

Article 8 SFDR – Website Disclosure
FDC SICAV Global Equities Small Cap – Active 1
LEI: 549300KELW4CYE982M12

Summary

Fonds de Compensation de la Sécurité Sociale, SICAV-FIS has appointed Allianz Global Investors GmbH (“AGI”) as the portfolio manager of its sub-fund FDC SICAV Global Equities Small Cap – Active 1 (the “Sub-Fund”). The management of the Sub-Fund is classified under Article 8 of SFDR¹.

It should be noted that, in implementing its investment strategy and as an overarching binding restriction, the portfolio manager Allianz Global Investors GmbH is required to exclude companies from the Sub-Fund referenced on Fonds de Compensation de la Sécurité Sociale, SICAV-FIS’ proprietary exclusion list. The latter screens out companies based on their involvement in controversial practices against international norms. The core normative framework consists of the Principles of the UN Global Compact, the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles for Business and Human Rights. Equally screened out are companies linked to following controversial weapons: anti-personnel mines, cluster munitions, chemical weapons, biological weapons, depleted uranium, white phosphorus and nuclear weapons. Fonds de Compensation de la Sécurité Sociale, SICAV-FIS’ exclusion list can be viewed at <https://fdc.public.lu/en/investissement-responsable/liste-exclusion-fdc.html>.

The Sub-Fund promotes environmental and/or social characteristics but does not have as its objective sustainable investment. To measure the attainment of the environmental and/or social characteristics, specific sustainability indicators are used and reported on.

Additionally, the Sub-Fund applies minimum exclusion criteria.

The Sub-Fund incorporates the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human rights, while also considering good governance principles by screening out companies based on their involvement in controversies around international norms.

Sustainability indicators have been defined for the Sub-Fund in order to measure the attainment of its environmental and/or social characteristics. The sustainability indicators are derived from the binding elements set for the Sub-Fund. The binding elements are monitored in pre- and post-trade compliance systems and thereby serve to ensure sufficient due diligence and as assessment criteria for the adherence to the environmental and/or social characteristics of the Sub-Fund. For each sustainability indicator, a methodology, based on different data sources, has been set up in order to ensure accurate measurement and reporting of the indicators.

No sustainable investment objective

The Sub-Fund promotes an environmental or social characteristic but does not have as its objective a sustainable investment. However at least 20% of the Sub-Fund will be allocated to sustainable investments.

Environmental or social characteristic of the financial product

To measure the attainment of the environmental and/or social characteristics the following sustainability indicators are used and reported on:

- The actual percentage of Key Performance Indicator (KPI) coverage of the Sub-Fund’s portfolio (portfolio in this respect does not comprise derivatives and instruments that are non-evaluated

¹ Regulation (EU) 2019/2088 on sustainability-related disclosures in the financial sector (“SFDR”).

- by nature (e. g., cash and deposits)).
- The actual weighted average sustainable investment share of the Sub-Fund’s assets.
- The actual share of investments not satisfying the Do No Significant Harm (“DNSH”) assessment of the Sub-Fund’s assets.
- Confirmation that Principal Adverse Impacts (PAIs) of investment decisions on sustainability factors are considered through the application of exclusion criteria.

The sustainability indicators are derived from the binding elements set for the Sub-Fund. All binding elements are monitored by means of internal compliance systems. If breaches occur, these will be reported to the relevant parties and resolved based on internal procedures.

Investment Strategy

The Sub-Fund’s investment objective is to invest in global equity markets with a focus on theme and stock selection in accordance with AGI’s Sustainability Key Performance Indicator Strategy (Absolute Threshold) (“KPI Strategy (Absolute Threshold)”). The Sub-Fund’s strategy is to target a specific minimum allocation into Sustainable Investments and limit its allocation to DNSH.

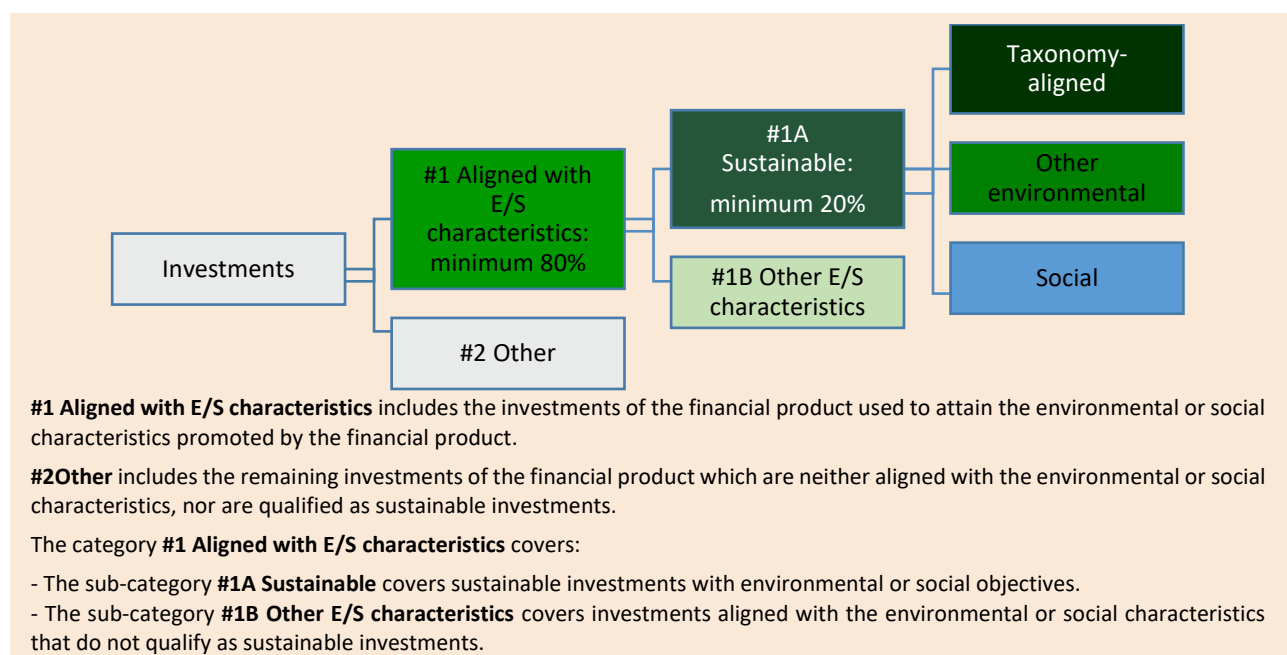
The proportion of assets which do not have a Sustainable Investment share assessment is expected to be low. Examples of instruments not having a Sustainable Investment share assessment are cash and deposits or investments for which data is not available.

The Sub-Fund’s general investment approach is described in Fonds de Compensation de la Sécurité Sociale, SICAV-FIS’ Issue Document.

Proportion of investments

Minimum 80% of the Sub-Funds’ assets are used to meet the environmental or social characteristics promoted by the Sub-Fund. A low portion of the Sub-Fund might contain assets which do not promote environmental or social characteristics. Example of such instruments are derivatives, cash and deposits or investment with temporarily divergent or absent environmental, social, or good governance qualifications. Minimum 20% of the Sub-Funds’ assets will be invested in sustainable investments.

The Sub-Fund does not commit to a minimum share of sustainable investments with an environmental objective aligned with the EU Taxonomy nor to a minimum share of environmentally Sustainable Investments that are not aligned with the EU Taxonomy. The Sub-Fund does not commit to a minimum share of socially sustainable investments. While the Sub-Fund cannot commit to a minimum share of environmentally or socially sustainable investments, such investments may be freely allocated to within the Sub-Fund aggregated sustainable investment commitment disclosed (minimum 20%).



Monitoring of environmental or social characteristics

To measure the attainment of the environmental and/or social characteristics the following sustainability indicators are used and reported on:

- The actual percentage of KPI coverage of the Sub-Fund's portfolio (portfolio in this respect does not comprise derivatives and instruments that are non-evaluated by nature (e. g., cash and deposits)).
- The actual weighted average sustainable investment share of the Sub-Fund's assets.
- The actual share of investments not satisfying the DNSH assessment of the Sub-Fund's assets.
- Confirmation that PAIs of investment decisions on sustainability factors are considered through the application of exclusion criteria.

The sustainability indicators are derived from the binding elements set for the Sub-Fund. All binding elements are monitored by means of internal compliance systems. If breaches occur, these will be reported to the relevant parties and resolved based on internal procedures.

Methodologies

The following methodologies are applied to enable reporting on the sustainability indicators:

- The percentage KPI coverage (securities assessed by the sustainable investment share methodology) is calculated based on the Sub-Fund's portfolio (portfolio in this respect does not comprise derivatives and instruments that are non-evaluated by nature (e. g., cash and deposits)).
- The actual weighted average sustainable investment share is the portfolio weighted sustainable investment share of the securities compared to the Sub-Fund's Net Asset Value ("NAV").
- The actual share of investments not satisfying the DNSH assessment is the portfolio weighted share of issuers having a DNSH violation compared to the Sub-Fund's NAV.
- AGI's applicable sustainable minimum exclusion list is updated at least twice per year by AGI's Sustainability Team and based on external data sources.
- Application of Fonds de Compensation de la Sécurité Sociale, SICAV-FIS' proprietary exclusion list.

Data sources and processing

The following data sources are used as input for the reporting: ISS ESG, Trucost and MSCI.

AGI's Sustainability and Impact Investing team selects third-party data providers through a Request For Proposal process ("RFP"), which is applied across AGI. Data origin, methodology (qualitative and/or quantitative), raw data points, issuer coverage, resources in place, expertise, granularity of research, approach, IT support, client support, and consistency/quality of data feed are assessed and tested during RFPs. Data is sourced from providers directly into the internal cloud-based data lake in line with AGI's data strategy. AGI uses technology such as Application Programming Interface ("API") and Secure File Transfer Protocol ("SFTP") when not made available by providers, allowing close monitoring and a smooth and constant update of data points. Controls apply to data flows and their evolution over time (coverage, expected values, etc.) to track potential issues upstream in the data supply chain.

Limitations to methodologies and data

There are several general limitations which apply. The Sub-Fund may use one or more different third-party research data providers and/or internal analyses. In assessing the eligibility of an issuer based on research, there is a dependence upon information and data from third party research data providers and internal analyses, which may be subjective, incomplete, inaccurate, or unavailable. As a result, there is a risk to incorrectly or subjectively assess a security or issuer. There is also a risk that AGI may not apply the relevant criteria resulting out of the research correctly or that the Sub-Fund following a sustainable investment strategy could have indirect exposure to issuers who do not meet the relevant criteria of the sustainable investment strategy.

The data coverage for the PAI indicators is heterogeneous. The data coverage related to biodiversity, water and waste is low and the related PAI indicators are considered either through equivalent data or through exclusion of securities issued by companies having a severe violation/ breach of principles and

guidelines such as the Principles of the United Nations Global Compact, the OECD Guidelines for Multinational Enterprises, and the United Nations Guiding Principles for Business and Human Rights on the grounds of problematic practices around human rights, labour rights, environment, and corruption issues.

Due diligence

AGI follows a risk-based approach to determine where unique instrument/transaction specific preinvestment checks should be performed by taking into account the complexity and the risk profile of the respective investment, the materiality of the transaction size on the Sub-Fund's NAV, and the direction (buy/sell) of the transaction.

To ensure that the Sub-Fund fulfils its environmental and social characteristics, the binding elements act as assessment criteria.

The binding elements are:

- Minimum 20% of weighted-average Sustainable Investment share of Sub-Fund assets. If AGI acquires a use of proceed security, which finance specific projects contributing to environmental or social objectives, the overall investment is considered to contribute to environmental and/or social objectives according to the Sustainable Investment methodology.
- Minimum 80% of Sub-Fund's portfolio shall be invested in companies which have been assessed according to the Sustainable Investment methodology (portfolio in this respect does not comprise derivatives and instruments that are non-evaluated by nature (e. g., cash and deposits)).
- Application of Fonds de Compensation de la Sécurité Sociale, SICAV-FIS' proprietary exclusion list.
- Application of the following exclusion criteria for direct investments:
 - securities issued by companies having a severe violation/breach of principles and guidelines such as the Principles of the United Nations Global Compact, the OECD Guidelines for Multinational Enterprises, and the United Nations Guiding Principles for Business and Human Rights on the grounds of problematic practices around human rights, labour rights, environment, and corruption issues
 - securities issued by companies involved in controversial weapons (anti-personnel mines, cluster munitions, chemical weapons, biological weapons, depleted uranium, white phosphorus, and nuclear weapons)
 - securities issued by companies that derive more than 10% of their revenues from weapons, military equipment, and services
 - securities issued by companies that derive more than 10% of their revenue from thermal coal extraction
 - securities issued by utility companies that generate more than 20% of their revenues from coal
 - securities issued by companies involved in the production of tobacco, and securities issued by companies involved in the distribution of tobacco with more than 5% of their revenues
 - direct investments in sovereign issuers with an insufficient freedom house index score are also excluded.

The sustainable minimum exclusion criteria are based on information from an external data provider and coded in pre- and post-trade compliance.

Engagement policies

The description of the engagement policies and activities of AGI can be found under the following link: <https://www.allianzgi.com/en/our-firm/esg/active-stewardship>.

AGI conducts engagement across its offering. Engagement activities are determined on an issuer level. Thus, it is not guaranteed that the engagements conducted include issuers held by every fund. AGI's engagement strategy rests on 2 pillars: (1) risk-based approach and (2) thematic approach.

The risk-based approach focuses on the material ESG risks identified. Engagements are closely related to the size of exposure. The focus of engagements is determined by considerations such as significant votes, where applicable, against company management at past general meetings and sustainability issues identified as below market practice. Engagements can also be triggered by controversies connected to sustainability or governance.

The thematic approach either links engagements to AGI's three strategic sustainability themes - climate change, planetary boundaries, and inclusive capitalism - as well as to governance themes within specific markets or more broadly. Thematic engagements are identified based on topics deemed important for portfolio investments and are prioritized based on the size of AGI's holdings and considering the priorities of clients.

Designated reference benchmark

A reference benchmark has not been designated for the purpose of attaining the environmental or social characteristics promoted by the Sub-Fund.

V1 February 2024

Article 8 SFDR – Website Disclosure
FDC SICAV EUR Bonds – Active 1
LEI: 549300SY1HLREV26JE11

Summary

Fonds de Compensation de la Sécurité Sociale, SICAV-FIS has appointed Allianz Global Investors GmbH (French Branch) ("AGI") as the fund manager of its sub-fund FDC SICAV EUR Bonds – Active 1 (the "Sub-Fund"). The management of the Sub-Fund has been classified under Article 8 of SFDR¹.

It should be noted that, in implementing its investment strategy and as an overarching binding restriction, AGI is required to exclude companies from the Sub-Fund referenced on Fonds de Compensation de la Sécurité Sociale, SICAV-FIS' proprietary exclusion list. The latter screens out companies based on their involvement in controversial practices against international norms. The core normative framework consists of the Principles of the UN Global Compact, the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles for Business and Human Rights. Equally screened out are companies linked to following controversial weapons: anti-personnel mines, cluster munitions, chemical weapons, biological weapons, depleted uranium, white phosphorus and nuclear weapons. Fonds de Compensation de la Sécurité Sociale, SICAV-FIS' exclusion list can be viewed at <https://fdc.public.lu/en/investissement-responsable/liste-exclusion-fdc.html>.

The Sub-Fund promotes environmental and/or social characteristics but does not have as its objective sustainable investment.

The Sub-Fund follows an SRI Best-in-Class ("BIC") approach, which accounts for environmental, social, human rights, governance and business behaviour factors by using an SRI rating that is established based on these considerations for portfolio construction.

Additionally, the Sub-Fund applies minimum exclusion criteria.

The Sub-Fund incorporates the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human rights, while also considering good governance principles by screening out companies based on their involvement in controversies around international norms.

Sustainability indicators have been defined for the Sub-Fund in order to measure the attainment of its environmental and/or social characteristics. The sustainability indicators are derived from the binding elements set for the Sub-Fund. The binding elements are monitored in pre- and post-trade compliance systems and thereby serve to ensure sufficient due diligence and as assessment criteria for the adherence to the environmental and/or social characteristics of the Sub-Fund. For each sustainability indicator, a methodology, based on different data sources, has been set up in order to ensure accurate measurement and reporting of the indicators.

No sustainable investment objective

The Sub-Fund promotes an environmental or social characteristic but does not have as its objective a sustainable investment. However at least 10% of the Sub-Fund will be allocated to sustainable investments.

Sustainable investments contribute to environmental and/or social objectives, for which AGI uses as reference frameworks, among others, the UN Sustainable Development Goals (SDGs), as well as the objectives of the EU Taxonomy:

1. Climate Change Mitigation

¹ Regulation (EU) 2019/2088 on sustainability-related disclosures in the financial sector ("SFDR").

2. Climate Change Adaptation
3. Sustainable Use and Protection of Water and Marine Resources
4. Transition to a Circular Economy
5. Pollution Prevention and Control
6. Protection and Restoration of Biodiversity and Ecosystems

The assessment of the positive contribution to the environmental or social objectives is based on a proprietary framework which combines quantitative elements with qualitative inputs from internal research. The methodology applies first a quantitative break down of an investee company into its business activities. The qualitative element of the framework is an assessment if business activities contribute positively to an environmental or a social objective.

Environmental or social characteristic of the financial product

The Sub-Fund promotes environmental, social, human rights, governance, and business behaviour factors (this domain does not apply for sovereigns issued by a Sovereign Entity) through the integration of a best-in-class approach into the Sub-Fund's investment process. This encompasses the evaluation of corporate or sovereign issuers based on an SRI Rating that it is used to construct the portfolio.

In addition, the following exclusion criteria for direct investments apply:

- securities issued by companies having a severe violation / breach of principles and guidelines such as the Principles of the United Nations Global Compact, the OECD Guidelines for Multinational Enterprises, and the United Nations Guiding Principles for Business and Human Rights on the grounds of problematic practices around human rights, labour rights, environment, and corruption issues;
- securities issued by companies involved in controversial weapons (anti-personnel mines, cluster munitions, chemical weapons, biological weapons, depleted uranium, white phosphorus, and nuclear weapons);
- securities issued by companies that derive more than 10% of their revenues from weapons, military equipment, and services;
- securities issued by companies that derive more than 10% of their revenue from thermal coal extraction;
- securities issued by utility companies that generate more than 20% of their revenues from coal;
- securities issued by companies involved in the production of tobacco, and securities issued by companies involved in the distribution of tobacco with more than 5% of their revenues;
- sovereign issuers with an insufficient freedom house index score are excluded.

The exclusion criteria are based on information from an external data provider and coded in pre- and post-trade compliance.

Investment Strategy

The Sub-Fund's investment objective is to invest in Investment Grade Debt Securities denominated in EUR of the OECD or EU bond markets, in accordance with a SRI best-in-class approach.

As part of the SRI best-in-class approach, the Sub-Fund takes environmental, social, human rights, governance, and business behaviour factors into account as follows:

- The aforesaid sustainability factors are analysed through SRI Research by AGI in order to assess how sustainable development and long-term issues are taken into account in the strategy of an issuer. SRI Research means the overall process of identifying potential risks as well as potential opportunities of an investment in securities of an issuer related to the analysis of sustainability factors. SRI Research data combines external research data (which might have some limitations) with internal analyses.
- Based on a combination of the results of the external and/or internal analyses of the sustainability factors, an internal rating is derived monthly (SRI Rating) and is afterwards assigned to a corporate or sovereign issuer.

This internal SRI Rating is used to rank and select or weight securities for the portfolio construction. The

Sub-Fund’s general investment approach is described in its Issue Document.

Good governance principles are considered by screening out companies based on their involvement in controversies around international norms corresponding to the four good governance practices: sound management structures, employee relations, remuneration of staff and tax compliance. Companies having a severe violation in either of those areas will not be investible. For certain cases, flagged issuers shall be on a watch list. These companies will appear on this watch list when AGI believes that engagement may lead to improvements or when the company is assessed to take remedial actions. Companies on the watch list remain investible unless AGI believes that its engagement or the remedial actions of the company does not lead to the desired remedy of the severe controversy.

In addition, AGI is committed to actively encourage open dialogues with investee companies on corporate governance and broader sustainability issues. AGI's approach to company engagement is set out in its Stewardship Statement.

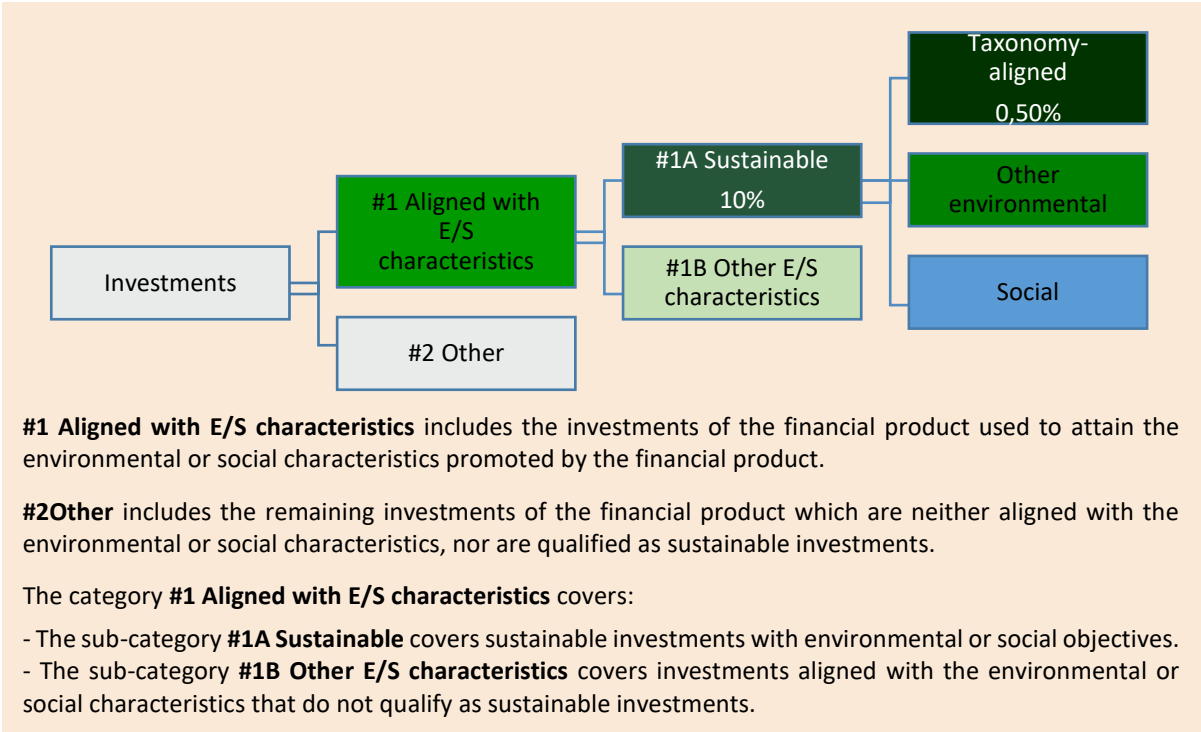
Good governance practices include sound management structures, employee relations, remuneration of staff and tax compliance.

Proportion of investments

The majority of the Sub-Funds’ assets are used to meet the environmental or social characteristics promoted by this Sub-Fund. A low portion of the Sub-Fund might contain assets which do not promote environmental or social characteristics. Examples of such instruments are derivatives, cash and deposits and investment with temporarily divergent or absent environmental, social, or good governance qualifications.

The Sub-Fund commits to have a minimum of 10% of sustainable investments and the remaining proportion of the investments will be invested in assets with environmental and social characteristics.

The Sub-Fund does commit to a minimum share of 0.5% of sustainable investments with an environmental objective that are aligned with the EU Taxonomy while the Sub-Fund’s does not commit to a minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy nor to a minimum share of socially sustainable investments. While the Sub-Fund cannot commit to such minimum shares, such investments may be freely allocated to within the Sub-Fund's aggregated sustainable investment commitment disclosed (minimum 10%).



Consideration of Principal Adverse Impact Indicators

To calculate the positive contribution on the Sub-Fund level the revenue share of each issuer attributable to business activities contributing to environmental and/or social objectives is considered provided the issuer is satisfying the Do No Significant Harm (“DNSH”) and Good Governance principles, and an asset-weighted aggregation is performed as a second step. Moreover, for certain types of securities, which finance specific projects contributing to environmental or social objectives the overall investment is considered to contribute to environmental and/or social objectives, but also for these a DNSH as well as a Good Governance check for issuers is performed.

In order to ensure that sustainable investments do not significantly harm any other environmental and/or social objective, AGI is leveraging the PAI indicators, whereby significance thresholds have been defined to identify significantly harmful issuers. Issuers not meeting the significance threshold can be engaged for a limited time period to remediate the adverse impact. Otherwise, if the issuer does not meet the defined significance thresholds twice subsequently or in case of a failed engagement, it does not pass the DNSH assessment. Investments in securities of issuers which do not pass the DNSH assessment are not counted as sustainable investments.

PAI indicators are considered either as part of the application of the exclusion criteria or through thresholds on a sectorial or absolute basis. Significance thresholds have been defined and they refer to a qualitative or quantitative criteria.

Recognizing the lack of data coverage for some of the PAI indicators equivalent data points are used to assess PAI indicators when applying the DNSH assessment, when relevant, for the following indicators for corporates: share of non-renewable energy consumption and production, activities negatively affecting biodiversity-sensitive areas, emissions to water, lack of processes and compliance mechanisms to monitor compliance with UNGC principles and OECD Guidelines for Multinational Enterprises; for sovereigns: GHG Intensity and investee countries subject to social violations. In case of securities which finance specific projects contributing to environmental or social objectives equivalent data at project level might be used to ensure that sustainable investments do not significantly harm any other environmental and/or social objective. AGI will strive to increase data coverage for PAI indicators with low data coverage by engaging with issuers and data providers. AGI will regularly evaluate whether the availability of data has increased sufficiently to potentially include assessment of such data in the investment process.

The Sub-Fund’s exclusion list screens out companies based on their involvement in controversial practices against international norms. The core normative framework consists of the Principles of the UN Global Compact, the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles for Business and Human Rights. Securities issued by companies having a severe violation of these frameworks will be restricted from investment universe.

Monitoring of environmental or social characteristics

To measure the attainment of the environmental and/or social characteristics the following sustainability indicators are used and reported on:

- The actual percentage of the Sub-Fund’s Portfolio (Portfolio in this respect does not comprise non-rated derivatives and instruments that are non-rated by nature (e. g., cash and deposits)) invested in best-in-class issuers (issuers with a minimum SRI Rating of 2 out of a scale from 0-4; 0 being the worst rating and 4 the best rating).
- Confirmation that Principal Adverse Impacts (PAIs) of investment decisions on sustainability factors are considered through the application of exclusion criteria.
- The Sub-fund has to follow an exclusion list with a certain number of companies who are not in line with international conventions and standards or linked to controversial weapons.

The sustainability indicators are derived from the binding elements set for the Sub-Fund. All binding elements are monitored by means of internal compliance systems. If breaches occur, these will be reported to the relevant parties and resolved based on internal procedures.

Methodologies for environmental or social characteristics

The following methodologies are applied to enable regulatory reporting on the Sub-Fund's sustainability indicators:

- The SRI BIC rating thresholds are based on the SRI rating. The SRI rating is updated monthly. Raw sustainability data is sourced from external data providers. Following this, data controls and quality checks are conducted. For select cases, additional internal research is conducted which may lead to a re-evaluation of the rating. The raw sustainability data is weighted according to its sector materiality and used to derive the constituent pillar scores of the SRI rating (environmental, social, governance, business behaviour). The final SRI rating is computed based on its constituent pillars.
- The Sub-Fund's exclusion list is regularly updated and based on external data sources.

Data sources and processing

The following data sources are used as input: Moody's ESG, Sustainalytics, ISS ESG and MSCI ESG.

AGI's Sustainability and Impact Investing team selects third-party data providers through a Request for Proposal (RfP) process, which is applied across AGI. Data origin, methodology (qualitative and/or quantitative), raw data points, issuer coverage, resources in place, expertise, granularity of research, approach, IT support, client support, and consistency/quality of data feed are assessed and tested during RfPs. Data is sourced from providers directly into the internal cloud-based data lake in line with AGI's data strategy. AGI uses technology such as application programming interface (API) and secure file transfer protocol (SFTP) when not made available by providers, allowing close monitoring and a smooth and constant update of data points. Controls apply to data flows and their evolution over time (coverage, expected values, etc.) to track potential issues upstream in the data supply chain.

Limitations to methodologies and data

There are several general limitations which apply. The Sub-Fund may use one or more different third-party research data providers and/or internal analyses. In assessing the eligibility of an issuer based on research, there is a dependence upon information and data from third party research data providers and internal analyses, which may be subjective, incomplete, inaccurate, or unavailable. As a result, there is a risk to incorrectly or subjectively assess a security or issuer. There is also a risk that AGI may not apply the relevant criteria resulting out of the research correctly or that the Sub-Fund following a sustainable investment strategy could have indirect exposure to issuers who do not meet the relevant criteria of the sustainable investment strategy.

The data coverage for the PAI indicators is heterogeneous. The data coverage related to biodiversity, water and waste is low and the related PAI indicators are considered either through equivalent data or through exclusion of securities issued by companies having a severe violation/ breach of principles and guidelines such as the Principles of the United Nations Global Compact, the OECD Guidelines for Multinational Enterprises, and the United Nations Guiding Principles for Business and Human Rights on the grounds of problematic practices around human rights, labour rights, environment, and corruption issues.

Due diligence

AGI follows a risk-based approach to determine where unique instrument/transaction specific preinvestment checks should be performed by taking into account the complexity and the risk profile of the respective investment, the materiality of the transaction size on the fund's NAV, and the direction (buy/sell) of the transaction.

To ensure that the Sub-Fund fulfils its environmental and social characteristics, the binding elements act as assessment criteria.

The binding elements are:

- Minimum rating coverage: At least 90% of Sub-Fund's portfolio are required to have an SRI

Rating (Portfolio in this respect does not comprise non-rated derivatives and instruments that are non-rated by nature (e.g., cash and deposits)). While most holdings of the Sub-Fund will have a corresponding SRI Rating some investments cannot be rated according to the SRI Research methodology. Examples of instruments not attaining to the SRI Rating include, but are not limited to cash, deposits and non-rated investments.

- Minimum 90% of the rated instruments are adhering to the minimum rating threshold of 2 (out of a rating scale from 0 – 4; 0 being the worst rating and 4 the best rating).
- Application of sustainable minimum exclusion criteria and Sub-Fund-specific exclusion criteria for direct investments. The Sub-Fund has to follow an exclusion list with a certain number of companies who are not in line with international conventions and standards or linked to controversial weapons. Exclusion criteria are based on information from an external data provider and coded in pre- and post-trade compliance.

Engagement policies

The description of the engagement policies and activities of AGI can be found under the following link: <https://www.allianzgi.com/en/our-firm/esg/active-stewardship>.

AGI conducts engagement across its offering. Engagement activities are determined on an issuer level. Thus, it is not guaranteed that the engagements conducted include issuers held by every fund. AGI's engagement strategy rests on 2 pillars: (1) risk-based approach and (2) thematic approach.

The risk-based approach focuses on the material ESG risks identified. Engagements are closely related to the size of exposure. The focus of engagements is determined by considerations such as significant votes, where applicable, against company management at past general meetings and sustainability issues identified as below market practice. Engagements can also be triggered by controversies connected to sustainability or governance.

The thematic approach either links engagements to AGI's three strategic sustainability themes - climate change, planetary boundaries, and inclusive capitalism - as well as to governance themes within specific markets or more broadly. Thematic engagements are identified based on topics deemed important for portfolio investments and are prioritized based on the size of AGI's holdings and considering the priorities of clients.

Designated reference benchmark

A reference benchmark has not been designated for the purpose of attaining the environmental or social characteristics promoted by the Sub-Fund.

V1 February 2024

Article 9 SFDR – Website Disclosure
FDC SICAV EUR Green Bonds – Active 1
LEI: 549300OISD1TL8QQD792

Summary

Fonds de Compensation de la Sécurité Sociale, SICAV-FIS has appointed Allianz Global Investors GmbH (French Branch) ("AGI") as the fund manager of its sub-fund FDC SICAV EUR Green Bonds – Active 1 (the "Sub-Fund"). The management of the Sub-Fund has been classified under Article 9 of SFDR¹.

It should be noted that, in implementing its investment strategy and as an overarching binding restriction, AGI is required to exclude companies from the Sub-Fund referenced on Fonds de Compensation de la Sécurité Sociale, SICAV-FIS' proprietary exclusion list. The latter screens out companies based on their involvement in controversial practices against international norms. The core normative framework consists of the Principles of the UN Global Compact, the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles for Business and Human Rights. Equally screened out are companies linked to following controversial weapons: anti-personnel mines, cluster munitions, chemical weapons, biological weapons, depleted uranium, white phosphorus and nuclear weapons. Fonds de Compensation de la Sécurité Sociale, SICAV-FIS' exclusion list can be viewed at <https://fdc.public.lu/en/investissement-responsable/liste-exclusion-fdc.html>.

The Sub-Fund follows AGI's "Green Bond Strategy" which aims to invest into green bonds that are a specific asset category where the bond proceeds are specifically earmarked to raise money for climate and environmental projects. Additionally, the Sub-Fund applies minimum exclusion criteria. By means of these exclusion criteria, the Sub-Fund considers PAI indicators.

The Sub-Fund incorporates the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human rights, while also considering good governance principles by screening out companies based on their involvement in controversies around international norms.

Sustainability indicators have been defined for the Sub-Fund in order to measure the attainment of its sustainable investment objective. The sustainability indicators are derived from the binding elements set for the Sub-Fund. The binding elements are monitored in pre- and post-trade compliance systems and thereby serve to ensure sufficient due diligence and as assessment criteria for the adherence to the attainment of the sustainable investment objective of the Sub-Fund. For each sustainability indicator, a methodology, based on different data sources, has been set up in order to ensure accurate measurement and reporting of the indicators.

Sustainable investment objective

The Sub-Fund follows the "Green Bond Strategy". The Green Bond Strategy's sustainable investment objective is to mobilize capital markets towards the transition to a low carbon society, natural capital preservation and adaptation to climate change. Green Bonds are designated debt securities intended to encourage sustainability and to support climate-related or other types of special environmental projects. The Sub-Fund invests primarily in green bonds financing climate change mitigation or adaptation projects or other environmental sustainability projects, notably in the following fields: energy efficiency, renewable energy, raw materials, water and land, waste management, greenhouse gas emissions reduction, biodiversity preservation or circular economy. The Sub-Funds will invest minimum 80% of its assets in sustainable investments.

In addition, Sub-Fund specific exclusion criteria apply.

¹ Regulation (EU) 2019/2088 on sustainability-related disclosures in the financial sector ("SFDR").

No significant harm to the sustainable investment objective

The Sub-Fund has a sustainable investment objective and will invest at least 80% of its assets in sustainable investments.

In order to ensure that sustainable investments do not significantly harm any other environmental and/or social objective, AGI is leveraging the Principal Adverse Impacts (“PAI”) indicators, whereby significance thresholds have been defined to identify significantly harmful issuers. Issuers not meeting the significance threshold can be engaged for a limited time period to remediate the adverse impact. Otherwise, if the issuer does not meet the defined significance thresholds twice subsequently or in case of a failed engagement, it does not pass the Do Not Significantly Harm (“DNSH”) assessment. Investments in securities of issuers which do not pass the DNSH assessment are not counted as sustainable investments.

PAI indicators are considered either as part of the application of the exclusion criteria or through thresholds on a sectorial or absolute basis. Significance thresholds have been defined and they refer to a qualitative or quantitative criteria.

Recognizing the lack of data coverage for some of the PAI indicators equivalent data points are used to assess PAI indicators when applying the DNSH assessment, when relevant, for the following indicators for corporates: share of non-renewable energy consumption and production, activities negatively affecting biodiversity-sensitive areas, emissions to water, lack of processes and compliance mechanisms to monitor compliance with UNGC principles and OECD Guidelines for Multinational Enterprises; for sovereigns: GHG Intensity and investee countries subject to social violations. In case of securities which finance specific projects contributing to environmental or social objectives equivalent data at project level might be used to ensure that sustainable investments do not significantly harm any other environmental and/or social objective. AGI will strive to increase data coverage for PAI indicators with low data coverage by engaging with issuers and data providers. AGI will regularly evaluate whether the availability of data has increased sufficiently to potentially include assessment of such data in the investment process.

The specific exclusion list screens out companies based on their involvement in controversial practices against international norms. The core normative framework consists of the Principles of the UN Global Compact, the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles for Business and Human Rights. Securities issued by companies having a severe violation of these frameworks will be restricted from investment universe.

Investment Strategy

The Green Bond Strategy's aim is to invest into green bonds that are a specific asset category where the bond proceeds are specifically earmarked to raise money for climate and environmental projects.

AGI analyses the bond structure to determine whether it is in line with the Green Bond Principles or not. The respect of those four principles below is a prerequisite for a bond to be considered a green bond:

- A formal statement in the use of proceeds section of the bond prospectus in question stating that the proceeds will be used to finance “green”/climate projects.
- Internal process by the issuer to identify qualifying projects based on sound methodology and clear criteria.
- Management of the proceeds to make sure that they will be allocated to the identified projects and not to other general expenses/investments.
- Reporting, at least annually, of the status of the use of proceeds, the status of projects and the actual environmental impact.

In addition, AGI analyses the projects financed by the green bond's proceeds. To be eligible, those projects must be part of the green projects list defined internally by AGI based on research from the Climate Bonds Initiative (CBI), a world-class reputation organisation, which provides a science-based evaluation of the climate change mitigation impacts of the different types of projects.

AGI completes this analysis by also considering the Environment, Social, Governance, Human Rights

and Business behaviour factors in the selection process of an issuer. The aforesaid sustainability factors are analysed through SRI Research by AGI in order to assess how sustainable development and long-term issues are taken into account in the strategy of an issuer. SRI Research means the overall process of identifying potential risks as well as potential opportunities of an investment in securities of an issuer related to the analysis of sustainability factors. SRI Research data combines external research data (which might have some limitations) with internal analyses. Based on a combination of the results of the external and/or internal analyses of the sustainability factors, an internal rating is derived monthly (SRI Rating) and is afterwards assigned to a corporate or sovereign issuer. In case the sustainability profile of the issuer is poor as measured by the average SRI Rating, the bonds issued by or from this issuer would not be eligible according to the Green Bond Strategy.

The last step of AGI's analysis is focused on the credibility of the respective issuer's approach regarding its transition to a low carbon model. AGI's intention is to favour green bonds from such issuers which have set up a sound strategy to mitigate the negative environmental impacts of their activities. AGI tries to identify such issuers which only make use of the green bond market solely for communication/marketing purposes and therefore will not invest in bonds issued by such issuers.

The investment strategy adheres to the following binding elements to attain the sustainable investment objective:

- Min. 85% of the Sub-Fund's assets are invested in green bonds.
- Green bonds held in the Sub-Fund's portfolio are adhering to the minimum SRI rating threshold of 1 (out of a rating scale from 0 – 4; 0 being the worst rating and 4 the best rating).
- Commitment to a minimum sustainable investment (SI) share of 80%.
- The application of the following Sub-Fund specific exclusion criteria for direct investments:
 - securities issued by companies having a severe violation/breach of principles and guidelines such as the Principles of the United Nations Global Compact, the OECD Guidelines for Multinational Enterprises, and the United Nations Guiding Principles for Business and Human Rights on the grounds of problematic practices around human rights, labour rights, environment, and corruption issues,
 - securities issued by companies involved in controversial weapons (anti-personnel mines, cluster munitions, chemical weapons, biological weapons, depleted uranium, white phosphorus, and nuclear weapons), and securities issued by companies that derive more than 10% of their revenues from weapons, military equipment, and services,
 - securities issued by companies involved in the production of tobacco, and securities of companies involved in the distribution of tobacco with more than 5% of their revenues,
 - securities issued by companies that derive more than 30 % of their revenue from thermal coal extraction and securities issued by utility companies that generate more than 30% of their revenues from coal,
 - Direct investments in sovereign issuers with an insufficient freedom house index score are excluded.

The Sub-Fund specific exclusion criteria are based on information from an external data provider and coded in pre- and post-trade compliance. The review is performed at least half yearly.

Good governance principles are considered by screening out companies based on their involvement in controversies around international norms corresponding to the four good governance practices: sound management structures, employee relations, remuneration of staff and tax compliance. Companies having a severe violation in either of those areas will not be investible. For certain cases, flagged issuers shall be on a watch list. These companies will appear on this watch list when AGI believes that engagement may lead to improvements or when the company is assessed to take remedial actions. Companies on the watch list remain investible unless AGI believes that our engagement or the remedial actions of the company does not lead to the desired remedy of the severe controversy.

In addition, AGI is committed to actively encourage open dialogues with investee companies on corporate governance and broader sustainability issues in advance of shareholder meetings (regularly for direct investments in shares). AGI's approach to company engagement is set out in AGI's Stewardship Statement.

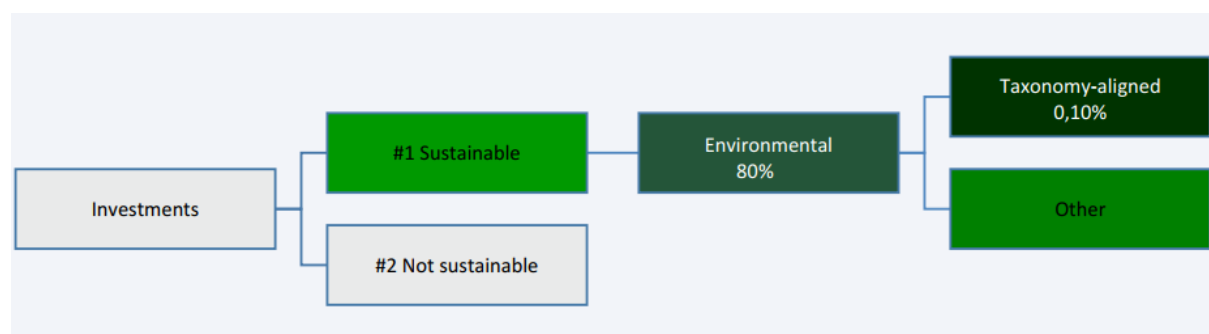
Proportion of investments

In order to mobilize capital markets towards the transition to a low carbon society, natural capital preservation and adaptation to climate change the Sub-Fund invests primarily in green bonds.

Min. 80% of the Sub-Funds' assets will be invested in sustainable investments. The minimum percentage of investments with an environmental objective is 0.10%. The minimum percentage of investments that are aligned with the EU Taxonomy is 0.10%. AGI does not commit to a minimum share of socially sustainable investments.

The Sub-Fund does not pursue any investments in fossil gas and/or nuclear energy related activities that comply with the EU taxonomy.

Nevertheless, as result of this investment strategy, investments may occur in corporates which are also active in these activities.



#1 Sustainable covers sustainable investments with environmental or social objectives.

#2 Not sustainable includes investments which do not qualify as sustainable investments.

Monitoring of the sustainable investment objective

To measure the attainment of the sustainable investment objective the following sustainability indicators are used and reported on, at the fiscal year end:

- The actual percentage of the Sub-Fund's assets invested in green bonds.
- Confirmation that PAIs of investment decisions on sustainability factors are considered through the application of exclusion criteria.
- Actual sustainable investment share.
- Adherence to a minimum SRI Rating of 1 for green bonds held in the Sub-Fund's portfolio (out of a scale from 0-4; 0 being the worst rating and 4 the best rating).
- The sub-fund has to follow an exclusion list with a certain number of companies who are not in line with international conventions and standards or linked to controversial weapons.

The sustainability indicators are derived from the binding elements set for the Sub-Fund. All binding elements are monitored by means of internal compliance systems. If breaches occur, these will be reported to the relevant parties and resolved based on internal procedures.

Methodologies

The following methodologies are applied to enable regulatory reporting on the Sub-Fund's sustainability indicators:

- A green bond loan indicator by an external provider is applied to identify whether bonds qualify as green bonds. Accordingly, the proportion of green bonds within the Sub-Fund's portfolio is computed.
- Exclusions are updated at least twice per year by the Sustainability Team and based on external data sources.
- The sustainable investment share is computed based on the following methodology.

Sustainable investments contribute to environmental and/or social objectives, for which AGI uses as reference frameworks, among others, the UN Sustainable Development Goals (SDGs), as well as the objectives of the EU Taxonomy:

- Climate Change Mitigation.
- Climate Change Adaptation.
- Sustainable and Protection of Water and Marine Resources.
- Transition to a Circular Economy.
- Pollution Prevention and Control.
- Protection and Restoration of Biodiversity and Ecosystems.

The assessment of the positive contribution to the environmental or social objectives is based on a proprietary framework which combines quantitative elements with qualitative inputs from internal research. The methodology applies first a quantitative break down of an investee company into its business activities. The qualitative element of the framework is an assessment if business activities contribute positively to an environmental or a social objective. To calculate the positive contribution on the Sub-Fund level the revenue share of each issuer attributable to business activities contributing to environmental and/or social objectives is considered provided the issuer is satisfying the DNSH and good governance principles, and an asset-weighted aggregation is performed as a second step. Moreover, for certain types of securities, which finance specific projects contributing to environmental or social objectives the overall investment is considered to contribute to environmental and/or social objectives, but also for these a DNSH as well as a good governance check for issuers is performed.

The SRI rating is updated monthly. Raw sustainability data is sourced from external data providers. Following this, data controls and quality checks are conducted. For select cases, additional internal research is conducted which may lead to a revaluation of the rating. The raw sustainability data is weighted according to its sector materiality and used to derive the constituent pillar scores of the SRI rating (environmental, social, governance, business behaviour). The final SRI rating is computed based on its constituent pillars.

Data sources and processing

The following data sources are used as input for the Sub-Fund's regulatory reporting: Bloomberg, ISS, VigeoEiris, MSCI, Sustainalytics.

AGI's Sustainability and Impact Investing team selects third-party data providers through a Request for Proposal (RfP) process, which is applied across AGI. Data origin, methodology (qualitative and/or quantitative), raw data points, issuer coverage, resources in place, expertise, granularity of research, approach, IT support, client support, and consistency/quality of data feed are assessed and tested during RfPs. Data is sourced from providers directly into the internal cloud-based data lake in line with AGI's data strategy. AGI uses technology such as application programming interface (API) and secure file transfer protocol (SFTP) when not made available by providers, allowing close monitoring and a smooth and constant update of data points. Controls apply to data flows and their evolution over time (coverage, expected values, etc.) to track potential issues upstream in the data supply chain.

Limitations to methodologies and data

There are several general limitations which apply. The Sub-Fund may use one or more different third-party research data providers and/or internal analyses. In assessing the eligibility of an issuer based on research, there is a dependence upon information and data from third party research data providers and internal analyses, which may be subjective, incomplete, inaccurate, or unavailable. As a result, there is a risk to incorrectly or subjectively assess a security or issuer. There is also a risk that AGI may not apply the relevant criteria resulting out of the research correctly or that the Sub-Fund following the Sustainable Investment Strategy could have indirect exposure to issuers who do not meet the relevant criteria of the Sustainable Investment Strategy.

The data coverage for the PAI indicators is heterogeneous. The data coverage related to biodiversity, water and waste is low and the related PAI indicators are considered either through equivalent data or through exclusion of securities issued by companies having a severe violation/ breach of principles and guidelines such as the Principles of the United Nations Global Compact, the OECD Guidelines for Multinational Enterprises, and the United Nations Guiding Principles for Business and Human Rights on

the grounds of problematic practices around human rights, labour rights, environment, and corruption issues.

Due diligence

AGI follows a risk-based approach to determine where unique instrument/transaction specific pre-investment checks should be performed by taking into account the complexity and the risk profile of the respective investment, the materiality of the transaction size on the fund's NAV, and the direction (buy/sell) of the transaction.

To ensure that the Sub-Fund attains its sustainable investment objective the binding elements act as assessment criteria.

The investment strategy adheres to the following binding elements to attain the sustainable investment objective:

- Min. 85% of the Sub-Fund's assets are invested in green bonds.
- Green bonds held in the Sub-Fund's portfolio are adhering to the minimum SRI rating threshold of 1 (out of a rating scale from 0 – 4; 0 being the worst rating and 4 the best rating).
- Commitment to a minimum sustainable investment (SI) share of 80%.
- The application of the following Sub-Fund specific exclusion criteria for direct investments:
 - securities issued by companies having a severe violation/breach of principles and guidelines such as the Principles of the United Nations Global Compact, the OECD Guidelines for Multinational Enterprises, and the United Nations Guiding Principles for Business and Human Rights on the grounds of problematic practices around human rights, labour rights, environment, and corruption issues,
 - securities issued by companies involved in controversial weapons (anti-personnel mines, cluster munitions, chemical weapons, biological weapons, depleted uranium, white phosphorus, and nuclear weapons), and securities issued by companies that derive more than 10% of their revenues from weapons, military equipment, and services,
 - securities issued by companies involved in the production of tobacco, and securities of companies involved in the distribution of tobacco with more than 5% of their revenues,
 - securities issued by companies that derive more than 30% of their revenue from thermal coal extraction and securities issued by utility companies that generate more than 30% of their revenues from coal,
 - Direct investments in sovereign issuers with an insufficient freedom house index score are excluded.

The Sub-Fund specific exclusion criteria are based on information from an external data provider and coded in pre- and post-trade compliance. The review is performed at least half yearly.

Engagement policies

The description of the engagement policies and activities of AGI can be found under the following link: <https://www.allianzgi.com/en/our-firm/esg/active-stewardship>.

AGI conducts engagement across its offering. Engagement activities are determined on an issuer level. AGI's engagement strategy rests on 2 pillars: (1) risk-based approach and (2) thematic approach.

The risk-based approach focuses on the material ESG risks identified. Engagements are closely related to the size of exposure. The focus of engagements is determined by considerations such as significant votes, where applicable, against company management at past general meetings and sustainability issues identified as below market practice. Engagements can also be triggered by controversies connected to sustainability or governance.

The thematic approach either links engagements to AGI's three strategic sustainability themes, climate change, planetary boundaries and inclusive capitalism, as well as to governance themes within specific

markets or more broadly. Thematic engagements are identified based on topics deemed important for portfolio investments and are prioritized based on the size of AGI's holdings and considering the priorities of clients.

Designated reference benchmark

The Sub-Fund has assigned the MSCI Euro Green Bond ex Securitized as benchmark.

The Sub-Fund uses a green bond benchmark which is however not completely aligned with the sustainable investment objective promoted by the Sub-Fund. MSCI Euro Green Bond ex Securitized index tracks the performance of securities issued for qualified "green" purposes. Qualifying bonds must have a clearly designated use of proceeds that is solely applied toward projects or activities that promote climate change mitigation or adaptation or other environmental sustainability purposes as outlined by the ICMA Green Bond Principles. The specific screening and exclusion criteria might deviate from the Sub-Fund's investment strategy.

The benchmark is not continuously aligned as the screening and exclusion criteria of the benchmark deviate from the Sub-Fund's investment strategy. The benchmark tracks the performance of securities issued for qualified "green" purposes.

Details of the Benchmark's methodology may be found on website https://www.msci.com/documents/10199/242721/Barclays_MSCI_Green_Bond_Index.pdf/.