

# FCS Fund Services SICAV

*Société d'investissement à capital variable*

Annual report and audited financial statements  
as of 31 December 2021

# FCS Fund Services SICAV

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# FCS Fund Services SICAV

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## ORGANISATION

<b>Registered office</b>	3, rue Gabriel Lippmann L-5365 Munsbach Grand Duchy of Luxembourg
<b>Management Company</b>	<b>FCS Asset Management Limited</b> 40/2, Main Street Balzan BZN 1259 Malta
<b>Board of Directors</b>	Jaime Agurruza Fatosme (Chairman) Oscar Casas Oscar Garcia Arroyo
<b>Investment Manager</b>	<b>FCS Asset Management Limited</b> 40/2, Main Street Balzan BZN 1259 Malta
<b>Depository bank and Paying agent</b>	<b>European Depository Bank S.A.</b> 3, rue Gabriel Lippmann, L-5365 Munsbach Grand Duchy of Luxembourg
<b>Central administrator and domiciliation agent</b>	<b>Apex Fund Services S.A.</b> 3, rue Gabriel Lippmann L-5365 Munsbach Grand Duchy of Luxembourg
<b>Auditor</b>	<b>Ernst &amp; Young S.A.</b> 35E, avenue John F. Kennedy L-1855 Luxembourg, Grand Duchy of Luxembourg
<b>Legal Advisers in Luxembourg</b>	<b>Simmons &amp; Simmons Luxembourg LLP</b> 26A, Boulevard Royal L-1528 Luxembourg Grand Duchy of Luxembourg

# FCS Fund Services SICAV

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## FEATURES OF THE FUND

FCS Fund Services SICAV (the “Fund”) is an open-end investment fund with multiple Compartments (société d’investissement à capital variable (SICAV) à compartiments multiples) governed by Part I of the law of 17 December 2010 on undertakings for collective investment, as may be amended from time to time (the “Law”). The Fund was converted from a Luxembourg partnership limited by shares (“Société en commandite par actions”) into a Luxembourg public limited company (“Société anonyme”), both governed by the law of 10 August 1915 on commercial companies.

The Fund was incorporated for an indefinite period on 6 November 2013, with an initial capital of EUR 31 000. Its articles of incorporation (the “Articles of Incorporation”) have been published in the Mémorial number 2975 on 26 November 2013.

The Articles of Incorporation were last amended on 16 March 2016. The Fund is registered with the Registre de Commerce et des Sociétés of Luxembourg under number B 181 633. The Fund was originally registered as a Luxembourg specialised investment fund under the law of 13 February 2007 on specialized investment funds (the “2007 Law”) and converted into a Luxembourg undertaking for collective investment in transferrable securities under the Law as of 16 March 2016.

The Fund’s capital shall at all times be equal to the value of its total net assets. The minimum capital required by the Law is EUR 1 250 000 or its equivalent in another currency.

The Fund is an umbrella fund and as such may provide investors the choice of investment in a range of several separate Compartments each of which relates to a separate portfolio of eligible assets.

Ordinary Shares may be issued in one or more Classes in each Compartment.

The Board of Directors may launch additional Compartments or Classes, the offering terms and conditions of which will be described for each Compartment in the relevant Appendix to the Prospectus.

The Board of Directors will maintain for each Compartment a separate portfolio of assets. As between shareholders, each portfolio of assets will be invested for the exclusive benefit of the relevant Compartment.

The Fund constitutes one single legal entity. However, with regard to third parties, in particular towards the Fund’s creditors, each Compartment will be exclusively responsible for all liabilities attributable to it.

Classes of Shares may be sub-divided into two Categories: accumulation of income and distribution of income.

The following Classes of Shares are available:

- Class A shares are reserved for institutional investors. Fractions of Class A Shares cannot be issued
- Class B shares are available to all types of investors. Fractions of Class B Shares cannot be issued.
- Class C shares are reserved for investors who instruct the Management Company, at the time of subscription, to make a donation to “Fundacion Colores de Calcuta” equal to 0.5% of the Management Fee charged. Fractions of Class C Shares cannot be issued

The Reference Currency of the Fund is Euro.

The financial year of the Fund ends on 31 December of each year.

As at 31 December 2021, the following Compartment is active:

- FCS FUND SERVICES SICAV – FLEX ABLE GROWTH SUB-FUND.

The annual and semi-annual reports are available free of charge to shareholders at the registered office of the Fund and the Depositary.

No subscription may be accepted on the basis of the financial reports. Subscriptions are accepted only on the basis of the current prospectus accompanied by the latest annual or semi-annual report if available.

The figures stated in this report are historical and not necessarily indicative of future performance.

# FCS Fund Services SICAV

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## INVESTMENT MANAGEMENT REPORT

2021 has been a volatile year for markets, with the emergence of different variants of COVID-19 and ongoing uncertainty over inflation, rate hikes and the growth slowdown in China. However, these fears masked what turned out to be a strong, positive year for most equity regions outside of emerging markets mainly due to Low-volatility and quality were the best-performing factors of the year, while the growth factor underperformed in most regions and the value factor saw mixed results. Importantly, style was less of a driver of performance throughout the year, with stock selection being of greater importance.

The year was also a more favourable environment for global ex-U.S.

Energy, mega cap Information technology, utilities and materials were the clear winners across most regions. Meanwhile, higher growth/valuation, long duration sectors such as technology and communication services, health care and consumer discretionary - which have largely been beneficiaries during the pandemic - lagged in performance due to profit-taking and ongoing concerns around inflation and the extent of potential rate hikes.

Sentiment remained generally optimistic about the economy; they are increasingly more discerning on the breadth of the recovery. This is leading to a preference for stronger balance-sheet businesses with pricing power, given the stickiness of inflation. The year-over-year earnings improvement will potentially be more challenging in 2022 relative to 2021.

### SG trends in 2021

#### Emphasis on Scope 3 emissions disclosure

- Scope 3 emissions represent 65-90% of all emissions at many companies.
- Radical transparency to assess impact of company on the world, not the impact of the world on the bottom line.

#### Private capital focus for green deals

- Industry figures suggest large private equity groups have room to increase renewable energy exposure.
  - This signals growth potential in environmental portfolios.
  - Private capital is looking at investments in climate tech.

#### Green bonds

- The green bond market will continue to grow, with investors being more critical as to what qualifies as green.

#### Carbon markets

- Post-COP26, governments look to utilise current (European Union) and new (China) carbon markets to limit greenhouse gas emissions.
- Carbon credit prices have been rising, yet still aren't high enough to prevent significant emissions.

#### Sustainability accountability

- Global standards are solidifying, using the Task Force on Climate-related Financial Disclosures (TCFD) as a guide in the UK and the EU, as well as the International Financial Reporting Standards (IFRS). In the U.S., the Securities and Exchange Commission (SEC) is expected to chime in later in 2022.

#### Emphasis on the S in ESG

- The pandemic has increased the focus on labour and human rights matters.
- Unloved areas such as energy are attractive with rich dividends, buffered by healthy spot prices and a potent reopening upside.

#### Actively covering for inflation expectations

- Investors are taking profits in both high-growth and deep value segments of the market, due to the volatility caused by anticipated U.S. rate hikes and negative sentiment.
- COVID-disrupted areas in hospitality and retail have seen increasing wage inflation.

# FCS Fund Services SICAV

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## INVESTMENT MANAGEMENT REPORT (Continued)

### Europe and UK equities

- The value opportunity set is expanding outside of the depressed travel and auto names. We keep considering not only cyclical names, banks, and insurance companies, but also areas such as defensive stocks.

### Europe: Earnings-per-share (EPS) expectations for 2022-23 remain depressed

- Broad market consensus is for the current recovery in company earnings to be short-lived. EPS expectations for 2022 and 2023 remain below historical averages and are not in line with general GDP (gross domestic product) growth consensus.
- The sharp rise in input costs is only gradually being passed through by companies, and we expect price hikes to continue throughout 2022. This, combined with continued supply chain woes, should maintain inflation at higher levels and benefit cyclicals.

### UK

- Valuations in the UK remain attractive. We have been adding to cyclical value names that should perform well in an environment of higher inflation and interest rates like Energy and Financials.

### Global equities

- Pandemic conditions and expectations shifted rapidly in 2021, driving volatility in the market. Meanwhile, investors are increasingly wary of inflation, and earnings face difficult year-over-year comparisons. Profit margins are already at very high - and in some cases, unsustainable - levels.
- A hawkish U.S. Federal Reserve (Fed) could dampen economic growth. Companies were able to pass on costs and expand margins in year 2021 but slowing year-over-year growth and rising costs are likely to reverse this trend.
- Q4 2021 factor performance trends were muted and reflective of a year in which there were no clear winners. Investors leaned toward quality and low volatility during the last quarter of the year, signalling a cautious outlook. Security selection, not allocation, was the main driver.
- European regulators may label natural gas and nuclear energy as green in a pragmatic but controversial approach to the energy transition. This would have long-term capital implications.
- Climate goals face conflicting socioeconomic and geopolitical agendas. Governments and investors must contend with high energy prices that hurt consumers.

### U.S. large cap equities

- There is a favourable outlook for consumer-related stocks and other industries that have suffered from pandemic-related slowdowns. Since the delta and omicron COVID-19 variants caused consumer spending to ebb and flow, reopening-related stocks offer relatively attractive valuations and considerable earnings upside during the year.
- Demand drove increasing spending in travel-related industries and autos.
- With inflationary pressures expected to persist, we continue to emphasise companies with pricing power and an ability to maintain profit margins.
- Very positive outlook for energy-related stocks, which have become more focused on cash flow and profitability.
- We continue to be bullish on banking stocks, as the outlook for rising interest rates will support improved net-interest margin for lenders. Since the beginning of the pandemic, large cap banks have also significantly reduced their cost structures through increased technology usage.
- Strong growth in e-commerce and software-as-a-service companies is expected to persist. However, following the pandemic-fuelled surge, these businesses will likely face difficulty in exceeding investors' earnings expectations.
- Markets have become more selective regarding software and internet companies, and many are focusing on emerging mid cap names that are earlier in their growth cycle.

# FCS Fund Services SICAV

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## INVESTMENT MANAGEMENT REPORT (Continued)

### U.S. small cap equities

- We expect muted absolute returns for small cap stocks in 2022 with the Fed likely to be less accommodative.
- We believe valuations in the early cyclical stocks, such as industrials and materials, are relatively full and the companies are close to hitting peak earnings.
- We believe that markets are rotating into later cycle areas with easier year-on-year comparable, such as in travel and leisure, autos, event management and office furniture companies.
- Tech valuations continue to be above historical averages after peaking in November.
- The strong fundamental growth in tech companies is believed to continue driver in the consolidation from strategic and private equity acquirers that could provide support.

We are largely sanguine on the economic growth prospects for 2022, persistent inflation and rising rates mean that superior, risk-adjusted returns will likely be harder to achieve than in the past few years. Amid such an environment, we believe that will be critical to identifying new opportunities and exploiting market inefficiencies

### Ongoing Concerns

The escalation of the Crimea War that started at 2014 and the invasion of rest of Ukraine by Russia is a matter of concern in the short and intermedium terms.

Although we have no direct or indirect interest in Russian assets, the approved broader economic sanctions against Russia have provoked increasingly side wards effects in commodities prices, especially in Gas and Oil and Materials adding to the already seen sticky inflation worldwide. Volatility is also expected to remain high and Economic recovery after Covid Pandemic to be challenged.

The information stated in the report is historical and is not representative of future results.

## Independent auditor's report

To the Shareholders of  
FCS FUND SERVICES SICAV  
3, rue Gabriel Lippman  
L-5365 Munsbach

### Opinion

We have audited the financial statements of FCS FUND SERVICES SICAV (the "Fund") and of each of its sub-funds, which comprise the statement of net assets and the statement of investments as at 31 December 2021, and the statement of operations and other changes in net assets for the year then ended, and the notes to the financial statements, including a summary of significant accounting policies.

In our opinion, the accompanying financial statements give a true and fair view of the financial position of the Fund and of each of its sub-funds as at 31 December 2021, and of the results of their operations and changes in their net assets for the year then ended in accordance with Luxembourg legal and regulatory requirements relating to the preparation and presentation of the financial statements.

### Basis for Opinion

We conducted our audit in accordance with the Law of 23 July 2016 on the audit profession (the "Law of 23 July 2016") and with International Standards on Auditing ("ISAs") as adopted for Luxembourg by the "Commission de Surveillance du Secteur Financier" ("CSSF"). Our responsibilities under the Law of 23 July 2016 and ISAs as adopted for Luxembourg by the CSSF are further described in the "responsibilities of the "réviseur d'entreprises agréé" for the audit of the financial statements" section of our report. We are also independent of the Fund in accordance with the International Code of Ethics for Professional Accountants, including International Independence Standards, issued by the International Ethics Standards Board for Accountants ("IESBA Code") as adopted for Luxembourg by the CSSF together with the ethical requirements that are relevant to our audit of the financial statements, and have fulfilled our other ethical responsibilities under those ethical requirements. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.



### **Other information**

The Board of Directors of the Fund is responsible for the other information. The other information comprises the information included in the annual report but does not include the financial statements and our report of the “réviseur d’entreprises agréé” thereon.

Our opinion on the financial statements does not cover the other information and we do not express any form of assurance conclusion thereon.

In connection with our audit of the financial statements, our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the financial statements or our knowledge obtained in the audit or otherwise appears to be materially misstated. If, based on the work we have performed, we conclude that there is a material misstatement of this other information, we are required to report this fact. We have nothing to report in this regard.

### **Responsibilities of the Board of Directors of the Fund for the financial statements**

The Board of Directors of the Fund is responsible for the preparation and fair presentation of these financial statements in accordance with Luxembourg legal and regulatory requirements relating to the preparation and presentation of the financial statements, and for such internal control as the Board of Directors of the Fund determines is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, the Board of Directors of the Fund is responsible for assessing the Fund and each of its sub-funds' ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless the Board of Directors of the Fund either intends to liquidate the Fund or any of its sub-funds or to cease operations, or has no realistic alternative but to do so.

### **Responsibilities of the “réviseur d’entreprises agréé” for the audit of the financial statements**

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue a report of the “réviseur d’entreprises agréé” that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with the Law of 23 July 2016 and with ISAs as adopted for Luxembourg by the CSSF will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

As part of an audit in accordance with the Law of 23 July 2016 and with ISAs as adopted for Luxembourg by the CSSF, we exercise professional judgment and maintain professional skepticism throughout the audit. We also:

- Identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.
- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Fund's internal control.
- Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by the Board of Directors of the Fund.
- Conclude on the appropriateness of Board of Directors of the Fund use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Fund or any of its sub-funds' ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our report of the "réviseur d'entreprises agréé" to the related disclosures in the financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our report of the "réviseur d'entreprises agréé". However, future events or conditions may cause the Fund or any of its sub-funds to cease to continue as a going concern.
- Evaluate the overall presentation, structure and content of the financial statements, including the disclosures, and whether the financial statements represent the underlying transactions and events in a manner that achieves fair presentation.

We communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.

Ernst & Young  
Société anonyme  
Cabinet de révision agréé



Jean-Marc Cremer

Luxembourg, 12 August 2022

A member firm of Ernst & Young Global Limited

# FCS Fund Services SICAV

## STATEMENT OF NET ASSETS

as at 31 December 2021

<u>ASSETS</u>	Notes	FLEX ABLE GROWTH PLUS* EUR	FLEX ABLE GROWTH EUR	COMBINED EUR
Investment at market value	1	-	2,617,652.14	2,617,652.14
Unrealised gain on futures contracts	6	-	10,337.89	10,337.89
Cash at banks		2,616.88	284,636.76	287,253.64
Dividends receivable		-	939.33	939.33
Due from affiliate		-	-	-
Formation expenses, net	2	-	4,564.99	4,564.99
Other receivables		-	-	-
<b>TOTAL ASSETS</b>		<b>2,616.88</b>	<b>2,918,131.11</b>	<b>2,920,747.99</b>
 <u>LIABILITIES</u>				
Provision for investment management fees	2	769.80	928.76	1,698.56
Provision for administration fees	2	-	46,325.88	46,325.88
Provision for audit fees	2	-	15,488.32	15,488.32
Provision for depositary fees		-	8,269.43	8,269.43
Distribution fees payable		-	2,547.93	2,547.93
Directors fee payable		-	27,636.25	27,636.25
Subscription duty ("taxe d'abonnement")	3	146.48	238.35	384.83
Amount due to investor		-	-	-
Other payables	2	1,700.60	27,529.16	29,229.76
<b>TOTAL LIABILITIES</b>		<b>2,616.88</b>	<b>128,964.08</b>	<b>131,580.96</b>
<b>TOTAL NET ASSETS</b>		<b>-</b>	<b>2,789,167.03</b>	<b>2,789,167.03</b>

\* Dormant Since 24 February 2021

# FCS Fund Services SICAV

## STATEMENT OF OPERATIONS AND OTHER CHANGES IN NET ASSETS

For the year ended 31 December 2021

	Notes	FLEX ABLE GROWTH PLUS* EUR	FLEX ABLE GROWTH EUR	COMBINED EUR
<b>INCOME</b>				
Dividends, net		-	43,701.88	43,701.88
Interest income		-	1,014.81	1,014.81
Other income	7	16,819.91	-	16,819.91
<b>TOTAL INCOME</b>		<b>16,819.91</b>	<b>44,716.69</b>	<b>61,536.60</b>
<b>EXPENSES</b>				
Investment management fees	2	1,645.79	12,650.07	14,295.86
Administrative agent and transfer agent fees	2	-	39,599.40	39,599.40
Depository fees		-	50,716.25	50,716.25
Bank charges and other fees		50.00	222.55	272.55
Audit fees	2	-	12,661.86	12,661.86
Formation expenses		15,336.84	3,149.95	18,486.79
Subscription duty ("taxe d'abonnement")	3	54.66	279.17	333.83
Transaction costs	2, 4	-	36,236.68	36,236.68
Interest expense		-	2,186.02	2,186.02
Distribution fees		2,383.55	29,999.87	32,383.42
Directors fees		12,687.99	27,636.25	40,324.24
FATCA fees		-	3,000.30	3,000.30
Regulatory fees		384.12	1,866.91	2,251.03
Licence fees		-	4,000.00	4,000.00
Other expenses		1,864.45	23,315.42	25,179.87
<b>TOTAL EXPENSES</b>		<b>34,407.40</b>	<b>247,520.70</b>	<b>281,928.10</b>
<b>NET INVESTMENT GAIN/(LOSS)</b>		<b>(17,587.49)</b>	<b>(202,804.01)</b>	<b>(220,391.50)</b>
<b>NET REALISED GAINS/(LOSSES)</b>				
- on investments		-	615,046.43	615,046.43
- on futures contracts	6	-	(127,817.80)	(127,817.80)
- on options		-	(32,403.97)	(32,403.97)
- on forward foreign exchange contracts		-	(1,160.96)	(1,160.96)
<b>NET REALISED GAINS/(LOSSES) FOR THE PERIOD/YEAR</b>		<b>(17,587.49)</b>	<b>250,859.69</b>	<b>233,272.20</b>
<b>CHANGE IN NET UNREALISED APPRECIATION/ (DEPRECIATION) FOR THE PERIOD/YEAR</b>				
- on investments		-	(271,216.56)	(271,216.56)
- on financial future contracts	6	-	5,939.29	5,939.29
- on options		-	600.00	600.00
- on foreign currency transactions		-	79,821.53	79,821.53
<b>RESULT OF OPERATIONS FOR THE PERIOD/YEAR</b>		<b>(17,587.49)</b>	<b>66,003.95</b>	<b>48,416.46</b>
Subscriptions		-	-	-
Redemptions		(724,623.31)	(400,000.00)	(1,124,623.31)
<b>TOTAL CHANGES IN NET ASSETS</b>		<b>(742,210.80)</b>	<b>(333,996.05)</b>	<b>(1,076,206.85)</b>
<b>TOTAL NET ASSETS at the beginning of the period/year</b>		<b>742,210.80</b>	<b>3,123,163.08</b>	<b>3,865,373.88</b>
<b>TOTAL NET ASSETS at the end of the period/year</b>		<b>-</b>	<b>2,789,167.03</b>	<b>2,789,167.03</b>

\* Dormant Since 24 February 2021

# FCS Fund Services SICAV- Flex Able Growth Plus

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## STATISTICAL INFORMATION

31 December 2021

### Total net assets

- as at 24 February 2021*	-
- as at 31 December 2020	EUR 742,210.80
- as at 31 December 2019	EUR 1,587,169.56

### Number of Class A EUR shares

- outstanding at the beginning of the period	-
- issued	-
- redeemed	-
<hr/>	
- outstanding at the end of the period	-

### Net asset value per Class A EUR shares

- as at 24 February 2021*	-
- as at 19 November 2020	EUR 61.85
- as at 31 December 2019	EUR 109.44

### Number of Class B EUR shares

- outstanding at the beginning of the period	15,855.0000
- issued	-
- redeemed	(15,855.0000)
<hr/>	
- outstanding at the end of the period	-

### Net asset value per Class B EUR shares

- as at 24 February 2021*	-
- as at 31 December 2020	EUR 46.81
- as at 31 December 2019	EUR 94.82

\* Dormant Since 24 February 2021

# FCS Fund Services SICAV- Flex Able Growth

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## STATISTICAL INFORMATION

31 December 2021

### Total net assets

- as at 31 December 2021	EUR 2,789,167.03
- as at 31 December 2020	EUR 3,123,163.08
- as at 28 June 2019	EUR 577,165.06

### Number of Class A EUR shares

- outstanding at the beginning of the year	30,000.00
- issued	-
- redeemed	(3,527.89)
<hr/>	
- outstanding at the end of the year	26,472.11

### Net asset value per Class A EUR shares

- as at 31 December 2021	EUR 105.36
- as at 31 December 2020	EUR 104.11
- as at 28 June 2019	EUR 84.04

# FCS Fund Services SICAV- Flex Able Growth

## STATEMENT OF INVESTMENTS

As at 31 December 2021

Currency	Nominal/ Quantity	Description	Cost	Market Value	% of total net assets
<b>TRANSFERABLE SECURITIES ADMITTED TO AN OFFICIAL STOCK EXCHANGE LISTING</b>					
<b>Equity shares</b>					
<i>Canada</i>					
USD	5,000.00	CAMECO CORPUSD	91,759.58	95,893.42	3.44%
		<i>Total Canada</i>		<i>95,893.42</i>	<i>3.44%</i>
<i>France</i>					
EUR	10,000.00	DERICHEBOURG SA	100,478.59	101,500.00	3.64%
EUR	3,500.00	TOTAL SET	143,378.76	156,205.00	5.59%
		<i>Total France</i>		<i>257,705.00</i>	<i>9.23%</i>
<i>Germany</i>					
EUR	2,500.00	COVESTRO AG	148,145.28	135,500.00	4.86%
EUR	5,000.00	EVONIK INDUSTRIES AG	138,822.71	142,350.01	5.10%
EUR	15,000.00	KLOECKNER & CO SE	162,314.45	160,800.00	5.77%
EUR	2,000.00	VONOVIA SE	107,440.00	97,000.00	3.48%
		<i>Total Germany</i>		<i>535,650.01</i>	<i>19.21%</i>
<i>Netherlands</i>					
EUR	7,000.00	ROYAL DUTCH SHELL PLC-A SHS	132,244.00	135,170.00	4.85%
EUR	3,000.00	VOPAK	104,327.20	92,400.00	3.31%
		<i>Total Netherlands</i>		<i>227,570.00</i>	<i>8.16%</i>
<i>Spain</i>					
EUR	1,000.00	AENA SM	145,013.15	138,800.00	4.98%
EUR	50,000.00	BANCO SANTANDER SA - (EUR)	155,722.90	147,025.00	5.27%
		<i>Total Spain</i>		<i>285,825.00</i>	<i>10.25%</i>
<i>United Kingdom</i>					
GBP	50,000.00	BARCLAYS PLC	111,328.83	111,362.18	3.99%
GBP	30,000.00	BP PLC	119,699.46	118,091.56	4.23%
GBP	6,500.00	CLOSE BROTHERS GROUP PLC	119,329.15	108,694.25	3.90%
		<i>Total United Kingdom</i>		<i>338,147.99</i>	<i>12.12%</i>
<i>United States</i>					
USD	1,800.00	ALLY FINANCIAL INC	87,303.13	75,358.78	2.70%
USD	4,500.00	DISCOVERY COMMUNICATIONS-A	114,697.85	93,149.85	3.34%
USD	800.00	EXPEDIA GROUP INC	118,787.34	127,133.31	4.56%
USD	1,000.00	FISERV INC	96,198.21	91,268.03	3.27%
USD	2,000.00	LAZARD LTD-CL A	89,108.51	76,732.32	2.75%
USD	500.00	PNC FINANCIAL SERVICES GROUP INC	89,341.36	88,163.91	3.16%
USD	2,000.00	SYNCHRONY FINANCIAL	90,553.64	81,586.35	2.93%
USD	1,500.00	TRUIST FINANCIAL CORP	82,099.84	77,229.16	2.77%
USD	1,700.00	US BANCORP	89,693.99	83,968.52	3.01%
USD	3,100.00	VIACOMCBS INC	112,607.28	82,270.49	2.95%
		<i>Total United States</i>		<i>876,860.72</i>	<i>31.44%</i>
<b>TOTAL TRANSFERABLE SECURITIES</b>					
<b>ADMITTED TO AN OFFICIAL STOCK EXCHANGE LISTING</b>			<b>2,750,395.21</b>	<b>2,617,652.14</b>	<b>93.85%</b>

# FCS Fund Services SICAV- Flex Able Growth

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## INDUSTRIAL AND GEOGRAPHICAL CLASSIFICATION OF INVESTMENTS

As at 31 December 2021

<b>Sector</b>	<b>% of net assets</b>
Financial	24.69
Energy	17.99
Communications	10.85
Industrial	14.38
Basic Materials	8.30
Non financial corporations	7.26
Other financial intermediaries	5.27
Materials	5.11
<b>TOTAL</b>	<b>93.85</b>

<b>Country</b>	<b>% of net assets</b>
United States	31.44
Germany	19.20
United Kingdom	12.12
Spain	10.25
France	9.24
Netherlands	8.16
Canada	3.44
<b>TOTAL</b>	<b>93.85</b>



# FCS Fund Services SICAV

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## NOTES TO THE FINANCIAL STATEMENTS

As at 31 December 2021

### NOTE 1 - Summary of significant accounting policies

The financial statements have been prepared in accordance with the generally accepted accounting principles for investment funds in Luxembourg. The significant accounting policies are summarised as follows:

#### *a) Calculation of the Net Asset Value*

The Net Asset Value will be expressed in the Reference Currency of each class within the relevant Compartment and will be determined as of any valuation day.

The frequency of the Net Asset Value calculation is detailed for each Compartment in the appendices of the prospectus.

The Net Asset Value per Share of each Class or Category of Shares is determined by dividing the value of the total assets of that Compartment properly allocable to such Class or Category less the liabilities of such Compartment properly allocable to such Class or Category by the total number of Shares of such Class or Category outstanding on the relevant Valuation Day.

The assets of the Fund, in relation to each Compartment, shall be deemed to include:

- (i) all cash on hand or on deposit, including any interest accrued thereon;
- (ii) all bills and demand notes payable and accounts receivable (including proceeds of securities sold but not delivered);
- (iii) all bonds, timenotes, certificates of deposit, shares, stock, debentures, debenture stocks, subscription rights, warrants, options and other securities, money market instruments, financial instruments and similar assets owned by the Fund or contracted by the management company on behalf of the Fund (provided that the management company may make some adjustments in a manner not inconsistent with paragraph below with regards to fluctuations in the market value of securities caused by trading ex-dividends, ex-rights, or by similar practices);
- (iv) all stock dividends, cash dividends and cash distributions receivable by the Fund to the extent information thereon is reasonably available to the Fund;
- (v) all interest accrued on any interest bearing assets owned by the Fund except to the extent that the same is included or reflected in the principal amount of such asset;
- (vi) the preliminary expenses of the Fund, including the cost of issuing and distributing Shares of the Fund, insofar as the same have not been written off;
- (vii) the liquidating value of all forward contracts and all call or put options the Fund has an open position in; and
- (viii) all other assets of any kind and nature including expenses paid in advance.

The value of such assets shall be determined as follows:

- the value of any cash on hand or on deposit, bills and demand notes and accounts receivable, prepaid expenses, cash dividends and interest declared or accrued and not yet received, is deemed to be the full amount thereof, unless in any case the same is unlikely to be paid or received in full, in which case the value thereof is arrived at after making such discount as may be considered appropriated in such case to reflect the true value thereof;

- the value of securities and money market instruments listed or dealt in on a Regulated Market, stock exchange or other regulated markets will be valued at the last available price on such markets. If a security or a money market instrument is listed or traded on several markets, the closing price at the market which constitutes the main market for such securities and money market instruments, will be determining;

- in the event that the securities and money market instruments are not listed or dealt in on a Regulated Market, stock exchange or other regulated markets or if, in the opinion of the Fund, the latest available price does not truly reflect the fair market value of the relevant securities and money market instruments, the value of such securities will be defined by the Fund based on the reasonably foreseeable sales proceeds determined prudently and in good faith by the Fund who may use commonly used valuation as a basis or any other method if it believes that such method better reflects the value of the relevant asset;

- units and shares of Underlying Funds are based on the last available value provided by the Central Administrator, the manager or any other reliable party involved with the Underlying Target Funds. For the purpose of Calculating the Net Asset Value of the Compartment, the Fund may allow the use of an estimate of value of the relevant underlying target funds;

# FCS Fund Services SICAV

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## NOTES TO THE FINANCIAL STATEMENTS (Continued)

As at 31 December 2021

### NOTE 1 - Summary of significant accounting policies (Continued)

#### *a) Calculation of the Net Asset Value (Continued)*

- the liquidating value of futures, forward or options contracts not dealt in on Regulated Markets, stock exchange or other regulated markets shall mean their net liquidation value determined, pursuant to the policies established by the Fund, on a basis consistently applied for each different variety of contracts. The liquidating value of futures, forward or options contracts dealt in on Regulated Markets, stock exchanges or other regulated markets shall be based upon the last available settlement prices of these contracts on Regulated Markets, stock exchanges or other regulated markets on which the particular futures, forward or options contracts are dealt in by the Fund; provided that if a futures, forward or options contract could not be liquidated on the day with respect to which net assets are being determined, the basis for determining the liquidating value of such contract shall be such value as the Fund may deem fair and reasonable;

- the Net Asset Value per Share of any Compartment may be determined by using an amortised cost method for all investments with a known short term maturity date. This involves valuing an investment at its cost and thereafter assuming a constant amortisation to maturity of any discount or premium, regardless of the impact of fluctuating interest rates on the market value of the investments. While this method provides certainty in valuation, it may result in periods during which value, as determined by amortisation cost, is higher or lower than the price such Compartment would receive if it sold the investment. The Fund will continually assess this method of valuation and recommend changes, where necessary, to ensure that the relevant Compartment's investments will be valued at their fair value as determined in good faith by the Fund. If the Fund believes that a deviation from the amortised cost per Share may result in material dilution or other unfair results to shareholders, the Fund shall take such corrective action, if any as they deem appropriate to eliminate or reduce, to the extent reasonably practicable, the dilution or unfair results;

- the relevant Compartment shall, in principle, keep in its portfolio the investments determined by the amortisation cost method until their respective maturity date unless another method is employed upon decision of the Board of Directors in the best interest of the investors;

- interest rate swaps will be valued at their market value established by reference to the applicable interest rate curve. Index and financial instruments related swaps will be valued at their market value established by reference to the applicable index or financial instrument. The valuation of the index or financial related swap agreement shall be based upon the market value of such swap transaction established in good faith pursuant to procedures established by the Fund;

- all other assets will be valued at fair market value as determined in good faith pursuant to procedures established by the Fund;

- the Fund, in its discretion, may permit some other method of valuation to be used if it considers that such valuation better reflects the fair value of any asset of the Fund.

In the event that extraordinary circumstances render valuations as aforesaid impracticable or inadequate, the Board of Directors may authorize the Management Company to prudently and in good faith, follow other rules in order to achieve a fair valuation of the assets of the Fund.

#### *b) Net realized gain (loss) on sales of securities*

The realized gains or losses on the sales of securities are calculated on the basis of the average cost of the securities sold.

#### *c) Valuation of forward foreign exchange contracts*

The unrealized gain (loss) of outstanding forward foreign exchange contracts is valued on the basis of the forward exchange rates prevailing at valuation date.

#### *d) Valuation of financial futures contracts*

Financial futures contracts are valued based on the latest available published price applicable on the valuation date. Realized gains and losses and the changes in unrealized gains and losses are recorded in the statement of operations. The realized gains and losses are calculated in accordance with the FIFO method, i.e. the first contracts acquired are regarded as the first to be sold.

# FCS Fund Services SICAV

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## NOTES TO THE FINANCIAL STATEMENTS (Continued)

As at 31 December 2021

### NOTE 1 - Summary of significant accounting policies (Continued)

#### *e) Valuation of financial options contracts*

Financial options contracts are valued based on the latest available published price applicable on the valuation date. Realised and unrealised profits and losses are recorded in the statement of operations and other changes in net assets.

#### *f) Conversion of foreign currencies*

Bank accounts, other net assets and the valuation of the investments in securities held denominated in currencies other than the currency of account of the different Compartments are converted at the mid closing spot rates on the valuation date. Income and expenses denominated in currencies other than the currency of the different Compartments are converted at the mid closing spot rates at payment date. Gain or loss on foreign exchange is included in the statement of operations.

The cost of securities denominated in currencies other than the currency of account of the different Compartments is converted at the mid closing spot rate prevailing on the day of acquisition.

#### *g) Receivable on securities sales, Payable on securities purchases*

The position "Receivable on securities sales" can also include receivables from foreign currency transactions. The position "Payable on securities purchases" can also include payables from foreign currency transactions.

Receivables and payables from foreign exchange transactions are netted.

#### *h) Combined statements*

The Combined statements of the Fund are expressed in EUR. The various items of the Combined statement of net assets and the Combined statement of operations and other changes in net assets as of 31 December 2021 of the Fund are equal to the sum of the corresponding items in the financial statements of each Compartment.

### NOTE 2 - Fees and Expenses

The Fund shall pay out of the assets of the relevant Compartment all expenses payable by the Compartment which shall include but not be limited to:

- fees payable to and reasonable disbursements and out-of-pocket expenses incurred by the Fund, the Depositary and the Central Administrator, as applicable;
- all taxes which may be due on the assets and the income of the Compartment (in particular, the "taxe d'abonnement" and any stamp duties payable);
- usual banking fees due on transactions involving securities held in the Compartment;
- legal expenses incurred by the Central Administrator, and the Depositary while acting in the interests of the shareholders;
- the cost of any liability insurance or fidelity bonds covering any costs, expenses or losses arising out of any liability of or claim for damage or other relief asserted against the Fund and/or the Depositary, the Central Administrator, or other agents of the Fund for violation of any law or failure to comply with their respective obligations under the Articles of Association or otherwise with respect to the Fund;
- the costs and expenses of the preparation and printing of written confirmations of Shares; the costs and expenses of preparing and/or filing and printing of all other documents concerning the Fund, including registration statements and Offering Document and explanatory memoranda with all authorities (including local securities dealers' associations) having jurisdiction over the Fund or the offering of Shares of the Fund; the costs and expenses of preparing, in such languages as are necessary for the benefit of the shareholders, including the beneficial holders of the Shares, and distributing annual reports and such other reports or documents as may be required under the applicable laws or regulations of the above-cited authorities; the cost of accounting, bookkeeping and calculating the Net Asset Value; the cost of preparing and distributing public notices to the shareholders; lawyers' and auditor's

# FCS Fund Services SICAV

## NOTES TO THE FINANCIAL STATEMENTS (Continued)

As at 31 December 2021

### NOTE 2 - Fee and Expenses (Continued)

fees; and all similar administrative charges, including all advertising expenses and other expenses directly incurred in offering or distributing the Shares.

All recurring charges will be charged first against income, then against capital gains and then against assets. Other charges may be amortised over a period not exceeding five (5) years.

#### *Formation and launching expenses of the Fund*

The costs and expenses of the formation of the Fund and the initial issue of its Shares will be borne by the Fund and amortised over a period not exceeding 5 years from the formation of the Fund and in such amounts in each year as determined by the Fund on an equitable basis.

#### *Formation and launching expenses of additional Compartments*

The costs and expenses incurred in connection with the creation of a new Compartment shall be written off over a period not exceeding five (5) years against the assets of such Compartment only and in such amounts each year as determined by the Fund on an equitable basis. The newly created Compartment shall not bear a pro-rata of the costs and expenses incurred in connection with the formation of the Fund and the initial issue of Shares, which have not already been written off at the time of the creation of the new Compartment.

#### *Fees of the Management Company*

Unless otherwise provided in the appendices of the sales prospectus, the Management Company is entitled to a management fee payable at the end of each month.

#### FCS FUND SERVICES SICAV - FLEX ABLE GROWTH PLUS SUB-FUND\*

Class A: 0.375% p.a. out of the Compartments' net assets.

Class B: 1.50 % p.a. out of the Compartment's net assets.

Class C: 1.125% p.a. out of the Compartment's net assets.

\*Dormant Since 24 February 2021

#### FCS FUND SERVICES SICAV - FLEX ABLE GROWTH SUB-FUND

Class A: 0.40% p.a. out of the Compartments' net assets.

Class B: 1% p.a. out of the Compartment's net assets.

Class C: 1.15% p.a. out of the Compartment's net assets.

Any reasonable disbursements and out-of-pocket expenses (including without limitation legal fees, external service providers fees, telephone, telex, cable and postage expenses) incurred by the Management Company will be borne by the relevant Compartment.

#### *Distribution fee*

The Management Company is entitled to a distribution fee equal to the higher of EUR 2,500 per month, or 0.5% on the Net New Assets per annum, on a monthly basis.

#### *Fees for the Central Administrator*

Apex Fund Services S.A. ("Apex") is acting as the Central administration. In consideration for the services rendered, Apex is entitled to a minimum fee of EUR 36,000 per annum, per Compartment, or the below, whichever is greater :

Up to EUR 200 million of aggregate Compartment value : 0.05%

From EUR 200 million and above : 0.04%

# FCS Fund Services SICAV

## NOTES TO THE FINANCIAL STATEMENTS (Continued)

As at 31 December 2021

### NOTE 2 - Fee and Expenses (Continued)

#### *Fees of the Depositary*

Any reasonable disbursements and out-of-pocket expenses (including without limitation telephone, telex, e-mail, website, cable and postage expenses) incurred by the Depositary, and any custody charges of banks and financial institutions to which custody of assets of a Compartment is entrusted, will be borne by the relevant Compartment.

European Depositary Bank S.A. ("EDB") is acting as depositary.

In consideration for the services rendered, EDB is entitled to a minimum fee of EUR 30,000 per annum, per Compartment, or the below, whichever is greater :

From EUR 0 to EUR 200 million of aggregate Compartment value : 0.025%

From EUR 200 million and above : 0.015%

#### *Listing Fees*

All fees and expenses relating to the listing of the Shares of Compartments on the Italian Stock Exchange, where applicable, and registering the Compartments for sale in various markets will be borne by the FCS Flex Able Growth Sub-Fund and FCS Flex Able Growth Plus Compartment. Such fees and expenses are estimated not to exceed EUR 100,000 and may be amortised over the first five Accounting Periods of the Compartments and shall be subject to such adjustments following the establishment of new Funds as the Directors may determine.

#### *Other Operating Expenses*

The costs and expenses in relation to the tasks and activities required to operate the Fund including without limitation, the fees of independent valuers, appraisers and cost associated to the use of special purpose vehicles.

#### *Directors Remuneration*

Each of the Directors of the Board of Directors will be entitled to remuneration for his services at the rate determined by the general meeting of shareholders from time to time. In addition, each Director may be paid reasonable travelling, hotel and other incidental expenses for attending and returning from board meetings or general meetings of shareholders as well as for visiting services providers and delegates of the Fund.

All recurring expenditure is paid when incurred or invoiced from the net assets of the relevant Compartment(s). Other expenditure may be amortised over a period not exceeding five years.

Charges involved in the calculation of the net asset values of the various Compartments shall be spread between the Compartments in proportion to their net assets, except in cases where charges specifically relate to one Compartment, in which case they will be charged to that Compartment.

#### *Foreign Exchange translation*

Values expressed in a currency other than the currency of denomination of the Net Asset Value of the relevant Sub-Fund are translated into that currency of denomination at the average of the last available buying and selling price for such currency.

The exchange rate prevailing as at 31 December 2021 was the following:

1 EUR = 1.1371 USD

1 EUR = 0.8396 GBP

#### *Audit fees*

The audit fees accrued and payable for the Sub-Fund FCS FUND SERVICES SICAV - FLEX ABLE GROWTH PLUS were covered by the Management Company, the Management Company will not request reimbursement of the audit fees to the Sub-Fund FCS FUND SERVICES SICAV - FLEX ABLE GROWTH PLUS for the period ended 24 February 2021.

# FCS Fund Services SICAV

## NOTES TO THE FINANCIAL STATEMENTS (Continued)

As at 31 December 2021

### NOTE 3 - Taxe d'abonnement

The Fund is subject to a subscription tax (taxe d'abonnement) levied at the rate of 0.05% per annum based on its net asset value at the end of the relevant quarter, calculated and paid quarterly. A reduced subscription tax rate of 0.01% per annum is applicable to Luxembourg UCIs whose exclusive object is the collective investment in money market instruments, the placing of deposits with credit institutions, or both. A reduced subscription tax rate of 0.01% per annum is applicable to UCITS individual Compartments of UCITS with multiple Compartments, as well as for individual classes of securities issued within a UCI or within a Compartment of a UCI with multiple Compartments, provided that the securities of such Compartments or classes are reserved to one or more institutional investors.

The taxe d'abonnement is waived for that part of the net assets invested in units or shares of other undertakings for collective investment that have already paid the taxe d'abonnement in accordance with the statutory provisions of Luxembourg law.

### NOTE 4 – Transaction costs

Transaction costs include brokerage fees, stamp duty, local taxes and other foreign charges if incurred during the period. Transaction fees are included in the cost of securities purchased and sold.

For the financial year ended on 31 December 2021, the Company incurred transaction costs relating to purchase or sale of investments in securities and similar transactions as follows:

FCS FUND SERVICES SICAV	
- FLEX ABLE GROWTH PLUS SUB-FUND*	-
- FLEX ABLE GROWTH SUB-FUND	36,236.68

\*Dormant Since 24 February 2021

### NOTE 5 – Authoritative language

The English version of these financial statements is the authoritative version and only this version was audited by the auditor.

### NOTE 6 – Futures contracts

FCS Fund Services SICAV – Flex Global Growth Sub-Fund

Unrealised gain on financial futures contracts as at 31 December 2021 was as follows:

Currency	Counterparty	No. of Contracts	Underlying Securities	Expiration Date	Notional value	Unrealised gain
					in EUR	in EUR
USD	European Depositary Bank	11.00	Euro FX Curr	March, 2022	1,368,349.89	10,337.89
					<b>Total</b>	<b>10,337.89</b>

# FCS Fund Services SICAV

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## NOTES TO THE FINANCIAL STATEMENTS (Continued)

As at 31 December 2021

### NOTE 7 – Other income

The amount of other income of EUR 16,819.91 is composed of fees (administrative agent and transfer agent, distribution and depositary bank fees) which were accrued over the period and until 24 February 2021. The total redemption of the sub-fund was placed in July 2020 and settled in February 2021, during this period no fees should have been accrued. On that basis, the fees accrued have been extouted and are presented under the caption other income.

### NOTE 8 - Subsequent events

The escalation of the Crimea War that started at 2014 and the invasion of rest of Ukraine by Russia is a matter of concern in the short and intermedium terms.

Although we have no direct or indirect interest in Russian assets, the approved broader economic sanctions against Russia have provoked increasingly side wards effects in commodities prices, especially in Gas and Oil and Materials adding to the already seen sticky inflation worldwide. Volatility is also expected to remain high and Economic recovery after Covid Pandemic to be challenged.

In February 2022, a number of countries (including the US, UK and EU) imposed sanctions against certain entities and individuals in Russia as a result of the official recognition of the Donetsk People Republic and Lugansk People Republic by the Russian Federation. Announcements of potential additional sanctions have been made following military operations initiated by Russia against the Ukraine on 24 February 2022.

The situation, together with growing turmoil from fluctuations in commodity prices and foreign exchange rates, and the potential to adversely impact global economies, has driven a sharp increase in volatility across markets. The Directors regards these events for the Fund and any of its sub-funds as non-adjusting events after the reporting period.

Although neither the Fund's and any of its sub-funds performance and going concern nor operations, at the date of this report, have been significantly impacted by the above, the Directors continues to monitor the evolving situation and its impact on the financial position of the Fund and any of its sub-funds.

No other events took place between the end of the Reporting Period and the date of the approval of these financial statements that would require disclosure in or adjustments to the amounts recognized in these financial statements.

# FCS Fund Services SICAV

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## Unaudited information

### 1. Global Exposure

#### *Risk management*

Risk management in accordance with the commitment approach is applied pursuant to the applicable laws and regulatory provisions.

#### *Leverage*

Leverage is defined pursuant to the applicable ESMA directives as the total of the nominal values of the derivatives used by the respective Compartment. According to this definition, leverage may result in artificially increased leverage amounts, as some derivatives that can be used for hedging purposes may be included in the calculation. Consequently, this information does not necessarily reflect the precise actual leverage risk that the investor is exposed to.

#### **Compartment:**

FCS Fund Services SICAV – Flex Able Growth Plus

FCS Fund Services SICAV – Flex Able Growth

#### **Global risk calculation method :**

Commitment approach

Commitment approach

### 2. Directors Remuneration

Each of the Directors of the Board of Directors will be entitled to remuneration for his services at the rate determined by the general meeting of Shareholders from time to time. In addition, each Director may be paid reasonable travelling, hotel and other incidental expenses for attending and returning from board meetings or general meetings of Shareholders as well as for visiting services providers and delegates of the Fund.

### 3. Remuneration Disclosure

The Board of FCS Asset Management Ltd. ('the Company') has considered the application of the proportionality principle and, taking into account the regulatory requirements as well as ESMA and MFSA's Guidelines, has determined that, given the size and internal organisation of the Company and the nature, scope and complexity of its activities, it is able on proportionality grounds to neutralise at the level of the whole Company, the remuneration rules relating to the pay-out-process of the variable remuneration rules relating to the pay-out-process of the variable remuneration (Annex II, point (1),m) to o) of the AIFM Directive and Article 111ter, (1) points m) to o) of the UCITS Directive), and the requirement to establish a remuneration committee (Annex II, point (3) of the AIFM Law and Article 111ter, (3) of the UCITS Directive).

On 25 April 2022, the Company has requested the Malta Financial Services Authority to renew its derogation, which expired on 21 October 2021, from the remuneration requirements on the pay-out process and to establish a remuneration committee.

The Company has adopted a remuneration policy pursuant to applicable laws and regulations with the objective to ensure that its remuneration structure is in line with its interests and those of the collective investment schemes it manages and to prevent risk-taking with is inconsistent with the risk profiles, rules or articles of incorporation or management regulation of the collective investment schemes it manages. Further details of the remuneration policy of the Company are available at [www.fcs-am.com](http://www.fcs-am.com) or upon request.

With respect to the financial year ended 31 December 2021 the total fixed amount paid by the management company to its employees amounted to EUR 307,769. The company did not pay any variable remuneration to its employees. The total remuneration paid by the management company to senior management and members of its staff whose actions have a material impact on the risk profile of the collective investment schemes managed amounted to EUR 282,873. The remuneration function of the Company has reviewed the implementation of the remuneration policy and has not identified any deficiencies in this respect. An updated remuneration policy will be presented to the Authority in May 2022.

### 4. Transparency of securities financing transactions and their reuse

No securities financing transactions or total return swaps within the meaning of Regulation (EU) 2015/2365 of the European Parliament and of the Council of 25 November 2015 on transparency of securities financing transactions and of reuse and amending Regulation (EU) No 648/2012 ("SFTR") were used in the investment fund's financial year. As a result, no disclosures within the meaning of Article 13 of said Regulation need to be made to investors in the annual report.

### 5. Information concerning the SFDR disclosures

The investments underlying these sub-funds do not take into account the EU criteria for environmentally sustainable economic activities.