EUROMOBILIARE
INTERNATIONAL FUND SICAV

Website disclosure referred to in Article 8 of Regulation (EU) 2019/2088 (SFDR)

Product Name: EUROFUNDLUX CORE+ FIDELITY US EQUITY

SECTION I: SUMMARY

The Sub-Fund promotes environmental and social characteristics by aiming to achieve an ESG score of the portfolio greater than the ESG score of its benchmark.

The Sub-Fund provides for a minimum allocation of 80% of its assets to investments that are aligned with the promoted environmental and social characteristics. As a result, the remaining maximum 20% of its assets fall into the "#2 Others" category.

The Sub-Fund has the objective to achieve an average ESG Score greater than its reference benchmark. The ESG Score is a proprietary score by Fidelity, the delegated investment manager, and used to evaluate the sustainability of an issuer and built by assigning set numerical values to Fidelity ESG ratings or ESG ratings provided by external agencies, which consider environmental characteristics including carbon intensity, carbon emissions, energy efficiency, water and waste management and biodiversity, as well as social characteristics including product safety, supply chain, health and safety and human rights.

The Sub-Fund does not invest in securities issued by issuers with exposure to controversial weapons, thermal coal mining for more than 5% of revenues, thermal coal power generation for more than 20% of revenues, tobacco production or involved in violations of UNGC principles, OECD Guidelines for Multinational Enterprises, UN Guiding Principles for Business and Human Rights, Responsible Business Conduct and ILO Conventions.

The Company ensures that all the Sub-Fund investments comply with good governance practices firstly through the exclusion of corporate issuers in violation of the UNGC principles and, in addition, through the consideration of the ESG Score and other indicators from fundamental research as track record of capital allocation, financial transparency, related party transactions, board independence and size, executive pay, auditors and internal oversight, minority shareholders rights.

The Sub-Fund considers a set of sustainability indicators to measure the attainment of the environmental and social characteristics promoted, to which it applies a set of binding elements of the investment strategy to select investments, in order to attain each of the environmental or social characteristics promoted. More details can be found in the following sections.

The Company ensures compliance with the binding elements of the investment strategy through the implementation of a purchasing block on the front office system, where possible, and through monitoring in other cases. The respect of the binding elements is presented quarterly to the Risk and Performance Committee and the value of the sustainability indicators and the confirmation of the respect of the binding elements are published annually in the periodic report. For the sustainability indicators considered, for which no binding element (or threshold) has been identified, a non-binding target has been set for internal monitoring.

The Company uses the data provided by the delegated investment manager as a data source to calculate the sustainability indicators to measure the attainment of the environmental and social characteristics promoted, as well as to ensure that the Sub-Fund's investments comply with good governance practices, while it uses MSCI data as a data source to calculate the sustainability indicators to consider principal adverse impacts and integrate sustainability risks.

In specific cases where the quality of individual data is questionable, or where data is identified as incorrect or inaccurate, the company interfaces directly with the provider.

Broadly speaking, the only existing limitation is the availability of data. The methodologies developed, as well as the sustainability indicators chosen and the binding elements determined, have, among their objective, also to synthesise the sustainability ambition of the product with the current availability of data, in order to best represent sustainability phenomena, avoiding underestimating them in the case of a negative effect (e.g. principal adverse impacts), or overestimating them in the case of a positive contribution (e.g. alignment to the EU Taxonomy).

The Sub-Fund does not adopt an engagement policy as part of its investment strategy.

The MSCI USA Screened Index has been designated as reference benchmark for the purpose of attaining the environmental and social characteristics promoted by the Sub-Fund.

SECTION 2: NO SUSTAINABLE INVESTMENT OBJECTIVE

This financial product promotes environmental or social characteristics, but does not have as its objective a sustainable investment.

SECTION 3: ENVIRONMENTAL OR SOCIAL CHARACTERISTICS OF THE FINANCIAL PRODUCT

The Sub-Fund promotes environmental and social characteristics by aiming to achieve an ESG score of the portfolio greater than the ESG score of its benchmark.

SECTION 4: INVESTMENT STRATEGY

The Sub-Fund invests at least 90% of its assets in equity securities issued by US companies, using MSCI USA Screened Index as reference benchmark.

The Sub-Fund invests at least 80% of its assets in the aforementioned types of financial instruments which are aligned with the promoted environmental and social characteristics.

The Sub-Fund has the objective to achieve an average ESG Score greater than its reference benchmark. The ESG Score is a proprietary score by Fidelity, the delegated investment manager, and used to evaluate the sustainability of an issuer and built by assigning set numerical values to Fidelity ESG ratings or ESG ratings provided by external agencies, which consider environmental characteristics including carbon intensity, carbon emissions, energy efficiency, water and waste management and biodiversity, as well as social characteristics including product safety, supply chain, health and safety and human rights.

The Sub-Fund does not invest in securities issued by issuers with exposure to controversial weapons, thermal coal mining for more than 5% of revenues, thermal coal power generation for more than 20% of revenues, tobacco production or involved in violations of UNGC principles, OECD Guidelines for Multinational Enterprises, UN Guiding Principles for Business and Human Rights, Responsible Business Conduct and ILO Conventions.

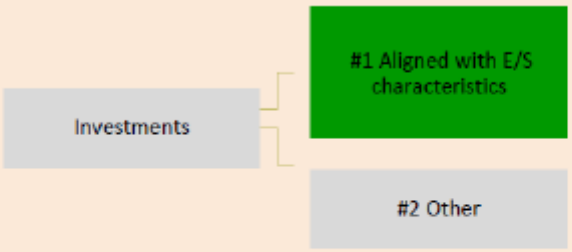
The Company ensures that all the Sub-Fund investments comply with good governance practices firstly through the exclusion of corporate issuers in violation of the UNGC principles and, in addition, through the consideration of the ESG Score and other indicators from fundamental research as track record of capital allocation, financial transparency, related party transactions, board independence and size, executive pay, auditors and internal oversight, minority shareholders rights.

In line with all other products established by the Company, the Sub-Fund excludes corporate issuers involved in controversial weapons or in very serious violations of human and child rights and speculative derivatives on food commodities.

The Company ensures that all the Sub-Fund investments comply with good governance practices through the exclusion of corporate issuers in violation of the UNGC principles. In addition, governance practices of corporate issuers are assessed through the ESG Score.

SECTION 5: PROPORTION OF INVESTMENTS

The Sub-Fund provides for a minimum allocation of 80% of its assets to investments that are aligned with the promoted environmental and social characteristics, As a result, the remaining maximum 20% of its assets fall into the “#2 Others” category.



#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.

#2Other includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

N/A

SECTION 6: MONITORING OF ENVIRONMENTAL OR SOCIAL CHARACTERISTICS

The Sub-Fund considers the following sustainability indicators to measure the attainment of the environmental and social characteristics promoted, to which it applies the following binding elements of the investment strategy to select investments in order to attain each of the environmental or social characteristics promoted, and of which the Company ensure the respect in the following way:

Characteristic promoted	Sustainability Indicator	Binding element	Type of monitoring used
Environmental and Social	ESG Score of the portfolio	ESG Score of the portfolio greater than its reference benchmark	Monitoring
	Percentage of investment in issuers with exposure to the following excluded activities: controversial weapons, thermal coal mining, thermal coal power generation, tobacco production	Exclusion of securities of issuers with exposure to the following excluded activities: controversial weapons, thermal coal mining (for more than 5% of revenues), thermal coal power generation (for more than 20% of revenues), tobacco production	Monitoring
	Percentage of investment in issuers involved in the following norms-based screens: UNGC principles, OECD Guidelines for Multinational Enterprises, UN Guiding Principles for Business and Human Rights, Responsible	Exclusions of securities of issuers involved in the following norms-based screens: UNGC principles, OECD Guidelines for Multinational Enterprises, UN Guiding Principles for Business and Human Rights, Responsible	Monitoring

	Business Conduct and the ILO Conventions	Business Conduct and ILO Conventions	

In summary, the Company ensures compliance with the binding elements of the investment strategy through the implementation of a purchasing block on the front office system, where possible, and through monitoring in other cases. The respect of the binding elements is presented quarterly to the Risk and Performance Committee and the value of the sustainability indicators and the confirmation of the respect of the binding elements are published annually in the periodic report.

SECTION 7: METHODOLOGIES

The Sub-Fund considers the following sustainability indicators to measure the attainment of the environmental and social characteristics promoted, to which it applies the following binding elements of the investment strategy to select investments in order to attain each of the environmental or social characteristics promoted, for which the Company developed the following methodologies:

Characteristic promoted	Sustainability Indicator	Binding element	Methodology
Environmental and Social	ESG Score of the portfolio	ESG Score of the portfolio greater than its reference benchmark	The delegated investment manager Fidelity uses a proprietary ESG score to evaluate the sustainability of an issuer and built by assigning set numerical values to Fidelity ESG ratings or ESG ratings provided by external agencies, which consider environmental characteristics including carbon intensity, carbon emissions, energy efficiency, water and waste management and biodiversity, as well as social characteristics including product safety, supply chain, health and safety and human rights.
	Percentage of investment in issuers with exposure to the following excluded activities: controversial weapons, thermal coal mining, thermal coal power generation, tobacco production	Exclusion of securities of issuers with exposure to the following excluded activities: controversial weapons, thermal coal mining (for more than 5% of revenues), thermal coal power generation (for more than 20% of	The delegated investment manager Fidelity implements the exclusions specified using data from data providers.

		revenues), tobacco production	
	Percentage of investment in issuers involved in the following norms-based screens: UNGC principles, OECD Guidelines for Multinational Enterprises, UN Guiding Principles for Business and Human Rights, Responsible Business Conduct and the ILO Conventions	Exclusions of securities of issuers involved in the following norms-based screens: UNGC principles, OECD Guidelines for Multinational Enterprises, UN Guiding Principles for Business and Human Rights, Responsible Business Conduct and ILO Conventions	The delegated investment manager Fidelity implements the exclusions specified using data from data providers.

SECTION 8: DATA SOURCES AND PROCESSING

The Company uses the data provided by the delegated investment manager as a data source to calculate the sustainability indicators to measure the attainment of the environmental and social characteristics promoted, as well as to ensure that the Sub-Fund's investments comply with good governance practices, while it uses MSCI data as a data source to calculate the sustainability indicators to consider principal adverse impacts and integrate sustainability risks.

When preparing the outputs for monitoring, which takes place at least quarterly in the Risk and Performance Committee, of compliance with the binding elements of the investment strategy, as well as compliance with good governance practices, consideration of the main adverse effects and integration of sustainability risks, the Company assesses the quality of the data and, in case of doubts about its quality, interfaces directly with the delegated investment manager or the data provider.

The data is automatically received by the data provider or the delegated investment manager and stored in an internal data register, which also performs any calculations and/or aggregations and produces the above outputs.

SECTION 9: LIMITATION TO METHODOLOGIES AND DATA

In specific cases where the quality of individual data is questionable, or where data is identified as incorrect or inaccurate, the company interfaces directly with the delegated investment manager or the data provider.

Broadly speaking, the only existing limitation is the availability of data. The methodologies developed, as well as the sustainability indicators chosen and the binding elements determined, have, among their objective, also to synthesise the sustainability ambition of the product with the current availability of data, in order to best represent sustainability phenomena, avoiding underestimating them in the case of a negative effect (e.g. principal adverse impacts), or overestimating them in the case of a positive contribution (e.g. alignment to the EU Taxonomy).

SECTION 10: DUE DILIGENCE

The Company ensures the correct application of the sustainable investment strategy, and specifically of measuring the attainment of the environmental and social characteristics promoted, as well as to ensure that the Sub-Fund's investments comply with good governance practices, consider principal adverse impacts and integrate sustainability risks through the data processing and monitoring methods described in the previous sections.

SECTION 11: ENGAGEMENT POLICIES

The Sub-Fund does not adopt an engagement policy as part of its investment strategy.

SECTION 12: DESIGNATED REFERENCE BENCHMARK

The MSCI USA Screened Index has been designated as reference benchmark for the purpose of attaining the environmental and social characteristics promoted by the Sub-Fund.

The MSCI USA Screened Index excludes companies from the underlying parent index based on Environmental, Social and Governance criteria, and in particular:

- Companies associated with controversial, civilian and nuclear weapons, tobacco, palm oil, arctic oil & gas
- Companies that derive revenues from thermal coal power and extraction of select fossil fuels
- Companies that are not in compliance with the UNGC principles
- Companies that are involved in Red Flag ESG controversies, in Orange Flag for controversies on “Land Use and Biodiversity” or “Supply Chain Management”

In addition, the MSCI USA Screened Index targets a minimum 30% reduction in carbon emission intensity relative to the underlying parent index.