

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 Sustainable Research Enhanced US
Equity UCITS ETF

Legal entity identifier:
25490070POIBCKYCHC02

Environmental and/or social characteristics

Did this financial product have a sustainable investment objective ?	
<input checked="" type="radio"/> <input type="radio"/> <input type="checkbox"/> Yes	<input type="radio"/> <input checked="" type="radio"/> <input type="checkbox"/> No
<input type="checkbox"/> It made sustainable investments with an environmental objective: __% <ul style="list-style-type: none"> <input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy <input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy <input type="checkbox"/> It made sustainable investments with a social objective: __%	<input checked="" type="checkbox"/> It promoted Environmental/Social (E/S) characteristics and while it did not have as its objective a sustainable investment, it had a proportion of 63.82% of sustainable investments <ul style="list-style-type: none"> <input checked="" type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy <input checked="" type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy <input checked="" type="checkbox"/> with a social objective <input type="checkbox"/> It promoted E/S characteristics, but did not make any sustainable investments

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852 establishing a list of **environmentally sustainable economic activities**. That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.



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

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

The sub-fund met the environmental and social characteristics it promoted as defined in the SFDR precontractual disclosure for the period. The sub-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. No reference benchmark was designated for the purpose of attaining the environmental and social characteristics promoted. Where the sub-fund invested in sustainable investments with environmental objectives, this contributed towards the climate change mitigation environmental EU Taxonomy objective. Where the sub-fund invested in sustainable investments with social objectives, this contributed towards the socially focused SDG objectives as explained in the answer on the objectives of the sustainable investments below.

The Sub-Fund systematically applied the exclusions as defined in the SFDR precontractual disclosure.

The following data has been compiled based on the quarterly average of the data at the end of the calendar as of 30 April 2024, 31 July 2024, 31 October 2024 and 31 January 2025 . Top investment and classification of securities including sector and country are determined as at the last day of the reference period.

How did the sustainability indicators perform?

For the period 1 February 2024 - 31 January 2025, the following sustainability indicators were used to measure the attainment of the environmental and social characteristics promoted by the Sub-Fund:

- i) the percentage of the Sub-Fund invested in securities of issuers with desirable ESG characteristics: 91.84%
- ii) the percentage of the Sub-Fund invested in securities of issuers with exposure to the Exclusions (defined below): 0%
- iii) the percentage of the Sub-Fund invested in sustainable investments: 63.82%
- iv) the percentage of the Sub-Fund invested in sustainable investments with an environmental objective in economic activities (that do not qualify as environmentally sustainable under the EU Taxonomy): 39.59%
- v) the percentage of the Sub-Fund invested in sustainable investments with social objective: 24.02%

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

... and compared to previous periods?

For the previous reference period, the following sustainability indicators were used to measure the attainment of the environmental and social characteristics promoted by the Sub-Fund:

- i) the percentage of the Sub-Fund invested in securities of issuers with desirable ESG characteristics: 93.58%
- ii) the percentage of the Sub-Fund invested in securities of issuers with exposure to the Exclusions (defined below): 0%
- iii) the percentage of the Sub-Fund invested in sustainable investments: 61.26%
- iv) the percentage of the Sub-Fund invested in sustainable investments with an environmental objective in economic activities (that do not qualify as environmentally sustainable under the EU Taxonomy): 36.53%
- v) the percentage of the Sub-Fund invested in sustainable investments with social objective: 24.39%

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 63.82% of sustainable investments. The sustainable investments had an environmental and social objective.

The Sub-Fund determined a sustainable investment as follows:

- (a) issuers that undertake economic activities that contribute to one or more of the environmental objectives set out in the EU Taxonomy and qualify as environmentally sustainable in accordance with EU Taxonomy. This contributed towards the climate change mitigation environmental EU Taxonomy objective; or
- (b) issuers whereby the majority of their business activities (more than 50% of revenue) contributed to environmental or social objectives aligned with one or more of the United Nations Sustainable Development Goals (“SDGs”); or
- (c) issuers which set a decarbonisation target consistent with a 1.5 degree warming scenario or lower (verified by the Science Based Target Initiative or a Fidelity Proprietary Climate Rating) which was considered to contribute to environmental objectives; provided they do no significant harm, meet minimum safeguards and good governance criteria.

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.

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.

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 were 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 were considered through and incorporated into investment decisions through a variety of tools, including:

- (i) Due Diligence - analysis of whether principal adverse impacts were material and negative.
- (ii) ESG rating - Fidelity references ESG ratings which incorporate 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.
- (iii) Exclusions - We adopted a principals-based approach to ESG matters and as part of this we place companies which we regard as unsuitable investments on an Exclusion List, including but not limited to the following; a firm-wide exclusions list, that includes biological weapons, chemical weapons, the use of stockpiling, production and transfer of anti-personnel mines, the treaty of non-proliferation of nuclear weapons and guidance from the UN, World Bank and other global authorities upholding ESG principals.
- (iv) Engagement - Fidelity used engagement as a tool to better understand principal adverse impacts on sustainability factors and, in some circumstances, advocate for enhancing principal adverse impacts and sustainability metrics. 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).
- (v) Voting - Fidelity's voting policy included explicit minimum standards for board gender diversity and engagement with climate change. Fidelity may also vote to enhance issuer performance on other indicators.
- (vi) Quarterly reviews - monitoring of principal adverse impacts through the fund's quarterly review process.

Fidelity takes into account specific indicators for each sustainability factor when considering whether investments have a principal adverse impact. These indicators are 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"](#).



What were the top investments of this financial product?

The list includes the investments constituting the greatest proportion of investments of the financial product during the reference period which is: 01/02/2024 - 31/01/2025

Largest investments	Sector	% Assets	Country
Apple, Inc.	Technology	6.91%	United States
Microsoft Corp.	Technology	5.95%	United States
Nvidia Corp.	Technology	5.93%	United States
Amazon.Com, Inc.	Communications	4.44%	United States
Meta Platforms, Inc.	Communications	2.97%	United States
Alphabet, Inc.	Communications	2.46%	United States
Jpmorgan Chase & Co.	Financial	2.32%	United States
Alphabet, Inc.	Communications	1.91%	United States
Mastercard, Inc.	Financial	1.84%	United States
Unitedhealth Group, Inc.	Consumer Non-cyclical	1.77%	United States
Tesla, Inc.	Consumer Cyclical	1.67%	United States
Broadcom, Inc.	Technology	1.64%	United States
Boston Scientific Corp.	Consumer Non-cyclical	1.42%	United States
Exxon Mobil Corp.	Energy	1.3%	United States
Home Depot, Inc.	Consumer Cyclical	1.3%	United States

Source of data: Fidelity International, as at 31 January 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 sub-fund invested 63.82% in sustainable investments

What was the asset allocation?

(#1 aligned with E/S characteristics) The sub-fund invested in:

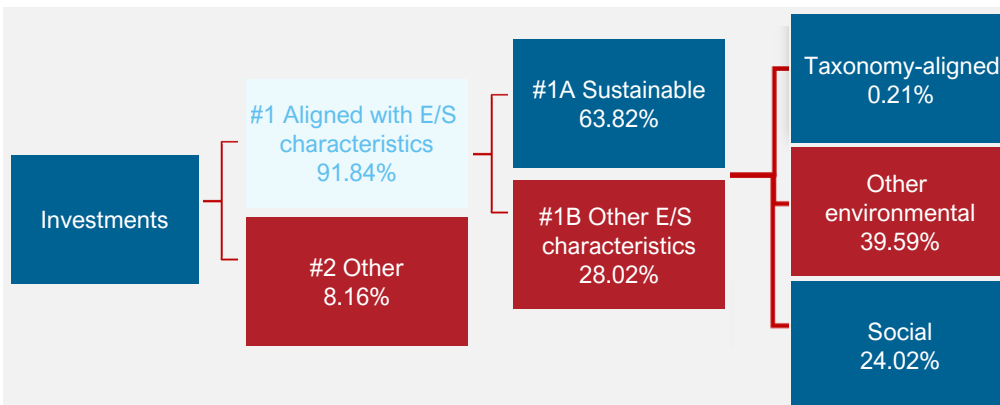
- 91.84% of its assets in securities of issuers with favourable ESG characteristics;
- 63.82% in sustainable investments (#1A sustainable) of which 0.21% have an environmental objective (which is aligned with the EU Taxonomy), 39.59% have an environmental objective (which is not aligned with the EU Taxonomy), 24.02% have a social objective.

(#1B Other E/S characteristics) Includes securities of issuers with favourable ESG characteristics but are not sustainable investments.

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.



#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
Basic Materials	Chemicals	1.28%
	Iron/Steel	0.24%

Basic Materials	Mining	0.15%
Communications	Internet	13.69%
	Telecommunications	0.73%
	Media	0.58%
	Advertising	0.4%
Consumer Cyclical	Retail	4.36%
	Auto Manufacturers	1.71%
	Home Builders	0.62%
	Auto Parts & Equipment	0.18%
	Apparel	0.17%
	Food Service	0.14%
	Leisure Time	0.14%
	Entertainment	0.13%
	Airlines	0.05%
	Textiles	0.03%
Consumer Non-Cyclical	Healthcare-Products	3.07%
	Pharmaceuticals	2.83%
	Biotechnology	2.54%
	Healthcare-Services	2.14%
	Food	1.24%
	Beverages	1.15%
	Commercial Services	0.8%
	Cosmetics/Personal Care	0.76%
	Agriculture	0.06%
Energy	Oil & Gas	1.76%
	Oil & Gas Services	0.5%
	Pipelines	0.37%
Financial	Banks	5.86%
	Diversified Finan Serv	5.14%
	Insurance	4.02%
	Reits	2.53%
	Real Estate	0.11%
Industrial	Miscellaneous Manufactur	1.89%
	Transportation	1.43%
	Aerospace/Defense	1.37%
	Electrical Compo & Equip	1.09%
	Machinery-Diversified	0.65%
	Packaging & Containers	0.43%
	Electronics	0.39%
	Building Materials	0.33%
	Environmental Control	0.32%
	Engineering & Construction	0.15%
Technology	Computers	8.16%
	Software	10.73%
	Semiconductors	10.61%
Utilities	Electric	2.46%

Source of data: Fidelity International, as at 31 January 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?

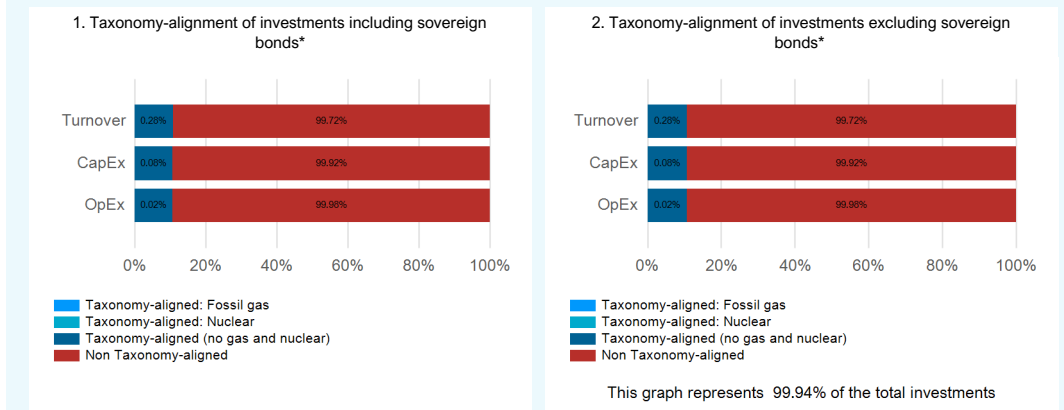
The sub-fund invested 0.21% in sustainable investments with an environmental objective aligned with the EU Taxonomy. This contributed to the environmental objectives of climate change mitigation and/ or climate change adaptation.

The two graphs below illustrate the extent to which sustainable investments with an environmental objective are aligned with the EU Taxonomy. The data included the contribution to the environmental objectives of climate change mitigation and adaptation. In a next iteration, this data will be enriched towards other EU Taxonomy environmental objectives, such as sustainable use and protection of water and marine resources, transition to a circular economy, pollution prevention and control and protection and restoration of biodiversity and ecosystems.

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

- 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.



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. The EU Taxonomy figures disclosed may differ 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 0.14% for enabling activities, measured by Turnover.

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

The quarterly average share of sustainable investments (including sovereign bonds)

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.

¹Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objectives - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

with an environmental objective aligned with the EU Taxonomy was 0.3% based on Turnover, 0.1% based on CapEx and 0.1% based on OpEx.

The quarterly average share of sustainable investments (excluding sovereign bonds) with an environmental objective aligned with the EU Taxonomy was 0.3% based on Turnover, 0.1% based on CapEx and 0.1% 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 39.59%.

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 24.02%.

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 Sub-Fund were invested in assets aligned with the financial objective of the Sub-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 Sub-Fund adhered to the Exclusions.



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

The Sub-Fund took the following actions to meet the environmental or social characteristics:

1. The Sub-Fund invested in securities of issuers with favourable ESG characteristics.
2. The Sub-Fund made sustainable investments.
3. Quarterly Sustainability Review to discuss and review the fund's qualitative and quantitative environmental and social characteristics.
4. The Sub-Fund has applied the Exclusions.



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

An Index has not been designated as a reference benchmark to determine whether this financial product is aligned with the environmental or social characteristics that it promotes.

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

Not 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?

Not applicable

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

Not applicable

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

Not applicable

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