

## **Principal Adverse Impact Statement**

Statement on principal adverse impacts of investment decisions on sustainability factors



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### 1 Summary

Under Regulation (EU) 2019/2088 on sustainability-related disclosures in the financial services sector ("**SFDR**"), some of the entities of Fidelity International in Continental Europe and the United Kingdom are required to publish entity and product-specific disclosures as soon as they meet the definition of Financial Market Participant or Financial Advisers. The purpose of this document is to publish some of these required disclosures for the following entities:

- FIL Investment Management (Luxembourg) S.A. (LEI : 54930020FVXYT8E0QU87) as a Financial Market Participant ;
- FIL (Luxembourg) S.A. (LEI : 2221001FAMMFQUAGXQ13) as a Financial Market Participant and a Financial Adviser ;
- FIL Gestion (LEI: 96950051B8PCYINJT692) as a Financial Market Participant and a Financial Adviser;
- FIL Investment Services (UK) Limited (LEI: 213800TWO2EHFEWNF438) as a Financial Market Participant ; and
- FIL Pensions Management (LEI: 213800SWMABMN8UKVY18) as a Financial Market Participant and a Financial Adviser (together "Fidelity in-scope entities").

Even though FIL Fondsbank GmbH, FIL Life Insurance (Ireland) DAC and Fidelity European Pension Plan are also under the Financial Market Participant definition according to SFDR, they are not in scope of this document as they do not consider principal adverse impacts. The SFDR disclosure for these specific entities is available on their specific websites.

Fidelity in-scope entities consider principal adverse impacts of its investment decisions on sustainability factors. The present statement is the consolidated statement on principal adverse impacts on sustainability factors of the Fidelity inscope entities.

The statement outlines how FIL Limited and its subsidiaries (herein referred to as "FIL" or "Organisation") consider and approach principal adverse sustainability impacts ("PAI" or "PASI") of investment decisions on behalf of the funds and discretionary mandates for which FIL acts as the appointed investment manager or advisor. This statement on principal adverse impacts on sustainability factors covers the reference period from 1 January to 31 December 2022. The impacts of the Principal adverse indicators of Table 1 and any selected indicators of Table 2 and 3 of Annex I of the SFDR Act will be reported in 2023, following their measurements over Q1 2022 - Q4 2022.

Applicability	Dicability Theme Adverse Sustainability Indicator		stainability Indicator	Annex I Table	Annex I Table Indicator Number
Investee Companies	Climate and other environment-	GHG emissions	GHG emissions (Scope 1, 2, 3 and total)	1	1
	related indicators		Carbon footprint	1	2
			GHG intensity of investee companies	1	3
			Exposure to companies active in the fossil fuel sector	1	4
			Share of non- renewable energy in consumption and production	1	5

supranationals	other environment-				
Sovereigns and	Climate and	Environmental	GHG intensity	1	15
		Human Rights	Lack of human rights policy	3	9
			Exposure to controversial weapons (anti- personnel mines, cluster munitions, chemical weapons and biological weapons)	1	14
			Board gender diversity	1	13
			Unadjusted gender pay gap	1	12
			Lack of processes and compliance mechanisms to monitor compliance with UN Global Compliance principles and OECD Guidelines for Multinational Enterprises	1	11
	Social and employee, respect for human rights, anti- corruption, and anti- bribery matters	Social and employee matters	Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises	1	10
			Deforestation	2	15
		and material emissions	Hazardous and radioactive waste ratio	1	9
		Water, waste,	Emissions to water	1	8
		Biodiversity	Activities negatively affecting biodiversity- sensitive areas	1	7
			Energy consumption intensity per high impact sector	1	6

	related indicators				
	Social and employee, respect for human rights, anti- corruption, and anti- bribery matters	Social	Investee countries subject to social violations	1	16
Real estate assets	Climate and other environment-	Fossil fuels	Exposure to fossil fuels through real estate assets	1	17
	related indicators	Energy efficiency	Exposure to energy inefficient real estate assets	1	18

# 2 Description of the principal adverse impacts on sustainability factors

Fidelity in-scope entities consider that PAIs are those impacts of our investment decisions that result in material negative impacts on environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters such as environment degradation, poor labour practice, and unethical corporate behaviour for example bribery and corruption. The PAIs outlined in the SFDR represent a helpful tool for measuring and reporting on principal adverse impacts, but are not exhaustive and may require contextual information and analysis to determine the extent to which performance on an individual PAI represents a material adverse impact on a sustainability factor such as impacts on biodiversity or the adverse effects of high emissions to water.

Principal adverse impacts on sustainability factors are considered by those funds and those segregated mandates that comply with the disclosure requirements of SFDR Article 8 and 9. For those funds that consider PAIs, information on PAIs on sustainability factors will be available in the specific fund's Sustainability Annex and in the next annual report of the funds. For those segregated mandates that consider PAIs, information on PAIs on sustainability factors will be available in the periodic report as referred to in Article 25(6) of the Directive 2014/65/EU.

#### 2.1 Entity: FIL Investment Management (Luxembourg) S.A

#### Indicators applicable to investment in investee companies - Table 1

Climate and ot	her environmen	ital-related indicators				
Adverse sustainability indicator		Metric	Impact (year 2022)	Impact (Year 2021)	Explanation	Actions taken, actions planned, and targets set for the next reference period
Greenhouse gas emissions	1. GHG emissions	Scope 1 GHG emissions Scope 2 GHG emissions Scope 3 GHG emissions Total GHG emissions	6,119,268 tCO <sub>2</sub> e 1,587,899 tCO <sub>2</sub> e 55,592,853 tCO <sub>2</sub> e 63,300,020 tCO <sub>2</sub> e	NA NA NA	Coverage: 86% Coverage: 86% Coverage: 86% Coverage: 86%	Approach         Climate considerations are         integrated into research through         our Proprietary ESG Ratings,         Proprietary Climate Ratings and 3 <sup>rr</sup> party data sets (including scenario analysis).         Fidelity's ESG Ratings explicitly         integrate climate PAI metrics (with
	2. Carbon footprint 3. GHG intensity of investee companies	Carbon footprint GHG intensity of investee companies	412 tCO <sub>2</sub> e per \$M USD Invested 759 tCO <sub>2</sub> e per \$M USD revenue	NA	Coverage: 86% Coverage: 86%	<ul> <li>the exception of exposure to the fossil fuel sector). Metrics are selected for each sector based on their materiality.</li> <li>Fidelity's Climate Rating complements our ESG Ratings, and assess issuers' alignment to</li> </ul>
	4. Exposure to companies active in the fossil fuel sector	Share of investments in companies active in the fossil fuel sector	6.23%	NA	Coverage: 74%	<ul> <li>the Paris Agreement and net zero pathways.</li> <li>Fidelity International has set a target to halve the aggregate carbon footprint of our investment portfolios by 2030, from a 2020</li> </ul>
Energy Performance	5. Share of non- renewable energy in consumption and production	Share of non- renewable energy consumption and non-renewable energy production of investee companies compared to renewable energy source expressed as a percentage of total energy sources	46.4%	NA	Coverage: 61%	<ul> <li>portfolios by 2030, from a 2020</li> <li>baseline, starting with equity and corporate bond holdings; and reach net zero for holdings by 2050.</li> <li>Engagement</li> <li>We engage with companies on our minimum climate requirements related to: <ul> <li>Disclosure of Scope 1, 2 &amp; 3 GHG emissions data</li> <li>Business alignment to Paris Agreement goals</li> <li>Disclosure aligned with TCFD recommendations</li> <li>Detailed disclosure of climate risks and opportunities for business</li> <li>Having a climate change policy and a net zero plan in place</li> </ul> </li> <li>In addition to the minimum criteria above, we also conduct thematic engagements with the objective of</li> </ul>
	6. Energy consumption intensity per high impact sector	Energy consumption in GWh per million USD of revenue of investee companies, per high impact climate sector	A-Agriculture, forestry and fishing: 0.0001 GWH per \$M USD revenue B-Mining and quarrying: 0.0319 GWH per \$M USD revenue	NA	Coverage: 61%	

	encouraging real-world
C-Manufacturing:	decarbonisation. For our example,
0.437 GWH per	we are engaging with investee
\$M USD revenue	companies with thermal coal
	exposure to encourage a timely
D-Electricity, gas,	phase out.
steam and air	Voting
conditioning	We expect our investee companies
supply: 0.0772	to:
GWH per \$M USD	
revenue	Take action to manage     climate change impacts
	and reduce their GHG
E-Water supply,	emissions.
sewerage, waste	Make specific and     appropriate disclosures
management and	around emissions,
remediation	climate targets, risk
activities: 0.005	management and oversight.
GWH per \$M USD	Where companies fall short of our
revenue	minimum climate expectations and
	do not demonstrate a willingness or
F-Construction:	plan to meet them, we will vote
0.00168 GWH per	against management.
\$M USD revenue	
G-Wholesale and	Collaboration
retail Trade, repair	We support policy makers in
of motor vehicles	helping markets meet Paris-aligned
and motorcycles:	emissions reductions targets. We are a regular contributor to public
0.00908 GWH per	consultations, including those
\$M USD revenue	pertaining to the EU Green Deal,
	EU Action Plan on Sustainable
H-Transportation	Finance and UK mandated TCFD
and storage:	reporting. We continue to engage
0.0212 GWH per	with policy makers and provide
\$M USD revenue	expert views on topics around
	financing the low-carbon transition
L-Real estate	and the role that asset managers
activities: 0.00538	can play.
GWH per \$M USD	
revenue	Exclusions
	Exclusions on thermal coal miners &
	power generation, oil sands
	extraction and artic oil & gas
	production apply for our <u>Sustainable</u>
	Family Funds.
	Further details on our approach to
	considering and mitigating the
	impacts of GHG and other
	emissions can be found in our
	Climate Policy.

Biodiversity	7. Activities	Share of investment	0.4%	NA	Coverage:	Approach
Diodivoloky	negatively	in investee	0.170		74%	Biodiversity considerations are
	affecting	companies with				integrated into our research using
	biodiversity-	sites/operations				our Proprietary ESG Rating that
	sensitive	located in or near to				include metrics on terrestrial and
	areas	biodiversity-sensitive				oceanic biodiversity impacts.
		areas where				Metrics are selected for each sector
		activities of those				based on their materiality.
		investee companies				Engagement & Collaboration
		negatively affect				Fidelity International, alongside
		those areas				more than 30 other financial
						companies, has committed to
						tackle forest-risk agricultural
						commodity driven deforestation
						activities at the companies in our
						investment portfolios through
						engagement and stewardship by
						the end of 2025 on a best-efforts
						basis.
						In 2021, Fidelity International
						signed up to the Finance for
						Biodiversity pledge which commits
						to protect and restore biodiversity.
						The pledge brings together over
						100 financial institutions,
						committing to collaborate & share
						knowledge, engage with
						companies, assess impact, and set
						targets to report on biodiversity
						matters before 2025.
						Fidelity International has a thematic
						and collaborative engagement
						programme focused on biodiversity
						issues. Relevant thematic
						engagements include plastics,
						deforestation and sustainable
						fashion.
						Voting
						Fidelity will vote against directors
						where they have clearly failed to
						manage or implement the
						capabilities to monitor and assess
						material environmental risks related
						to biodiversity matters and reduce
						the ecological impact of their
						operations.
Water, waste,	8. Emissions	Tonnes of emissions	47.6 tonnes of	NA	Coverage:	Approach
and material	to water	to water generated	emissions per \$M		3.1%	Water, waste and material
emissions		by investee	invested			emissions considerations are
		companies per				integrated into our research using
		million USD				our Proprietary ESG Ratings that
		invested, expressed				include specific metrics on water

		as a weighted average				usage, toxic emissions, and hazardous waste intensity. Metrics
	9. Hazardous and radioactive waste ratio	Tonnes of hazardous waste and radioactive waste generated by investee companies per million USD invested, expressed as a weighted average	0.954 tonnes of hazardous waste per \$M USD invested	NA	Coverage: 27%	<ul> <li>are selected for each sector based on their materiality.</li> <li>Engagement &amp; Collaboration</li> <li>Fidelity is a signatory of the Valuing Water Finance Initiative that aims to support companies toward and protect water resources in their business operations and global supply chains. We engage with poor performing issues to help encourage improvements to protect water resources. Additionally, we will look to engage with issuers which are not have a high hazardous waste ratio.</li> <li>Voting</li> <li>Fidelity International vote against directors where a company has clearly failed to properly manage the sourcing of water, failed to mitigate potential water scarcity risks, or are accountable for failings resulting in material pollution or contamination.</li> </ul>
Indicators fo Adverse sus indicator	-	oyee, respect for huma			-	Actions taken, actions planned, and targets set for the next
			Impact (year 2022)	Impact (Year 2021)	Explanation	reference period
Social and employee matters	10. Violations of UN Global Compact principles and Organisation for Economic Cooperation and	Share of investments in investee companies that have been involved in violations of UNGC principles or OECD Guidelines for Multinational Enterprises	0.02%	NA	Coverage: 90%	Approach Corporate governance and human rights considerations are integrated into our research using our Proprietary ESG Ratings that include indicators on human rights, modern slavery issues, anti-bribery, and corruption. Metrics are selected for each sector based on their materiality.
	Development (OECD) Guidelines for Multinational Enterprises					<b>Exclusions</b> Fidelity International exclude issuers that we deem to be in violation of the United Nations Global Compact, the OECD Guidelines for Multinational
	11. Lack of processes and compliance	Share of investments in investee companies without policies to monitor	40.1%	NA	Coverage: 74%	Enterprises, the UN Guiding Principles for Business and Human Rights, Responsible Business Conduct and

mechanisms to monitor compliance with UN Global Compliance principles and OECD Guidelines for Multinational Enterprises	compliance with the UNGC principles or OECD Guidelines for Multinational Enterprises or grievance/complaints handling mechanism to address violations of the UNGC principles or OECD Guidelines for Multinational Enterprises				International Labour Organization (ILO) Conventions. Engagement & Collaboration Fidelity International is a member of the Investors Against Slavery and Trafficking Asia Pacific initiative and aim to drive positive change through collaborative engagement with targeted companies. Voting Fidelity International will vote against the election of members of a company's board of directors where, in our view, the company has not met the minimum standards of monitoring and overseeing itself and its suppliers with regard to human rights and minimising the risk of modern slavery or human rights violations occurring within its organisation or supply chain.
12. Unadjusted gender pay gap	Average unadjusted gender pay gap of investee companies	2.42	NA	Coverage: 17%	Approach Gender pay gap and board gender diversity considerations are integrated into our research using
13. Board gender diversity	Average ratio of female to male board members in investee companies, expressed as a percentage of all board members	22.4%	NA	Coverage: 74%	our Proprietary ESG Rating through the inclusion of specific indicators. Metrics are selected for each sector based on their materiality. <b>Engagement &amp; Collaboration</b> Fidelity International supports various initiatives globally on gender pay gap and diversity, including the 30 percent club and the 40:40 Vision working towards gender balanced executive teams by 2030. <b>Voting</b> Our voting policy is designed to encourage gender diversity on corporate boards. We support gender diversity on a company's board and will vote against the election of directors where boards do not have at least 30% female representation at companies in the most developed markets (including the UK, EU, USA and Australia)

						and 15% female representation in all other markets where standards on gender diversity are still developing. We may also take into account factors including the board size, industry and corporate structure.
	14. Exposure to controversial weapons (anti- personnel mines, cluster munitions, chemical weapons and biological weapons)	Share of investment in investee companies involved in the manufacturing or selling of controversial weapons	0.0%	NA	Coverage: 74%	Exclusions We exclude issuers with exposure to controversial weapons in accordance with our <u>Exclusions</u> <u>Policy</u> . Additional exclusions, including on semi-automatic weapons producers and conventional weapons, apply to <u>our</u> <u>Sustainable Fund Family</u> .
Indicators appl	icable to invest	ments in sovereigns a	nd supranationals	1		
Adverse sustai indicator	nability	Metric	Impact (year 2022)	Impact (Year 2021)	Explanation	Actions taken, actions planned, and targets set for the next reference period
Environmental	15. GHG intensity	GHG intensity of investee countries	19.34tCO₂e per \$M USD GDP	NA	Coverage of eligible assets: 99.52%	Approach Fidelity International is awaiting the completion of a global standard for sovereign GHG intensity by the Partnership for Carbon Accounting Financials (PCAF) and plans to adopt the global standard when available.
Social	16. Investee countries subject to social violations	Number of investee countries subject to social violations (absolute number and relative number divided by all investee countries), as referred to international treaties and conventions, United Nations principles and,	6.25 7.35%	NA	Coverage of eligible assets:: 100%	<b>Exclusions</b> Fidelity International's <u>Sustainable</u> <u>Fund Family</u> excludes Sovereign issuers based on: 1) an internal assessment of three principles relating to governance, respect for human rights and foreign policy; and 2) external internationally recognised country indicators.

Adverse sustainability indicator		•		Metric	Impact (year 2022)	Impact (Year 2021)	Explanation	Actions taken, actions planned, and targets set for the next reference period
Fossil fuels	17. Exposure to fossil fuels through real estate assets	Share of investments in real estate assets involved in the extraction, storage, transport or manufacture of fossil fuels	NA	NA	NA	Approach Consideration of exposure to fossil fuel exposure is integrated into Fidelity International's process and evaluated on asset acquisition and during each fund's Quarterly Sustainability Review.		
						<b>Exclusions</b> Fidelity International's <u>Sustainable</u> <u>Fund Family</u> exclusions include criteria for thermal coal miners & power generation, oil sands extraction, arctic oil and gas production. These exclusions cover both assets and tenants.		
Energy Efficiency	18. Exposure to energy- inefficient real estate assets	Share of investments in energy-inefficient real estate assets	NA	NA	NA	Approach Consideration of the energy- efficiency of a real estate asset is integrated into Fidelity International's process and periodically evaluated through a Quarterly Sustainability Review for the fund. More information on Fidelity International's approach is set out in the <u>Real Estate</u> <u>Sustainability Policy</u>		

Indicators ap	oplicable to in	vestment in inves	tee compa	nies		
Additional C	limate and ot	her environmental	-related inc	dicators -	Table 2	
Adverse sustainability indicator		Metric	Impact (year 2022)	Impact (Year 2021)	Explanation	Actions taken, actions planned, and targets set for the next reference period
Water, waste, and material emissions	15. Deforestation	Share of investments in companies without a policy to address deforestation	68.3%	NA	Coverage: 74%	<ul> <li>Approach         Deforestation considerations are integrated into our research using our Proprietary ESG Rating that includes an indicator on deforestation. Indicators are selected for each sector based on their materiality.     </li> <li>Engagement &amp; Collaboration         Fidelity International, alongside more than 30 other financial companies, has committed to tackle forest-risk agricultural commodity driven deforestation activities at the companies in our investment portfolios through engagement and stewardship by the end of 2025 on a best-efforts basis.     </li> <li>Fidelity International has a thematic and collaborative engagement programme focused on biodiversity issues that includes a focus on deforestation.</li> </ul>
Additional Indic	9. Lack of a human rights policy	Share of investments in entities without a human rights policy	for human rig	nA	rruption and a Coverage: 74%	ApproachHuman rights considerations are integratedinto our research using our Proprietary ESGRatings that include indicators on humanrights and modern slavery issues. Metrics areselected for each sector based on theirmateriality.ExclusionsFidelity International exclude issuers that wedeem to be in violation of the United NationsGlobal Compact, the OECD Guidelines forMultinational Enterprises, the UN GuidingPrinciples for Business and Human Rights,Responsible Business Conduct andInternational Labour Organization (ILO)Conventions.Engagement & CollaborationFidelity International is a member of the

	change through collaborative engagement with targeted companies.
	Voting Fidelity International will vote against the election of members of a company's board of directors where, in our view, the company has not met the minimum standards of monitoring and overseeing itself and its suppliers with regard to human rights and minimising the ris of modern slavery or human rights violations occurring within its organisation or supply chain.

#### 2.2 Entity: FIL (Luxembourg) S.A.

#### Indicators applicable to investment in investee companies - Table 1

Climate and other environmental-related indicators

Adverse sustainability indicator		Metric	Impact (year 2022)	Impact (Year 2021)	Explanation	Actions taken, actions planned, and targets set for the next reference period
Greenhouse gas emissions	1. GHG emissions	Scope 1 GHG emissions	899,836 tCO <sub>2</sub> e	NA	Coverage: 90%	Approach Climate considerations are integrated
		Scope 2 GHG emissions	185,086 tCO <sub>2</sub> e	NA	Coverage: 90%	into research through our Proprietary ESG Ratings, Proprietary Climate Ratings and 3 <sup>rd</sup> party data sets (including
		Scope 3 GHG emissions	4,147,439 tCO <sub>2</sub> e	NA	Coverage: 90%	scenario analysis). Fidelity's ESG Ratings explicitly integrate
		Total GHG emissions	5,232,361 tCO <sub>2</sub> e	NA	Coverage: 90%	climate PAI metrics (with the exception of exposure to the fossil fuel sector).
	2. Carbon footprint	Carbon footprint	225 tCO₂e per \$M USD invested	NA	Coverage: 90%	Metrics are selected for each sector based on their materiality.
	3. GHG intensity of investee companies	GHG intensity of investee companies	455 tCO <sub>2</sub> e per \$M USD revenue	NA	Coverage: 90%	Fidelity's Climate Rating complements our ESG Ratings, and assess issuers' alignment to the Paris Agreement and net zero pathways.
	4. Exposure to companies active in the fossil fuel sector	Share of investments in companies active in the fossil fuel sector	4.10%	NA	Coverage: 51%	Fidelity International has set a target to halve the aggregate carbon footprint of our investment portfolios by 2030, from a 2020 baseline, starting with equity and corporate bond holdings; and reach net zero for holdings by 2050.
Energy Performance	5. Share of non- renewable energy in consumption and production	Share of non- renewable energy consumption and non-renewable energy production of investee companies compared to renewable energy source expressed as a percentage of total energy sources	29.7%	NA	Coverage: 43%	<ul> <li>Engagement</li> <li>We engage with companies on our minimum climate requirements related to: <ul> <li>Disclosure of Scope 1, 2 &amp; 3 GHG emissions data</li> <li>Business alignment to Paris Agreement goals</li> <li>Disclosure aligned with TCFD recommendations</li> <li>Detailed disclosure of climate risks and opportunities for business</li> <li>Having a climate change policy and a net zero plan in place</li> </ul> </li> <li>In addition to the minimum criteria above, we also conduct thematic engagements with the objective of encouraging real-world decarbonisation. For our example, we are engaging with investee companies with thermal coal exposure to encourage a timely phase out.</li> </ul>
	6. Energy consumption intensity per high impact sector	Energy consumption in GWh per million USD of revenue of investee companies, per high impact climate sector	A-Agriculture, forestry and fishing: 0.000003 GWH per \$M revenue B-Mining and quarrying: 0.0048 GWH per \$M revenue	NA	Coverage: 38%	

Biodiversity	7. Activities	Share of investment	C-Manufacturing: 0.0846 GWH per \$M revenue D-Electricity, gas, steam and air conditioning supply: 0.0199 GWH per \$M revenue E-Water supply, sewerage, waste management and remediation activities: 0.00246 GWH per \$M revenue F-Construction: 0.0005 GWH per \$M revenue G-Wholesale and retail Trade, repair of motor vehicles and motorcycles: 0.00147 GWH per \$M revenue H-Transportation and storage: 0.0070 GWH per \$M revenue L-Real estate activities: 0.0080 GWH per \$M revenue	NA	Coverage:	<ul> <li>Voting</li> <li>We expect our investee companies to:         <ul> <li>Take action to manage climate change impacts and reduce their GHG emissions.</li> <li>Make specific and appropriate disclosures around emissions, climate targets, risk management and oversight.</li> </ul> </li> <li>Where companies fall short of our minimum climate expectations and do not demonstrate a willingness or plan to meet them, we will vote against management.</li> <li>Collaboration</li> <li>We support policy makers in helping markets meet Paris-aligned emissions reductions targets. We are a regular contributor to public consultations, including those pertaining to the EU Green Deal, EU Action Plan on Sustainable Finance and UK mandated TCFD reporting. We continue to engage with policy makers and provide expert views on topics around financing the low-carbon transition and the role that asset managers can play.</li> <li>Exclusions</li> <li>Exclusions on thermal coal miners &amp; power generation, oil sands extraction and artic oil &amp; gas production apply for our Sustainable Family Funds.</li> <li>Further details on our approach to considering and mitigating the impacts of GHG and other emissions can be found in our <u>Climate Policy</u>.</li> </ul>
Biodiversity	7. Activities negatively affecting biodiversity- sensitive areas	Share of investment in investee companies with sites/operations located in or near to biodiversity-sensitive areas where activities of those investee companies negatively affect those areas	0.7%	NA	Coverage: 51%	Approach Biodiversity considerations are integrated into our research using our Proprietary ESG Rating that include metrics on terrestrial and oceanic biodiversity impacts. Metrics are selected for each sector based on their materiality. Engagement & Collaboration Fidelity International, alongside more than 30 other financial companies, has committed to tackle forest-risk agricultural commodity driven deforestation activities at the companies

						in our investment portfolios through engagement and stewardship by the end of 2025 on a best-efforts basis. In 2021, Fidelity International signed up to the Finance for Biodiversity pledge which commits to protect and restore biodiversity. The pledge brings together over 100 financial institutions, committing to collaborate & share knowledge, engage with companies, assess impact, and set targets to report on biodiversity matters before 2025. Fidelity International has a thematic and collaborative engagement programme focused on biodiversity issues. Relevant thematic engagements include plastics, deforestation and sustainable fashion. <b>Voting</b> Fidelity will vote against directors where they have clearly failed to manage or implement the capabilities to monitor and assess material environmental risks related to biodiversity matters and reduce the ecological impact of their operations.
Water, waste, and material emissions	8. Emissions to water	Tonnes of emissions to water generated by investee companies per million USD invested, expressed as a weighted average	0.0326 tonnes of emissions per \$M USD invested	NA	Coverage: 2.0%	Approach Water, waste and material emissions considerations are integrated into our research using our Proprietary ESG Ratings that include specific metrics on water usage, toxic emissions, and hazardous waste intensity. Metrics are selected for each sector based on their
	9. Hazardous and radioactive waste ratio	Tonnes of hazardous waste and radioactive waste generated by investee companies per million USD invested, expressed as a weighted average	0.639 tonnes of hazardous waste per \$M USD invested	NA	Coverage: 17%	materiality. Engagement & Collaboration Fidelity is a signatory of the Valuing Water Finance Initiative that aims to support companies toward and protect water resources in their business operations and global supply chains. We engage with poor performing issues to help encourage improvements to protect water resources. Additionally, we will look to engage with issuers which are not have a high hazardous waste ratio.
						Voting Fidelity International vote against directors where a company has clearly failed to properly manage the sourcing of water, failed to mitigate potential water scarcity risks, or are accountable for

						failings resulting in material pollution or contamination.
Indicators for	r social and empl	oyee, respect for huma	n rights, anti-corr	uption and ant	i-bribery matt	ers
Adverse sustainability indicator		Metric	Impact (year 2022)	Impact (Year 2021)	Explanation	Actions taken, actions planned, and targets set for the next reference period
Social and employee matters	10. Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises	Share of investments in investee companies that have been involved in violations of UNGC principles or OECD Guidelines for Multinational Enterprises	0.0002%	NA	Coverage: 58%	Approach Corporate governance and human right considerations are integrated into our research using our Proprietary ESG Ratings that include indicators on huma rights, modern slavery issues, anti- bribery, and corruption. Metrics are selected for each sector based on their materiality. Exclusions Fidelity International exclude issuers th we deem to be in violation of the United Nations Global Compact, the OECD Guidelines for Multinational Enterprises the UN Guiding Principles for Business and Human Rights, Responsible
	11. Lack of processes and compliance mechanisms to monitor compliance with UN Global Compliance principles and OECD Guidelines for Multinational Enterprises	Share of investments in investee companies without policies to monitor compliance with the UNGC principles or OECD Guidelines for Multinational Enterprises or grievance/complaints handling mechanism to address violations of the UNGC principles or OECD Guidelines for Multinational Enterprises	21%	NA	Coverage: 51%	Business Conduct and International Labour Organization (ILO) Conventions. Engagement & Collaboration Fidelity International is a member of the Investors Against Slavery and Traffickin Asia Pacific initiative and aim to drive positive change through collaborative engagement with targeted companies. Voting Fidelity International will vote against the election of members of a company's board of directors where, in our view, th company has not met the minimum standards of monitoring and overseeing itself and its suppliers with regard to human rights and minimising the risk of modern slavery or human rights violations occurring within its organisation or supply chain.
	12. Unadjusted gender pay gap	Average unadjusted gender pay gap of investee companies	3.66	NA	Coverage: 17%	Approach Gender pay gap and board gender diversity considerations are integrated into our research using our Proprietary

	13. Board gender diversity	Average ratio of female to male board members in investee companies, expressed as a percentage of all board members	17%	NA	Coverage: 51%	ESG Rating through the inclusion of specific indicators. Metrics are selected for each sector based on their materiality. Engagement & Collaboration Fidelity International supports various initiatives globally on gender pay gap and diversity, including the 30 percent club and the 40:40 Vision working towards gender balanced executive teams by 2030. Voting Our voting policy is designed to encourage gender diversity on corporate boards. We support gender diversity on a company's board and will vote against the election of directors where boards do not have at least 30% female representation at companies in the most developed markets (including the UK, EU, USA and Australia) and 15% female representation in all other markets where standards on gender diversity are still developing. We may also take into account factors including the board size,
	14. Exposure to controversial weapons (anti- personnel mines, cluster munitions, chemical weapons and biological weapons)	Share of investment in investee companies involved in the manufacturing or selling of controversial weapons	0.0%	NA	Coverage: 51%	industry and corporate structure. <b>Exclusions</b> We exclude issuers with exposure to controversial weapons in accordance with our <u>Exclusions Policy</u> . Additional exclusions, including on semi-automatic weapons producers and conventional weapons, apply to <u>our Sustainable Fund</u> <u>Family</u> .
Indicators appl	icable to invest	ments in sovereigns a	nd supranationals			
Adverse sustai indicator	nability	Metric	Impact (year 2022)	Impact (Year 2021)	Explanation	Actions taken, actions planned, and targets set for the next reference period
Environmental	15. GHG intensity	GHG intensity of investee countries	92.75 tCO₂e per \$M USD GDP	NA	Coverage of eligible assets: 99.93%	Approach Fidelity International is awaiting the completion of a global standard for sovereign GHG intensity by the Partnership for Carbon Accounting

						Financials (PCAF) and plans to adopt the global standard when available.
Social	16. Investee countries subject to social violations	Number of investee countries subject to social violations (absolute number and relative number divided by all investee countries), as referred to international treaties and conventions, United Nations principles and, where applicable, national law	4.75 7.84%	NA	Coverage of eligible assets: 100%	<b>Exclusions</b> Fidelity International's <u>Sustainable Fund</u> <u>Family</u> excludes Sovereign issuers based on: 1) an internal assessment of three principles relating to governance, respect for human rights and foreign policy; and 2) external internationally recognised country indicators.
Indicators app Adverse susta indicator		ment in real estate ass Metric	sta (year 2022)	(Year 2021)	Explanation	Actions taken, actions planned, and targets set for the next reference period
Fossil fuels	17. Exposure to fossil fuels through real estate assets	Share of investments in real estate assets involved in the extraction, storage, transport or manufacture of fossil fuels	ΝΑ NA	NA	MA	Approach Consideration of exposure to fossil fuel exposure is integrated into Fidelity International's process and evaluated on asset acquisition and during each fund's Quarterly Sustainability Review. Exclusions Fidelity International's <u>Sustainable Fund</u> Family exclusions include criteria for thermal coal miners & power generation, oil sands extraction, arctic oil and gas production. These exclusions cover both assets and tenants.
Energy Efficiency	18. Exposure to energy- inefficient real estate assets	Share of investments in energy-inefficient real estate assets	NA	NA	NA	Approach Consideration of the energy-efficiency of a real estate asset is integrated into Fidelity International's process and periodically evaluated through a Quarterly Sustainability Review for the fund. More information on Fidelity International's approach is set out in the <u>Real Estate</u> <u>Sustainability Policy</u>

Indicators a	pplicable to in	vestment in inves	tee compa	nies						
Additional Climate and other environmental-related indicators - Table 2										
Adverse sustai indicator	nability	Metric	Impact (year 2022)	Impact (Year 2021)	Explanation	Actions taken, actions planned, and targets set for the next reference period				
Water, waste, and material emissions	15. Deforestation	Share of investments in companies without a policy to address deforestation	44.8%	NA	Coverage: 51%	Approach Deforestation considerations are integrated into our research using our Proprietary ESG Rating that includes an indicator on deforestation. Indicators are selected for each sector based on their materiality. Engagement & Collaboration Fidelity International, alongside more than 30 other financial companies, has committed to tackle forest-risk agricultural commodity driven deforestation activities at the companies in our investment portfolios through engagement and stewardship by the end of 2025 on a best- efforts basis. Fidelity International has a thematic and collaborative engagement programme focused on biodiversity issues that includes a focus on deforestation.				
Additional Indi	cators for social a	and employee, respect	for human rig	hts, anti-co	rruption and a	anti-bribery matters - Table 3				
Human Rights	9. Lack of a human rights policy	Share of investments in entities without a human rights policy	4.61%	NA	Coverage: 51%	Approach Human rights considerations are integrated into our research using our Proprietary ESG Ratings that include indicators on human rights and modern slavery issues. Metrics are selected for each sector based on their materiality.				
						<b>Exclusions</b> Fidelity International exclude issuers that we deem to be in violation of the United Nations Global Compact, the OECD Guidelines for Multinational Enterprises, the UN Guiding Principles for Business and Human Rights, Responsible Business Conduct and International Labour Organization (ILO) Conventions.				
						<b>Engagement &amp; Collaboration</b> Fidelity International is a member of the Investors Against Slavery and Trafficking Asia Pacific initiative and aim to drive positive				

			change through collaborative engagement with targeted companies.
			Voting Fidelity International will vote against the election of members of a company's board of directors where, in our view, the company has not met the minimum standards of monitoring and overseeing itself and its suppliers with regard to human rights and minimising the risk of modern slavery or human rights violations occurring within its organisation or supply chain.

#### 2.3 Entity: FIL Gestion

#### Indicators applicable to investment in investee companies - Table 1

Adverse susta	inahility	Metric			-	Actions taken, actions planned, and	
Adverse sustainability indicator		Metric	Impact (year 2022)	Impact (Year 2021)	Explanation	targets set for the next reference period	
Greenhouse gas emissions	1. GHG emissions	Scope 1 GHG emissions	188,576 tCO₂e	NA	Coverage: 99%	Approach Climate considerations are integrated	
		Scope 2 GHG emissions	42,921 tCO <sub>2</sub> e	NA	Coverage: 99%	<ul> <li>into research through our Proprietary</li> <li>ESG Ratings, Proprietary Climate</li> <li>Ratings and 3<sup>rd</sup> party data sets</li> </ul>	
		Scope 3 GHG emissions	1,901,829 tCO₂e	NA	Coverage: 99%	(including scenario analysis). Fidelity's ESG Ratings explicitly	
		Total GHG emissions	2,133,327 tCO <sub>2</sub> e	NA	Coverage: 99%	integrate climate PAI metrics (with the exception of exposure to the fossil fuel	
	2. Carbon footprint	Carbon footprint	453 tCO <sub>2</sub> e per \$M USD invested	NA	Coverage: 99%	<ul> <li>sector). Metrics are selected for each sector based on their materiality.</li> </ul>	
	3. GHG intensity of investee companies	GHG intensity of investee companies	789 tCO <sub>2</sub> e per \$M USD revenue	NA	Coverage: 99%	<ul> <li>Fidelity's Climate Rating complements our ESG Ratings, and assess issuers' alignment to the Paris Agreement and net zero pathways.</li> <li>Fidelity International has set a target to halve the aggregate carbon footprint of our investment portfolios by 2030, from a 2020 baseline, starting with equity and corporate bond holdings; and reach net zero for holdings by 2050.</li> <li>Engagement         We engage with companies on our minimum climate requirements related to:         <ul> <li>Disclosure of Scope 1, 2 &amp; 3 GHG emissions data</li> <li>Business alignment to Paris Agreement goals</li> <li>Disclosure aligned with TCFD recommendations</li> <li>Detailed disclosure of climate risks and opportunities for business</li> <li>Having a climate change</li> </ul> </li> </ul>	
	4. Exposure to companies active in the fossil fuel sector	Share of investments in companies active in the fossil fuel sector	7.89%	NA	Coverage: 85%		
Energy Performance	5. Share of non- renewable energy in consumption and production	Share of non- renewable energy consumption and non-renewable energy production of investee companies compared to renewable energy source expressed as a percentage of total energy sources	55.7%	NA	Coverage: 78%		
	6. Energy consumption intensity per high impact sector	Energy consumption in GWh per million USD of revenue of investee companies, per high impact climate sector	A-Agriculture, forestry and fishing: NA B-Mining and quarrying: 0.0187 GWH per \$M USD revenue	NA	Coverage: 78%	<ul> <li>In addition to the minimum criteria above, we also conduct thematic engagements with the objective of encouraging real-world decarbonisation. For our example, we are engaging with investee companies with thermal coal</li> </ul>	

			C-Manufacturing: 0.198 GWH per \$M USD revenue D-Electricity, gas, steam and air conditioning supply: 0.0568 GWH per \$M USD revenue E-Water supply, sewerage, waste management and remediation activities: 0.0020 GWH per \$M USD revenue F-Construction: 0.0004 GWH per \$M USD revenue G-Wholesale and retail Trade, repair of motor vehicles and motorcycles: 0.00847 GWH per \$M USD revenue H-Transportation and storage:			<ul> <li>exposure to encourage a timely phase out.</li> <li>Voting</li> <li>We expect our investee companies to: <ul> <li>Take action to manage climate change impacts and reduce their GHG emissions.</li> <li>Make specific and appropriate disclosures around emissions, climate targets, risk management and oversight.</li> </ul> </li> <li>Where companies fall short of our minimum climate expectations and do not demonstrate a willingness or plan to meet them, we will vote against management.</li> <li>Collaboration</li> <li>We support policy makers in helping markets meet Paris-aligned emissions reductions targets. We are a regular contributor to public consultations, including those pertaining to the EU Green Deal, EU Action Plan on Sustainable Finance and UK mandated TCFD reporting. We continue to engage with policy makers and provide expert views on topics around financing the low-carbon transition and the role that asset managers can play.</li> <li>Exclusions on thermal coal miners &amp; power generation, oil sands extraction and artic oil &amp; gas production apply for our <u>Sustainable Family Funds</u>.</li> </ul>
			revenue			power generation, oil sands extraction and artic oil & gas production apply for
Biodiversity	7. Activities negatively affecting biodiversity- sensitive areas	Share of investment in investee companies with sites/operations located in or near to biodiversity-sensitive areas where activities of those investee companies negatively affect those areas	0.1%	NA	Coverage: 85%	Approach Biodiversity considerations are integrated into our research using our Proprietary ESG Rating that include metrics on terrestrial and oceanic biodiversity impacts. Metrics are selected for each sector based on their materiality. Engagement & Collaboration Fidelity International, alongside more than 30 other financial companies, has

						deforestation activities at the companies in our investment portfolios through engagement and stewardship by the end of 2025 on a best-efforts basis. In 2021, Fidelity International signed up to the Finance for Biodiversity pledge which commits to protect and restore biodiversity. The pledge brings together over 100 financial institutions, committing to collaborate & share knowledge, engage with companies, assess impact, and set targets to report on biodiversity matters before 2025. Fidelity International has a thematic and collaborative engagement programme focused on biodiversity issues. Relevant thematic engagements include plastics, deforestation and sustainable fashion. <b>Voting</b> Fidelity will vote against directors where they have clearly failed to manage or implement the capabilities to monitor and assess material environmental risks related to biodiversity matters and reduce the ecological impact of their operations.
Water, waste, and material emissions	<ol> <li>8. Emissions to water</li> <li>9. Hazardous and radioactive waste ratio</li> </ol>	Tonnes of emissions to water generated by investee companies per million USD invested, expressed as a weighted average Tonnes of hazardous waste and radioactive waste generated by investee companies per million USD invested, expressed as a weighted average	0.004 tonnes of emissions per \$M USD invested 0.512 tonnes of hazardous waste per \$M USD invested	NA	Coverage: 1.5% Coverage: 35%	Approach Water, waste and material emissions considerations are integrated into our research using our Proprietary ESG Ratings that include specific metrics on water usage, toxic emissions, and hazardous waste intensity. Metrics are selected for each sector based on their materiality. Engagement & Collaboration Fidelity is a signatory of the Valuing Water Finance Initiative that aims to support companies toward and protect water resources in their business operations and global supply chains. We engage with poor performing issues to help encourage improvements to protect water resources. Additionally, we will look to engage with issuers which are
						not have a high hazardous waste ratio. <b>Voting</b> Fidelity International vote against directors where a company has clearly

Indicators for	social and empl	oyee, respect for huma	in rights, anti-corru	ption and a	anti-bribery mat	failed to properly manage the sourcing of water, failed to mitigate potential water scarcity risks, or are accountable for failings resulting in material pollution or contamination.
Adverse susta indicator	inability	Metric	Impact (year 2022)	Impact (Year 2021)	Explanation	Actions taken, actions planned, and targets set for the next reference period
Social and employee matters	<ul> <li>10.</li> <li>Violations of</li> <li>UN Global</li> <li>Compact</li> <li>principles</li> <li>and</li> <li>Organisation</li> <li>for Economic</li> <li>Cooperation</li> <li>and</li> <li>Development</li> <li>(OECD)</li> <li>Guidelines</li> <li>for</li> <li>Multinational</li> <li>Enterprises</li> <li>11. Lack of</li> <li>processes</li> <li>and</li> <li>compliance</li> <li>mechanisms</li> <li>to monitor</li> <li>compliance</li> <li>with UN</li> <li>Global</li> <li>Compliance</li> <li>principles</li> <li>and OECD</li> <li>Guidelines</li> <li>for</li> <li>Multinational</li> <li>Enterprises</li> </ul>	Share of investments in investee companies that have been involved in violations of UNGC principles or OECD Guidelines for Multinational Enterprises Share of investments in investee companies without policies to monitor compliance with the UNGC principles or OECD Guidelines for Multinational Enterprises or grievance/complaints handling mechanism to address violations of the UNGC principles or OECD Guidelines for Multinational Enterprises	0.00%	NA	Coverage: 93%	ApproachCorporate governance and human rights considerations are integrated into our research using our Proprietary ESG Ratings that include indicators on human rights, modern slavery issues, anti- bribery, and corruption. Metrics are selected for each sector based on their materiality.ExclusionsFidelity International exclude issuers that we deem to be in violation of the United Nations Global Compact, the OECD Guidelines for Multinational Enterprises, the UN Guiding Principles for Business and Human Rights, Responsible Business Conduct and International Labour Organization (ILO) Conventions.Engagement & Collaboration Fidelity International is a member of the Investors Against Slavery and Trafficking Asia Pacific initiative and aim to drive positive change through collaborative engagement with targeted companies.VotingFidelity International will vote against the election of members of a company's board of directors where, in our view, the company has not met the minimum standards of monitoring and overseeing itself and its suppliers with regard to human rights and minimising the risk of modern slavery or human rights violations occurring within its organisation or supply chain.

12. Unadjusted gender pay gap	Average unadjusted gender pay gap of investee companies	3.56	NA	Coverage: 29%	Approach Gender pay gap and board gender diversity considerations are integrated into our research using our Proprietary
13. Board gender diversity	Average ratio of female to male board members in investee companies,	34.0%	NA	Coverage: 85%	ESG Rating through the inclusion of specific indicators. Metrics are selected for each sector based on their materiality.
	expressed as a percentage of all board members				<b>Engagement &amp; Collaboration</b> Fidelity International supports various initiatives globally on gender pay gap and diversity, including the 30 percent club and the 40:40 Vision working towards gender balanced executive teams by 2030.
					Voting Our voting policy is designed to encourage gender diversity on corporate boards. We support gender diversity on a company's board and will vote against the election of directors where boards do not have at least 30% female representation at companies in the most developed markets (including the UK, EU, USA and Australia) and 15% female representation in all other markets where standards on gender diversity are still developing. We may also take into account factors including the board size, industry and corporate structure.
14. Exposure to controversial weapons (anti- personnel mines, cluster munitions, chemical weapons and biological weapons)	Share of investment in investee companies involved in the manufacturing or selling of controversial weapons	0.0%	NA	Coverage: 85%	Exclusions We exclude issuers with exposure to controversial weapons in accordance with our <u>Exclusions Policy</u> . Additional exclusions, including on semi-automatic weapons producers and conventional weapons, apply to <u>our Sustainable Fund</u> <u>Family</u> .

Adverse sustainability indicator		Metric	Impact (year 2022)	Impact (Year 2021)	Explanation	Actions taken, actions planned, and targets set for the next reference period
Environmental	15. GHG intensity	GHG intensity of investee countries	12.57 tCO <sub>2</sub> e per \$M GDP	NA	Coverage of eligible assets: 99.51%	Approach Fidelity International is awaiting the completion of a global standard for sovereign GHG intensity by the Partnership for Carbon Accounting Financials (PCAF) and plans to adopt the global standard when available.
Social	16. Investee countries subject to social violations	Number of investee countries subject to social violations (absolute number and relative number divided by all investee countries), as referred to international treaties and conventions, United Nations principles and, where applicable, national law	2.25 3.11%	NA	Coverage of eligible assets:: 100%	Exclusions Fidelity International's <u>Sustainable Fund</u> Family excludes Sovereign issuers based on: 1) an internal assessment of three principles relating to governance, respect for human rights and foreign policy; and 2) external internationally recognised country indicators.
Indicators appl	licable to invest	ment in real estate ass	ets			
Adverse sustai indicator	inability	Metric	Impact (year 2022)	Impact (Year 2021)	Explanation	Actions taken, actions planned, and targets set for the next reference period
Fossil fuels	17. Exposure to fossil fuels through real estate assets	Share of investments in real estate assets involved in the extraction, storage, transport or manufacture of fossil fuels	NA	NA	NA	Approach Consideration of exposure to fossil fuel exposure is integrated into Fidelity International's process and evaluated on asset acquisition and during each fund's Quarterly Sustainability Review. Exclusions Fidelity International's <u>Sustainable Fund</u> Family exclusions include criteria for thermal coal miners & power generation, oil sands extraction, arctic oil and gas production. These exclusions cover both assets and tenants.

Energy	18. Exposure	Share of investments	NA	NA	NA	Approach
Efficiency	to energy-	in energy-inefficient				Consideration of the energy-efficiency of
	inefficient	real estate assets				a real estate asset is integrated into
	real estate					Fidelity International's process and
	assets					periodically evaluated through a
						Quarterly Sustainability Review for the
						fund. More information on Fidelity
						International's approach is set out in the
						Real Estate Sustainability Policy

Other indicat	Other indicators for principal adverse impacts on sustainability factors							
Indicators ap	plicable to in	vestment in inves	tee compan	ies				
Additional Climate and other environmental-related indicators - Table 2								
Adverse sustainability indicator		Metric	Impact (year 2022)	Impact (Year 2021)	Explanation	Actions taken, actions planned, and targets set for the next reference period		
Water, waste, and material emissions	15. Deforestation	Share of investments in companies without a policy to address deforestation	76.4%	NA	Coverage: 85%	<ul> <li>Approach         Deforestation considerations are integrated         into our research using our Proprietary ESG         Rating that includes an indicator on             deforestation. Indicators are selected for each             sector based on their materiality.     </li> <li>Engagement &amp; Collaboration         Fidelity International, alongside more than 30             other financial companies, has committed to             tackle forest-risk agricultural commodity driven             deforestation activities at the companies in our             investment portfolios through engagement and             stewardship by the end of 2025 on a best-             efforts basis.         Fidelity International has a thematic and             collaborative engagement programme focused             on biodiversity issues that includes a focus on             deforestation.     </li> </ul>		
Additional Indic	ators for social a	and employee, respect	for human righ	nts, anti-cor	ruption and a	anti-bribery matters - Table 3		
Human Rights	9. Lack of a human rights policy	Share of investments in entities without a human rights policy	3.21%	NA	Coverage: 85%	Approach Human rights considerations are integrated into our research using our Proprietary ESG Ratings that include indicators on human rights and modern slavery issues. Metrics are selected for each sector based on their materiality.		

	ExclusionsFidelity International exclude issuers that we deem to be in violation of the United Nations Global Compact, the OECD Guidelines for Multinational Enterprises, the UN Guiding Principles for Business and Human Rights, Responsible Business Conduct and International Labour Organization (ILO) Conventions.Engagement & Collaboration Fidelity International is a member of the
	Investors Against Slavery and Trafficking Asia Pacific initiative and aim to drive positive change through collaborative engagement with targeted companies.
	Voting Fidelity International will vote against the election of members of a company's board of directors where, in our view, the company has not met the minimum standards of monitoring and overseeing itself and its suppliers with regard to human rights and minimising the risk of modern slavery or human rights violations occurring within its organisation or supply chain.

#### 2.4 Entity - FIL Investment Services (UK) Limited

Climate and other environmental-related indicators							
Adverse sustainability indicator		Metric	Impact (year 2022)	Impact (Year 2021)	Explanation	Actions taken, actions planned, and targets set for the next reference period	
Greenhouse 1. GHG gas emissions emissions		Scope 1 GHG emissions Scope 2 GHG	2,505,452 tCO <sub>2</sub> e	NA NA	Coverage: 86% Coverage:	Approach Climate considerations are integrated into research through our Proprietary	
		emissions	33,202,206 tCO <sub>2</sub> e		86%	ESG Ratings, Proprietary Climate Ratings and 3 <sup>rd</sup> party data sets (includin	
		Scope 3 GHG emissions	55,202,200 ICO <sub>2</sub> e	NA	Coverage: 86%	scenario analysis). Fidelity's ESG Ratings explicitly integrat	
		Total GHG emissions	36,429,549 tCO <sub>2</sub> e	NA	Coverage: 86%	climate PAI metrics (with the exception of exposure to the fossil fuel sector). Metrics are selected for each sector based on their materiality. Fidelity's Climate Rating complements our ESG Ratings, and assess issuers' alignment to the Paris Agreement and net zero pathways. Fidelity International has set a target to halve the aggregate carbon footprint of our investment portfolios by 2030, from a 2020 baseline, starting with equity and corporate bond holdings; and reach net zero for holdings by 2050.	
	2. Carbon footprint	Carbon footprint	486 tCO <sub>2</sub> e per \$M USD invested	NA	Coverage: 86%		
	3. GHG intensity of investee companies	GHG intensity of investee companies	841 tCO <sub>2</sub> e per \$M USD revenue	NA	Coverage: 86%		
	4. Exposure to companies active in the fossil fuel sector	Share of investments in companies active in the fossil fuel sector	8.25%	NA	Coverage: 77%		
Energy Performance	5. Share of non- renewable energy in consumption and production	Share of non- renewable energy consumption and non-renewable energy production of investee companies compared to renewable energy source expressed as a percentage of total energy sources	50.6%	NA	Coverage: 67%	<ul> <li>Engagement</li> <li>We engage with companies on our minimum climate requirements related to: <ul> <li>Disclosure of Scope 1, 2 &amp; 3 GHG emissions data</li> <li>Business alignment to Paris Agreement goals</li> <li>Disclosure aligned with TCFD recommendations</li> <li>Detailed disclosure of climate risks and opportunities for business</li> <li>Having a climate change policy and a net zero plan in place</li> </ul> </li> <li>In addition to the minimum criteria above, we also conduct thematic engagements with the objective of encouraging real-world decarbonisation. For our example, we are engaging with investee</li> </ul>	
	6. Energy consumption intensity per high impact sector	Energy consumption in GWh per million USD of revenue of investee companies, per high impact climate sector	A-Agriculture, forestry and fishing: 0.00001 GWH per \$M USD revenue B-Mining and	NA	Coverage: 68%		

			GWH per \$M USD revenue C-Manufacturing: 0.177 GWH per \$M USD revenue D-Electricity, gas, steam and air conditioning supply: 0.0948 GWH per \$M USD revenue E-Water supply, sewerage, waste management and remediation activities: 0.004 GWH per \$M USD revenue F-Construction:			<ul> <li>companies with thermal coal exposure to encourage a timely phase out.</li> <li>Voting</li> <li>We expect our investee companies to: <ul> <li>Take action to manage climate change impacts and reduce their GHG emissions.</li> <li>Make specific and appropriate disclosures around emissions, climate targets, risk management and oversight.</li> </ul> </li> <li>Where companies fall short of our minimum climate expectations and do not demonstrate a willingness or plan to meet them, we will vote against management.</li> <li>Collaboration</li> <li>We support policy makers in helping markets meet Paris-aligned emissions reductions targets. We are a regular contributor to public consultations, including those pertaining to the EU Green Deal, EU Action Plan on Suutcingtable Eigenee and UK mandeted</li> </ul>
			<ul> <li>P-Construction.</li> <li>0.00152 GWH per</li> <li>\$M USD revenue</li> <li>G-Wholesale and retail Trade, repair of motor vehicles and motorcycles:</li> <li>0.0052 GWH per</li> <li>\$M USD revenue</li> <li>H-Transportation and storage:</li> <li>0.0203 GWH per</li> <li>\$M USD revenue</li> <li>L-Real estate activities: 0.0139</li> <li>GWH per \$M USD revenue</li> </ul>			Sustainable Finance and UK mandated TCFD reporting. We continue to engage with policy makers and provide expert views on topics around financing the low- carbon transition and the role that asset managers can play. <b>Exclusions</b> Exclusions on thermal coal miners & power generation, oil sands extraction and artic oil & gas production apply for our <u>Sustainable Family Funds</u> . Further details on our approach to considering and mitigating the impacts of GHG and other emissions can be found in our <u>Climate Policy</u> .
Biodiversity	7. Activities negatively affecting biodiversity- sensitive areas	Share of investment in investee companies with sites/operations located in or near to biodiversity-sensitive areas where activities of those investee companies negatively affect those areas	0.137%	NA	Coverage: 77%	Approach Biodiversity considerations are integrated into our research using our Proprietary ESG Rating that include metrics on terrestrial and oceanic biodiversity impacts. Metrics are selected for each sector based on their materiality. Engagement & Collaboration Fidelity International, alongside more than 30 other financial companies, has

						agricultural commodity driven deforestation activities at the companies in our investment portfolios through engagement and stewardship by the end of 2025 on a best-efforts basis. In 2021, Fidelity International signed up to the Finance for Biodiversity pledge which commits to protect and restore biodiversity. The pledge brings together over 100 financial institutions, committing to collaborate & share knowledge, engage with companies, assess impact, and set targets to report on biodiversity matters before 2025. Fidelity International has a thematic and collaborative engagement programme focused on biodiversity issues. Relevant thematic engagements include plastics, deforestation and sustainable fashion. <b>Voting</b> Fidelity will vote against directors where they have clearly failed to manage or implement the capabilities to monitor and assess material environmental risks related to biodiversity matters and reduce the ecological impact of their operations.
Water, waste, and material emissions	8. Emissions to water	Tonnes of emissions to water generated by investee companies per million USD invested, expressed as a weighted average	32.30 tonnes of emissions per \$M USD invested	NA	Coverage: 3%	Approach Water, waste and material emissions considerations are integrated into our research using our Proprietary ESG Ratings that include specific metrics on water usage, toxic emissions, and hazardous waste intensity. Metrics are selected for each sector based on their
	9. Hazardous and radioactive waste ratio	Tonnes of hazardous waste and radioactive waste generated by investee companies per million USD invested, expressed as a weighted average	4.13 tonnes of hazardous waste per \$M USD invested	NA	Coverage: 27%	materiality. Engagement & Collaboration Fidelity is a signatory of the Valuing Water Finance Initiative that aims to support companies toward and protect water resources in their business operations and global supply chains. We engage with poor performing issues to help encourage improvements to protect water resources. Additionally, we will look to engage with issuers which are not have a high hazardous waste ratio. Voting Fidelity International vote against directors where a company has clearly

ocial and emple	oyee, respect for huma Metric	n rights, anti-co	rruption and ant	i-bribery matte	ers
nability	Metric				
		Impact (year 2022)	Impact (Year 2021)	Explanation	Actions taken, actions planned, and targets set for the next reference period
10. Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises and compliance mechanisms to monitor compliance with UN Global Compliance principles and OECD Guidelines for Multinational Enterprises	Share of investments in investee companies that have been involved in violations of UNGC principles or OECD Guidelines for Multinational Enterprises Share of investments in investee companies without policies to monitor compliance with the UNGC principles or OECD Guidelines for Multinational Enterprises or grievance/complaints handling mechanism to address violations of the UNGC principles or OECD Guidelines for Multinational Enterprises or	<u>−</u> <u>−</u> 0.0290% 41.2%	NA	ш Сoverage: 95% Соverage: 77%	Approach Corporate governance and human right considerations are integrated into our research using our Proprietary ESG Ratings that include indicators on huma rights, modern slavery issues, anti- bribery, and corruption. Metrics are selected for each sector based on their materiality. Exclusions Fidelity International exclude issuers that we deem to be in violation of the United Nations Global Compact, the OECD Guidelines for Multinational Enterprises, the UN Guiding Principles for Business and Human Rights, Responsible Business Conduct and International Labour Organization (ILO) Conventions. Engagement & Collaboration Fidelity International is a member of the Investors Against Slavery and Traffickin Asia Pacific initiative and aim to drive positive change through collaborative engagement with targeted companies. Voting Fidelity International will vote against the election of members of a company's board of directors where, in our view, the company has not met the minimum standards of monitoring and overseeing itself and its suppliers with regard to
	Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises 11. Lack of processes and compliance mechanisms to monitor compliance with UN Global Compliance principles and OECD Guidelines for Multinational	Violations of UN Globalin investee companies that have been involved in yrinciplesCompact principlesbeen involved in violations of UNGC andand for EconomicGuidelines for MultinationalCooperation and Development (OECD)EnterprisesGuidelines for Multinational EnterprisesIn investee companies without policies to monitor11. Lack of processes and compliance to monitorShare of investments policies to monitor11. Lack of processes and compliance to monitorShare of investments policies to monitorCompliance to monitorOECD Guidelines for yrinciples or complianceGlobal Global FinciplesEnterprises or grievance/complaints handling mechanism and OECDGuidelines for yrinciples or OECDGuidelines for yrinciples or OECDGuidelines principlesGuidelines forMultinational GlobalEnterprises or grievance/complaints handling mechanism and OECDMultinational GuidelinesGuidelines for	10.Share of investments in investee0.0290%Violations of UN Globalcompanies that have been involved in principles0.0290%Compact organisationbeen involved in principles or OECD0OrganisationGuidelines for for EconomicMultinational Enterprises-Cooperation and Development (OECD)Enterprises-Multinational Enterprisesfor Multinational Enterprises11. Lack of processes and compliance in investeeShare of investments in investee41.2%11. Lack of processesShare of investments in investee41.2%in investee complianceOECD Guidelines for in investee-Global GlobalEnterprises or grievance/compliants principles-Global GlobalEnterprises or in andling mechanism and OECD-Guidelines principlesGuidelines principlesGuidelines principlesGuidelinesGuidelinesGuidelinesGuidelinesGuidelinesGuidelinesGuidelinesGuidelinesGuidelinesGuidelinesGuidelinesGuidelinesGlobalGuide	10.Share of investments in investee0.0290%NAViolations of UN Global compant principlescompanies that have been involved in violations of UNGC and principles or OECD0.0290%NAOrganisation for Economic Cooperation and Development (OECD) Guidelines for Multinational EnterprisesNANA11. Lack of processes and compliance policies to monitor mechanisms complianceShare of investments in investee and companies without compliance oECD Guidelines for for multinational Enterprises41.2%NA11. Lack of policies to monitor mechanisms compliance policies to monitor mith UN Global Global Global Enterprises or Compliance grievance/complaints handling mechanism and OECD to address violations Guidelines for with UN Multinational Global Global Global Global Grinciples or OECD for principles handling mechanism and OECD to address violations Guidelines for Multinational Global Global Giotes to molicor for principles or OECD Multinational Global Global Global Gidelines for Multinational Guidelines for Multinational Guidelines for Multinational Guidelines for Multinational Guidelines for Multinational Guidelines for Multinational Guidelines for Multinational Guidelines for Multinational Guidelines for Multinational Guidelines for MultinationalImage: Multinational Guidelines for Multinational Guidelines for MultinationalFinterprisesMultinational Guidelines for MultinationalImage: Multinational Guidelines for Multinational<	10.Coverage:10.Share of investments in investee compant principles0.0290%NACoverage: 95%Violations of understrate principlescompanies that have been involved in violations of UNGC and principles or OECD Organisation Guidelines for for Economic Multinational Enterprises0.0290%NACoverage: 95%Organisation for Economic (OECD) Guidelines for Multinational EnterprisesGuidelines for for Multinational Enterprises41.2%NACoverage: 95%11. Lack of processes and compliance to monitor compliance with UN Glidelines for mechanisms compliance with the to monitor41.2%NACoverage: 77%11. Lack of processes in investee and compliance with the to monitorShare of investments policies to monitor understrate for of Compliance of Compliance with the to monitor41.2%NACoverage: 77%Idelines for multinational Global Global Global and OECD for principles or OECD for multinational Guidelines of for to address violations and OECD for principles or OECD for multinationalAll 2%NACoverage: state for handling mechanism for OECD for principles or OECD for principles or OECD for principles or OECD for for principles or OECD for for principles or OECD for principles or OECD for for principles or OECD <br< td=""></br<>

12. Unadjusted gender pay gap	Average unadjusted gender pay gap of investee companies	4.19	NA	Coverage: 26%	Approach Gender pay gap and board gender diversity considerations are integrated into our research using our Proprietary ESG Rating through the inclusion of
13. Board gender diversity	Average ratio of female to male board members in investee companies,	25.4%	NA	Coverage: 77%	specific indicators. Metrics are selected for each sector based on their materiality.
	expressed as a percentage of all board members				<b>Engagement &amp; Collaboration</b> Fidelity International supports various initiatives globally on gender pay gap and diversity, including the 30 percent club and the 40:40 Vision working towards gender balanced executive teams by 2030.
					Voting Our voting policy is designed to encourage gender diversity on corporate boards. We support gender diversity on a company's board and will vote against the election of directors where boards do not have at least 30% female representation at companies in the most developed markets (including the UK, EU, USA and Australia) and 15% female representation in all other markets where standards on gender diversity are still developing. We may also take into account factors including the board size, industry and corporate structure.
14. Exposure to controversial weapons (anti- personnel mines, cluster munitions, chemical weapons and biological weapons)	Share of investment in investee companies involved in the manufacturing or selling of controversial weapons	0.0634%	NA	Coverage: 77%	Exclusions We exclude issuers with exposure to controversial weapons in accordance with our Exclusions Policy. Additional exclusions, including on semi-automatic weapons producers and conventional weapons, apply to <u>our Sustainable Fund</u> Family.

Adverse sustainability indicator		Metric	Impact (year 2022)	Impact (Year 2021)	Explanation	Actions taken, actions planned, and targets set for the next reference period
Environmental	15. GHG intensity	GHG intensity of investee countries	8.86 tCO₂e per \$M GDP	NA	Coverage of eligible assets: 99.69%	Approach Fidelity International is awaiting the completion of a global standard for sovereign GHG intensity by the Partnership for Carbon Accounting Financials (PCAF) and plans to adopt the global standard when available.
Social	16. Investee countries subject to social violations	Number of investee countries subject to social violations (absolute number and relative number divided by all investee countries), as referred to international treaties and conventions, United Nations principles and, where applicable, national law	6.25 7.86%	NA	Coverage of eligible assets: 100%	<b>Exclusions</b> Fidelity International's <u>Sustainable Fund</u> <u>Family</u> excludes Sovereign issuers based on: 1) an internal assessment of three principles relating to governance, respect for human rights and foreign policy; and 2) external internationally recognised country indicators.
Indicators appl	icable to invest	ment in real estate ass	ets		1	
Adverse sustainability indicator		Metric	Impact (year 2022)	Impact (Year 2021)	Explanation	Actions taken, actions planned, and targets set for the next reference period
Fossil fuels	17. Exposure to fossil fuels through real estate assets	Share of investments in real estate assets involved in the extraction, storage, transport or manufacture of fossil fuels	NA	NA	NA	Approach Consideration of exposure to fossil fuel exposure is integrated into Fidelity International's process and evaluated on asset acquisition and during each fund's Quarterly Sustainability Review. Exclusions Fidelity International's <u>Sustainable Fund</u> Family exclusions include criteria for thermal coal miners & power generation, oil sands extraction, arctic oil and gas production. These exclusions cover both assets and tenants.

Energy	18. Exposure	Share of investments	NA	NA	NA	Approach
Efficiency	to energy- inefficient real estate assets	in energy-inefficient real estate assets				Consideration of the energy-efficiency of a real estate asset is integrated into Fidelity International's process and periodically evaluated through a Quarterly Sustainability Review for the fund. More information on Fidelity International's approach is set out in the <u>Real Estate</u> <u>Sustainability Policy</u>

-	-	vestment in inves	-			
Additional Climate and ot Adverse sustainability indicator		her environmental	(year 2022)	(Year 2021)	Explanation	Actions taken, actions planned, and targets set for the next reference period
Water, waste, and material emissions	15. Deforestation	Share of investments in companies without a policy to address deforestation	70.2%	NA	Coverage: 77%	Approach Deforestation considerations are integrated into our research using our Proprietary ESG Rating that includes an indicator on deforestation. Indicators are selected for each sector based on their materiality. Engagement & Collaboration Fidelity International, alongside more than 30 other financial companies, has committed to tackle forest-risk agricultural commodity driven deforestation activities at the companies in our investment portfolios through engagement and stewardship by the end of 2025 on a best- efforts basis. Fidelity International has a thematic and collaborative engagement programme focused on biodiversity issues that includes a focus on deforestation.
Additional Indic	ators for social a	and employee, respect	for human rigl	nts, anti-co	rruption and a	anti-bribery matters - Table 3
Human Rights	9. Lack of a human rights policy	Share of investments in entities without a human rights policy	9.01%	NA	Coverage: 77%	ApproachHuman rights considerations are integratedinto our research using our Proprietary ESGRatings that include indicators on humanrights and modern slavery issues. Metrics areselected for each sector based on theirmateriality.ExclusionsFidelity International exclude issuers that wedeem to be in violation of the United NationsGlobal Compact, the OECD Guidelines for

		Multinational Enterprises, the UN Guiding Principles for Business and Human Rights, Responsible Business Conduct and International Labour Organization (ILO) Conventions.
		<b>Engagement &amp; Collaboration</b> Fidelity International is a member of the Investors Against Slavery and Trafficking Asia Pacific initiative and aim to drive positive change through collaborative engagement with targeted companies.
		Voting Fidelity International will vote against the election of members of a company's board of directors where, in our view, the company has not met the minimum standards of monitoring and overseeing itself and its suppliers with regard to human rights and minimising the risk of modern slavery or human rights violations occurring within its organisation or supply chain.

#### 2.5 Entity: FIL Pensions Management

#### Indicators applicable to investment in investee companies - Table 1

Adverse sustainability indicator		Metric	Impact (year 2022)	Impact (Year 2021)	Explanation	Actions taken, actions planned, and targets set for the next reference period	
			Impact (year 20	Impact (Year 20	Expla	period	
Greenhouse gas emissions	1. GHG emissions	Scope 1 GHG emissions	1,003,935 tCO <sub>2</sub> e	NA	Coverage: 86%	Approach Climate considerations are integrated	
		Scope 2 GHG emissions	221,142 tCO <sub>2</sub> e	NA	Coverage: 86%	into research through our Proprietary ESG Ratings, Proprietary Climate Ratings and 3 <sup>rd</sup> party data sets (including	
		Scope 3 GHG emissions	8,041,249 tCO <sub>2</sub> e	NA	Coverage: 86%	scenario analysis). Fidelity's ESG Ratings explicitly integrat	
		Total GHG emissions	9,266,326 tCO <sub>2</sub> e	NA	Coverage: 86%	climate PAI metrics (with the exception or exposure to the fossil fuel sector).	
	2. Carbon footprint	Carbon footprint	391 tCO₂e per \$M USD invested	NA	Coverage: 86%	Metrics are selected for each sector based on their materiality.	
	3. GHG intensity of investee companies	GHG intensity of investee companies	791 tCO₂e per \$M USD revenue	NA	Coverage: 86%	<ul> <li>Fidelity's Climate Rating complements our ESG Ratings, and assess issuers' alignment to the Paris Agreement and net zero pathways.</li> <li>Fidelity International has set a target to halve the aggregate carbon footprint of our investment portfolios by 2030, from a 2020 baseline, starting with equity and corporate bond holdings; and reach net zero for holdings by 2050.</li> <li>Engagement We engage with companies on our minimum climate requirements related to: <ul> <li>Disclosure of Scope 1, 2 &amp; 3 GHG emissions data</li> <li>Business alignment to Paris Agreement goals</li> <li>Disclosure aligned with TCFD recommendations</li> <li>Detailed disclosure of climate risks and opportunities for business</li> <li>Having a climate change polic and a net zero plan in place</li> <li>In addition to the minimum criteria above we also conduct thematic engagements with the objective of encouraging real-world decarbonisation. For our example, we are engaging with investee </li> </ul></li></ul>	
	4. Exposure to companies active in the fossil fuel sector	Share of investments in companies active in the fossil fuel sector	7.44%	NA	Coverage: 72%		
Energy Performance	5. Share of non- renewable energy in consumption and production	Share of non- renewable energy consumption and non-renewable energy production of investee companies compared to renewable energy source expressed as a percentage of total energy sources	45.02%	NA	Coverage: 61%		
	6. Energy consumption intensity per high impact sector	Energy consumption in GWh per million USD of revenue of investee companies, per high impact climate sector	A-Agriculture, forestry and fishing: 0.0001 GWH per \$M USD revenue B-Mining and quarrying: 0.0276	NA	Coverage: 55%		

		1				
			GWH per \$M USD			companies with thermal coal exposure to
			revenue			encourage a timely phase out.
			C Manufacturinan			Voting
			C-Manufacturing:			We expect our investee companies to:
			0.268 GWH per \$M USD revenue			Take action to manage climate change impacts and reduce
			D-Electricity, gas,			<ul><li>their GHG emissions.</li><li>Make specific and appropriate</li></ul>
			steam and air conditioning			disclosures around emissions, climate targets, risk
			supply: 0.103			management and oversight.
			GWH per \$M USD			Where companies fall short of our
			revenue			minimum climate expectations and do
						not demonstrate a willingness or plan to
			E-Water supply,			meet them, we will vote against
			sewerage, waste			management.
			management and			Collaboration
			remediation			We support policy makers in helping
			activities: 0.0129			markets meet Paris-aligned emissions
			GWH per \$M USD			reductions targets. We are a regular
			revenue			contributor to public consultations,
						including those pertaining to the EU
			F-Construction:			Green Deal, EU Action Plan on
			0.00129 GWH per			Sustainable Finance and UK mandated
			\$M USD revenue			TCFD reporting. We continue to engage with policy makers and provide expert
			G-Wholesale and			views on topics around financing the low-
			retail Trade, repair			carbon transition and the role that asset
			of motor vehicles			managers can play.
			and motorcycles:			Exclusions
			0.00594 GWH per			Exclusions on thermal coal miners &
			\$M USD revenue			power generation, oil sands extraction
			H-Transportation			and artic oil & gas production apply for our Sustainable Family Funds.
			and storage:			
			0.0277 GWH per			Further details on our approach to
			\$M USD revenue			considering and mitigating the impacts of GHG and other emissions can be found in
			L-Real estate			our <u>Climate Policy.</u>
			activities: 0.00699			
			GWH per \$M USD			
			revenue			
Biodiversity	7. Activities negatively	Share of investment in investee	0.440%	NA	Coverage: 72%	Approach Biodiversity considerations are integrated
	affecting	companies with				into our research using our Proprietary
	biodiversity-	sites/operations				ESG Rating that include metrics on
	sensitive	located in or near to				terrestrial and oceanic biodiversity
	areas	biodiversity-sensitive				impacts. Metrics are selected for each
		areas where				sector based on their materiality.
		activities of those				Engagement & Collaboration
		investee companies				Fidelity International, alongside more
		negatively affect				than 30 other financial companies, has
		those areas				committed to tackle forest-risk

						agricultural commodity driven deforestation activities at the companies in our investment portfolios through engagement and stewardship by the end of 2025 on a best-efforts basis. In 2021, Fidelity International signed up to the Finance for Biodiversity pledge which commits to protect and restore biodiversity. The pledge brings together over 100 financial institutions, committing to collaborate & share knowledge, engage with companies, assess impact, and set targets to report on biodiversity matters before 2025. Fidelity International has a thematic and collaborative engagement programme focused on biodiversity issues. Relevant thematic engagements include plastics,
						deforestation and sustainable fashion. <b>Voting</b> Fidelity will vote against directors where they have clearly failed to manage or implement the capabilities to monitor and assess material environmental risks related to biodiversity matters and reduce the ecological impact of their operations.
Water, waste, and material emissions	8. Emissions to water	Tonnes of emissions to water generated by investee companies per million USD invested, expressed as a weighted average	33.4 tonnes of emissions per \$M USD invested	NA	Coverage: 2.2%	Approach Water, waste and material emissions considerations are integrated into our research using our Proprietary ESG Ratings that include specific metrics on water usage, toxic emissions, and hazardous waste intensity. Metrics are selected for each sector based on their materiality.
	9. Hazardous and radioactive waste ratio	Tonnes of hazardous waste and radioactive waste generated by investee companies per million USD invested, expressed as a weighted average	2.007 tonnes of hazardous waste per \$M USD invested	NA	Coverage: 25%	materiality. Engagement & Collaboration Fidelity is a signatory of the Valuing Water Finance Initiative that aims to support companies toward and protect water resources in their business operations and global supply chains. We engage with poor performing issues to help encourage improvements to protect water resources. Additionally, we will look to engage with issuers which are not have a high hazardous waste ratio.
						<b>Voting</b> Fidelity International vote against directors where a company has clearly failed to properly manage the sourcing of

						water, failed to mitigate potential water scarcity risks, or are accountable for failings resulting in material pollution or contamination.			
Indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters									
Adverse sust indicator	ainability	Metric	Impact (year 2022)	Impact (Year 2021)	Explanation	Actions taken, actions planned, and targets set for the next reference period			
Social and employee matters	10. Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises 11. Lack of	Share of investments in investee companies that have been involved in violations of UNGC principles or OECD Guidelines for Multinational Enterprises	0.0719%	NA	Coverage: 85%	Approach Corporate governance and human rights considerations are integrated into our research using our Proprietary ESG Ratings that include indicators on human rights, modern slavery issues, anti- bribery, and corruption. Metrics are selected for each sector based on their materiality. Exclusions Fidelity International exclude issuers tha we deem to be in violation of the United Nations Global Compact, the OECD Guidelines for Multinational Enterprises, the UN Guiding Principles for Business and Human Rights, Responsible Business Conduct and			
	processes and compliance mechanisms to monitor compliance with UN Global Compliance principles and OECD Guidelines for Multinational Enterprises	in investee companies without policies to monitor compliance with the UNGC principles or OECD Guidelines for Multinational Enterprises or grievance/complaints handling mechanism to address violations of the UNGC principles or OECD Guidelines for Multinational Enterprises			72%	Guidelines for Multinational Enterprises, the UN Guiding Principles for Business and Human Rights, Responsible			

Environmental	15. GHG intensity	GHG intensity of investee countries	24.14 tCO <sub>2</sub> e per \$M GDP	NA	Coverage of eligible	Approach Fidelity International is awaiting the completion of a global standard for
Adverse sustai indicator	nability	Metric	Impact (year 2022)	Impact (Year 2021)	Explanation	Actions taken, actions planned, an targets set for the next reference period
Indicators and	chemical weapons and biological weapons)	ments in sovereigns a	nd supropotionalo			
	controversial weapons (anti- personnel mines, cluster munitions,	companies involved in the manufacturing or selling of controversial weapons				controversial weapons in accordance with our <u>Exclusions Policy</u> . Additional exclusions, including on semi-automatic weapons producers and conventional weapons, apply to <u>our Sustainable Fun</u> <u>Family</u> .
	14. Exposure to	Share of investment in investee	0.0445%	NA	Coverage: 72%	<b>Exclusions</b> We exclude issuers with exposure to
						Voting Our voting policy is designed to encourage gender diversity on corporat boards. We support gender diversity or company's board and will vote against the election of directors where boards of not have at least 30% female representation at companies in the most developed markets (including the UK, EU, USA and Australia) and 15% femal representation in all other markets whe standards on gender diversity are still developing. We may also take into account factors including the board size industry and corporate structure.
		expressed as a percentage of all board members				<b>Engagement &amp; Collaboration</b> Fidelity International supports various initiatives globally on gender pay gap and diversity, including the 30 percent club and the 40:40 Vision working towards gender balanced executive teams by 2030.
	13. Board gender diversity	Average ratio of female to male board members in investee companies,	23.4%	NA	Coverage: 72%	ESG Rating through the inclusion of specific indicators. Metrics are selected for each sector based on their materiality.
	12. Unadjusted gender pay gap	Average unadjusted gender pay gap of investee companies	3.47	NA	Coverage: 21%	Approach Gender pay gap and board gender diversity considerations are integrated into our research using our Proprietary

					assets: 97.70%	sovereign GHG intensity by the Partnership for Carbon Accounting Financials (PCAF) and plans to adopt the global standard when available.
Social Indicators app	16. Investee countries subject to social violations	Number of investee countries subject to social violations (absolute number and relative number divided by all investee countries), as referred to international treaties and conventions, United Nations principles and, where applicable, national law	6 6.66% ets	NA	Coverage of eligible assets: 100%	Exclusions Fidelity International's <u>Sustainable Fund</u> <u>Family</u> excludes Sovereign issuers based on: 1) an internal assessment of three principles relating to governance, respect for human rights and foreign policy; and 2) external internationally recognised country indicators.
Adverse susta indicator	ainability	Metric	Impact (year 2022)	Impact (Year 2021)	Explanation	Actions taken, actions planned, and targets set for the next reference period
Fossil fuels	17. Exposure to fossil fuels through real estate assets	Share of investments in real estate assets involved in the extraction, storage, transport or manufacture of fossil fuels	NA	NA	NA	Approach Consideration of exposure to fossil fuel exposure is integrated into Fidelity International's process and evaluated on asset acquisition and during each fund's Quarterly Sustainability Review. Exclusions Fidelity International's <u>Sustainable Fund</u> <u>Family</u> exclusions include criteria for thermal coal miners & power generation, oil sands extraction, arctic oil and gas production. These exclusions cover both assets and tenants.
Energy Efficiency	18. Exposure to energy- inefficient real estate assets	Share of investments in energy-inefficient real estate assets	NA	NA	NA	Approach Consideration of the energy-efficiency of a real estate asset is integrated into Fidelity International's process and periodically evaluated through a Quarterly Sustainability Review for the fund. More information on Fidelity International's approach is set out in the <u>Real Estate</u> <u>Sustainability Policy</u>

-	-	vestment in inves				
Additional Climate and ot Adverse sustainability indicator		her environmental	(year 2022)	- stotaci Impact (Year 2021)	Explanation	Actions taken, actions planned, and targets set for the next reference period
Water, waste, and material emissions	15. Deforestation	Share of investments in companies without a policy to address deforestation	66.7%	NA	Coverage: 72%	Approach Deforestation considerations are integrated into our research using our Proprietary ESG Rating that includes an indicator on deforestation. Indicators are selected for each sector based on their materiality. Engagement & Collaboration Fidelity International, alongside more than 30 other financial companies, has committed to tackle forest-risk agricultural commodity driven deforestation activities at the companies in our investment portfolios through engagement and stewardship by the end of 2025 on a best- efforts basis. Fidelity International has a thematic and collaborative engagement programme focused on biodiversity issues that includes a focus on deforestation.
Additional Indic	ators for social a	and employee, respect	for human riç	ghts, anti-co	rruption and a	nti-bribery matters - Table 3
Human Rights	9. Lack of a human rights policy	Share of investments in entities without a human rights policy	8.55%	NA	Coverage: 72%	Approach Human rights considerations are integrated into our research using our Proprietary ESG Ratings that include indicators on human rights and modern slavery issues. Metrics are selected for each sector based on their materiality.
						<b>Exclusions</b> Fidelity International exclude issuers that we deem to be in violation of the United Nations Global Compact, the OECD Guidelines for Multinational Enterprises, the UN Guiding Principles for Business and Human Rights,

			Responsible Business Conduct and International Labour Organization (ILO) Conventions. Engagement & Collaboration Fidelity International is a member of the Investors Against Slavery and Trafficking Asia Pacific initiative and aim to drive positive change through collaborative engagement with targeted companies. Voting Fidelity International will vote against the election of members of a company's board of directors where, in our view, the company has not met the minimum standards of monitoring and overseeing itself and its suppliers with
			of modern slavery or human rights violations occurring within its organisation or supply chain.

# 3 Description of policies to identify and prioritise principal adverse impacts on sustainability factors

#### 3.1 Governance structure

Fidelity International's approach to identify and prioritise principal adverse impacts is set out in our Principal Adverse Impacts Guidelines (PAI Guidelines) and Sustainable Investing Principles (SI Principles). The review and oversight of sustainable investing matters are vested in the Sustainable Investing Operating Committee (SIOC), which operates under the authority of the Global Operating Committee (GOC) chaired by Fidelity's Chief Executive Officer.

The scope of SIOC includes oversight of sustainable investing matters across Fidelity's business units, setting the overall strategic direction, policy formulation, external representation, product, business growth, investment integration, and setting the exclusion lists. The Committee also oversees the execution of Fidelity's ownership rights in investee issuers, including engagement and proxy voting activities. The Committee is composed of senior executives from across our business, including the Global Head of Stewardship and Sustainable Investing and senior representatives of the Investment Management, Distribution and General Counsel functions.

#### 3.2 Methodology to identify and prioritise principal adverse impacts

As a firm, Fidelity International's Principle Adverse Impacts on Sustainability Indicators are largely due to the companies we invest in or lend to. FIL considers principal adverse impacts on sustainability factors are those impacts of our investment decisions that result in material negative impacts on environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters such as environment degradation, poor labour practice, and unethical corporate behaviour for example bribery and corruption ("principal adverse impacts").

When evaluating principal adverse impacts of its investments, FIL considers the potential for engagement with an issuer to mitigate any adverse impacts on sustainability factors and enhance issuer performance on PASIs. FIL holds that its scale, active ownership and long-term investment approach provide a compelling platform for positive influence of investee companies and that engagement can be more impactful than divestment in many instances. If a material issue is identified in a portfolio company, and engagement is not successful, this may lead to escalation up to and including divestment.

Principle adverse impacts are identified and prioritised from a macro and micro perspective. At the macro level, the Thematic Engagement Oversight Group identifies and establishes a set of thematic engagement strategies that are presented to SIOC for approval. Our current areas of focus include thermal coal, deforestation, climate change and board gender diversity. Associated engagements are undertaken independently and through collaborative initiatives such as Climate Action 100+ and Investors Against Slavery and Trafficking APAC (IAST APAC).

At the micro level, principal adverse impacts are identified and prioritised through a combination of tools and channels, the precise application of which will vary by investment strategy and asset class. These are summarised below:

- <u>Due diligence</u> Analysis of whether principle adverse impacts are material and negative is undertaken by our investment teams using the due diligence processes described in our <u>Sustainable Investing Principles</u>. Our investment teams may take into account the size, nature and scale of our investment and the type of financial product we are investing in when considering whether an investment decision has a principal adverse impact on sustainability factors.
- 2. <u>ESG ratings and integration</u> Our FIL ESG Ratings are available to all investment managers and have been explicitly designed to include selected Principal Adverse Impact indicators. The indicators used to evaluate each issuer under FIL's ESG Ratings are identified through sector specific materiality mapping. FIL's materiality mapping considers international frameworks, and our analysts' views regarding the severity and probability of occurrence. For example, a low probability but high severity and irreparable principle adverse impact is far more likely to be material. This approach can result in focusing on a different set of principal adverse impacts for different sectors.
- 3. <u>Active ownership</u> FIL's investment teams and sustainability analysts regularly engage with investee companies to better understand their sustainability characteristics, principle adverse impacts and where relevant, advocate for

enhancing performance on PASIs and related key sustainability metrics.

- 4. <u>Exclusions and controversies</u> FIL's Article 8, Article 9 and Sustainable Family (SF) range of funds will not invest in issuers in breach of the principles of the UN Global Compact, that are assessed as having severe controversies relating to sustainability issues, or that participate in prohibited activities such as controversial weapons. Our Article 8, Article 9 and SF Range of funds may have more extensive sector exclusions that help minimise potential exposure to industries with material principal adverse impacts such as thermal coal, tobacco, gambling, alcohol, and unconventional oil and gas.
- 5. <u>Sustainable Investments</u> As defined under SFDR, Fidelity International's identification of Sustainable Investments includes a 'Do No Significant Harm' test that integrates a quantitative screen based on Principal Adverse Impact data. In our approach, issuers in the bottom 10% of the screen are not eligible to be classified as a Sustainable Investment unless FIL determines the issues identified are mitigated or unlikely to be a source of material harm.

#### 3.3 Methodologies to integrate consideration of PAI

Fidelity's funds that disclose under Articles 8 and 9 consider PAI as defined in Article 7 of SFDR, through the following tools and channels:

- <u>Integration ESG Ratings</u>: Fidelity's ESG Ratings have been created to explicitly include PAI indicators, with the exception of third party funds, and topics. Importantly, this means that an assessment of the materiality of PAI for each sector has been undertaken as part of the Fidelity ESG Rating process, and each issuer has been scored on the relevant PAI indicators or on metrics covering similar issues. As a result, consideration of PAIs is a critical and inseparable part of Fidelity's approach to ESG integration and assessment of ESG risk.
- <u>Integration Quarterly Sustainability Review (QSR)</u>: Fidelity has introduced a mandatory QSR for all funds under SFDR Article 8, Article 9 or Fidelity's SF. The QSR is held by the relevant CIO and aims to provide a comprehensive assessment and discussion of a fund's qualitative and quantitative sustainability characteristics. The QSR includes a section on PAIs with performance on each Principal Adverse Sustainability Indicator vs. the benchmark.
- <u>Exclusions</u>: Fidelity's exclusion policies help reduce the potential for Principal Adverse Impacts by excluding business activities or issuers with a track record of behaviour that have material negative effects on sustainability factors. For example, Fidelity's behavioural exclusions explicitly target issuers in breach of the principles of the UN Global Compact and other norms-based standards. Fidelity's Article 8, Article 9 and SF range of funds have sector exclusions that help minimise potential exposure to industries with material PAIs including tobacco, thermal coal and weapons producers.

Fund-of-fund structures that invest in Fidelity funds are assessed on a look-through basis. Where look-through is not practical, the holdings of external or sub-advised funds are assessed periodically and as part of initial and ongoing fund due-diligence. We note that external or sub-advised funds will be subject to their own engagement and escalation approach regarding Principal Adverse Impacts.

#### 3.4 Data sources

FIL primarily sources data on principal adverse impacts from third-party providers including MSCI, ISS, FactSet and Bloomberg. These data providers are supplemented by specialist providers (including Urgewald and The Carbon Disclosure Project), desktop research from our analysts, and engagement.

Despite significant improvements over the last 10 years, the quality and availability of reported data relating to principle adverse impacts remains limited and can constrain our ability to undertake quantitative analysis of FIL's principle adverse impacts. This issue can be exacerbated for smaller companies, private companies or in emerging markets.

We attempt to bridge quantitative data gaps through direct or collaborative engagement with issuers, public policy advocacy for enhanced and consistent disclosures, use of specialist data providers, and participation in industry initiatives.

FIL's ESG Ratings include principal adverse impact indicators, and our analysts can assess a company's performance based on research and direct company engagement. While this can help narrow the challenge presented by data gaps, it can include subjective assessment of issuer performance and culture, which may be subject to interpretation and error.

#### Constraints

While we have attempted to adopt a comprehensive approach to consideration of principal adverse impacts on sustainability factors, we recognise that potential sources of error remain in the methodologies and approach adopted. These include: 1) data quality and consistency; 2) data availability; 3) subjective assessment of issuer performance; 4) model error.

We recognise that data availability, methodologies and the underlying science are evolving rapidly in certain areas of sustainable investment. As a result, we review and aim to continue to enhance our approach to identifying principal adverse impacts on Sustainability Indicators as well as our approach to ESG integration and the broader tools available to our investment teams.

## 4 Engagement policies

When evaluating Principal Adverse Impacts of our investments, Fidelity considers the potential for engagement with an issuer to mitigate any adverse impacts on sustainability factors and enhance issuer performance on Principal Adverse Impacts. We have set out our stewardship approach below:

- Stewardship Active ownership: Fidelity's investment teams and sustainable investing analysts engage with
  investee companies to better understand their sustainability characteristics, Principal Adverse Impacts and where
  relevant, advocate for enhancing performance on key sustainability metrics. Engagements are undertaken
  independently and through collaborative initiatives such as Climate Action 100+ and Investors Against Slavery
  and Trafficking, APAC with the assistance of the Sustainable Investing team.
- Stewardship Voting and divestment: Fidelity's proxy voting guidelines provide Fidelity's expectations for
  investee companies on topics including climate change related disclosure, board level diversity, and corporate
  governance. If an investee company fails to meet our expectations we will inform the company, seek to engage
  where appropriate and may escalate by voting against the election of a director, or in certain circumstances by
  divesting from the company. Optional PAI indicators are selected based on considerations including data
  availability, materiality, and integration into Fidelity's ESG Ratings. The process is run by the Sustainable
  Investing team in consultation with internal stakeholders and presented to SIOC for validation

The table above sets out specific engagement activity targeted for each Principal Adverse Impact metric. You can find further details of our engagement activities in our <u>Sustainable Investing Principles</u>, <u>UK Stewardship Report</u> and <u>Sustainable Investing Report</u>.

## 5 References to international standards

### 5.1 Paris Agreement

#### 5.1.1 Link to PAI indicators

Table 1 PAI 1-6 Greenhouse gas emissions

#### 5.1.2 Methodologies and data used

We have taken steps to align our business to the objectives of the Paris Agreement via our founding membership of the Net Zero Asset Owner initiative. As part of this membership, we are committed to supporting the goal of net zero greenhouse gas emissions by 2050 or sooner, in line with global efforts to limit warming to 1.5 degrees Celsius above pre-industrial levels and to supporting investing aligned with net zero emissions by 2050 or sooner.

Fidelity has set a target to reduce CO2 emissions across our investment portfolios by 50 per cent by 2030, against our 2020 base level. This will be supported by development of a set of proprietary Climate Ratings that will leverage our existing in-house research capabilities to assess whether the companies we invest in have ambition and alignment to achieve net zero targets. Once all companies in Fidelity's investment universe have been assessed using this framework, Fidelity will be able to aggregate the assessments and score all funds for their alignment to net zero. This will enable transition targets to be set at both fund and individual company level to further manage the Principal Adverse Impacts these companies are having on climate and allow resources to be directed towards the biggest emissions reduction opportunities in terms of investment and engagement.

As part of our transition to net zero, we have also committed to phase out companies exposed to unabated thermal coal in OECD countries by 2030 and by 2040 globally. This gradual exit will give companies the chance to demonstrate their ability to transition. However, if individual companies do not show progress towards net zero in a timeframe not exceeding three years, we will look to divest.

This emission reduction and thermal coal phase-out targets are aligned with the IPCC Special Report 2018 1.5°C pathway P1.

Fidelity has published a report under the recommendations established by the Taskforce on Climate-related Financial Disclosures (TCFD) that highlights Fidelity's macro-economic research based on understanding how climate change may impact macro-economic variables. This analysis principally reflects the Network for Greening the Financial System's Orderly, Disorderly, and Hot House World scenarios (2021), as well as the extreme scenario from the Burke-Hsiang-Miguel model (2015).

#### 5.2 UN Global Compact

#### 5.2.1 Link to PAI indicators

Table 1 PAI 10: Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises

Table 1 PAI 11: Lack of processes and compliance mechanisms to monitor compliance with UN Global Compliance principles and OECD Guidelines for Multinational Enterprises

#### 5.2.2 Methodologies and data used

United Nations Global Compact, the OECD Guidelines for Multinational Enterprises, the UN Guiding Principles for Business and Human Rights, Responsible Business Conduct and International Labour Organization (ILO) Conventions are used to assess human rights practices of companies to help assess and mitigate Principal Adverse Impacts companies may have on social factors.

#### Various references assessing governance

We are involved in external governance-related organisations and hold positions in the Investment Association, the Panel on Takeovers and Mergers, the Confederation of British Industry and the International Corporate Governance Network. We are also a signatory to the United Nations Principles for Responsible Investment ("UNPRI"), the UK Stewardship Code, the EFAMA Stewardship Code, the Japanese Stewardship Code, the Taiwanese Stewardship Principles for Responsible Investors and the Hong Kong Principles of Responsible Ownership.

At this stage no forward-looking climate scenarios are used to explicitly assess potential impacts on the topics covered in this section. Fidelity is exploring the consideration of more comprehensive climate scenarios.

#### 5.3 Deforestation

#### 5.3.1 Link to PAI Indicators

Table 1 PAI 7: Activities negatively affecting biodiversity sensitive areas

#### Table 2 PAI 15: Deforestation

#### 5.3.2 Methodologies and data used

In 2021, Fidelity signed the Financial Sector Commitment Letter on Eliminating Commodity-Driven Deforestation. The commitment emphasises the role of active ownership and ongoing stewardship and the importance of collaboration with wider stakeholders to meet these goals.

We have conducted an initial assessment of exposure to deforestation risk, considering high-risk companies, and widened the scope of our long-standing thematic engagement on palm oil to create our deforestation thematic engagement, incorporating key forest-risk agricultural commodities: palm oil, soy, beef & leather and pulp & paper. Governance and oversight of the engagement strategy will be provided by Fidelity's Engagement and Oversight Group (EOG). We will monitor the progress of our engagements and escalate as we see appropriate. Where companies in scope do not meet our minimum expectations, we intend to hold members of the board accountable through voting from 2024.

To identify how deforestation affects our investee companies, we leverage our fundamental research and analysis capability. At the heart of this sits our proprietary ESG rating as a tool for gaining comprehensive insight into companies' various sustainability characteristics, including their approach to addressing deforestation for relevant sectors. While data on deforestation is improving, challenges remain relative to other ESG disclosures. However, this is not an excuse for inaction. We are working with companies and ESG data providers to improve measurement, due diligence, and disclosures

To support our commitment, we will also continue to participate in several collaborative initiatives and investor workings groups, including Finance for Biodiversity Pledge (FIB), Natural Capital Investment Alliance (NCIA), WWF Biodiversity Risk Method for Investors and Taskforce on Nature-related Financial Dislosures (TNFD), to help develop standards and address deforestation at a system level.

At this stage no forward-looking climate scenarios are used to explicitly assess potential impacts on the topics covered in this section. Fidelity is exploring the consideration of more comprehensive climate scenarios.

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