



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 delegated investment manager as data sources to calculate the sustainability indicators to measure the attainment of the environmental and social characteristics promoted, as well as to ensure that the SubFund's investments comply with good governance practices, while it uses data from Mainstreet Partners and MSCI as data sources 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 SIGNIFICANT HARM TO THE SUSTAINABLE INVESTMENT OBJECTIVE

The Sub-Fund promotes environmental and 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.

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



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 which the Company ensures compliance with in the following manner:

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
Environmental and Social	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
Environmental and Social	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 the ILO Conventions	Monitoring

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, and for which the Company has 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 revenues), tobacco production	The delegated investment manager Fidelity implements the exclusions specified using data from data providers.
	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 the 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 providers Mainstreet Partners and MSCI as data sources 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, consider principal adverse impacts and integrate sustainability risks.



In preparing the outputs for the monitoring that 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 principal adverse impacts and integration of sustainability risks, the Company assesses the quality of the data, and, if there is any doubt about it, it discusses directly with the data provider.

The data is automatically received from the data provider and stored in an internal data register, which also performs any calculations and/or aggregations and produces the above-mentioned 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 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 proper application of the sustainable investment strategy, and specifically 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, 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.