Periodic disclosure for financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852

Product name:

Fidelity Funds - European Growth Fund

Legal entity identifier: 549300G4OINSKM9K3661

### **Environmental and/or social characteristics**

#### Did this financial product have a sustainable investment objective? It made sustainable investments with It promoted Environmental/Social (E/S) an environmental objective:\_\_% characteristics and while it did not have as its objective a sustainable investment, it had a proportion of 85.41% of sustainable investments with an environmental objective in in economic activities that qualify as environmentally sustainable under economic activities that qualify as the EU Taxonomy environmentally sustainable under the EU Taxonomy in economic activities that do not with an environmental objective in qualify as environmentally economic activities that do not qualify as environmentally sustainable under the EU sustainable under the EU Taxonomy Taxonomy × with a social objective It made sustainable investments with a It promoted E/S characteristics, but did not social objective: % make any sustainable investments



### To what extent were the environmental and/or social characteristics promoted by this financial product met?

With effect from 30 July 2024, the fund's approach towards promoting environmental and social characteristics was revised in accordance with the updated Fidelity Sustainable Investing Framework, as detailed in the fund's precontractual disclosure. Accordingly, where reporting values have been impacted by this update, values disclosed in this report will reflect the reporting period from 1 May 2024 to 30 July 2024 and additional information will be provided below covering the period from 31 July 2024 to 30 April 2025.

Based on this circumstance, this year's reporting was adapted as follows:

- the data 'Favourable ESG characteristics', which is typically reported as a quarterly average of the data at the end of the calendar, was adapted as at 30 July 2024
- the data 'ESG score', which is new data as from 31 July 2024, was compiled based on the quarterly average of the data as at of 31 July 2024, 31 October 2024, 31 January 2025 and 30 April 2025
- the data 'sustainable investments' and its variations, was unchanged and was compiled based on the quarterly average of the data as at 31 July 2024, 31 October 2024, 31 January 2025 and 30 April 2025
- the data 'top investments' and 'sector' were unchanged and reported as of the year end 30 April 2025

Prior to 30 July 2024, the fund met the environmental and social characteristics it promoted as defined in the SFDR precontractual disclosure for the period. The fund promoted environmental and social characteristics by investing in securities of issuers with favourable ESG characteristics. Favourable ESG characteristics were determined by reference to ESG ratings. ESG ratings considered environmental characteristics including carbon intensity, carbon emissions, energy, efficiency, water and waste management and biodiversity, as well as social characteristics including product safety, supply chain, health and safety and human rights.

As from 31 July 2024, the fund met the environmental and social characteristics it promoted as



**Sustainable** 

investment in an

investment means an

economic activity that contributes to an

environmental or social objective, provided that the investment does not

significantly harm any environmental or social

objective and that the

follow good governance

The **EU Taxonomy** is a

laid down in Regulation

sustainable economic

include a list of socially sustainable economic

activities. Sustainable

investments with an environmental objective might be aligned with the Taxonomy or not.

Regulation does not

classification system

(EU) 2020/852 establishing a list of

environmentally

activities. That

investee companies

practices.

**Sustainability** indicators measure how the environmental or social characteristics promoted by the financial product are

attained.



defined in the SFDR precontractual disclosure for the period. The fund promoted environmental and social characteristics by aiming to achieve an ESG score of its portfolio greater than the ESG score of its benchmark.

ESG scores were determined by reference to ESG ratings. ESG ratings consider environmental characteristics including carbon intensity, carbon emissions, energy efficiency, water and waste management and biodiversity, as well as social characteristics including product safety, supply chain, health and safety and human rights.

ESG scores of individual securities were established by assigning set numerical values to Fidelity ESG ratings and ESG ratings provided by external agencies. These numerical values were aggregated to determine the average ESG score of the portfolio and that of the benchmark.

The weighted average ESG score of the fund's portfolio was measured against the ESG score of the benchmark using either a weighted average or equal weighted method of calculation. Further details on the calculation methodology are set out at <u>Sustainable investing framework</u> and may be updated from time to time.

The fund systematically applied the exclusions as defined in the SFDR precontractual disclosure.

#### How did the sustainability indicators perform?

For the period 1 May 2024 - 30 July 2024, the following sustainability indicators were used to measure the attainment of the environmental and social characteristics promoted by the fund: i) the percentage of the fund invested in securities of issuers with favourable ESG characteristics in accordance with the Fidelity's Sustainable Investing Framework: 96.34%

For the period 31 July 2024 - 30 April 2025, the following sustainability indicators were used to measure the attainment of the environmental and social characteristics promoted by the fund: i) the ESG score of the fund's portfolio measured against the ESG score of its benchmark: 7.81 vs. 7.42

For the period 1 May 2024 - 30 April 2025, the following sustainability indicators were used to measure the attainment of the environmental and social characteristics promoted by the fund:

- i) the percentage of the fund invested in securities of issuers with exposure to the Exclusions: 0.00%.
- ii) the percentage of the fund invested in sustainable investments: 85.41%
- iii) the percentage of the fund invested in sustainable investments with an environmental objective in economic activities (that do not qualify as environmentally sustainable under the EU Taxonomy): 43.53%
- iv) the percentage of the fund invested in sustainable investments with a social objective: 39.56%

These sustainability indicators were not subject to an assurance provided by an auditor or a review by a third party.

Principal adverse impacts are the most significant negative impact of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

#### ... and compared to previous periods?

For the period 1 May 2022 - 30 April 2023, the following sustainability indicators were used to measure the attainment of the environmental and social characteristics promoted by the fund:

- i) the percentage of the fund invested in securities of issuers with favourable ESG characteristics in accordance with the Fidelity's Sustainable Investing Framework: 92.4%.
- ii) the percentage of the fund invested in securities of issuers with exposure to the Exclusions: 0.00%.
- iii) the percentage of the fund invested in sustainable investments: 58.72%
- iv) the percentage of the fund invested in sustainable investments with an environmental objective in economic activities (that do not qualify as environmentally sustainable under the EU Taxonomy): 23.40%
- v) the percentage of the fund invested in sustainable investments with a social objective: 35.01%

For the period 1 May 2023 - 30 April 2024, the following sustainability indicators were used to measure the attainment of the environmental and social characteristics promoted by the fund:

- i) the percentage of the fund invested in securities of issuers with favourable ESG characteristics in accordance with the Fidelity's Sustainable Investing Framework: 95.6%.
- ii) the percentage of the fund invested in securities of issuers with exposure to the Exclusions: 0.00%.
- iii) the percentage of the fund invested in sustainable investments: 73.76%
- iv) the percentage of the fund invested in sustainable investments with an environmental objective in economic activities (that do not qualify as environmentally sustainable under the EU Taxonomy): 30.28%
- v) the percentage of the fund invested in sustainable investments with a social objective: 40.43%

These sustainability indicators were not subject to an assurance provided by an auditor or a review by a third party.

# What were the objectives of the sustainable investments that the financial product partially made and how did the sustainable investment contribute to such objectives?

While it did not have as its objective a sustainable investment, it had a proportion of 85.41% of sustainable investments. The sustainable investments had an environmental and social objective.

The fund determines sustainable investments as investments in securities of:

- (a) issuers making a substantial contribution through their economic activities (more than 50% for corporate issuers) to either:
- (i) one or more of the environmental objectives set out in the EU Taxonomy and qualify as environmentally sustainable in accordance with EU Taxonomy; or
- (ii) environmental or social objectives aligned with one or more of the United Nations Sustainable Development Goals ("SDGs"); or
- (b) issuers which contribute towards a decarbonisation objective consistent with maintaining the global temperature rise to below 1.5 degrees; or
- (c) bonds which intend to use the majority of proceeds for specific activities, assets or projects that contribute to environmental or social objectives;

provided they do not significantly harm any environmental or social objectives and that the investee companies follow good governance practices.

The contribution to the EU Taxonomy objectives is displayed under the question 'To what extent were the sustainable investments with an environmental objective aligned with the EU Taxonomy?'

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



# How did the sustainable investments that the financial product partially made not cause significant harm to any environmental or social sustainable investment objective?

Sustainable investments were screened for involvement in activities that cause significant harm and controversies, assessed through a check that the issuer met minimum safeguards and standard that relate to principal adverse impacts (PAIs) as well as performance on PAI metrics. This included: Norms-based screens - the screening out of securities identified under Fidelity's existing norms-based screens (as set out below); Activity-based screens - the screening out of issuers based on their participation in activities with significant negative impacts on society or the environment, including issuers that were considered to have a 'Very Severe' controversy using controversy screens, covering 1) environmental issues, 2) human rights and communities, 3) labour rights and supply chain, 4) customers, 5) governance; and PAI indicators - quantitative data (where available) on PAI indicators are used to evaluate whether an issuer was involved in activities that cause significant harm to any environmental or social objective.

### How were the indicators for adverse impacts on sustainability factors taken into account?

For sustainable investments, as set out above, Fidelity undertook a quantitative evaluation to identify issuers with challenging performance on PAI indicators, all mandatory and any relevant indicators for adverse impacts on sustainability factors as set out in Annex 1 of the EU SFDR Regulatory Technical Standards were taken into account (where data was available).

Issuers with a low overall score will be ineligible to be 'sustainable investments' unless Fidelity's fundamental research determine that the issuer was not breaching "do no significant harm" requirements or was on the path to mitigate the adverse impacts through effective management or transition.

# Were sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:

Norms-based screens will be applied: Issuers identified as failing to behave in a way which meets their fundamental responsibilities in the areas of human rights, labour, environmental and anti-corruption as aligned with international norms including those set out by the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, UN Global Compact (UNGC), ILO Standards International Labour Organisation (ILO) Conventions, will not be considered sustainable investments.

The EU Taxonomy sets out a "do not significant harm" principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific Union criteria.

The "do no significant harm" principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.





## How did this financial product consider principal adverse impacts on sustainability factors?

Principal adverse impacts on sustainability factors (referred to as principal adverse impacts) were considered through and incorporated into investment decisions through a variety of tools, including:

- (i) ESG rating Fidelity references ESG ratings which incorporate consideration of material principal adverse impacts such as carbon emissions, employee safety and bribery and corruption, water management. For sovereign issued securities, principal adverse impacts were considered through and incorporated into investment decisions using ratings which incorporate material principal adverse impacts such as carbon emissions, social violations and freedom of expression.
- (ii) Exclusions When investing directly in corporate issuers, the fund applied the Exclusions to help mitigate the principal adverse impacts through excluding harmful sectors and prohibiting investment in issuers that breach international standards, such as the UNGC. Such exclusions included PAI indicator 4: Exposure to Companies active in the fossil fuel Sector, PAI indicator 10: Violations of UN Global Compact principles & OECD Guidelines for Multinational Enterprises and PAI indicator 14: Exposure to controversial weapons.
- (iii) Engagement Fidelity used engagement as a tool to better understand principal adverse impacts and, in some circumstances, advocate for mitigating principal adverse impacts. Fidelity participated in relevant individual and collaborative engagements that target a number of principal adverse impacts (i.e. Climate Action 100+, Investors Against Slavery and Trafficking APAC).
- (iv) Voting Fidelity's voting policy includes explicit minimum standards for board gender diversity and engagement with climate change for corporate issuers. Fidelity may also vote to help mitigate principal adverse impacts.
- (v) Quarterly reviews discussion and review of principal adverse impacts through the fund's quarterly review process.

Fidelity took into account specific indicators for each sustainability factor when considering whether investments have a principal adverse impact. These indicators were subject to data availability and may evolve with improving data quality and availability.

The above exclusions and screens (the "Exclusions") may be updated from time to time. Please refer to this website for further information: "Sustainable investing framework".





The list includes the investments constituting the greatest proportion of investments of the financial product during the reference period which is: 01/05/2024 -30/04/2025

### What were the top investments of this financial product?

Largest investments	Sector	% Assets	Country
Ferrovial SE	Industrials	4.4%	Netherlands
3i Group	Financials	3.84%	United Kingdom
Industria de Diseno Textil SA	Consumer Discretionary	3.79%	Spain
Ahold Delhaize	Consumer Staples	3.36%	Netherlands
TotalEnergies SE	Energy	3.2%	France
UniCredit (A)	Financials	2.92%	Italy
Sage Group	Information Technology	2.86%	United Kingdom
Kone (B)	Industrials	2.75%	Finland
Coca-Cola Europacific Partners	Consumer Staples	2.65%	United Kingdom
Allianz	Financials	2.59%	Germany
NatWest Group	Financials	2.57%	United Kingdom
KBC Group	Financials	2.57%	Belgium
AIB Group	Financials	2.43%	Ireland
Roche Holding AG	Healthcare	2.25%	Switzerland
Reckitt Benckiser Group	Consumer Staples	2.23%	United Kingdom

Source of data: Fidelity International, as at 30 April 2025

The largest investments (excluding derivatives) and their classifications are based on official accounting data and are based on the last day of the reference period. Any percentage differences with the financial statement portfolios result from a rounding difference.



#### What was the proportion of sustainability-related investments?

The fund invested 85.41% in sustainable investments.

#### What was the asset allocation?

The proportion of the investments of the fund used to meet the environmental or social characteristics promoted, in accordance with the binding elements of the investment strategy of the financial product is 98.83%, which corresponds to the proportion of fund achieving an ESG score of its portfolio greater than the ESG score of its benchmark. This included 85.41% in sustainable investments of which 2.32% have an environmental objective (which is aligned with the EU Taxonomy), 43.53% have an environmental objective (which is not aligned with the EU Taxonomy) and 39.56% have a social objective.

The EU Taxonomy data is sourced from a third-party data provider. The assessment on EU Taxonomy alignment is conducted with reported data from investee companies. The methodology applied by the third-party data provider assesses how companies are involved in economic activities that substantially contribute to an environmental objective while not significantly harming other sustainable objectives and meeting minimum social safeguards.

The remaining proportion of the investments is mainly used as described under the question: "What investments are included under " #2 Other", what is their purpose and are there any minimum environmental or social safeguards?"

This asset allocation, including the compliance to the EU Taxonomy, was not subject to an assurance provided by an auditor or a review by a third party.



Asset allocation describes the share of investments in specific assets.





**#1 Aligned with E/S characteristics** includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

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

The category **#1 Aligned with E/S characteristics** covers:

The sub-category **#1A Sustainable** covers environmentally and socially sustainable investments.

- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

#### In which economic sectors were the investments made?

Sector	Sub Sector	% of NAV
Communication Services	Diversified Telecommunication Services	0.96%
Consumer Discretionary	Speciality Retail	3.79%
	Hotels Restaurants & Leisure	3.69%
	Media	1.89%
	Auto Components	1.82%
Consumer Staples	Food & Staples Retailing	4.93%
	Personal Products	3.52%
	Beverages	2.65%
	Household Products	2.23%
Energy	Oil, Gas & Consumable Fuels	3.2%
Financials	Diversified Financial Services	5.93%
	Commercial Banks	10.49%
	Insurance	10.08%
Healthcare	Pharmaceuticals	5.89%
Industrials	Professional Services	6.35%
	Machinery	4.9%
	Construction & Engineering	4.4%
	Trading Companies & Distributors	2.82%
	Electrical Equipment	1.81%
	Airlines	1.05%
Information Technology	Software	5.05%
	Internet Software & Services	2.07%
	IT Services	1.68%
Materials	Containers & Packaging	1.87%
	Paper & Forest Products	1.12%
Open Ended Fund	Closed Ended Cash Fund	2.02%
Utilities	Multi-Utilities	1.92%
	Electric Utilities	1.5%

Source of data: Fidelity International, as at 30 April 2025

The sector breakdown of the investments (excluding derivatives) and their classifications are based on official accounting data and are based on the last day of the reference period. Any percentage differences with the financial statement portfolios result from a rounding difference.

Due to data limitations, we are not able to disclose information on the proportion of investments on sectors and sub-sectors of the economy that derive revenues from exploration, mining, extraction, production, processing, storage, refining or distribution, including transportation, storage and trade, of fossil fuels. This is currently covered through a different fossil fuels grouping.



## To what extent were the sustainable investments with an environmental objective aligned with the EU Taxonomy?

The quarterly average share of sustainable investments with an environmental objective aligned with the EU Taxonomy was 2.32%. This contributed to the following environmental objectives:

- climate change mitigation: 1.28%
   climate change adaptation: 0.02%
- 3) protection of water and marine resources: 0%
- 4) transition to a circular economy: 0%5) pollution prevention and control: 0%
- 6) protection and restoration of biodiversity and ecosystems: 0%

The compliance of the investments of the fund with the EU Taxonomy was not subject

To comply with the EU Taxonomy, the criteria for fossil gas include limitations on emissions and switching to fully renewable power or low-carbon fuels by the end of 2035. For nuclear energy, the criteria include comprehensive safety and waste management

rules.



Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

Taxonomy-aligned activities are expressed as a share of:

- -turnover reflecting the share of revenue from green activities of investee companies.
- capital expenditure (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- operational expenditure (OpEx) reflecting green operational activities of investee companies.

to an assurance by auditors or a review by third parties. The taxonomy alignment of the underlying investments of the fund is measured by turnover.

This is the first year we are including contributions to the EU Taxonomy's expanded environmental objectives, which now cover the protection of water and marine resources, transition to a circular economy, pollution prevention and control, and protection and restoration of biodiversity and ecosystems. To accommodate these additions, this year's reporting approach has been adjusted:

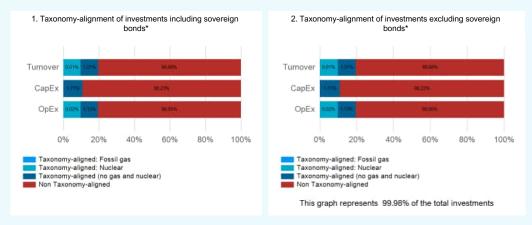
For 'climate change mitigation' and 'climate change adaptation', the approach was unchanged and data has been compiled based on the quarterly average of the data at the end of the calendar as of 31 July 2024, 31 October 2024, 31 January 2025 and 30 April 2025.

For the new objectives ('protection of water and marine resources,' 'transition to a circular economy,' 'pollution prevention and control,' and 'protection and restoration of biodiversity and ecosystems'), we have used the quarterly average of data as of 31 January 2025 and 30 April 2025 due to the limited timeframe that this data has been available.

Did the financial product invest in fossil gas and/or nuclear energy related activities complying with the EU Taxonomy¹?

Yes□ In fossil gas☑ In nuclear energy□ No

The two graphs below show in dark blue the percentage of investments that were aligned with the EU Taxonomy. As there is no appropriate methodology to determine the taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.



\* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures.

Source of data: Moody's, quarterly average over the reference period. The above data has been compiled through static data from our trading and compliance system and enriched through an external data source Moody's. The data has been compiled based on the last day of close of calendar quarterly data and averaged for the reference period. There may be variations in the EU Taxonomy figures disclosed due to differences in the calculation methodology applied.

### What was the share of investments made in transitional and enabling activities?

The share of investments in transitional and enabling activities within the meaning of the EU Taxonomy Regulation is 0% for transitional activities and 1.16% for enabling activities, measured by Turnover.

# How did the percentage of investments that were aligned with the EU Taxonomy compare with previous reference periods?

For the period 1 May 2022 - 30 April 2023, the quarterly average share of sustainable investments (including sovereign bonds) with an environmental objective aligned with the EU Taxonomy was 3.0% based on Turnover, 5.6% based on CapEx and 3.8% based



on OpEx. The quarterly average share of sustainable investments (excluding sovereign bonds) with an environmental objective aligned with the EU Taxonomy was 3.0% based on Turnover, 5.6% based on CapEx and 3.8% based on OpEx.

For the period 1 May 2023 - 30 April 2024, the quarterly average share of sustainable investments (including sovereign bonds) with an environmental objective aligned with the EU Taxonomy was 3.04% based on Turnover, 5.08% based on CapEx and 4.75% based on OpEx. The quarterly average share of sustainable investments (excluding sovereign bonds) with an environmental objective aligned with the EU Taxonomy was 3.04% based on Turnover, 5.08% based on CapEx and 4.75% based on OpEx.



are sustainable investments with an environmental objective that do not take into account the criteria for environmentally sustainable economic activities under Regulation (EU) 2020/852



## What was the share of sustainable investments with an environmental objective not aligned with the EU Taxonomy?

The quarterly average share of sustainable investments with an environmental objective not aligned with the EU Taxonomy was 43.53%

Economic activities that are not recognised by the EU Taxonomy are not necessarily harmful to the environment or unsustainable. Moreover, not all activities that can make a substantial contribution to environmental and social objectives are yet integrated into the EU Taxonomy.



### What was the share of socially sustainable investments?

The quarterly average share of sustainable investments with a social objective was 39.56%

This contributed towards the socially-focused SDG objectives, as explained in the answer on the objectives of the sustainable investments above.



## What investments were included under "#2 Other", what was their purpose and were there any minimum environmental or social safeguards?

The remaining investments of the fund were invested in assets aligned with the financial objective of the fund, cash and cash equivalents for liquidity purposes and derivatives used for investment and efficient portfolio management. As a minimum environmental and social safeguard, the fund adhered to the Exclusions.



# What actions have been taken to meet the environmental and/or social characteristics during the reference period?

The fund took the following actions to meet the environmental or social characteristics:

- 1. Until 30 July 2024, the fund invested in securities of issuers with favourable ESG characteristics.
- 2. Quarterly Sustainability Review to discuss and review the fund's qualitative and quantitative environmental and social characteristics.
- 3. The fund has applied the Exclusions.
- 4. As from 31 July 2024, the fund promoted environmental and social characteristics by aiming to achieve an ESG score of its portfolio greater than its benchmark.





Reference benchmarks are indexes to measure whether the financial products attains the environmental or social characteristics that they promote.

### How did this financial product perform compared to the reference benchmark?

No reference benchmark has been designated to measure whether the fund attains the environmental or social characteristics that they promote.

How does the reference benchmark differ from a broad market index?

Non Applicable

How did this financial product perform with regard to the sustainability indicators to determine the alignment of the reference benchmark with the environmental or social characteristics promoted?

Non Applicable

How did this financial product perform compared with the reference benchmark?

Non Applicable

How did this financial product perform compared with the broad market index? Non Applicable

