies of the Intesa Sanpaolo Group, consists of debt transferable securities principally “zero coupon” maturing mainly in 2029 and in the two (2) adjacent years (2028 and 2030).

The selection criteria are characterized by a repayment guarantee of the invested capital in issues the residual maturity date of which is in 2029 or in the two (2) adjacent years (2028 and 2030).

The sub-fund is actively managed.

The sub-fund is not managed in reference to a benchmark.

*Securities lending:*

- Maximum portion of assets that can be subject to securities lending: 70%.
- Expected portion of assets that will be subject to securities lending: 40%.

*Risk transparency:*

- Global Exposure Determination Methodology: commitment approach

*Risk profile of the typical investor:*

This sub-fund is suitable for investors who search long-term investments. The investor seeks a relatively safe investment but understands that his investment is not guaranteed against a possible loss.

## **25. FIDEURAM FUND – ZERO COUPON 2030**

**FIDEURAM FUND – ZERO COUPON 2030**, expressed in EURO, exclusively reserved to companies of the Intesa Sanpaolo Group, consists of debt transferable securities principally “zero coupon” maturing mainly in 2030 and in the two (2) adjacent years (2029 and 2031).

The selection criteria are characterized by a repayment guarantee of the invested capital in issues the residual maturity date of which is in 2030 or in the two (2) adjacent years (2029 and 2031).

The sub-fund is actively managed.

The sub-fund is not managed in reference to a benchmark.

### *Securities lending:*

- Maximum portion of assets that can be subject to securities lending: 70%.
- Expected portion of assets that will be subject to securities lending: 40%.

### *Risk transparency:*

- Global Exposure Determination Methodology: commitment approach

### *Risk profile of the typical investor:*

This sub-fund is suitable for investors who search long-term investments. The investor seeks a relatively safe investment but understands that his investment is not guaranteed against a possible loss.

## **26. FIDEURAM FUND – ZERO COUPON 2031**

**FIDEURAM FUND – ZERO COUPON 2031**, expressed in EURO, exclusively reserved to companies of the Intesa Sanpaolo Group, consists of debt transferable securities principally “zero coupon” maturing mainly in 2031 and in the two (2) adjacent years (2030 and 2032).

The selection criteria are characterized by a repayment guarantee of the invested capital in issues the residual maturity date of which is in 2031 or in the two (2) adjacent years (2030 and 2032).

The sub-fund is actively managed.

The sub-fund is not managed in reference to a benchmark.

### *Securities lending:*

- Maximum portion of assets that can be subject to securities lending: 70%.
- Expected portion of assets that will be subject to securities lending: 40%.

### *Risk transparency:*

- Global Exposure Determination Methodology: commitment approach

### *Risk profile of the typical investor:*

This sub-fund is suitable for investors who search long-term investments. The investor seeks a relatively safe investment but understands that his investment is not guaranteed against a possible loss.

## **27. FIDEURAM FUND – ZERO COUPON 2032**

**FIDEURAM FUND – ZERO COUPON 2032**, expressed in EURO, exclusively reserved to companies of the Intesa Sanpaolo Group, consists of debt transferable securities principally “zero coupon” maturing mainly in 2032 and in the two (2) adjacent years (2031 and 2033).

The selection criteria are characterized by a repayment guarantee of the invested capital in issues the residual maturity date of which is in 2032 or in the two (2) adjacent years (2031 and 2033).

The sub-fund is actively managed.

The sub-fund is not managed in reference to a benchmark.

### *Securities lending:*

- Maximum portion of assets that can be subject to securities lending: 70%.
- Expected portion of assets that will be subject to securities lending: 40%.

### *Risk transparency:*

- Global Exposure Determination Methodology: commitment approach

### *Risk profile of the typical investor:*

This sub-fund is suitable for investors who search long-term investments. The investor seeks a relatively safe investment but understands that his investment is not guaranteed against a possible loss.

## **28. FIDEURAM FUND – ZERO COUPON 2033**

**FIDEURAM FUND – ZERO COUPON 2033**, expressed in EURO, exclusively reserved to companies of the Intesa Sanpaolo Group, consists of debt transferable securities principally “zero coupon” maturing mainly in 2033 and in the two (2) adjacent years (2032 and 2034).

The selection criteria are characterized by a repayment guarantee of the invested capital in issues the residual maturity date of which is in 2033 or in the two (2) adjacent years (2032 and 2034).

The sub-fund is actively managed.

The sub-fund is not managed in reference to a benchmark.

*Securities lending:*

- Maximum portion of assets that can be subject to securities lending: 70%.
- Expected portion of assets that will be subject to securities lending: 40%.

*Risk transparency:*

- Global Exposure Determination Methodology: commitment approach

*Risk profile of the typical investor:*

This sub-fund is suitable for investors who search long-term investments. The investor seeks a relatively safe investment but understands that his investment is not guaranteed against a possible loss.

## **29. FIDEURAM FUND – ZERO COUPON 2034**

**FIDEURAM FUND – ZERO COUPON 2034**, expressed in EURO, exclusively reserved to companies of the Intesa Sanpaolo Group, consists of debt transferable securities principally “zero coupon” maturing mainly in 2034 and in the two (2) adjacent years (2033 and 2035).

The selection criteria are characterized by a repayment guarantee of the invested capital in issues the residual maturity date of which is in 2034 or in the two (2) adjacent years (2033 and 2035).

The sub-fund is actively managed.

The sub-fund is not managed in reference to a benchmark.

### *Securities lending:*

- Maximum portion of assets that can be subject to securities lending: 70%.
- Expected portion of assets that will be subject to securities lending: 40%.

### *Risk transparency:*

- Global Exposure Determination Methodology: commitment approach

### *Risk profile of the typical investor:*

This sub-fund is suitable for investors who search long-term investments. The investor seeks a relatively safe investment but understands that his investment is not guaranteed against a possible loss.

### **30. FIDEURAM FUND – ZERO COUPON 2035**

**FIDEURAM FUND – ZERO COUPON 2035**, expressed in EURO, exclusively reserved to companies of the Intesa Sanpaolo Group, consists of debt transferable securities principally “zero coupon” maturing mainly in 2035 and in the two (2) adjacent years (2034 and 2036).

The selection criteria are characterized by a repayment guarantee of the invested capital in issues the residual maturity date of which is in 2035 or in the two (2) adjacent years (2034 and 2036).

The sub-fund is actively managed.

The sub-fund is not managed in reference to a benchmark.

*Securities lending:*

- Maximum portion of assets that can be subject to securities lending: 70%.
- Expected portion of assets that will be subject to securities lending: 40%.

*Risk transparency:*

- Global Exposure Determination Methodology: commitment approach

*Risk profile of the typical investor:*

This sub-fund is suitable for investors who search long-term investments. The investor seeks a relatively safe investment but understands that his investment is not guaranteed against a possible loss.

### **31. FIDEURAM FUND – ZERO COUPON 2036**

**FIDEURAM FUND – ZERO COUPON 2036**, expressed in EURO, exclusively reserved to companies of the Intesa Sanpaolo Group, consists of debt transferable securities principally “zero coupon” maturing mainly in 2036 and in the two (2) adjacent years (2035 and 2037).

The selection criteria are characterized by a repayment guarantee of the invested capital in issues the residual maturity date of which is in 2036 or in the two (2) adjacent years (2035 and 2037).

The sub-fund -Fund is actively managed.

The sub-fund is not managed in reference to a benchmark.

*Securities lending:*

- Maximum portion of assets that can be subject to securities lending: 70%.
- Expected portion of assets that will be subject to securities lending: 40%.

*Risk transparency:*

- Global Exposure Determination Methodology: commitment approach

*Risk profile of the typical investor:*

This sub-fund is suitable for investors who search long-term investments. The investor seeks a relatively safe investment but understands that his investment is not guaranteed against a possible loss.

### **32. FIDEURAM FUND – ZERO COUPON 2037**

**FIDEURAM FUND – ZERO COUPON 2037**, expressed in EURO, exclusively reserved to companies of the Intesa Sanpaolo Group, consists of debt transferable securities principally “zero coupon” maturing mainly in 2037 and in the two (2) adjacent years (2036 and 2038).

The selection criteria are characterized by a repayment guarantee of the invested capital in issues the residual maturity date of which is in 2037 or in the two (2) adjacent years (2036 and 2038).

The sub-fund is actively managed.

The sub-fund is not managed in reference to a benchmark.

*Securities lending:*

- Maximum portion of assets that can be subject to securities lending: 70%.
- Expected portion of assets that will be subject to securities lending: 40%.

*Risk transparency:*

- Global Exposure Determination Methodology: commitment approach

*Risk profile of the typical investor:*

This sub-fund is suitable for investors who search long-term investments. The investor seeks a relatively safe investment but understands that his investment is not guaranteed against a possible loss.

### **33. FIDEURAM FUND – ZERO COUPON 2038**

**FIDEURAM FUND – ZERO COUPON 2038**, expressed in EURO, exclusively reserved to companies of the Intesa Sanpaolo Group, consists of debt transferable securities principally “zero coupon” maturing mainly in 2038 and in the two (2) adjacent years (2037 and 2039).

The selection criteria are characterized by a repayment guarantee of the invested capital in issues the residual maturity date of which is in 2038 or in the two (2) adjacent years (2037 and 2039).

The sub-fund is actively managed.

The sub-fund is not managed in reference to a benchmark.

*Securities lending:*

- Maximum portion of assets that can be subject to securities lending: 70%.
- Expected portion of assets that will be subject to securities lending: 40%.

*Risk transparency:*

- Global Exposure Determination Methodology: commitment approach

*Risk profile of the typical investor:*

This sub-fund is suitable for investors who search long-term investments. The investor seeks a relatively safe investment but understands that his investment is not guaranteed against a possible loss.

### **34. FIDEURAM FUND – ZERO COUPON 2039**

**FIDEURAM FUND – ZERO COUPON 2039**, expressed in EURO, exclusively reserved to companies of the Intesa Sanpaolo Group, consists of debt transferable securities principally “zero coupon” maturing mainly in 2039 and in the two (2) adjacent years (2038 and 2040).

The selection criteria are characterized by a repayment guarantee of invested capital in issues the residual maturity date of which is in 2039 or in the two (2) adjacent years (2038 and 2040).

The sub-fund is actively managed.

The sub-fund is not managed in reference to a benchmark.

*Securities lending:*

- Maximum portion of assets that can be subject to securities lending: 70%.
- Expected portion of assets that will be subject to securities lending: 40%.

*Risk transparency:*

- Global Exposure Determination Methodology: commitment approach

*Risk profile of the typical investor:*

This sub-fund is suitable for investors who search long-term investments. The investor seeks a relatively safe investment but understands that his investment is not guaranteed against a possible loss.

### **35. FIDEURAM FUND – ZERO COUPON 2040**

**FIDEURAM FUND – ZERO COUPON 2040**, expressed in EURO, exclusively reserved to companies of the Intesa Sanpaolo Group, consists of debt transferable securities principally “zero coupon” maturing mainly in 2040 and in the two (2) adjacent years (2039 and 2041).

The selection criteria are characterized by a repayment guarantee of invested capital in issues the residual maturity date of which is in 2040 or in the two (2) adjacent years (2039 and 2041).

The sub-fund is actively managed.

The sub-fund is not managed in reference to a benchmark.

*Securities lending:*

- Maximum portion of assets that can be subject to securities lending: 70%.
- Expected portion of assets that will be subject to securities lending: 40%.

*Risk transparency:*

- Global Exposure Determination Methodology: commitment approach

*Risk profile of the typical investor:*

This sub-fund is suitable for investors who search long-term investments. The investor seeks a relatively safe investment but understands that his investment is not guaranteed against a possible loss.

### **36. FIDEURAM FUND – ZERO COUPON 2041**

**FIDEURAM FUND – ZERO COUPON 2041**, expressed in EURO, exclusively reserved to companies of the Intesa Sanpaolo Group, consists of debt transferable securities principally “zero coupon” maturing mainly in 2041 and in the two (2) adjacent years (2040 and 2042).

The selection criteria are characterized by a repayment guarantee of the invested capital of issues the residual maturity date of which is in 2041 or in the two (2) adjacent years (2040 and 2042).

The sub-fund is actively managed.

The sub-fund is not managed in reference to a benchmark.

*Securities lending:*

- Maximum portion of assets that can be subject to securities lending: 70%.
- Expected portion of assets that will be subject to securities lending: 40%.

*Risk transparency:*

- Global Exposure Determination Methodology: commitment approach

*Risk profile of the typical investor:*

This sub-fund is suitable for investors who search long-term investments. The investor seeks a relatively safe investment but understands that his investment is not guaranteed against a possible loss.

### **37. FIDEURAM FUND – ZERO COUPON 2042**

**FIDEURAM FUND – ZERO COUPON 2042**, expressed in EURO, exclusively reserved to companies of the Intesa Sanpaolo Group, consists of debt transferable securities principally “zero coupon” maturing mainly in 2042 and in the two (2) adjacent years (2041 and 2043).

The selection criteria are characterized by a repayment guarantee of the invested capital in issues the residual maturity date of which is in 2042 or in the two (2) adjacent years (2041 and 2043).

The sub-fund is actively managed.

The sub-fund is not managed in reference to a benchmark.

*Securities lending:*

- Maximum portion of assets that can be subject to securities lending: 70%.
- Expected portion of assets that will be subject to securities lending: 40%.

*Risk transparency:*

- Global Exposure Determination Methodology: commitment approach

*Risk profile of the typical investor:*

This sub-fund is suitable for investors who search long-term investments. The investor seeks a relatively safe investment but understands that his investment is not guaranteed against a possible loss.

### **38. FIDEURAM FUND – ZERO COUPON 2043**

**FIDEURAM FUND – ZERO COUPON 2043**, expressed in EURO, exclusively reserved to companies of the Intesa Sanpaolo Group, consists of debt transferable securities principally “zero coupon” with a residual maturity date in 2043 and in the two (2) adjacent years (2042 and 2044).

The selection criteria are characterized by a repayment guarantee of the invested capital in issues the residual maturity date of which is in 2043 or in the two (2) adjacent years (2042 and 2044).

The sub-fund is actively managed.

The sub-fund is not managed in reference to a benchmark.

*Securities lending:*

- Maximum portion of assets that can be subject to securities lending: 70%.
- Expected portion of assets that will be subject to securities lending: 40%.

*Risk transparency:*

- Global Exposure Determination Methodology: commitment approach

*Risk profile of the typical investor:*

This sub-fund is suitable for investors who search long-term investments. The investor seeks a relatively safe investment but understands that his investment is not guaranteed against a possible loss.

### **39. FIDEURAM FUND – ZERO COUPON 2044**

**FIDEURAM FUND – ZERO COUPON 2044**, expressed in EURO, exclusively reserved to companies of the Intesa Sanpaolo Group, consists of debt transferable securities principally “zero coupon” with a residual maturity date in 2044 and in the two (2) adjacent years (2043 and 2045).

The selection criteria are characterized by a repayment guarantee of the invested capital in issues the residual maturity date of which is in 2044 or in the two (2) adjacent years (2043 and 2045).

The sub-fund is actively managed.

The sub-fund is not managed in reference to a benchmark.

*Securities lending:*

- Maximum portion of assets that can be subject to securities lending: 70%.
- Expected portion of assets that will be subject to securities lending: 40%.

*Risk transparency:*

- Global Exposure Determination Methodology: commitment approach

*Risk profile of the typical investor:*

This sub-fund is suitable for investors who search long-term investments. The investor seeks a relatively safe investment but understands that his investment is not guaranteed against a possible loss.

#### 40. FIDEURAM FUND – GLOBAL EQUITY

**FIDEURAM FUND – GLOBAL EQUITY**, expressed in EURO, aims to outperform the benchmark by investing essentially in equity transferable securities listed on a stock exchange or dealt in on another regulated markets worldwide, which comply with Environmental, Social and Governance (“ESG”) criteria.

The sub-fund may invest up to 10% of its net asset value in equity transferable securities issued by companies that are located in the emerging markets countries or have their principal business activities in these regions.

The sub-fund may invest up to 5% in aggregate of its net asset value in Chinese companies listed offshore (mainly in United States and Hong Kong) and in China A-shares via the Shanghai-Hong Kong Stock Connect program (the “**Stock Connect**”). China A-Shares are shares of Mainland China based companies traded on Shanghai Stock exchange, denominated in Renminbi (“**RMB**”), and which may be purchased through the Stock Connect.

The sub-fund may invest without limitation in securities denominated in currencies other than the reference currency (EURO). The currency exposure of the sub-fund is flexibly managed.

Moreover, the sub-fund may use financial derivative instruments for the purpose of risk hedging and for investment purposes.

The sub-fund can invest a portion of assets in unfunded TRS on indices and single stocks. Such indices may have as underlying asset (without being limited to) equity, ETF, forward foreign exchange, equity futures, index futures and options on financial derivative instruments.

The sub-fund is actively managed. The benchmark of the sub-fund consists of the index:

for the units of class I: “MSCI World” Net Total Return in EUR;

for the units of class IH: “MSCI World” Net Total Return, hedged in EUR;

which is used in the investment screening process and for portfolio construction.

The relative risk and positioning to the benchmark is monitored. To provide a disciplined management approach, risk limits are set to contain investment risk. While maintaining an active management style, the sub-fund composition has a limited deviation from the benchmark. However, performance may differ depending on market conditions. There is discretion to invest in other securities not included in the benchmark, and to use alternative weighting of securities to the benchmark.

The sub-fund has been categorized as an ESG Promotion Strategy Sub-fund, as promoting, among other characteristics environmental and social characteristics,

which are a binding component, for the assets selection and investment decision-making process, and the companies in which the sub-fund shall invest in need to follow good governance practices, in accordance with article 8 of the SFDR. More information relating to the environmental and social characteristics of the sub-fund is provided in the Appendix to the Prospectus in accordance with SFDR and Commission Delegated Regulation (EU) 2022/1288.

*Total Return Swap:*

- Maximum portion of assets that can be subject to TRS: 6%.
- Expected portion of assets that will be subject to TRS: 3%.

*Securities lending:*

- Maximum portion of assets that can be subject to securities lending: 50%.
- Expected portion of assets that will be subject to securities lending: 20%.

*Risk transparency:*

- Global Exposure Determination Methodology: commitment approach

*Risk profile of the typical investor:*

This sub-fund is suitable for investors who search long-term investments. The investor seeks a relatively safe investment but must be able to accept the possibility of losing part of the invested amount.

#### **41. FIDEURAM FUND – GLOBAL BOND**

**FIDEURAM FUND – GLOBAL BOND**, expressed in EURO, aims to outperform the benchmark by investing essentially in debt transferable securities issued by government and government-related entities that are 100% owned by the related State, which comply with Environmental, Social and Governance (“ESG”) criteria. The sub-fund may also invest up to 30% of its net asset value in debt transferable securities issued by corporate entities.

The sub-fund may invest up to 20% of its net asset value in debt transferable securities issued by entities located in the emerging markets countries.

The sub-fund may invest up to 10% of its net assets in debt securities issued by Mainland China issuers through Bond Connect program and/or traded on the China Interbank Bond Market (“CIBM”).

The sub-fund may invest up to 10% of its net asset value in debt transferable securities qualifying as non-investment grade, including non-investment grade debt transferable securities issued by emerging markets issuers.

Securities will be deemed non-investment grade if, at the time of purchase, they are rated below “BBB-” or equivalent and above or equal to “CCC” or equivalent and in any case within the limits of the equivalent rating defined on the basis of the internal valuation model implemented by the Management Company.

The sub-fund may invest without limitation in securities denominated in currencies other than the reference currency (EURO). The currency risk of the sub-fund is generally hedged and flexibly managed.

Moreover, the sub-fund may use financial derivative instruments for the purpose of risk hedging and for investment purposes.

The sub-fund is actively managed. The benchmark of the sub-fund consists of the index “Bloomberg Barclays Global Aggregate Treasuries” Total Return hedged in EUR, which is used in the investment screening process and for portfolio construction.

The relative risk and positioning to the benchmark is monitored. To provide a disciplined management approach, risk limits are set to contain investment risk. While maintaining an active management style, the sub-fund composition has a limited deviation from the benchmark. However, performance may differ depending on market conditions. There is discretion to invest in other securities not included in the benchmark, and to use alternative weighting of securities to the benchmark.

The sub-fund has been categorized as an ESG Promotion Strategy Sub-fund, as promoting, among other characteristics environmental and social characteristics, which are a binding component, for the assets selection and investment decision-making process, and the companies in which the sub-fund shall invest in need to follow good governance practices, in accordance with article 8 of the SFDR. More information relating to the environmental and social characteristics of the sub-fund is provided in the Appendix to the Prospectus in accordance with SFDR and Commission Delegated Regulation (EU) 2022/1288.

*Securities lending:*

- Maximum portion of assets that can be subject to securities lending: 70%.
- Expected portion of assets that will be subject to securities lending: 40%.

*Risk transparency:*

- Global Exposure Determination Methodology: commitment approach

*Risk profile of the typical investor:*

This sub-fund is suitable for investors who search medium-term investments. The investor seeks a relatively safe investment but must be able to accept the possibility of losing a part of the invested amount.

## **APPENDIX II - PRE-CONTRACTUAL DISCLOSURES**

Information relating to the environmental and social characteristics or sustainable investment objectives of the sub-funds is provided in the following Appendix in accordance with SFDR and Commission Delegated Regulation (EU) 2022/1288, as amended.

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

**Product name:**

Fideuram Fund - Fideuram Fund Euro Corporate Bond

**Legal entity identifier**

549300I8QI9AYKIU6G04

**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 include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

## Environmental and/or social characteristics

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

**Yes**

**No**

<p><input type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective</b>: _%</p> <p><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</p> <p><input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</p> <p><input type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective</b> _%</p>	<p><input checked="" type="checkbox"/> It <b>promotes Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 20 % of sustainable investments</p> <p><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</p> <p><input checked="" type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</p> <p><input checked="" type="checkbox"/> with a social objective</p> <p><input type="checkbox"/> It promotes E/S characteristics, but <b>will not make any sustainable investments</b></p>
---	--



### 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 main environmental and social characteristics promoted by the Sub-fund through the Management Company's ESG methodology are the following:

- Environmental: climate change prevention (in terms for example of reduction of carbon emission, carbon footprint, climate change vulnerability), pollution & waste prevention (with reference to toxic emissions & waste, packaging material & waste, electronic waste); environmental opportunities (in clean tech, in renewable energy);
- Social: human capital (labor management, health & safety, human capital development, supply chain labor standards), product liability (product safety & quality, chemical safety, consumer financial protection, privacy & data security, responsible investment, health & demographic risk), social opportunities (access to communications, access to finance, access to health care, opportunities in nutrition & health), stakeholder opposition (controversial sourcing, community relations).

In addition the Sub-fund partly invests in sustainable investments pursuant to article 2(17) SFDR which means companies and issuers involved in activities that contribute to an

environmental and social objective as outlined in UN Sustainable Development Goals (hereinafter also "SDGs") while not significantly harming any other environmental or social objectives.

No reference benchmark has been designated for the purpose of attaining the environmental or social characteristics promoted by the sub-fund.

● **What Sustainability Indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?**

The indicators used to measure the attainment of each of the environmental or social characteristic promoted by the Sub-fund are:

- the binding restrictions in the investments in securities that are on the exclusion list as result of the application of the exclusion policy. The Management Company restricts investment in sectors which deems to be harmful from an SRI/ESG perspective or which do not follow good governance practices. The Sub-fund complies with an exclusions policy which refers to: i) the production, maintenance, sales and storage of weapons of mass destruction (WMD); and ii) the extractive activities, production and distribution of electricity connected with thermal coal, the energy source among fuels which represents the highest contributor in terms of carbon dioxide emissions; therefore, issuers deriving at least 25% of their revenues from these activities are excluded. The exclusion is extended to those issuers in breach of the Principles of the UN Global Compact which include principles relating to human rights, labour conditions, environmental issues and anti-corruption practices;
- the weighted average ESG score of the portfolio.

To undertake this ESG criteria analysis, the Management Company will use data provided by external ESG research providers' proprietary models (e.g. MSCI).

● **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 Sub-fund has a commitment to invest a minimum part of the portfolio in sustainable investments combining environmental and social objectives. It aims to create positive environmental and social impact by investing in companies that are involved in economic activities that are considered environmentally or socially sustainable by virtue of their contribution to one or more of the 17 environmental or social-themed SDGs (<https://sdgs.un.org/goals>).

It must be clarified that the Sub-fund does not commit to make investments in taxonomy-aligned environmentally sustainable investments according to article 6 of the Taxonomy Regulation (EU) 2020/852 (the "EU Taxonomy"). Consequently there is not a specific commitment to pursue one or more environmental objectives of article 9 of the EU Taxonomy. It is however not excluded that the Sub-fund may be exposed to underlying investments that contribute to one or more of the environmental objectives of the EU Taxonomy, such as but not limited to climate change mitigation and/or climate change adaptation.

The criteria assumed for measuring the positive contribution of each investment to each sustainable objective is based on the components defined by "MSCI ESG Research" within its methodological framework "SDG Alignment Methodology" which is based on the two following main indicators:

- "Product Alignment", i.e. the indicator of the degree of "net alignment" of an issuer's products and services to the targets associated with each SDG; this indicator aims to (i) estimate the revenue of companies issuing products and services that respond to one or more relevant SDGs, and (ii) identify products and services that have potentially negative impacts with respect to the achievement of the SDGs;
- "Operational Alignment", i.e. the indicator of the degree of alignment of the production processes of the issuing companies with respect to specific SDGs. This metric takes into account the internal policies, objectives and practices implemented by the issuers.

● **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?**

The sustainable investment methodology based on SDGs is built around the concept of SDGs alignment as much as misalignment. Each investee companies is evaluated in

relation to both metrics therefore any misalignment to at least one of the 17 SDGs is considered a breach of the Do Not Significantly Harm (“DNSH”) threshold and it excludes the possibility to consider the issuer as a sustainable investment. Additional third party data provides further tools and KPIs to assess if and how any investee company pass the DNSH test.

**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?*

The significant harm to any environmental or social sustainable investment objective (represented by one or more of the 17 SDGs) is avoided by the monitoring of any adverse impact caused by each sustainable investment on sustainability factors.

All of the mandatory adverse impact indicators of Table 1 of Annex I of Commission Delegated Regulation (EU) 2022/1288 (the “SFDR RTS”) are taken into account and any relevant ones in Tables 2 and 3 of the SFDR RTS by checking the PAI data through a periodic monitoring report where the values of the indicators at product level can be consulted and, where present and possible, at respective benchmark level in order to include this information in the investment decision-making process.

However, considering the large variability of PAI data at sectoral and geographical level, as well as their retrospective nature, no thresholds or stringent limits are set at portfolio level.

Additional information on PAI is available in the section dedicated to sustainability in the Management Company’s website (<http://www.fideuramireland.ie/en/sustainability/sustainability/>), which includes the “Sustainable And Responsible Investment Policy” as well as other PAI information.

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

The Management Company’s Sustainable and Responsible Investment Policy specifies that corporate approach to sustainable and responsible investments is inspired by the principles contained in documents such as UN Global Compact principles (UNGC), UN Guiding Principles on Business and Human Rights (UNGPs), Organization for Economic Cooperation and Development (OECD) Guidelines for multinational enterprises, International Labor Organization Conventions. This approach follows the methodology for the definition of “sustainable investments” with specific reference to the Do Not Significantly Harm Principle.

The Management Company monitors the entire portfolio on the basis of a series of environmental, social and governance indicators (via third party data), including the violations of the UNGC and OECD Guidelines for Multinational Enterprises. Issuers characterized by a severe and serious dispute equal to “Red” (also referring to selected global norms and conventions, including the United Nations Global Compact Principles, the International Labour Organization’s conventions, and the United Nations Guiding Principles on Business and Human Rights) are excluded from the investment perimeter.

In addition, as described in the Sustainable and Responsible Investment Policy, the Management Company monitors two social PAI selected to limit exposures to violations of the UNGC principles/OECD guidelines.

*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?

- X** Yes, the Management Company specifically considers the following principal adverse impact (“PAI”) indicators: Carbon emission (Scope 1 + 2); GHG intensity of investee companies; Violations of UNGC principles and OECD guidelines for Multinational Enterprises; Exposure to controversial weapons (anti-personnel mines, cluster ammunitions, chemical and biological weapons). For government bond and supranationals: GHG intensity and Investee Countries subject to social violations.

The Sub-fund’s Management Company can check the PAI data through a periodic monitoring report where can be consulted the values of the indicators at product level and, where present and possible, at respective benchmark level in order to include this information in the investment decision-making process. However, considering the large variability of PAI data at sectoral and geographical level, as well as their retrospective nature, no thresholds or stringent limits are set at portfolio level.

Further information on PAIs will be available in the Fund’s annual report.

No



## What investment strategy does this financial product follow?

The Management Company’s approach includes the adoption of strategies in line with the Principles for Responsible Investing. These strategies can be integrated into different steps of the investment process and they are based on exclusion criteria (for Issuers operating in non-socially responsible sectors or exposed to ESG risk) and in the integration of ESG factors into the analysis, selection and composition of managed portfolios with flexible approaches with regards to asset class typology and product investment strategy.

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

- ***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?***

Below are detailed the binding elements followed by the Management Company for each strategy adopted for promoting environmental and social characteristics.

The Sub-Fund partially makes sustainable investments, as defined by article 2(17) SFDR in accordance with the Management Company’s methodology for selecting sustainable investments.

SRI exclusion criteria:

Issuers directly operating in the following sectors are subject to binding investment restrictions:

- in the production, maintenance, sales and storage of weapons of mass destruction (WMD), i.e. nuclear, biological, chemical and radiological weapons (NBCR), including those which are excessively harmful and indiscriminate as identified by the United Nations Convention on Certain conventional Weapons (CCW);
- in the extractive activities and production of electricity connected with thermal coal, the energy source among fuels which represents at the global level the highest incidence for carbon dioxide emissions; therefore, issuers with at least 25% of their revenues from these activities are excluded.

ESG screening and monitoring:

Issuers characterized by the following are restricted from the investment perimeter:

- an ESG rating equal to “CCC”, classified according to the proprietary rating methodology of the external provider MSCI, which contemplates a range of values going from “AAA”, for the best rated issuers, to “CCC” for the riskiest issuers;
- a severe and serious dispute equal to “Red”, classified according to the proprietary methodology of the external provider MSCI, that indicates an ongoing very severe ESG controversy (a controversy having a social and/or environmental impact) implicating a company directly through its actions, products or operations (e.g. loss of life, destruction of eco-system, economic shakedown affecting multiple jurisdictions).

The ESG screening and monitoring is performed using data based on MSCI methodology.

For this product, which has a benchmark (as set out in the Sub-fund’s investment policy), the binding investment restrictions allow a maximum permissible exposure equal to the issuer’s weight on the benchmark.

Integration of ESG factors:

The integration of ESG factors is promoted through the selection of issuers in terms of their sustainable performance through an ESG score and in order that the final average ESG portfolio scoring is higher than that one related to the Sub-fund’s benchmark. To undertake this ESG score analysis, the Management Company will use data provided by external ESG research providers’ proprietary models (e.g. MSCI).

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

There is not a specific minimum rate of commitment for reducing the scope of the investments considered prior to the application of that investment strategy.

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

The assessment of the good governance practices is a central pillar of the investment process adopted by the Management Company and it consists on the assurance that the governance of each investee company is based on rules of conduct aligned to international best practices and inspired by the consideration of all stakeholder’s interests also by means of a remuneration policy. The good governance assessment takes into account sound management structures, employee relations, remuneration of staff and tax compliance.

Compliance with issuers’ good governance practices is ensured through the application of ESG and SRI exclusions criteria. The absence of criticality in these areas is considered as a minimum requirement that guarantees the good governance of an issuer for inclusion in the investible universe. For details on the ESG and SRI exclusion criteria please refer to the answer to the question “What investment strategy does this financial product follow?”.

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?**

In accordance with the binding element of the investment strategy adopted for promoting the environmental and social characteristics, the minimum proportion of the investments that meet the ESG criteria (in terms of ESG rating coverage) should be at least 80% of the portfolio (box



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

#1 Aligned with E/S characteristics).

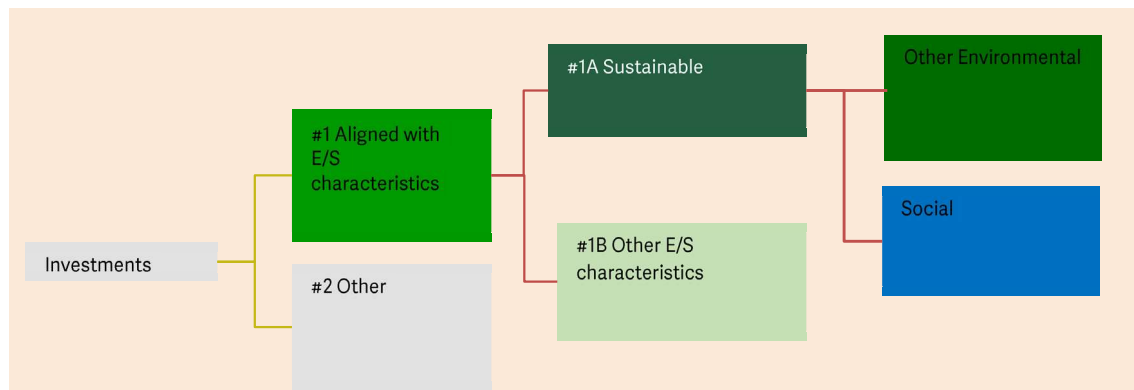
The remaining proportion (20% corresponding to the box #2 Other) of the investments (not included in the investments for promoting environmental or social characteristics or in the classification of sustainable investment) should be limited to:

- cash and cash equivalent instruments which may be held as ancillary liquidity or for risk balancing purposes;
- derivatives which may be held for risk balancing purposes and efficient portfolio management but not for promoting environmental and social characteristic;
- securities for which relevant data is not available.

The Sub-fund will have a minimum proportion of 20% of sustainable investments (box #1A Sustainable).

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** 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?**

Not applicable, derivatives are not used to promote environmental or social characteristics.



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

The Sub-fund promotes environmental and social characteristics but does not commit to make investments in taxonomy-aligned environmentally sustainable investments. It is however not excluded that the Sub-fund may be exposed to underlying investments that contribute to climate change mitigation and/or climate change adaptation.

However, currently due to a lack of reliable data, the share of environmentally sustainable investments under the Taxonomy Regulation is assessed to be 0%.

● **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy ?<sup>1</sup>**

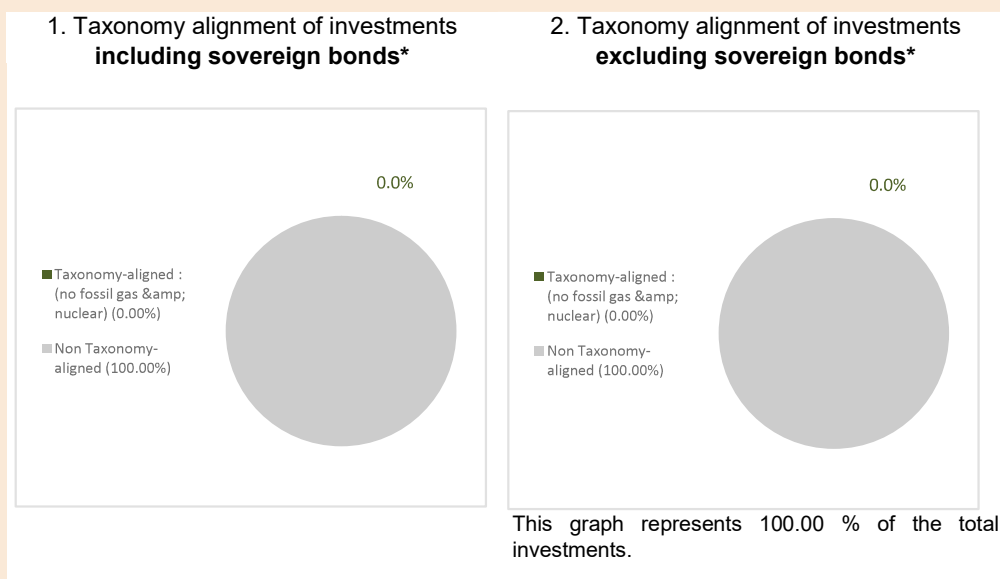
Yes

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



\*For the purpose of these graphs, ‘sovereign bonds’ consist of all sovereign exposures

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective. **Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

● **What is the minimum share of investments in transitional and enabling activities?**

Not applicable. The Sub-fund does not commit to invest in a minimum proportion of investments in transitional and enabling activities.



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

10

The Sub-fund commits to invest at least 10% of the portfolio in sustainable investments with an environmental objective that are not aligned with the EU Taxonomy.



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 socially sustainable investments?

The Sub-fund commits to invest at least 15% of the portfolio in sustainable investment 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 portfolio may also hold instruments not subject to the ESG integration process such as cash and cash equivalent instruments or for risk balancing purposes and derivatives for risk balancing purposes and efficient portfolio management. This category may also include securities for which relevant data is not available.



## 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?

No reference benchmark has been designated for the purpose of attaining the environmental or social characteristics promoted by the Sub-fund.

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?**

Not applicable

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

Not applicable

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

Not applicable

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

Not applicable



## Where can I find more product specific information online?

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

[http://www.fideuramireland.ie/en/legal\\_documentation](http://www.fideuramireland.ie/en/legal_documentation)

Further details are available on the Management Company’s “Sustainable And Responsible Investment Policy”:

[http://www.fideuramireland.ie/upload/File/pdf/Policy\\_FAMI/FAMI\\_Sustainable\\_and\\_responsible\\_investment\\_policy.pdf](http://www.fideuramireland.ie/upload/File/pdf/Policy_FAMI/FAMI_Sustainable_and_responsible_investment_policy.pdf)

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

**Product name:**

**Legal entity identifier**

Fideuram Fund - Fideuram Fund Millennials Equity USA

5493008LENBXWJ0H6H04

**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 include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

## Environmental and/or social characteristics

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

**Yes**

**No**

It will make a minimum of **sustainable investments with an environmental objective**: \_%

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 30 % of sustainable investments

in economic activities that qualify as environmentally sustainable under the EU Taxonomy

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

with an environmental objective 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** \_%

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 main environmental and social characteristics promoted by the Sub-fund through the Management Company's ESG methodology are the following:

- Environmental: climate change prevention (in terms for example of reduction of carbon emission, carbon footprint, climate change vulnerability), pollution & waste prevention (with reference to toxic emissions & waste, packaging material & waste, electronic waste); environmental opportunities (in clean tech, in renewable energy);
- Social: human capital (labor management, health & safety, human capital development, supply chain labor standards), product liability (product safety & quality, chemical safety, consumer financial protection, privacy & data security, responsible investment, health & demographic risk), social opportunities (access to communications, access to finance, access to health care, opportunities in nutrition & health), stakeholder opposition (controversial sourcing, community relations).

In addition the Sub-fund partly invests in sustainable investments pursuant to article 2(17) SFDR which means companies and issuers involved in activities that contribute to an environmental and social objective as outlined in UN Sustainable Development Goals (hereinafter also "SDGs") while not significantly harming any other environmental or social objectives.

No reference benchmark has been designated for the purpose of attaining the environmental or social characteristics promoted by the sub-fund.

● ***What Sustainability Indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?***

The indicators used to measure the attainment of each of the environmental or social characteristic promoted by the Sub-fund are:

- the binding restrictions in the investments in securities that are on the exclusion list as result of the application of the exclusion policy. The Management Company restricts investment in sectors which deems to be harmful from an SRI/ESG perspective or which do not follow good governance practices. The Sub-fund complies with an exclusions policy which refers to: i) the production, maintenance, sales and storage of weapons of mass destruction (WMD); and ii) the extractive activities, production and distribution of electricity connected with thermal coal, the energy source among fuels which represents the highest contributor in terms of carbon dioxide emissions; therefore, issuers deriving at least 25% of their revenues from these activities are excluded. The exclusion is extended to those issuers in breach of the Principles of the UN Global Compact which include principles relating to human rights, labour conditions, environmental issues and anti-corruption practices;
- the weighted average ESG score of the portfolio.

To undertake this ESG criteria analysis, the Management Company will use data provided by external ESG research providers' proprietary models (e.g. MSCI).

● ***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 Sub-fund has a commitment to invest a minimum part of the portfolio in sustainable investments combining environmental and social objectives. It aims to create positive environmental and social impact by investing in companies that are involved in economic activities that are considered environmentally or socially sustainable by virtue of their contribution to one or more of the 17 environmental or social-themed SDGs (<https://sdgs.un.org/goals>).

It must be clarified that the Sub-fund does not commit to make investments in taxonomy-aligned environmentally sustainable investments according to article 6 of the Taxonomy Regulation (EU) 2020/852 (the "EU Taxonomy"). Consequently there is not a specific commitment to pursue one or more environmental objectives of article 9 of the EU Taxonomy. It is however not excluded that the Sub-fund may be exposed to underlying investments that contribute to one or more of the environmental objectives of the EU Taxonomy, such as but not limited to climate change mitigation and/or climate change adaptation.

The criteria assumed for measuring the positive contribution of each investment to each sustainable objective is based on the components defined by "MSCI ESG Research" within its methodological framework "SDG Alignment Methodology" which is based on the two following main indicators:

- "Product Alignment", i.e. the indicator of the degree of "net alignment" of an issuer's products and services to the targets associated with each SDG; this indicator aims to (i) estimate the revenue of companies issuing products and services that respond to one or more relevant SDGs, and (ii) identify products and services that have potentially negative impacts with respect to the achievement of the SDGs;
- "Operational Alignment", i.e. the indicator of the degree of alignment of the production processes of the issuing companies with respect to specific SDGs. This metric takes into account the internal policies, objectives and practices implemented by the issuers.

● ***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?***

The sustainable investment methodology based on SDGs is built around the concept of SDGs alignment as much as misalignment. Each investee companies is evaluated in relation to both metrics therefore any misalignment to at least one of the 17 SDGs is considered a breach of the Do Not Significantly Harm (“DNSH”) threshold and it excludes the possibility to consider the issuer as a sustainable investment. Additional third party data provides further tools and KPIs to assess if and how any investee company pass the DNSH test.

**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?*

The significant harm to any environmental or social sustainable investment objective (represented by one or more of the 17 SDGs) is avoided by the monitoring of any adverse impact caused by each sustainable investment on sustainability factors.

All of the mandatory adverse impact indicators of Table 1 of Annex I of Commission Delegated Regulation (EU) 2022/1288 (the “SFDR RTS”) are taken into account and any relevant ones in Tables 2 and 3 of the SFDR RTS by checking the PAI data through a periodic monitoring report where the values of the indicators at product level can be consulted and, where present and possible, at respective benchmark level in order to include this information in the investment decision-making process.

However, considering the large variability of PAI data at sectoral and geographical level, as well as their retrospective nature, no thresholds or stringent limits are set at portfolio level.

Additional information on PAI is available in the section dedicated to sustainability in the Management Company’s website (<http://www.fideuramireland.ie/en/sustainability/sustainability/>), which includes the “Sustainable And Responsible Investment Policy” as well as other PAI information.

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

The Management Company’s Sustainable and Responsible Investment Policy specifies that corporate approach to sustainable and responsible investments is inspired by the principles contained in documents such as UN Global Compact principles (UNGC), UN Guiding Principles on Business and Human Rights (UNGPs), Organization for Economic Cooperation and Development (OECD) Guidelines for multinational enterprises, International Labor Organization Conventions. This approach follows the methodology for the definition of “sustainable investments” with specific reference to the Do Not Significantly Harm Principle.

The Management Company monitors the entire portfolio on the basis of a series of environmental, social and governance indicators (via third party data), including the violations of the UNGC and OECD Guidelines for Multinational Enterprises. Issuers characterized by a severe and serious dispute equal to “Red” (also referring to selected global norms and conventions, including the United Nations Global Compact Principles, the International Labour Organization’s conventions, and the United Nations Guiding Principles on Business and Human Rights) are excluded from the investment perimeter.

In addition, as described in the Sustainable and Responsible Investment Policy, the Management Company monitors two social PAI selected to limit exposures to violations of the UNGC principles/OECD guidelines.

*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*



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

- X** Yes, the Management Company specifically considers the following principal adverse impact (“PAI”) indicators: Carbon emission (Scope 1 + 2); GHG intensity of investee companies; Violations of UNGC principles and OECD guidelines for Multinational Enterprises; Exposure to controversial weapons (anti-personnel mines, cluster ammunitions, chemical and biological weapons). For government bond and supranationals: GHG intensity and Investee Countries subject to social violations.

The Sub-fund’s Management Company can check the PAI data through a periodic monitoring report where can be consulted the values of the indicators at product level and, where present and possible, at respective benchmark level in order to include this information in the investment decision-making process. However, considering the large variability of PAI data at sectoral and geographical level, as well as their retrospective nature, no thresholds or stringent limits are set at portfolio level.

Further information on PAIs will be available in the Fund’s annual report.

No



## What investment strategy does this financial product follow?

The Management Company’s approach includes the adoption of strategies in line with the Principles for Responsible Investing. These strategies can be integrated into different steps of the investment process and they are based on exclusion criteria (for Issuers operating in non-socially responsible sectors or exposed to ESG risk) and in the integration of ESG factors into the analysis, selection and composition of managed portfolios with flexible approaches with regards to asset class typology and product investment strategy.

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

- **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?**

Below are detailed the binding elements followed by the Management Company for each strategy adopted for promoting environmental and social characteristics.

The Sub-Fund partially makes sustainable investments, as defined by article 2(17) SFDR in accordance with the Management Company’s methodology for selecting sustainable investments.

SRI exclusion criteria:

Issuers directly operating in the following sectors are subject to binding investment restrictions:

- in the production, maintenance, sales and storage of weapons of mass destruction (WMD), i.e. nuclear, biological, chemical and radiological weapons (NBCR), including those which are excessively harmful and indiscriminate as identified by the United Nations Convention on Certain conventional Weapons (CCW);
- in the extractive activities and production of electricity connected with thermal coal, the energy source among fuels which represents at the global level the highest incidence for carbon dioxide emissions; therefore, issuers with at least 25% of their revenues from

these activities are excluded.

ESG screening and monitoring:

Issuers characterized by the following are restricted from the investment perimeter:

- an ESG rating equal to “CCC”, classified according to the proprietary rating methodology of the external provider MSCI, which contemplates a range of values going from “AAA”, for the best rated issuers, to “CCC” for the riskiest issuers;
- a severe and serious dispute equal to “Red”, classified according to the proprietary methodology of the external provider MSCI, that indicates an ongoing very severe ESG controversy (a controversy having a social and/or environmental impact) implicating a company directly through its actions, products or operations (e.g. loss of life, destruction of eco-system, economic shakedown affecting multiple jurisdictions).

The ESG screening and monitoring is performed using data based on MSCI methodology.

For this product, which has a benchmark (as set out in the Sub-fund’s investment policy), the binding investment restrictions allow a maximum permissible exposure equal to the issuer’s weight on the benchmark.

Integration of ESG factors:

The integration of ESG factors is promoted through the selection of issuers in terms of their sustainable performance through an ESG score and in order that the final average ESG portfolio scoring is higher than that one related to the Sub-fund’s benchmark. To undertake this ESG score analysis, the Management Company will use data provided by external ESG research providers’ proprietary models (e.g. MSCI).

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

There is not a specific minimum rate of commitment for reducing the scope of the investments considered prior to the application of that investment strategy.

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

The assessment of the good governance practices is a central pillar of the investment process adopted by the Management Company and it consists on the assurance that the governance of each investee company is based on rules of conduct aligned to international best practices and inspired by the consideration of all stakeholder’s interests also by means of a remuneration policy. The good governance assessment takes into account sound management structures, employee relations, remuneration of staff and tax compliance.

Compliance with issuers’ good governance practices is ensured through the application of ESG and SRI exclusions criteria. The absence of criticality in these areas is considered as a minimum requirement that guarantees the good governance of an issuer for inclusion in the investible universe. For details on the ESG and SRI exclusion criteria please refer to the answer to the question “What investment strategy does this financial product follow?”.

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?**

In accordance with the binding element of the investment strategy adopted for promoting the environmental and social characteristics, the minimum proportion of the investments that meet the ESG criteria (in terms of ESG rating coverage) should be at least 80% of the portfolio (box

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

#1 Aligned with E/S characteristics).

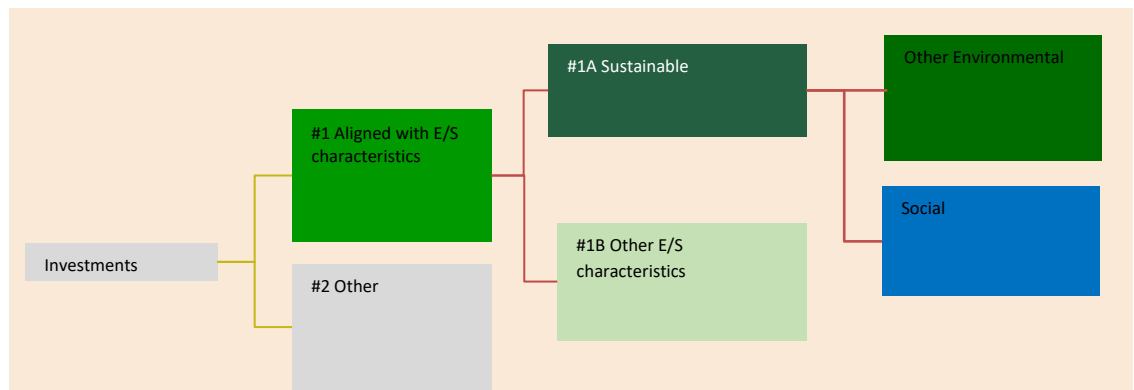
The remaining proportion (20% corresponding to the box #2 Other) of the investments (not included in the investments for promoting environmental or social characteristics or in the classification of sustainable investment) should be limited to:

- cash and cash equivalent instruments which may be held as ancillary liquidity or for risk balancing purposes;
- derivatives which may be held for risk balancing purposes and efficient portfolio management but not for promoting environmental and social characteristic;
- securities for which relevant data is not available.

The Sub-fund will have a minimum proportion of 30% of sustainable investments (box #1A Sustainable).

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** 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?**

Not applicable, derivatives are not used to promote environmental or social characteristics.



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

The Sub-fund promotes environmental and social characteristics but does not commit to make investments in taxonomy-aligned environmentally sustainable investments. It is however not excluded that the Sub-fund may be exposed to underlying investments that contribute to climate change mitigation and/or climate change adaptation.

However, currently due to a lack of reliable data, the share of environmentally sustainable investments under the Taxonomy Regulation is assessed to be 0%.

● **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy ?<sup>1</sup>**

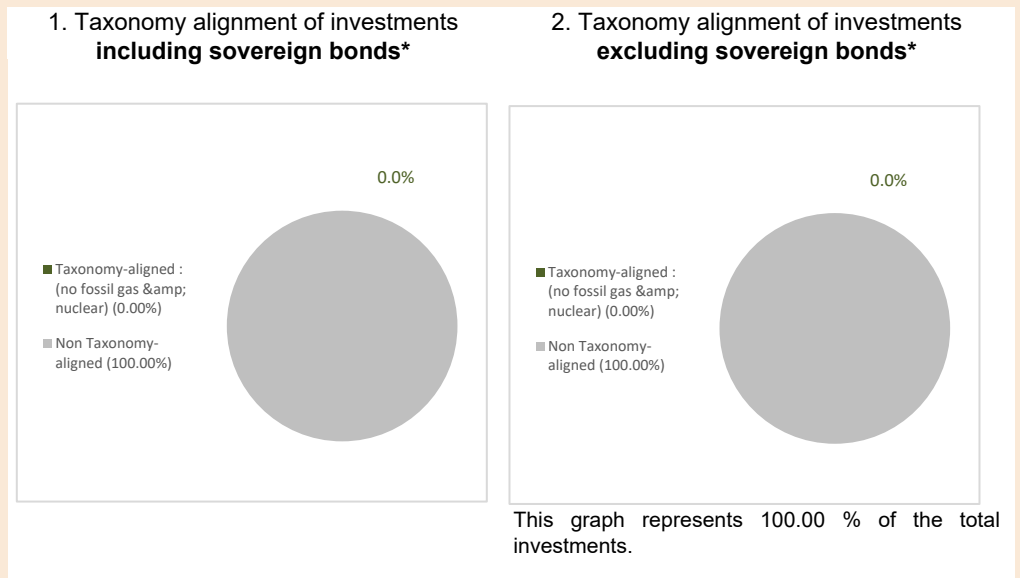
Yes

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



\*For the purpose of these graphs, ‘sovereign bonds’ consist of all sovereign exposures

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective. **Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

● **What is the minimum share of investments in transitional and enabling activities?**

Not applicable. The Sub-fund does not commit to invest in a minimum proportion of investments in transitional and enabling activities.



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

20%

The Sub-fund commits to invest at least 20% of the portfolio in sustainable investments with an environmental objective that are not aligned with the EU Taxonomy.



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 socially sustainable investments?

The Sub-fund commits to invest at least 25% of the portfolio in sustainable investment 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 portfolio may also hold instruments not subject to the ESG integration process such as cash and cash equivalent instruments or for risk balancing purposes and derivatives for risk balancing purposes and efficient portfolio management. This category may also include securities for which relevant data is not available.



## 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?

No reference benchmark has been designated for the purpose of attaining the environmental or social characteristics promoted by the Sub-fund.

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

Not applicable.

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

Not applicable.

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

Not applicable.

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

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:

[http://www.fideuramireland.ie/en/legal\\_documentation](http://www.fideuramireland.ie/en/legal_documentation)

Further details are available on the Management Company's "Sustainable And Responsible Investment Policy":

[http://www.fideuramireland.ie/upload/File/pdf/Policy\\_FAMI/FAMI\\_Sustainable\\_and\\_responsible\\_investment\\_policy.pdf](http://www.fideuramireland.ie/upload/File/pdf/Policy_FAMI/FAMI_Sustainable_and_responsible_investment_policy.pdf)

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

**Product name:**

**Legal entity identifier**

Fideuram Fund - Fideuram Fund Global Equity

549300ASA8PW1N3UE561

**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 include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

## Environmental and/or social characteristics

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

**Yes**

**No**

It will make a minimum of **sustainable investments with an environmental objective**: \_%

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 30 % of sustainable investments

in economic activities that qualify as environmentally sustainable under the EU Taxonomy

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

with an environmental objective 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** \_%

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 main environmental and social characteristics promoted by the Sub-fund through the Management Company's ESG methodology are the following:

- Environmental: climate change prevention (in terms for example of reduction of carbon emission, carbon footprint, climate change vulnerability), pollution & waste prevention (with reference to toxic emissions & waste, packaging material & waste, electronic waste); environmental opportunities (in clean tech, in renewable energy);
- Social: human capital (labor management, health & safety, human capital development, supply chain labor standards), product liability (product safety & quality, chemical safety, consumer financial protection, privacy & data security, responsible investment, health & demographic risk), social opportunities (access to communications, access to finance, access to health care, opportunities in nutrition & health), stakeholder opposition (controversial sourcing, community relations).

In addition the Sub-fund partly invests in sustainable investments pursuant to article 2(17) SFDR which means companies and issuers involved in activities that contribute to an

environmental and social objective as outlined in UN Sustainable Development Goals (hereinafter also "SDGs") while not significantly harming any other environmental or social objectives.

No reference benchmark has been designated for the purpose of attaining the environmental or social characteristics promoted by the sub-fund.

● **What Sustainability Indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?**

The indicators used to measure the attainment of each of the environmental or social characteristic promoted by the Sub-fund are:

- the binding restrictions in the investments in securities that are on the exclusion list as result of the application of the exclusion policy. The Management Company restricts investment in sectors which deems to be harmful from an SRI/ESG perspective or which do not follow good governance practices. The Sub-fund complies with an exclusions policy which refers to: i) the production, maintenance, sales and storage of weapons of mass destruction (WMD); and ii) the extractive activities, production and distribution of electricity connected with thermal coal, the energy source among fuels which represents the highest contributor in terms of carbon dioxide emissions; therefore, issuers deriving at least 25% of their revenues from these activities are excluded. The exclusion is extended to those issuers in breach of the Principles of the UN Global Compact which include principles relating to human rights, labour conditions, environmental issues and anti-corruption practices;
- the weighted average ESG score of the portfolio.

To undertake this ESG criteria analysis, the Management Company will use data provided by external ESG research providers' proprietary models (e.g. MSCI).

● **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 Sub-fund has a commitment to invest a minimum part of the portfolio in sustainable investments combining environmental and social objectives. It aims to create positive environmental and social impact by investing in companies that are involved in economic activities that are considered environmentally or socially sustainable by virtue of their contribution to one or more of the 17 environmental or social-themed SDGs (<https://sdgs.un.org/goals>).

It must be clarified that the Sub-fund does not commit to make investments in taxonomy-aligned environmentally sustainable investments according to article 6 of the Taxonomy Regulation (EU) 2020/852 (the "EU Taxonomy"). Consequently there is not a specific commitment to pursue one or more environmental objectives of article 9 of the EU Taxonomy. It is however not excluded that the Sub-fund may be exposed to underlying investments that contribute to one or more of the environmental objectives of the EU Taxonomy, such as but not limited to climate change mitigation and/or climate change adaptation.

The criteria assumed for measuring the positive contribution of each investment to each sustainable objective is based on the components defined by "MSCI ESG Research" within its methodological framework "SDG Alignment Methodology" which is based on the two following main indicators:

- "Product Alignment", i.e. the indicator of the degree of "net alignment" of an issuer's products and services to the targets associated with each SDG; this indicator aims to (i) estimate the revenue of companies issuing products and services that respond to one or more relevant SDGs, and (ii) identify products and services that have potentially negative impacts with respect to the achievement of the SDGs;
- "Operational Alignment", i.e. the indicator of the degree of alignment of the production processes of the issuing companies with respect to specific SDGs. This metric takes into account the internal policies, objectives and practices implemented by the issuers.

● **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?**

The sustainable investment methodology based on SDGs is built around the concept of SDGs alignment as much as misalignment. Each investee companies is evaluated in

relation to both metrics therefore any misalignment to at least one of the 17 SDGs is considered a breach of the Do Not Significantly Harm (“DNSH”) threshold and it excludes the possibility to consider the issuer as a sustainable investment. Additional third party data provides further tools and KPIs to assess if and how any investee company pass the DNSH test.

**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?*

The significant harm to any environmental or social sustainable investment objective (represented by one or more of the 17 SDGs) is avoided by the monitoring of any adverse impact caused by each sustainable investment on sustainability factors.

All of the mandatory adverse impact indicators of Table 1 of Annex I of Commission Delegated Regulation (EU) 2022/1288 (the “SFDR RTS”) are taken into account and any relevant ones in Tables 2 and 3 of the SFDR RTS by checking the PAI data through a periodic monitoring report where the values of the indicators at product level can be consulted and, where present and possible, at respective benchmark level in order to include this information in the investment decision-making process.

However, considering the large variability of PAI data at sectoral and geographical level, as well as their retrospective nature, no thresholds or stringent limits are set at portfolio level.

Additional information on PAI is available in the section dedicated to sustainability in the Management Company’s website (<http://www.fideuramireland.ie/en/sustainability/sustainability/>), which includes the “Sustainable And Responsible Investment Policy” as well as other PAI information.

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

The Management Company’s Sustainable and Responsible Investment Policy specifies that corporate approach to sustainable and responsible investments is inspired by the principles contained in documents such as UN Global Compact principles (UNGC), UN Guiding Principles on Business and Human Rights (UNGPs), Organization for Economic Cooperation and Development (OECD) Guidelines for multinational enterprises, International Labor Organization Conventions. This approach follows the methodology for the definition of “sustainable investments” with specific reference to the Do Not Significantly Harm Principle.

The Management Company monitors the entire portfolio on the basis of a series of environmental, social and governance indicators (via third party data), including the violations of the UNGC and OECD Guidelines for Multinational Enterprises. Issuers characterized by a severe and serious dispute equal to “Red” (also referring to selected global norms and conventions, including the United Nations Global Compact Principles, the International Labour Organization’s conventions, and the United Nations Guiding Principles on Business and Human Rights) are excluded from the investment perimeter.

In addition, as described in the Sustainable and Responsible Investment Policy, the Management Company monitors two social PAI selected to limit exposures to violations of the UNGC principles/OECD guidelines.

*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?

- X** Yes, the Management Company specifically considers the following principal adverse impact (“PAI”) indicators: Carbon emission (Scope 1 + 2); GHG intensity of investee companies; Violations of UNGC principles and OECD guidelines for Multinational Enterprises; Exposure to controversial weapons (anti-personnel mines, cluster ammunitions, chemical and biological weapons). For government bond and supranationals: GHG intensity and Investee Countries subject to social violations.

The Sub-fund’s Management Company can check the PAI data through a periodic monitoring report where can be consulted the values of the indicators at product level and, where present and possible, at respective benchmark level in order to include this information in the investment decision-making process. However, considering the large variability of PAI data at sectoral and geographical level, as well as their retrospective nature, no thresholds or stringent limits are set at portfolio level.

Further information on PAIs will be available in the Fund’s annual report.

No



## What investment strategy does this financial product follow?

The Management Company’s approach includes the adoption of strategies in line with the Principles for Responsible Investing. These strategies can be integrated into different steps of the investment process and they are based on exclusion criteria (for Issuers operating in non-socially responsible sectors or exposed to ESG risk) and in the integration of ESG factors into the analysis, selection and composition of managed portfolios with flexible approaches with regards to asset class typology and product investment strategy.

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

- ***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?***

Below are detailed the binding elements followed by the Management Company for each strategy adopted for promoting environmental and social characteristics.

The Sub-Fund partially makes sustainable investments, as defined by article 2(17) SFDR in accordance with the Management Company’s methodology for selecting sustainable investments.

SRI exclusion criteria:

Issuers directly operating in the following sectors are subject to binding investment restrictions:

- in the production, maintenance, sales and storage of weapons of mass destruction (WMD), i.e. nuclear, biological, chemical and radiological weapons (NBCR), including those which are excessively harmful and indiscriminate as identified by the United Nations Convention on Certain conventional Weapons (CCW);
- in the extractive activities and production of electricity connected with thermal coal, the energy source among fuels which represents at the global level the highest incidence for carbon dioxide emissions; therefore, issuers with at least 25% of their revenues from these activities are excluded.

ESG screening and monitoring:

Issuers characterized by the following are restricted from the investment perimeter:

- an ESG rating equal to “CCC”, classified according to the proprietary rating methodology of the external provider MSCI, which contemplates a range of values going from “AAA”, for the best rated issuers, to “CCC” for the riskiest issuers;
- a severe and serious dispute equal to “Red”, classified according to the proprietary methodology of the external provider MSCI, that indicates an ongoing very severe ESG controversy (a controversy having a social and/or environmental impact) implicating a company directly through its actions, products or operations (e.g. loss of life, destruction of eco-system, economic shakedown affecting multiple jurisdictions).

The ESG screening and monitoring is performed using data based on MSCI methodology.

For this product, which has a benchmark (as set out in the Sub-fund’s investment policy), the binding investment restrictions allow a maximum permissible exposure equal to the issuer’s weight on the benchmark.

Integration of ESG factors:

The integration of ESG factors is promoted through the selection of issuers in terms of their sustainable performance through an ESG score and in order that the final average ESG portfolio scoring is higher than that one related to the Sub-fund’s benchmark. To undertake this ESG score analysis, the Management Company will use data provided by external ESG research providers’ proprietary models (e.g. MSCI).

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

There is not a specific minimum rate of commitment for reducing the scope of the investments considered prior to the application of that investment strategy.

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

The assessment of the good governance practices is a central pillar of the investment process adopted by the Management Company and it consists on the assurance that the governance of each investee company is based on rules of conduct aligned to international best practices and inspired by the consideration of all stakeholder’s interests also by means of a remuneration policy. The good governance assessment takes into account sound management structures, employee relations, remuneration of staff and tax compliance.

Compliance with issuers’ good governance practices is ensured through the application of ESG and SRI exclusions criteria. The absence of criticality in these areas is considered as a minimum requirement that guarantees the good governance of an issuer for inclusion in the investible universe. For details on the ESG and SRI exclusion criteria please refer to the answer to the question “What investment strategy does this financial product follow?”.

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?

In accordance with the binding element of the investment strategy adopted for promoting the environmental and social characteristics, the minimum proportion of the investments that meet the ESG criteria (in terms of ESG rating coverage) should be at least 80% of the portfolio (box



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

#1 Aligned with E/S characteristics).

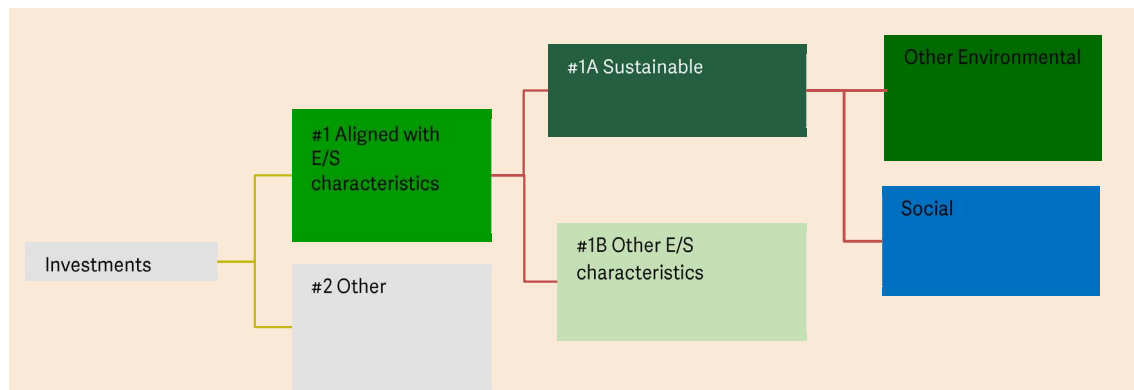
The remaining proportion (20% corresponding to the box #2 Other) of the investments (not included in the investments for promoting environmental or social characteristics or in the classification of sustainable investment) should be limited to:

- cash and cash equivalent instruments which may be held as ancillary liquidity or for risk balancing purposes;
- derivatives which may be held for risk balancing purposes and efficient portfolio management but not for promoting environmental and social characteristic;
- securities for which relevant data is not available.

The Sub-fund will have a minimum proportion of 30% of sustainable investments (box #1A Sustainable).

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** 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?**

Not applicable, derivatives are not used to promote environmental or social characteristics.



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

The Sub-fund promotes environmental and social characteristics but does not commit to make investments in taxonomy-aligned environmentally sustainable investments. It is however not excluded that the Sub-fund may be exposed to underlying investments that contribute to climate change mitigation and/or climate change adaptation.

However, currently due to a lack of reliable data, the share of environmentally sustainable investments under the Taxonomy Regulation is assessed to be 0%.

● **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy ?<sup>1</sup>**

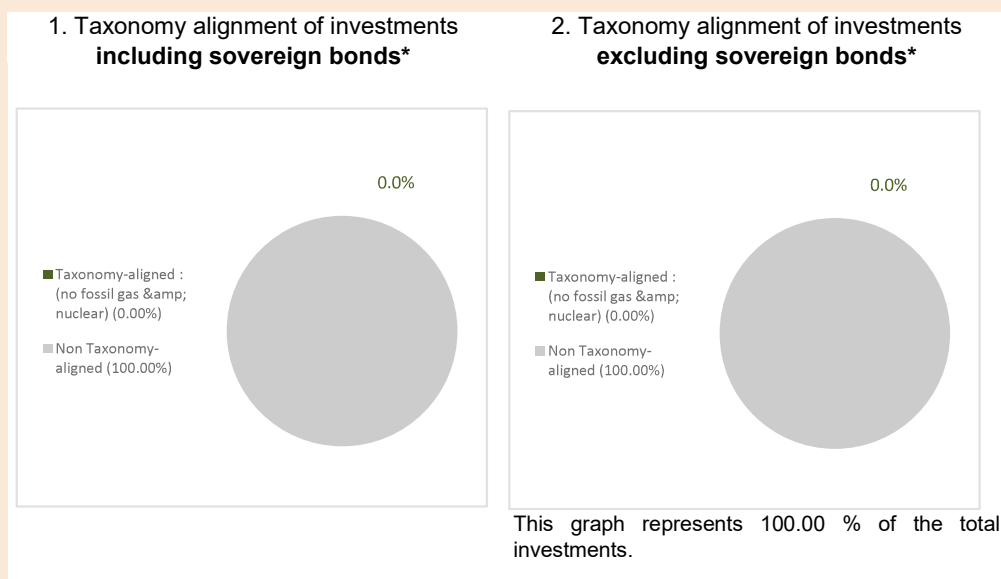
Yes

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



\*For the purpose of these graphs, ‘sovereign bonds’ consist of all sovereign exposures

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective. **Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

● **What is the minimum share of investments in transitional and enabling activities?**

Not applicable. The Sub-fund does not commit to invest in a minimum proportion of investments in transitional and enabling activities.



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

20

The Sub-fund commits to invest at least 20% of the portfolio in sustainable investments with an environmental objective that are not aligned with the EU Taxonomy.



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 socially sustainable investments?

The Sub-fund commits to invest at least 25% of the portfolio in sustainable investment 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 portfolio may also hold instruments not subject to the ESG integration process such as cash and cash equivalent instruments or for risk balancing purposes and derivatives for risk balancing purposes and efficient portfolio management. This category may also include securities for which relevant data is not available.



## 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?

No reference benchmark has been designated for the purpose of attaining the environmental or social characteristics promoted by the Sub-fund.

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

Not applicable

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

Not applicable

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

Not applicable

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

Not applicable

## Where can I find more product specific information online?

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

[http://www.fideuramireland.ie/en/legal\\_documentation](http://www.fideuramireland.ie/en/legal_documentation)

Further details are available on the Management Company’s “Sustainable And Responsible Investment Policy”:

[http://www.fideuramireland.ie/upload/File/pdf/Policy\\_FAMI/FAMI\\_Sustainable\\_and\\_responsible\\_investment\\_policy.pdf](http://www.fideuramireland.ie/upload/File/pdf/Policy_FAMI/FAMI_Sustainable_and_responsible_investment_policy.pdf)



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

**Product name:**

**Legal entity identifier**

Fideuram Fund - Fideuram Fund Global Bond

549300H4MXS7ZJF35O75

**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 include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

## Environmental and/or social characteristics

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

**Yes**

**No**

It will make a minimum of **sustainable investments with an environmental objective**: \_%

in economic activities that qualify as environmentally sustainable under the EU Taxonomy

in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

It will make a minimum of **sustainable investments with a social objective** \_%

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 0 % 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 main environmental and social characteristics promoted by the Sub-fund through the Management Company's ESG methodology are the following:

- Environmental: climate change prevention (in terms for example of reduction of carbon emission, carbon footprint, climate change vulnerability), pollution & waste prevention (with reference to toxic emissions & waste, packaging material & waste, electronic waste), environmental opportunities (in clean tech, in renewable energy).
- Social: human capital (labor management, health & safety, human capital development, supply chain labor standards), product liability (product safety & quality, chemical safety, consumer financial protection, privacy & data security, responsible investment, health & demographic risk), social opportunities (access to communications, access to finance, access to health care, opportunities in nutrition & health), stakeholder opposition (controversial sourcing, community relations).

No reference benchmark has been designated for the purpose of attaining the environmental or

social characteristics promoted by the Sub-fund.

● **What Sustainability Indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?**

The indicators used to measure the attainment of each of the environmental or social characteristic promoted by the Sub-fund are:

- the binding restrictions in the investments in securities that are on the exclusion list as result of the application of the exclusion policy. The Management Company restricts investment in sectors which deems to be harmful from an SRI/ESG perspective or which do not follow good governance practices. The Sub-fund complies with an exclusions policy which refers to: i) the production, maintenance, sales and storage of weapons of mass destruction (WMD); and ii) the extractive activities, production and distribution of electricity connected with thermal coal, the energy source among fuels which represents the highest contributor in terms of carbon dioxide emissions; therefore, issuers deriving at least 25% of their revenues from these activities are excluded. The exclusion is extended to those issuers in breach of the Principles of the UN Global Compact which include principles relating to human rights, labour conditions, environmental issues and anti-corruption practices;
- the weighted average ESG score of the portfolio.

To undertake this ESG criteria analysis, the Management Company will use data provided by external ESG research providers' proprietary models (e.g. MSCI).

● **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?**

Not applicable

● **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?**

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.

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

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:*

Not applicable

*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, the Management Company specifically considers the following principal adverse impact (“PAI”) indicators: Carbon emission (Scope 1 + 2); GHG intensity of investee companies; Violations of UNGC principles and OECD guidelines for Multinational Enterprises; Exposure to controversial weapons (anti-personnel mines, cluster ammunitions, chemical and biological weapons). For government bond and supranationals: GHG intensity and Investee Countries subject to social violations.

The Sub-fund’s Management Company can check the PAI data through a periodic monitoring report, where can be consulted the values of the indicators at product level and, where present and possible, at respective benchmark level in order to include this information in the investment decision-making process. However, considering the large variability of PAI data at sectoral and geographical level, as well as their retrospective nature, no thresholds or stringent limits are set at portfolio level.

Further information on PAIs will be available in the Fund’s annual report.

No



## What investment strategy does this financial product follow?

The Management Company’s approach includes the adoption of strategies in line with the Principles for Responsible Investing. These strategies can be integrated into different steps of the investment process and they are based on exclusion criteria (for Issuers operating in non-socially responsible sectors or exposed to ESG risk) and in the integration of ESG factors into the analysis, selection and composition of managed portfolios with flexible approaches with regards to asset class typology and product investment strategy.

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

- **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?**

Below are detailed the binding elements followed by the Management Company for each strategy adopted for promoting environmental and social characteristics.

SRI exclusion criteria:

Issuers directly operating in the following sectors are subject to binding investment restrictions:

- in the production, maintenance, sales and storage of weapons of mass destruction (WMD), i.e. nuclear, biological, chemical and radiological weapons (NBCR), including those which are excessively harmful and indiscriminate as identified by the United Nations Convention on Certain conventional Weapons (CCW);
- in the extractive activities and production of electricity connected with thermal coal, the energy source among fuels which represents at the global level the highest incidence for carbon dioxide emissions; therefore, issuers with at least 25% of their revenues from these activities are excluded.

ESG screening and monitoring:

Issuers characterized by the following are restricted from the investment perimeter:

- an ESG rating equal to “CCC”, classified according to the proprietary rating methodology of the external provider MSCI, which contemplates a range of values going from “AAA”, for the best rated issuers, to “CCC” for the riskiest issuers;
- a severe and serious dispute equal to “Red”, classified according to the proprietary methodology of the external provider MSCI, that indicates an ongoing very severe ESG

controversy (a controversy having a social and/or environmental impact) implicating a company directly through its actions, products or operations (e.g. loss of life, destruction of eco-system, economic shakedown affecting multiple jurisdictions).

The ESG screening and monitoring is performed using data based on MSCI methodology.

For this product, which has a benchmark (as set out in the Sub-fund's investment policy), the binding investment restrictions allow a maximum permissible exposure equal to the issuer's weight on the benchmark.

Integration of ESG factors:

The integration of ESG factors is promoted through the selection of issuers in terms of their sustainable performance through an ESG score and in order that the final average ESG portfolio scoring is higher than that one related to the Sub-fund's benchmark. To undertake this ESG score analysis, the Management Company will use data provided by external ESG research providers' proprietary models (e.g. MSCI).

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

There is not a specific minimum rate of commitment for reducing the scope of the investments considered prior to the application of that investment strategy.

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

The assessment of the good governance practices is a central pillar of the investment process adopted by the Management Company and it consists on the assurance that the governance of each investee company is based on rules of conduct aligned to international best practices and inspired by the consideration of all stakeholder's interests also by means of a remuneration policy. The good governance assessment takes into account sound management structures, employee relations, remuneration of staff and tax compliance.

Compliance with issuers' good governance practices is ensured through the application of ESG and SRI exclusions criteria. The absence of criticality in these areas is considered as a minimum requirement that guarantees the good governance of an issuer for inclusion in the investible universe. For details on the ESG and SRI exclusion criteria please refer to the answer to the question "What investment strategy does this financial product follow?".

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



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

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

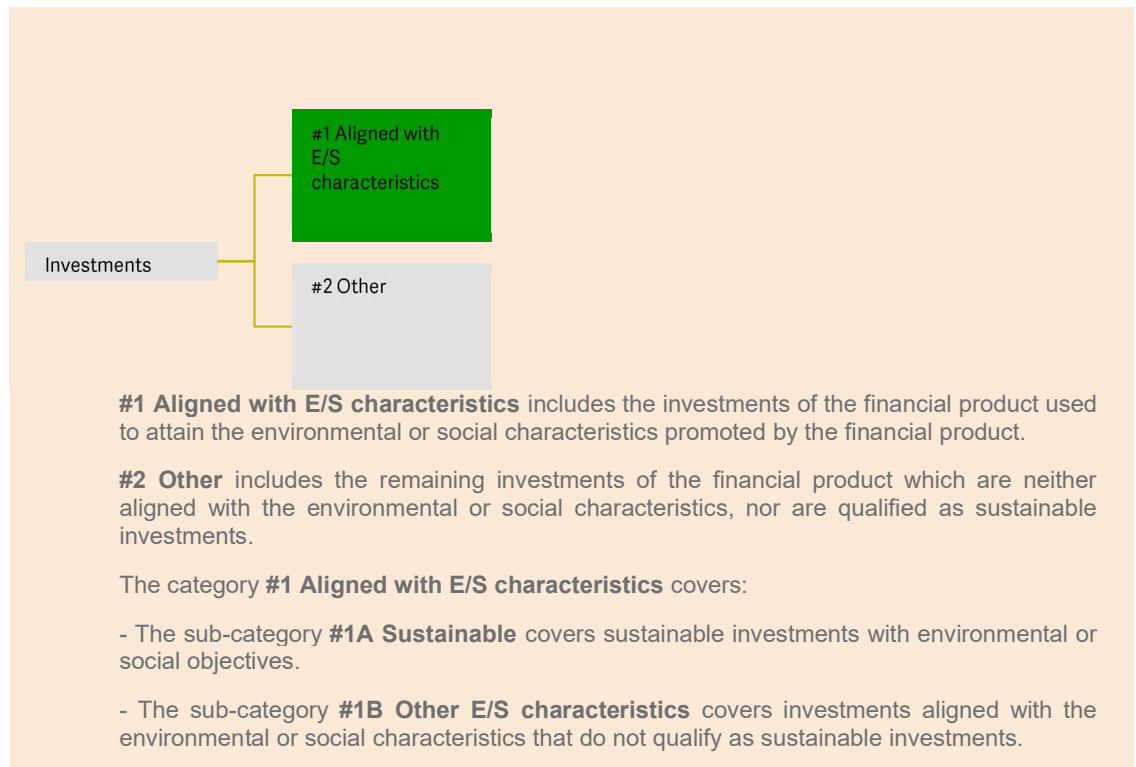
In accordance with the binding elements of the investment strategy adopted for promoting the environmental and social characteristics, the minimum proportion of the investments that meet the ESG criteria (in terms of ESG rating coverage) should be at least 80% of the portfolio (box #1 Aligned with E/S characteristics).

The remaining proportion (20% corresponding to the box #2 Other) of the investments (not included in the investments for promoting environmental or social characteristics) should be limited to:

- cash and cash equivalent instruments which may be held as ancillary liquidity or for risk balancing purposes;
- derivatives which may be held for risk balancing purposes and efficient portfolio management but not for promoting environmental and social characteristic;
- securities for which relevant data is not available.

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.



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

Not applicable, derivatives are not used to promote environmental or social characteristics.



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

The Sub-fund promotes environmental and social characteristics but does not commit to make investments in taxonomy-aligned environmentally sustainable investments. It is however not excluded that the Sub-fund may be exposed to underlying investments that contribute to one or more of the environmental objectives of the EU Taxonomy, such as but not limited to climate change mitigation and/or climate change adaptation. However, currently due to a lack of reliable data, the share of environmentally sustainable investments under the Taxonomy Regulation is assessed to be 0%.

● **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

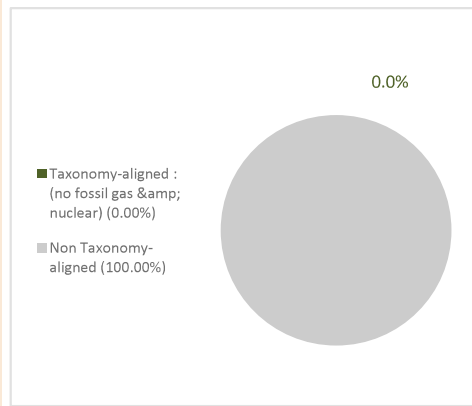
In nuclear energy

No

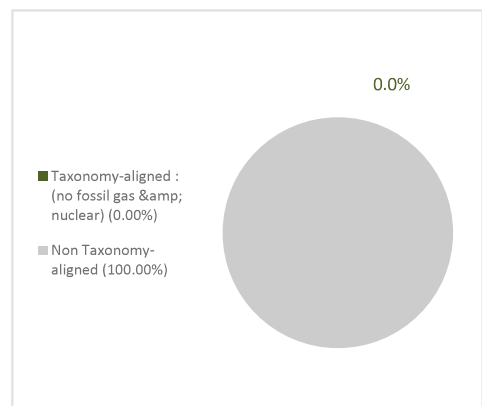
<sup>1</sup> Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change (“climate change mitigation”) and do not significantly harm any EU Taxonomy objectives - see explanatory note in the left hand margin. The full criteria for 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 green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy-alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy-alignment only in relation to the investments of the financial product other than sovereign bonds.**

1. Taxonomy alignment of investments including sovereign bonds\*



2. Taxonomy alignment of investments excluding sovereign bonds\*



This graph represents 1.00 % of the total investments.

\*For the purpose of these graphs, ‘sovereign bonds’ consist of all sovereign exposures

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective. **Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

● **What is the minimum share of investments in transitional and enabling activities?**

Not applicable. The Sub-fund does not commit to invest in a minimum proportion of investments in transitional and enabling activities.



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

Not applicable



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 socially sustainable investments?

Not applicable



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

The remaining portfolio may also hold instruments not subject to the ESG integration process such as cash and cash equivalent instruments or for risk balancing purposes and derivatives for risk balancing purposes and efficient portfolio management. This category may also include securities for which relevant data is not available.



## 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?

No reference benchmark has been designated for the purpose of attaining the environmental or social characteristics promoted by the Sub-fund.

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?**

Not applicable

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

Not applicable

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

Not applicable

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

Not applicable



## Where can I find more product specific information online?

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

[http://www.fideuramireland.ie/en/legal\\_documentation](http://www.fideuramireland.ie/en/legal_documentation)

Further details are available on the Management Company’s “Sustainable And Responsible Investment Policy”:

[http://www.fideuramireland.ie/upload/File/pdf/Policy\\_FAMI/FAMI\\_Sustainable\\_and\\_responsible\\_investment\\_policy.pdf](http://www.fideuramireland.ie/upload/File/pdf/Policy_FAMI/FAMI_Sustainable_and_responsible_investment_policy.pdf)