



ODDO BHF
ASSET MANAGEMENT

*Responsible
Investment*
POLICY

DECEMBER 2024

INTRODUCTION



The asset management industry is a key sector able to contribute to society's transition towards a more developing sustainable model – in which the fight against global warming, climate change, fair governance, and social impact are central. This conviction has been driving ODDO BHF Asset Management's approach - ODDO BHF AM representing the single brand under which ODDO BHF Asset Management SAS (France), ODDO BHF Asset Management GmbH (Germany), and ODDO BHF Asset Management Lux (Luxembourg) are operating - in favor of sustainable investing since 2006. Following our first commitments to sustainability, social and environmental challenges have become increasingly important and financially relevant.

A greener, more sustainable finance, which was considered a niche several years ago, has become broadly adopted by economic action, as well as an incredible source of investment opportunities for our clients. In a few years, we have developed a consistent, strong, and ambitious sustainability approach in our investment capabilities and solutions offered to our clients through different asset classes. We have also ensured the quality and reliability of our ESG methodology through the labelling of our funds by independent labels (FNG in Germany, ISR in France, Towards Sustainability in Belgium). As an investor, we are responsible to our clients for the purpose of our investments and their impact on the economy and society as a whole.

A separate document has been prepared for the Private Assets.

We want to be an industry leader in sustainable finance through the integration of ESG criteria into our investment processes. Active ownership and stakeholder dialogue are also key pillars of our strategy as we consider the exercise of voting rights, dialogue, and engagement to be an integral part of our responsibility as an active investor.

We structure our sustainable vision around

4 DEVELOPMENT AND PRIORITY AXES:

FOCUS ON HUMAN CAPITAL AND CORPORATE GOVERNANCE

1

We strive to support investments which grant sustainable benefits to the economy, the environment and the society. The focus on human capital management is crucial to unlock innovation, ensure social fairness and drive sustainability commitments.

In addition, the reliability and consistency of our practices and engagements are key to secure a sustainable approach. As such, we have set up a dedicated governance structure with a ESG Strategic Committee and an ESG Investment Forum directly reporting to the ODDO BHF AM's Global Management Committee, which gathers representatives of the main departments.

SUSTAINABLE DUTY TO CLIENTS

2

As a responsible asset manager, we have a duty towards our clients to make progress on sustainability-related issues. We are passionate about providing our clients with a clear picture of sustainable opportunities as well as challenges. Our independence allows our teams to be reactive, flexible, and innovative in order to constantly come up with specific investment solutions that empower our clients to better meet their financial and sustainability objectives.

LONG-TERM VISION

3

We constantly strengthen the integration of sustainability into our investment processes to better manage systemic risk and to create value through the selection of companies that will be able to play a role in tomorrow's world. The relevance of companies' strategy, governance structure and innovation potential are particularly important to identify sustainable opportunities.

The stability of our investment management teams allows a great proximity with the companies in which we invest and guarantees solid and regular dialogue to make progress on sustainability-related issues.

We are convinced that there is strength in unity. Our membership of l'Institut de la Finance Durable or Finance for Biodiversity Foundation among others allows us to take actions collectively on key challenges to favor the positive transition towards a more sustainable future.

ESG INTEGRATION

4

ODDO BHF AM defines its sustainable approach based on three fundamental pillars:

1. EXCLUSIONS

Our Exclusion Policy reflects our active engagement on environmental issues by excluding sectors whose economic development model is contrary to our sustainable investing goals. Thus, we defined a common base of exclusions introducing evolving thresholds to follow a transition approach.

2. ESG INTEGRATION & CLIMATE TRANSITION

We have adopted a hybrid approach based on an internally developed methodology for ESG ratings of companies and sovereigns and on the research of external data providers such as MSCI. This approach impacts the portfolio construction of a main part of our strategies across all asset classes: Equities, Fixed Income, Asset Allocation, Private Equity and Private Debt.

3. ACTIVE OWNERSHIP

The ESG team meets an important number of companies every year to discuss their sustainable development efforts. The investment and ESG teams collaborate on engagement processes ensure the integration of Environmental, Social, and Governance challenges into our voting policy.



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01

Our sustainability approach

At ODDO BHF AM, we define sustainable investing as the combination of traditional investment approaches and ESG characteristics with the objective to mitigate risks and enhance long-term return. We believe sustainability-related issues, ranging from board governance to human capital management to climate risks and opportunities, have real and substantial financial impacts.

Across ODDO BHF AM, we provide all our investment teams with data and insights to keep them well informed of sustainability considerations. Our dedicated portfolio managers are able to integrate sustainability-related information into their investment processes by discounting or emphasizing this information as any other financial input. We have built dedicated governance models, systems, and processes to support our approach.

Approach to SUSTAINABLE INVESTING

We rely on three fundamental pillars

- Exclusions
- ESG integration & climate transition
- Active ownership

1 EXCLUSIONS

- **ODDO BHF AM Exclusion Policy:**
 - Common base of exclusion
 - Specific sector exclusions
 - Relevant European labels requirements
 - Exclusions specific to green and sustainable bonds

2 ESG INTEGRATION & CLIMATE TRANSITION

- Use of **ESG ratings & KPIs** in funds' investment processes
- **Proprietary methodology** for ESG ratings
- Raising ESG awareness and understanding through **sector reviews & companies' news flow**
- Dedicated ESG analysis process for **Green, Social, Sustainability bonds**
- Companies' **transition and decarbonization strategy**

3 ACTIVE OWNERSHIP

- **Regular dialogue** with companies within the investment universe on ESG topics
- **Individual or collaborative engagement** with companies on specific ESG topics
- **ODDO BHF AM Voting Policy** including a climate scorecard module
- **Escalation process** if engagement is unsuccessful



Based on these three pillars, we are committed to strengthening our ESG coverage in the management of our portfolios as described in the following table:

SCOPE OF ODDO BHF AM ESG POLICIES AND PROCESSES

		Open-ended funds Art. 6 SFDR	Open-ended funds Art. 8-9 SFDR	Dedicated funds and mandates Art. 6 SFDR	Dedicated funds and mandates Art. 8-9 SFDR
Exclusion Policy	Common base	✔	✔	~	~
	Specific sector exclusions	~	~	~	~
ESG integration	ESG ratings, ESG research used for portfolio management	✘	✔	✘	✔
Active ownership	Dialogue	~	✔	~	✔
	Individual engagement	✘	✔	✘	✔
	Collaborative engagement	~	✔	~	✔
	Voting <i>Minimum threshold</i>	✔	✔	~	~

Yes
 Partially
 No



EXCLUSIONS FRAMEWORK

The ODDO BHF AM Exclusion Policy integrates restrictive thresholds in order to consider long-term risks and exchanges with our stakeholders: clients, NGOs, ODDO BHF Group's employees. This policy takes also into account sustainability label requirements and specific exclusions to green bonds.

COMMON BASE OF OUR EXCLUSIONS

The common base of exclusions applies to all open-ended funds regardless of their EU SFDR classification. They also apply to delegated fund managers within the ODDO BHF Group. However, private equity funds Art. 6 SFDR, funds of funds, listed derivative products, ODDO BHF AIF PLC are excluded and ODDO BHF Data Driven L/S ICAV. When managing dedicated funds or segregated accounts, these exclusions will be presented to clients and will be applied unless they advise us otherwise.

SPECIFIC SECTOR-BASED EXCLUSIONS

The specific sector-based exclusions apply only to certain open-ended funds, dedicated funds and mandates, in order to comply with the rules governing the sustainability labelling of some of our strategies.

ESG INTEGRATION FRAMEWORK

Investments are analyzed by our fund management teams, supported by the ESG Research team. This approach allows us to identify companies' financial and extra-financial risks and to assess how financially material such risks are.

We have developed our own in-house ESG research and scoring model for corporates. For the time being it covers companies of our European investment strategies. For Global investment strategies we mostly rely on an MSCI ESG ratings. We have also developed a proprietary ESG model for sovereigns.

Our sustainability approach

TIMELINE OF OUR ENGAGEMENTS

Committed to ESG since 2006

MEMBER



SIGNATORY



SUPPORTER





Active Ownership

PRINCIPLES AND COMMITMENTS

ODDO BHF AM takes its role and commitment as an active and fiduciary asset manager very seriously. Thus, we seek to raise internal and external awareness of global environmental, social and governance issues across the firm and the investment value chain.

We engage in market dialogue with a variety of membership organizations and coalitions on this mission. ODDO BHF AM fully aligns with the EFAMA's stewardship code principles. More than 10 years ago, we started this journey by becoming a member of the FIR (Forum de l'Investissement Responsable).

In 2010, we signed up to the Principles for Responsible Investment (PRI), strengthening the integration of ESG criteria available to ODDO BHF AM's management teams. Since then, we have joined many coalitions, initiatives or working groups to harmonize sustainability practices, incite companies and/or financial institutions to improve their policies and practices, to promote and educate on sustainable investing, and to access and improve specific data, tools, and frameworks.

CORPORATE DIALOGUE

We undertake a dialogue with investee companies, with a particular focus on our open-ended funds, and dedicated funds and mandates, aligned with EU SFDR Art. 8-9. We meet all types of company profiles and try to focus on the most material sustainable-related subjects in our discussions.

INDIVIDUAL ENGAGEMENT

We undertake individual engagement with investee companies, with a particular focus on our open-ended funds, and dedicated funds and mandates, aligned with EU SFDR Art. 8-9. Engagement goes further than dialogue as we support companies in their sustainable development and transition strategies.

COLLABORATIVE ENGAGEMENT

We undertake collaborative engagement with investee companies with a particular focus on our open-ended funds, dedicated funds and mandates, aligned with EU SFDR Art. 8-9. By being an active contributor to sustainability-focused membership organization and coalitions such as Climate Action 100+, the Non-Disclosure Campaign of CDP, the Just Transition coalitions led by l'Institut de la Finance Durable, the French Forum for Responsible Investment and the Finance for Biodiversity platform, we can follow collaborative investor engagement efforts with companies in which we invest.

VOTING

As described in section 4, we vote with the help of our proxy services provider ISS. For funds with a sustainable finance label, we vote at all General Meetings (AGM). For all the others, we generally vote from a minimum holding threshold of ownership of the companies' capital. All details on our voting approach are available in our Shareholder Engagement policy.

We publish our active ownership policy and an annual reporting on our dialogue, engagement, and voting activities and statistics.

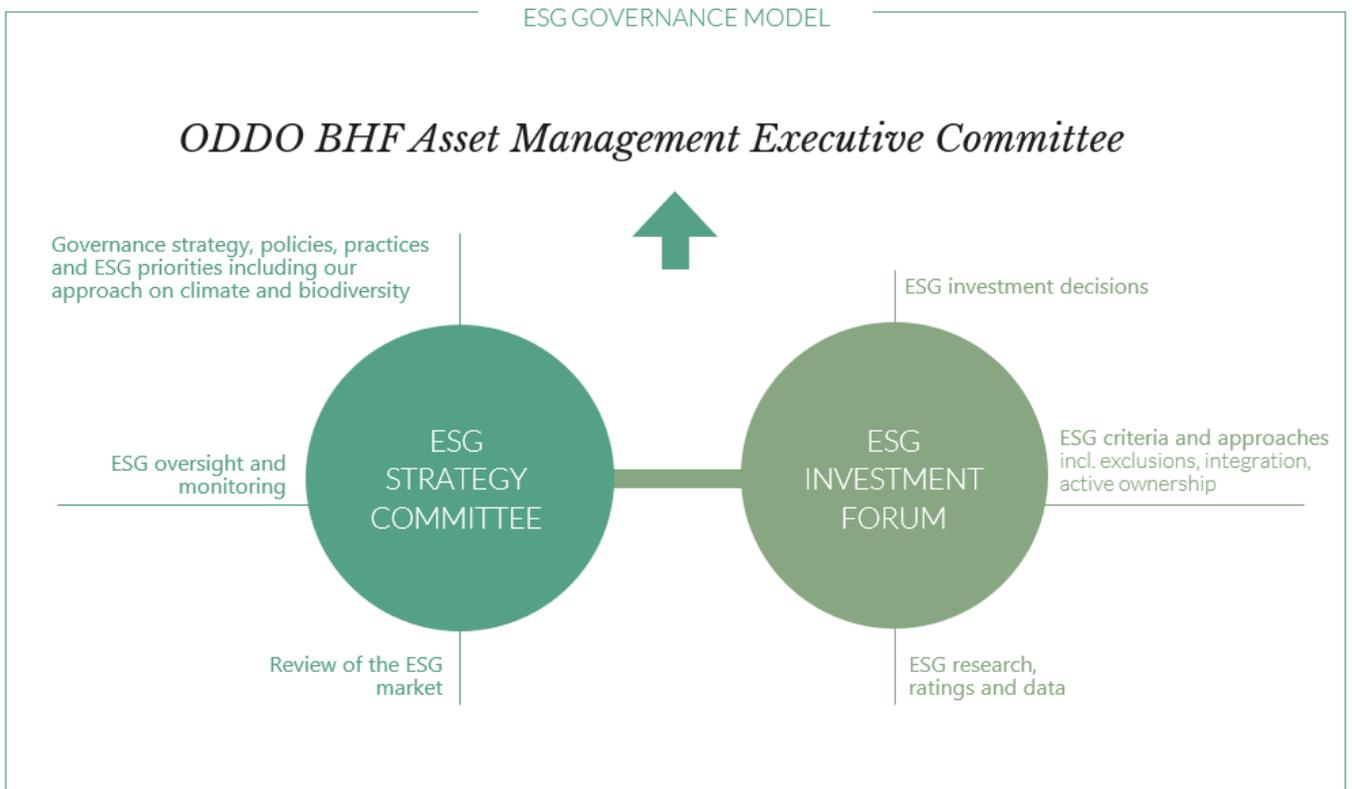
Investment organization

IN RELATION TO SUSTAINABILITY

To ensure the efficient deployment of our sustainable investment approach, ODDO BHF AM has defined a dedicated governance structure, which was strengthened in 2021 due to the increasing integration of sustainability across our activities and processes.

We have created one ESG strategy committee to supervise key ESG-related decisions and processes. All strategic decisions related to sustainability are shared with the Global

Management Committee of ODDO BHF Asset Management. We have also set up an ESG Investment Forum which discusses ESG investment cases (ESG ratings, company news and controversies), reviews lists required for investment decision-making, approves or rejects sustainable debt issues, reviews excluded issuers and complex investment cases in relation to our internal policies.





ODDO BHF AM'S ESG STRATEGY COMMITTEE

It has been established to refine and engage on ESG governance and the operating framework, to highlight and address market developments and challenges linked to sustainability, as well as to ensure alignment with ODDO BHF AM's ESG policy, processes, and practices. This Committee has a key function to define our strategic sustainability roadmap aligned with our ambitions, and to deliver solutions and activities supporting the climate, ecological and just transition. The Strategy Committee meets quarterly and is composed of members from ODDO BHF AM:

- the Chief Executive Officer (CEO)
- the Chief Investment Officer (CIO)
- the Global Head of ESG Research
- the Global Head of Marketing & Products
- the Global Head of Sales
- the Global Chief Risk & Compliance Officer
- the Global Chief Operating Officer (COO)
- the Head of Private Debt
- the Managing Directors of Private Equity

THE ESG INVESTMENT FORUM

centers on ESG integration into the investment decision making process. It addresses specific and complex investment issues linked to sustainability by reviewing portfolio company cases from a financial and sustainability angle, discussing the impacts of ESG integration processes and the implications of sustainable finance label rules on the different investment strategies. The Forum takes place every month and is made of members from ODDO BHF AM:

- the Chief Investment Officer (CIO)
- the Global Head of ESG Research
- the ESG Research Team
- the Investment Teams

Our ESG TEAM

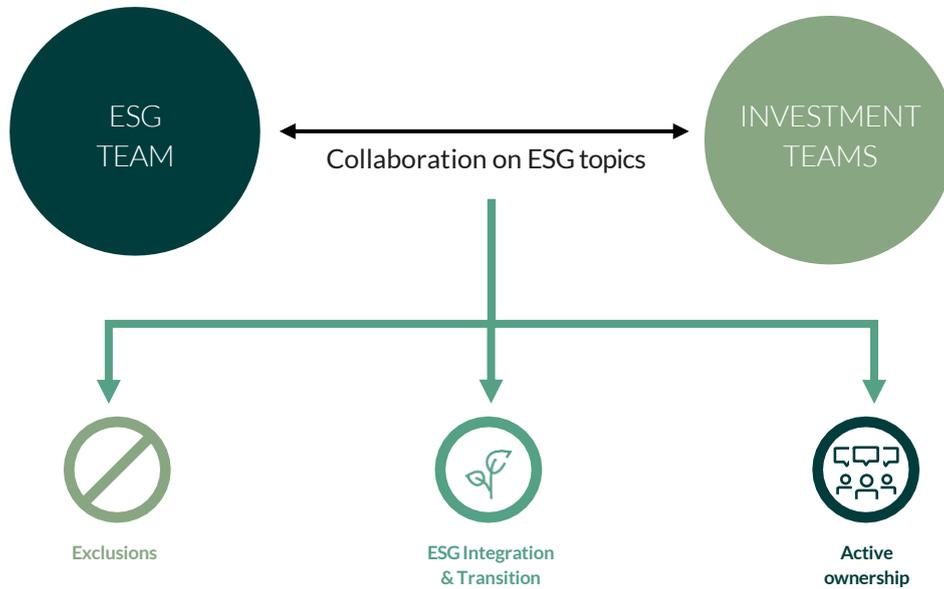
The ESG team consists of four dedicated ESG strategy, product, and investment experts with diversified and multi-disciplinary backgrounds. The Head of ESG Research reports to the CEO of ODDO BHF AM and is a member of the Global Management Committee.

All investment teams work together with the ESG team in structuring and implementing the three systematic stages of our ESG integration approach – exclusion, ESG integration and active ownership. The ESG team is supported by the Group Head of Sustainability Policy in charge of implementing a common and coherent ESG strategy at group level.

<p><i>ESG Research</i></p>  <p>RACHIDA MOURAHIB Global Head of ESG Research, Member of the Global Management Committee ODDO BHF AM SAS & ODDO BHF Private Equity 20 years of experience in ESG Research & Strategy</p>		
<p><i>ESG Quantitative Analyst</i></p>  <p>ALEXIS PRADELLES ODDO BHF AM SAS 3 years of experience in Investment Management</p>	<p><i>ESG Analyst</i></p>  <p>BRYAN BARRAS Human Rights & Supply Chain Lead ODDO BHF AM SAS 4 year of experience in Investment Management</p>	<p><i>ESG Analyst</i></p>  <p>CAMILLE LANCESSEUR Sustainable Debt Lead ODDO BHF AM SAS 10 years of experience in Investment Management</p>

Source: ODDO BHF Asset Management, 2024

Interaction between the ESG team AND THE INVESTMENT TEAMS



The ESG team conducts regular internal training sessions to bring more clarity and context on topics related to market dynamics, new regulations (SFDR, EU Taxonomy, Decree 29 in France, Zielmarkt in Germany etc.) and specific themes in relation to sustainability.





02 *Exclusions*

Common Base OF EXCLUSIONS

Sectors	Exclusion thresholds	Activities
UN Global Compact	0	Violation against the United Nations Global Compact
Unconventional weapons	0	Manufacture or distribution of weapons prohibited under the Chemical Weapons Convention, the Ottawa Convention, the Oslo Convention, the amended and supplemented Convention on prohibitions or restrictions on the use of certain conventional weapons (blinding laser weapons, incendiary weapons, and non-detectable fragments weapons), and nuclear weapons manufactured by a company incorporated in a country that does not form part of the Nuclear Non-Proliferation Treaty (NPT)
Coal	> 8m tonnes or 5% ¹	Coal mining – EU & OECD: 0% (2030), Rest of the world: 0% (2040)
	> 15GW or > 15% ²	Power generation EU & OECD countries: 10% (2026) – 5% (2028) – 0% (2030)
	0	Any company developing new projects involving thermal coal, regardless of the project's size
Unconventional oil & gas³	> 5% ¹	Exploration-production & exploitation
Arctic exploration	> 10% ¹	Exploration-production & exploitation of (conventional & unconventional) oil & gas in the Arctic
Biodiversity	> 5% ¹	Palm oil production
	0	Severe controversies harming biodiversity
Tobacco	> 0% ¹	Production

1. % of revenues- 2. % of production mix or of installed capacity- 3. Incl. shale oil & gas, oil sands

We use MSCI ESG Research for business involvement screening. Meanwhile, the ESG Investment Forum reserves the right to review each controversy case to define a watch list. The list of excluded sectors and companies is updated monthly based on the MSCI ESG Research tools, Urgewald data for the coal industry and our internal analyses.

Additional sector exclusions are applied to some open-ended funds, dedicated funds, or segregated accounts particularly to comply with the rules governing the labelling of some of our portfolio management strategies or because of their roles supporting our transition philosophy. These specific exclusions include conventional oil & gas, nuclear, gambling, conventional weapons, GMOs, alcohol, and adult entertainment

Specific sector EXCLUSIONS

Sectors	Exclusion thresholds	Activities
Conventional oil & gas	> 5% ¹	Exploration-production & exploitation
Nuclear	> 5% ¹	Production of nuclear energy, operation of nuclear power plants and uranium mining
Gambling	> 5% ¹	Activités de jeux d'argent
Conventional weapons	> 5% ¹	Production, manufacture, maintenance and sale Companies regulated by a state that has not signed and/or ratified the Arms Trade Treaty
GMOs	> 5% ¹	Production
Alcohol	> 5% ¹	Production
Adult entertainment	> 5% ¹	Production

1. % of revenues





03 *ESG Research* AND RATINGS METHODOLOGY

At ODDO BHF AM, we aim to diversify our ESG data and rating sources to avoid the dependency on one single ESG data provider as ESG data, research and investing still lack harmonized standards and frameworks.

On a European investment universe, we have hence developed our own in-house ESG research and rating model for corporates using multiple ESG information, data and rating sources, including companies' publications, MSCI, ISS, CDP, Bloomberg, FactSet, specialized broker publications.

For investee companies outside of the European coverage universe we mostly rely on MSCI ESG ratings.

We also developed an internal ESG model for sovereigns gathering 75 indicators from multiple reference sources (World Bank, IMF, etc.)¹.

¹Amnesty International, Bündnis Entwicklung Hilft, Climate Watch, Convention on Biological Diversity, COP21, COP26, Financial Action Task Force, Food and Agriculture Organization, Freedomhouse, Garriga, International Energy Agency, International Labour Organization, International Monetary Fund, International Telecommunication Union, OECD, Population Reference Bureau, Program for International Student Assessment, Transparency International, UNESCO, UNICEF, United Nations, Vision of Humanity, WHO, World Bank, World Intellectual Property Organization

Our internal ESG model

FOR CORPORATES



Our internal ESG research and rating model has been built in 2017 on the following standards and frameworks:

- The principles of the United Nations Global Compact (UNGC), of which we have been signatory since 2015.
- Major international norms, conventions, and guidelines (Universal Declaration of Human Rights, ILO conventions, the Rio Declaration on Environment and Development, the United Nations Convention Against Corruption, OECD Guidelines for multinational enterprises).
- The United Nations' Sustainable Development Goals (SDGs) and its Agenda 2030.



The model is based on 8 themes including 2 environmental, 3 social, and 3 governance themes, for which different indicators are evaluated. This encompasses the Principal Adverse Sustainability Impacts (PAI) as described in our Principal Adverse Impact Statement.

8 Themes of the ESG Research and Rating Model for corporates,
LINKED TO SUSTAINABLE DEVELOPMENT GOALS



Our proprietary ESG methodology places great emphasis on the criteria of governance and human capital as we consider these areas as essential for a company’s ability to deliver on its strategy, ambitions, and targets.



WEIGHTING OF THE THEMES

The weighting assigned to each of the “Environmental”, “Social” and “Governance” categories is determined at the sectoral level according to long-term risks and opportunities.

SCORING

A score out of 100 points is given to each of the three pillar – E, S, and G – and the sub-pillars “quality of management & human capital” and “corporate governance”. An aggregate ESG score is then calculated based on the weighting of each pillar and sub-pillars.

ESG controversies are closely monitored based on the information provided by MSCI and our own proprietary research which can affect the final ESG score assigned to each company. It allows us to rank the companies on a 5-level scale: “Strong Opportunity” (= 5), “Opportunity” (=4), “Neutral” (=3), “Moderate Risk” (=2) and “High Risk” (=1).

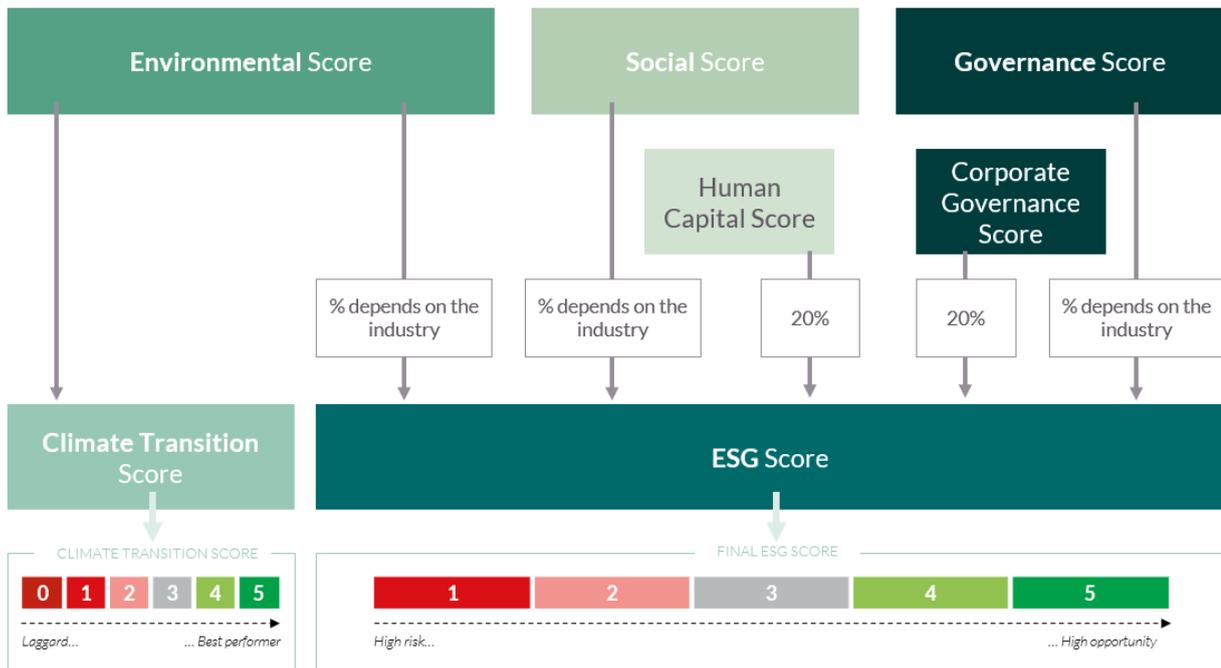
UPDATES

Company analysis updates are generally carried out when fund managers and ESG analysts meet the company in question. A positive or negative development such as an ESG controversy may also change a company’s score at any time.

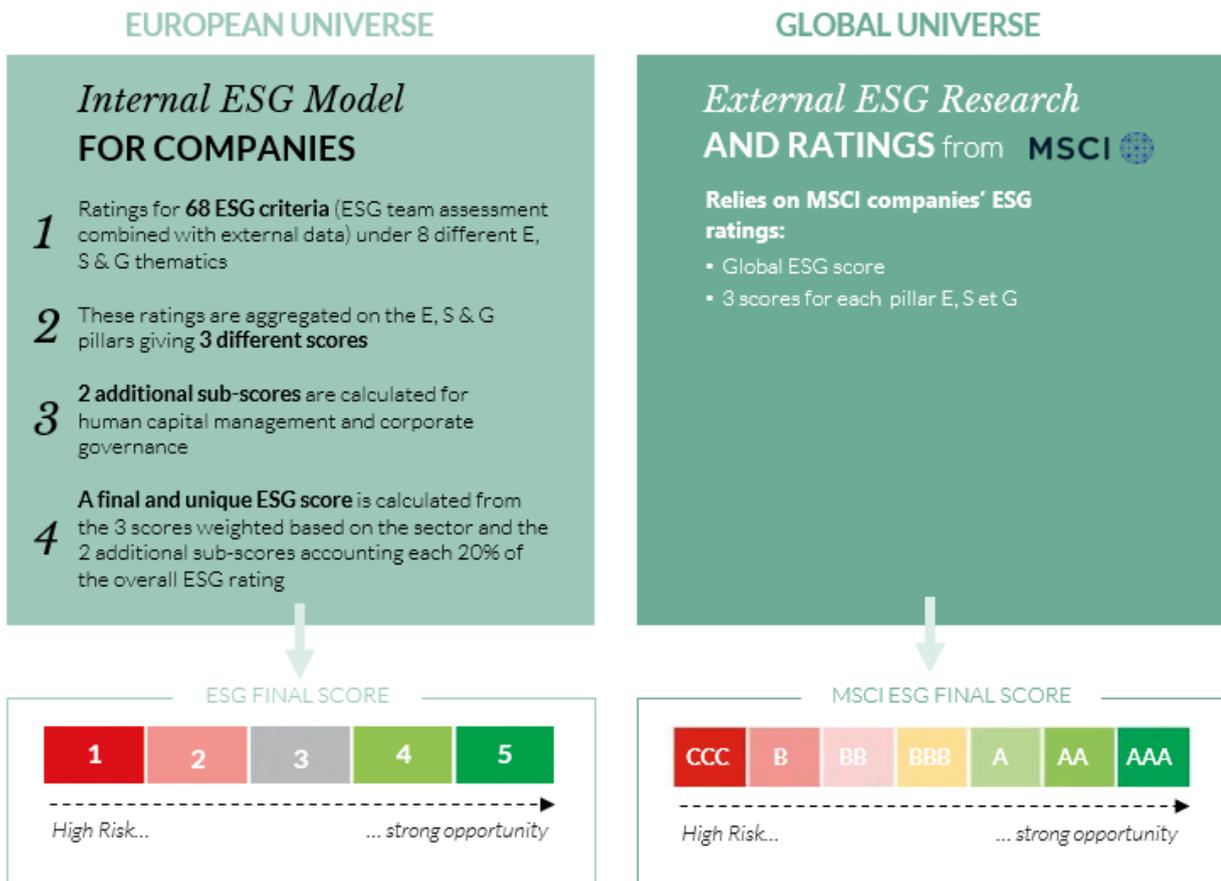
OUR INTERNAL CLIMATE TRANSITION MODEL FOR COMPANIES

A “transition score” is also calculated to assess the risk that companies’ activities face regarding the environmental transition. This score is obtained through the combination of indicators on the E pillar. This transition score allows us to evaluate companies from a transition risk/opportunity perspective: carbon intensity measures (analysis of scopes 1, 2 and 3), CapEx plans in low-carbon solutions or the breakdown of revenues between “green share” and “brown share”. It is calculated considering several indicators such as the sector activity of the company, the decarbonization strategy and its credibility, the carbon footprint¹, or transition, physical and reputational risks.

Scores derived from
OUR PROPRIETARY MODEL



Summary of our ESG Research and Ratings Methodology
FOR CORPORATES



Our internal ESG Model FOR SOVEREIGNS



Our internal ESG model for sovereigns has been updated in 2022, based on the United Nations’ Sustainable Development Goals (SDGs), a framework particularly relevant for the analysis of sovereigns.

The model is based on 4 pillars (environment, social, governance, economy) divided into 15 themes. In comparison to our ESG model for corporates, an economic dimension has been added with prospective and sustainability-linked indicators.

In total, 75 indicators are assessed, of which 59 are common to all countries, 7 are specifically material to upper income countries (GNI per capita > USD 10k), and 9 to middle income countries (GNI per capita < USD 10k) as all countries do not face the same challenges depending on their level of development.

15 Themes of the internal ESG Model for Sovereigns,
LINKED TO SUSTAINABLE DEVELOPMENT GOALS



WEIGHTING OF THE THEMES

Our internal ESG model for sovereigns aims to have a systematic and statistical approach. In addition, we want to avoid as much as possible the classic pitfall of extra-financial analysis for sovereigns, namely the attribution of good ratings to high revenue countries and bad ratings to moderate revenue countries. This “Ingrained Income Bias”, described by the World Bank, is the fact that “a country’s national income permeates all sustainability-linked measures”, as for example the life expectancy depends on how much can be spent on health. The two solutions proposed by the institution to overcome this structural problem are: to run income-peers group scoring and to better account for the dynamic, which reflects recent efforts.

In this vein, our scoring methodology is meant to grasp multiple dimensions for each single indicator, which is in fact a “composite” scoring based on a differentiated appreciation of:

- The current status and recent dynamics of each country's indicator in relation to its peers
- The current status and recent dynamics of each country's indicator in relation to all other countries as a whole

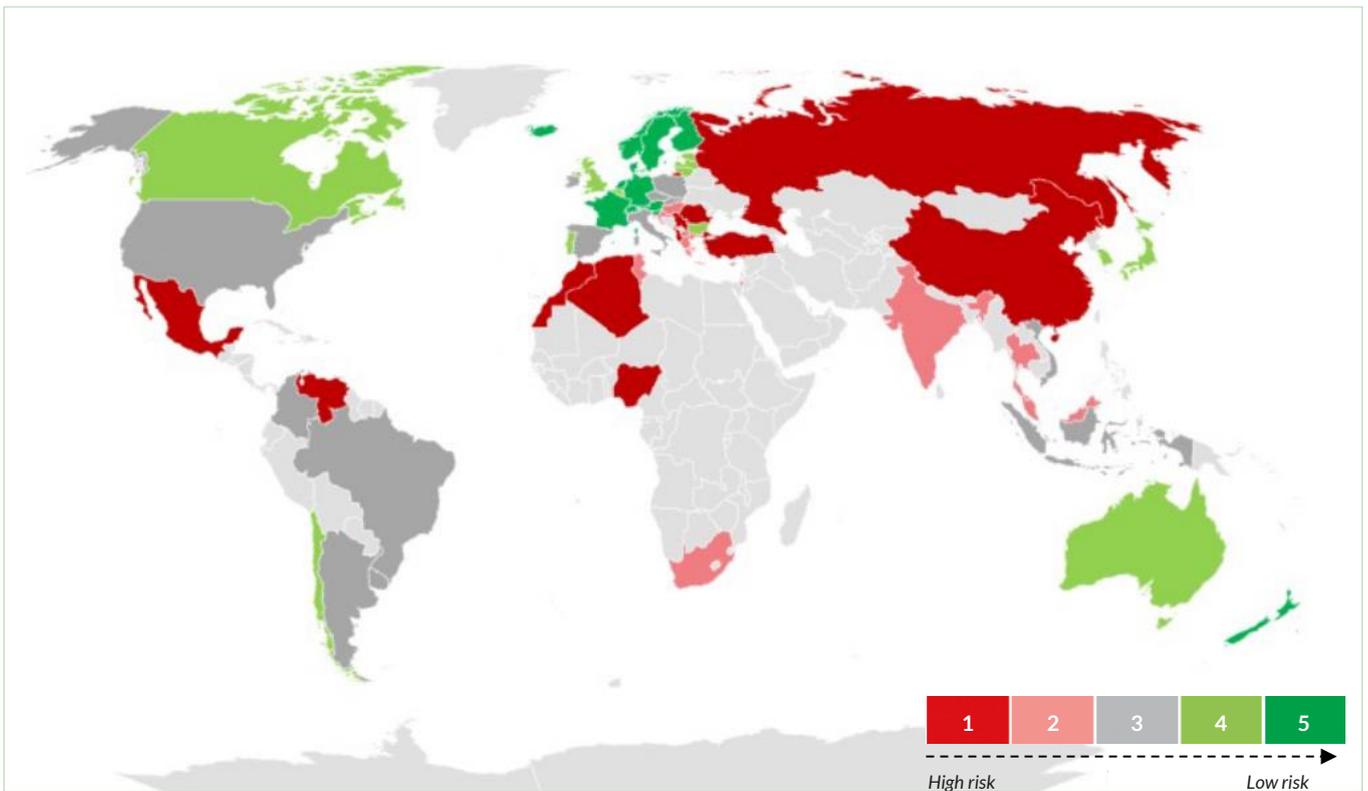
The way in which the 4 pillars are aggregated gives a perspective on different time horizons. We retain the short/medium term, where the governance pillar is fundamental, being one of the most material risks on the credit markets in the near future. Thus, the necessary, but not sufficient, condition for a country to be considered sustainable is that it has a robust governance. This focus on governance is aligned with our internal ESG model for corporates.

SCORING

65 countries, plus the European Union are rated through this model. Each country receives a rating from 1 (= “High Risk”) to 5 (= “Low Risk”) as in our internal ESG model for corporates.



Short/mid-term ESG risk level per country



Source: ODDO BHF Asset Management, 2023



04 *Active* OWNERSHIP

ODDO BHF AM considers the exercise of its voting rights, dialogue, and engagement to be an integral part of its responsibility as an active investor and fiduciary steward of its clients' assets. Thus, our approach to active ownership aims to improve investee companies' business practices, fosters transparency on environmental, social, and governance issues, and aims to ensure long-term value creation in relation to strategy, risk management and governance. Our active ownership approach is aligned with EFAMA's stewardship code principles.

Active
OWNERSHIP
APPROACH

Integrated Approach for Active Ownership,
ALIGNED ON POSITIVE CHANGE TRAJECTORIES



Our active ownership strategy allows us to influence the positive change trajectories of companies towards the climate transition, the ecological transition, and the just transition - a key pre-requisite for meeting the objectives of the United Nations Agenda 2030.

Our engagement actions are conducted both on an individual and collaborative engagement basis. Individual engagements are the chosen method to address concrete issues as outlined by our ESG methodology. These can be usually addressed in the short term.

Collaborative engagements are preferred when focusing on transformative and cross-disciplinary matters related to sustainable development. These commonly have a medium to a long-term time horizon and require a multi-stakeholder approach.



Engagement SELECTION AND PRIORITIZATION

We prioritize individual engagement with investee companies whose sustainability strategy we consider is insufficient considering the risks in the sector, or those companies which are transparent enough on their ESG objectives and practices.

Engagement PROCESS

1



2



3

Identification and preparation

Identify the themes (such as biodiversity) **and the investee companies** with a long-term perspective and within a multi-strategy context

Define engagement objectives in line with:

- > Portfolio investments
- > Events and controversies
- > The challenges for the sector

Define engagement themes and key performance indicators to track progress

Dialogue

Regular meetings with the company in order to:

- > Discuss the challenges
- > Communicate the expectations and expected results over an achievable time horizon
- > Agree on next steps and goals

Participate in multi-stakeholder dialogue with other investors and through member organizations

Monitoring

Document and monitor next engagement steps as agreed with the company and other stakeholders

Include engagement outcomes in regular reporting to ensure transparency

Share best practices in collaborative engagement groups and incorporate learning from other engagement experts

Source: ODDO BHF Asset Management, 2024

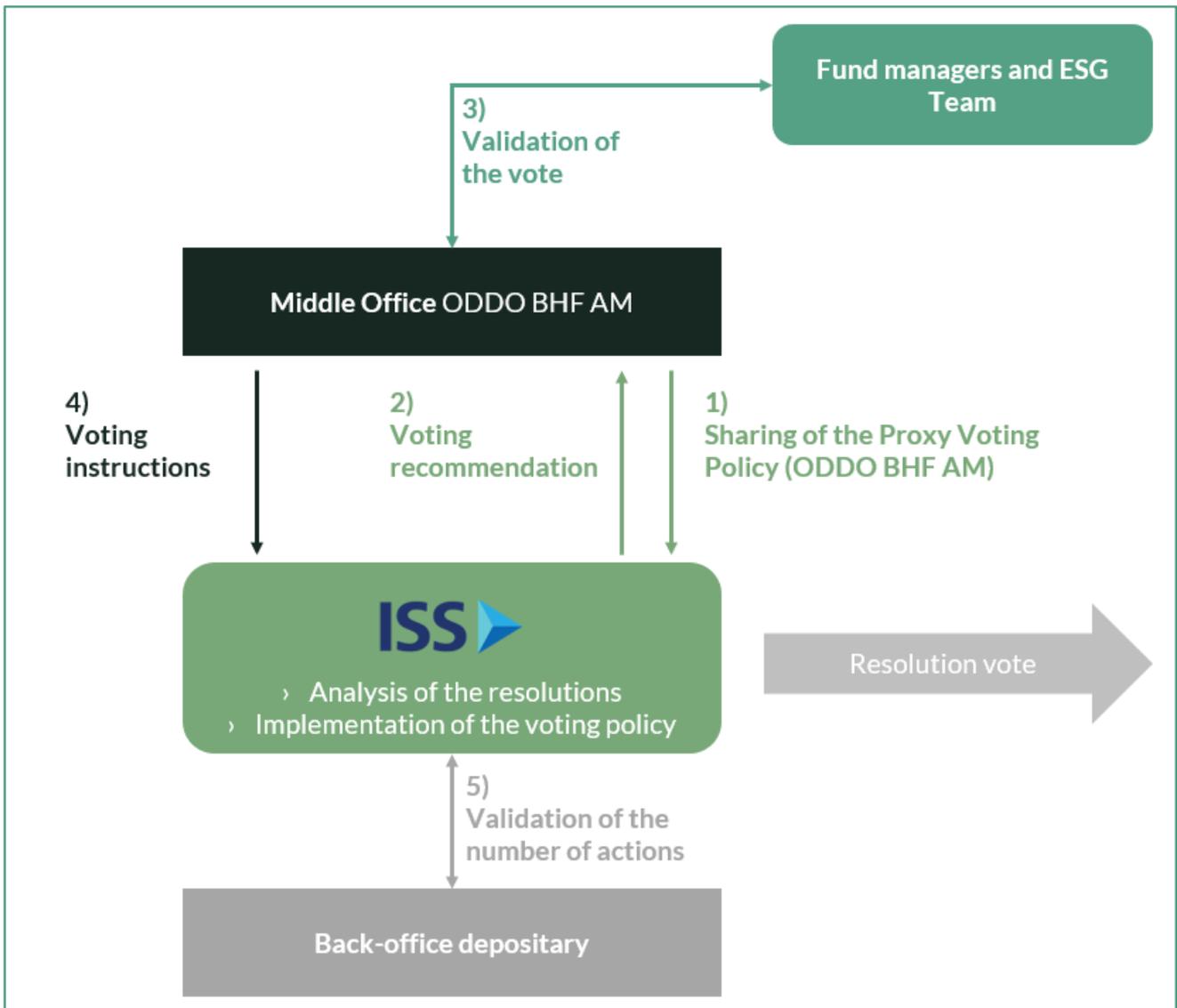
Our engagement process follows three steps starting with the identification of explicit areas of concern that we aim to address in collaboration with the investment management teams. After conducting an initial engagement meeting with a company and taking part in stakeholder dialogue, we closely track, monitor and assess any results achieved.

Our approach is deemed successful if a dialogue with a company leads to greater ESG transparency and/or an improvement in practices linked to sustainability. If an engagement outcome is deemed unsuccessful, our fund managers and ESG teams may establish an escalation process. The escalation process can lead to the initiation of a collaborative engagement effort with other investors, and/or to an opposing vote at the next Annual General Meeting of the company, and/or to assessing our exposure or ownership of the company.

The voting process

Exercising voting rights and other rights attached to shares is fundamental to ODDO BHF AM as an active shareholder. In 2021, we have established a new and harmonized voting approach and process across ODDO BHF AM. Since 2022, a new climate voting policy supported by ISS' analysis enables us to better form voting decisions with a clear view on an investee company's climate-related risks and opportunities (ISS Custom Climate Model).

For funds with a sustainable finance label, we vote at all General Meeting (AGM). For all others, we vote from a minimum 0.05% holding threshold of ownership of the companies' capital. With regards to the operations, the Middle Office department checks the different AGMs and our ownership percentage, in order to centralize and send the information to the fund managers for validation of the voting choice, and to the ESG department to provide a view on the votes related to extra-financial criteria.



Source: ODDO BHF Asset Management, 2024



05 *Climate change* AND BIODIVERSITY

The overriding objective of the Paris Agreements in 2015, supported by the COP21, is to keep “the increase in global average temperature well below 2°C above pre-industrial levels” and to continue efforts “to limit the increase in temperature to 1.5°C above pre-industrial levels” by 2100. The private sector, and the financial sector in particular, has a role to play in mitigating and adapting to climate change.

As a responsible investor, ODDO BHF AM estimates that climate and biodiversity risks disclosures and reporting have to be fully integrated in a sustainability-related investment strategy, also to meet regulatory requirements in the EU. This integration also allows our portfolio managers to invest more effectively by avoiding investment flows towards companies that fail to respect and protect biodiversity, and, consequently, threatening the fight against global warming and the ecological transition.



Climate RISK

Our climate strategy is based on the three pillars :

1. Decarbonize our open-ended funds
2. Evaluate companies' transition pathway
3. Promote climate solutions

Our in-house model integrates the recommendations of TCFD using CDP's recommendations to obtain a better understanding of climate-related risks. It implies the review of four climate risk dimensions including risk governance, evaluation of climate strategy, operational management of climate risk, and quantifiable objectives. On this basis, we review for each company key climate risk-related issues such as leadership on climate issues, the degree of awareness amongst leadership teams and boards of transition risks and physical risks, the use of the 1.5-2°C scenario in strategic planning, and whether the company has set absolute scientifically certified targets for greenhouse gas reductions.

1 -

DECARBONIZE OUR OPEN-ENDED FUNDS

As an asset management company, ODDO BHF Asset Management is concerned by the need to mitigate and adapt to climate change. For several years now, the Group has been implementing a climate strategy based, among other things, on an analysis of companies' transition risks and the carbon footprint of our portfolios. Indeed, all our open-ended funds art. 8-9 SFDR (excluding Private Assets funds due to the lack of reliable data) formally include a carbon intensity objective. Our portfolio managers take into account the impact of the carbon emissions of the issuers in their portfolios in order to achieve an aggregate carbon intensity lower than that of their benchmark index or investment universe.

We have set ourselves medium-term targets for coal phase-out:

- › Coal mining: exclusion of investments exposed to coal, up to 0% of revenues by 2030 for OECD countries and by 2040 for the rest of the world.
- › Power generation: any company where coal exceeds 15% of the production mix, or 15% of its installed capacity. These thresholds will be lowered to 10% in 2026, 5% in 2028 and 0% in 2030 for EU and OECD countries.
- › Development of new projects: exclusion of any company operating in mining or power generation and developing new thermal coal projects, whatever the size of the project.

In 2023 and 2024, we strengthened our strategy of alignment with the Paris Agreements by setting ourselves several short- and medium-term objectives.

Short-term targets (2024-2025)

- › Familiarize our portfolio manager/analysts with the various alignment indicators: implicit temperature, SBTi certification or trend monitoring of emissions;
- › Integrate alignment indicators into portfolio management tools and train management teams to use these data;
- › Engage with invested companies that have a very high temperature.

Medium-term targets (2024-2030)

- › Follow the intermediate alignment trajectory defined at 2.5°C for 2030, which as a first step concerns funds falling within the scope of Article 29. This target will be reviewed and adjusted every five years to reach 2°C or less by 2050. Some funds are already on a trajectory below 2.5°C (see section 1.3.2), which could lead us to revise their targets during the annual review of our report;
- › Improve carbon emissions reporting of scope 1 and 2, especially scope 3;
- › Phase out investment in coal mining by 2030 for OECD countries.

2 -

EVALUATE COMPANIES' TRANSITION PATHWAY

Since 2017 and as part of the ambition to reach the goals of the Paris Agreement, ODDO BHF Asset Management developed a proprietary Climate Transition Score to assess the progress of each company regarding the global climate situation. As described in section "ESG Research and Ratings Methodology", our Climate Transition model part of our internal ESG model appraises the quality and ambition of carbon emission reduction targets, determines investments needs toward low-carbon technologies, and estimates regulatory and physical potential risks.

These scores are used by our investment teams to identify leaders and laggards within a sector in the transition to a low carbon economy. For the time being, they only cover our European universe.

3 -

PROMOTE CLIMATE SOLUTIONS

We aim to innovate within our fund range to provide our clients low carbon opportunities. We launched several strategies at the forefront of the climate transition such as:

- › ODDO BHF Green Planet (article 9 SFDR): This equity fund uses artificial intelligence and quantitative analysis to invest in listed equities worldwide exposed to the theme of the ecological transition via a selection of associated sub-themes: clean energy, energy efficiency, sustainable mobility, and the preservation of natural resources.
- › ODDO BHF Green Bond (article 9 SFDR): This fixed income fund invests in green bonds from international issuers, as well as sustainability bonds. One of the objective of this fund is to make a positive contribution to climate and environmental protection by financing projects with measurable environmental, climate and social benefits.
- › ODDO BHF Artificial Intelligence (article 9 SFDR): This global equity fund uses artificial intelligence and quantitative analysis to invest in listed equities exposed to the theme of artificial intelligence while at the same time following a decarbonization trajectory to be carbon neutral by 2050 or earlier.

It is interesting to mention that we have implemented several mandates at the request of our clients, including decarbonization trajectories.



Biodiversity RISK

Biological diversity is key to ensure the preservation of ecosystem services that are essential for our human well-being, development, and economic growth. Biodiversity loss represents a systemic risk to investors across many sectors as well as a threat for the achievement of the UN Sustainable Development Goals.

In 2022, we reviewed the three pillars of our sustainability strategy to improve the integration of biodiversity and better align with the Convention on Biological Diversity. As for our general sustainability strategy, we adopted a risk-based approach through a double materiality angle.



1 - EXCLUSIONS

We drew up two exclusion lists specific to biodiversity:

1. The first is based on non-sustainable environmental practices in the palm oil sector including companies that generate more than 5% of their revenues from various activities in the palm oil industry and that violate sustainability principles as defined by certification bodies (e.g. Roundtable on Sustainable Palm Oil (RSPO));
2. The second is focused on highly environmentally controversial companies with high negative impacts on biodiversity.

The Exclusion Policy includes other activities, which may negatively impact biodiversity such as coal related ones.

2 - INTEGRATION & TRANSITION

We updated our internal ESG model for corporates in September 2022 and to better define how we address and integrate biodiversity risks and opportunities.



DOUBLE MATERIALITY APPROACH



Direct effects

› Biodiversity footprint (BIA-GBS)	(1)	› Natural capital risk	(1)
› Use of resources	(2)	› Waste & pollution risk	(1)
› Waste management & pollution	(2)		

Indirect effects

› Climate change	(7)	› Climate risk	(3)
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(): number of criteria to score in our internal ESG model for corporates

3 -

DIALOGUE & ACTIVE OWNERSHIP

We structure our active ownership approach in three ways: dialogue with companies, individual or collaborative engagement, exercise of voting rights.

On the first axis, we address biodiversity through different themes as in our internal ESG model. In 2022, we conducted a review of the sector materiality matrices, which resulted in having biodiversity flagged for 18 sectors and sub-sectors. Since then, we have addressed biodiversity in our discussions with the companies we met that are exposed to high risks in these sectors.

Regarding individual initiatives, we target companies with very high negative impact on biodiversity such as for example chemical companies distributing harmful products to wildlife. Different examples can be found in our Shareholder Engagement Report.

ODDO BHF Asset Management SAS decided to be more active in the field of biodiversity following the rise of European and global initiatives involving a broad range of financial actors. In 2021, we became a signatory to the Finance for Biodiversity Pledge and a member of the Foundation Finance for Biodiversity. The objective is to protect and restore biodiversity through finance and investment activities. It implies different actions by 2024 at the latest.

4 -

TOOLS

ODDO BHF Asset Management uses the Biodiversity Impact Analytics database developed by CDC Biodiversité and Carbon4 Finance for our listed assets. The model is built on a regression using Exiobase and the GLOBIO3 model providing companies' biodiversity footprint in one aggregated metric in MSA (Mean Species Abundance). BIA-GBS data can be used to identify the main pressures and impacts on biodiversity to be reduced.

For the time being, we are taking a cautious approach, as we still identify some limitations to the methodology. Firstly, the marine realm is not covered yet, and it is challenging to predict the impact on aggregate scores once it will be available. Although considering that the terrestrial and aquatic impacts are strongly correlated to the size of their respective ecosystems, we could expect an important change in the aggregate scores. Secondly, regarding the coverage, even if the database is progressively expanding, it may not be representative for some portfolios such as for the ones focused on small and medium capitalizations. That is why we have defined an action plan described in the previous section to gradually tend to a trajectory on biodiversity.

We are a member of the Nature Action 100 working group, which have set up collaborative engagements with a number of high-stake biodiversity companies. We also follow up on those initiatives that are the most structural in nature in building a joint methodological framework and tools to measure and monitor biodiversity indicators. For example, we support the work of the Taskforce on Nature-related Financial Disclosures (TNFD), which is developing an overarching framework for disclosing biodiversity risks. We continue to review our engagement in initiatives and join new ones as and when appropriate.



06

Reporting and TRANSPARENCY

Summary of ODDO BHF AM's Documents published related to sustainability topics.

Documents	Scope	Description
Annual PRI report	ODDO BHF AM	The Responsible Investment Transparency Report enables signatory transparency on RI activities and facilitate dialogue between investors and their clients, beneficiaries, and other stakeholders
Appendix SFDR pre-contractual disclosures	Fund	Pre-contractual information for products art. 8-9 SFDR on sustainable investments (EU taxonomy aligned, non-EU taxonomy aligned, environmental or social characteristics), no significant harm or addressing principle adverse impacts (PAI).
Article 29 of the Law N°2019-1147 (Energy-Climate Law – known as “LEC”)	ODDO BHF AM SAS	Definition of the information obligations of institutional investors concerning their transparency in relation to the integration of environmental, social, and governance (ESG) criteria in their investment operations.
Exclusion Policy	ODDO BHF AM	Investment rules covering a range of controversial activities across sectors and practices that are contrary to major international norms and conventions.
Prospectus	Fund	The purpose of the prospectus is to provide full, true and plain disclosure of all material facts about the securities being issued so that the investor can make informed investment decisions. The prospectus must disclose all matters that could affect the value or market price of the security being offered.
Shareholder engagement policy	ODDO BHF AM	Definition of our approach in terms of dialogue with companies held in our portfolios, the exercise of voting rights and other rights attached to shares, our voting policy principles, the cooperation with other shareholders, the communication with stakeholders, and the prevention and management of actual or potential conflicts of interest.

Documents	Scope	Description
Shareholder engagement report	ODDO BHF AM	Report on dialogues, engagements, and voting annual statistics.
Sustainable Finance Disclosure Regulation (SFDR)	ODDO BHF AM	Regulatory documents required by the EU regulation (SFDR classification, SFDR sustainability risk policy (art. 3), transparency of adverse sustainability impacts (art. 4)).
SFDR Website product disclosure	Fund	Document based on art. 10 SFDR summarizing ESG profile of funds art. 8-9 SFDR, commitments to sustainable investments, etc.
Sustainability Report	Fund	Monthly fund's report for which we integrate ESG criteria into their investment process to summarize all ESG aspects considered.
Transparency Codes	Fund	Regulatory document required for each fund applying for the French SRI label and the French Greenfin label to have a complete review of the sustainable strategy of the asset manager and of the fund. At ODDO BHF AM, we decided for homogeneity reasons to prepare a transparency code for each fund applying for any labels.

Source: ODDO BHF Asset Management, 2024

- All documents with a scope of "ODDO BHF AM" or "ODDO BHF AM SAS" can be found on our Sustainable Investment webpage: https://am.oddo-bhf.com/france/en/professional_investor/ad/sustainability/1339/publication/1380
- The Shareholder & Engagement Policies and Reports can be found on our Regulatory Information webpage: https://am.oddo-bhf.com/france/en/professional_investor/infos_reglementaire
- All documents with a scope of "Fund" can be found on our Funds webpage by selecting the desired fund: https://am.oddo-bhf.com/france/en/professional_investor/fundspage





Good Governance POLICY

Drawing on our long-standing expertise in corporate governance research, we have defined a policy for good governance practices of companies we invest in. It is our conviction that a poor governance poses a major risk to the proper execution of the strategy of the company, which represents a potential source of value destruction over the medium to long-term.

The following principles, ensuring an appropriate governance, need be pursued by each company. It allows to strengthen companies' value and guarantee a better alignment with shareholders' interests.

Basic Governance PRINCIPLES

At ODDO BHF Asset Management, we expect from the investee companies to show the subsequent characteristics:

RESPONSABILITY

Companies act in a manner that demonstrates their responsibility for their actions and their impact on employees, stakeholders, and broader communities. It verifies whether the duties are being fulfilled properly and whether the responsibilities have been used appropriately. We strongly believe that responsibility is key to achieve constant progress enacting positive change.

FAIRNESS

Companies give the right to employees, stakeholders including shareholders, and broader communities to benefit from an equal treatment so that they can express and address any issue that need to be considered by governance bodies, but also because it creates an inclusive environment where everyone is estimated at its fair value. Thus, it reduces the risk of various adverse and potential conflicts of interest that may arise.

TRACEABILITY AND TRANSPARENT DISCLOSURE

Companies exhibit strong commitment to provide clear, factual information, and disclosure of material matters. Beyond being compliant with the regulation, it safeguards stakeholders' confidence in the decision-making and management of a company, an essential part to finance further growth.

OPENNESS TO DIALOGUE AND IMPROVEMENT

Companies are inclined to leave the door open to exchange and to question their practices. Receiving external feedbacks can help them correct their missteps and avoid pitfalls while at the same time create an internal dynamic to take up challenges.

Good governance

ASSESSMENT

In our investment decision process, we put the accent on governance as we estimate this criterion to be an imperative to ensure strong financial fundamentals. The following key performance indicators are retained in our analyses:

SUSTAINABLE DEVELOPMENT STRATEGY

A good indicator for the degree of alignment of companies' strategies with sustainable aspects is their positioning regarding the UN Global Compact. By committing to the ten principles on human rights, labor, environment, and anti-corruption, the company sends a positive signal of strong ambitions towards a long-term oriented financial ecosystem.

We also verify if companies have implemented a policy on sustainability or have defined related objectives. If it is the case, we further analyze the means put in place to achieve them, where the responsibility is held and if there is an alignment with the remuneration of the top management.

QUALITY OF MANAGEMENT

The quality of management is essential to ensure business efficiency allowing constant improvements. The higher the quality, the more integrity and reliability the company has in achieving its objectives. To determine the quality of management, the different layers of the governance structure are analyzed including the profile, reliability, vision of the CEO, as well as the composition and functioning of the executive committee. We aim to better understand the organization and ascertain the degree of cognitive diversity of the management, which fosters creativity and innovation, while evaluating the way it handles challenging situations and controversies.

CORPORATE GOVERNANCE

As a starting point for appraising the corporate governance, we look into the ownership structure as it gives indications on the alignment of shareholders' interests with the ones of the company and analyze the voting rights to understand the power given to them to cast their vote on important decisions within a company.

We emphasize the independence within the various management bodies and committees to avoid conflict of interests and to ensure a more objective and successful execution of the strategy. In order to have a better picture of this strategy, top management accessibility is essential so that we can enter in a dialogue and tackle issues that may arise.

The structure of remuneration is also studied to verify its consistency, which is part of companies' fairness. The wage ratio gives a first insight of the distribution of wages but needs to be cautiously interpreted taking into account other factors such as companies' size, geographical presence, sector of activity, etc. In our view, employees and executive members need to be compensated appropriately according to their performance, experience, and job requirements.

The level of transparency is therefore decisive as it allows external stakeholders to access to a greater level of details in order to judge the quality of the corporate governance.



BUSINESS ETHICS

Investee companies should act responsibly having good business ethics, which include an analysis of their track record of incidents, their safeguards, controlling bodies, and corrective measures. The following themes are considered in this analysis: anticompetitive practices management, fraud management, tax transparency, or exposure to the risk of corruption. It is expected that companies have taken a position on these issues and propose clear and verified solutions to reduce these risks.

The ESG research team works closely with fund management teams and/or analysts to assess the governance structure of assessed companies. This approach makes it possible to capitalize on the regular meetings that are held between fund managers and issuers.

It is therefore a bottom-up approach involving the ESG experts, the fund management team and the external providers that supply the quantitative data, giving us a holistic overview of each company, where governance needs to be positively assessed.

The following external sources of data are used for the internal analyses:

- Company publications (reports, presentations)
- External providers of ESG research (MSCI ESG Research², CDP³, Carbon4Finance⁴, SESAMm⁵ and Refinitiv⁶)
- External providers of raw financial and non-financial data (Bloomberg, FactSet)
- Specialist reports by brokers (theme-based research)
- Other sources (NGOs reports, academic publications)

Updates are carried out whenever the fund managers and ESG analysts meet the company in question.

Controversies are central to our ESG analysis model. The occurrence of a “High” or “Serious” controversy regarding a portfolio company will not systematically result in an exclusion of the company, but it will trigger active dialogue between the fund management team, the ESG research team and the company in question. Controversies are reviewed during our monthly ESG Investment Forum.

² MSCI <https://www.msci.com/>

³ Carbon Disclosure Project, www.cdp.net.

⁴ Carbon4Finance, www.carbon4finance.com

⁵ SESAMm, www.sesamm.com

⁶ Refinitiv, www.lseg.com/en/data-analytics.com





Glossary

Active OWNERSHIP

CONCEPT

Active ownership

Defined as the use of the rights and position of ownership to influence the activities or behavior of investee companies. The two tools to achieve that objective are voting (for listed equities) and engagement. Voting refers to the exercise of voting rights on management and/or shareholder resolutions to explicitly express its position at the Annual General Meeting (AGM) of investee companies. Engagement can be pursued individually or collaboratively. Individual engagement aims to maintain a regular dialogue with the investee companies on sustainable topics and monitor their progress to improve their practices and transparency in this area. Collaborative engagement includes groups of investors working together, with or without the involvement of a formal investor network or other membership organizations, to exercise more pressure on sustainability-related issues within corporations.

DATA PROVIDER

ISS

A voting proxy provider that enables to manage the entire voting process.

Climate TRANSITION

COLLABORATIVE INITIATIVES

CDP

Not-for-profit charity operating a global environmental disclosure system for investors, companies, cities, state & regions.

Climate Action 100+

Investor-led initiative targeting 171 companies accounting for 80% of corporate industrial GHG emissions; the goal of the initiative is to coordinate engagement efforts among investors to ensure that the targeted companies amend their strategies to align with a 1.5° pathway.

Taskforce for Climate-Related Financial Disclosure (TCFD)

The Taskforce on Climate-related Financial Disclosures aims at providing companies & investors with a harmonized and comprehensive framework for their reporting on climate risks.

INTERNATIONAL CONVENTIONS

1,5-2°C trajectory

The IPCC scientists estimate that global warming exceeding +1.5°C of the Earth's average temperature by 2100 (compared to preindustrial levels) would trigger deadly heatwaves, a surge in the frequency and strength of natural disasters, an explosion of poverty and irreversible damages to ecosystems. According to the IPCC it is necessary to cut global fossil fuel emission in half by 2030 in order to avoid this turning point.

Paris Agreement / COP21

The Paris Agreement (2015) is a declaration of intent adopted by almost all countries, which committed to regularly submit GHG emission reduction targets in order to limit global warming well below 2°C compared to pre-industrial levels.

Ecological TRANSITION

COLLABORATIVE INITIATIVES

Finance for Biodiversity Foundation

The foundation is comprised of signatories of the Finance for Biodiversity Pledge and seeks to coordinate engagement efforts on biodiversity, help build a framework for biodiversity-financial disclosure and increase cooperation and transparency on the topic.

Finance for Biodiversity Pledge

Launched in September 2020, the pledge has been signed so far by 140 financial institutions calling on global leaders to restore & protect biodiversity and committing to increase engagement with companies and reporting efforts on the topic.

Taskforce for Nature-Related Financial Disclosures (TNFD)

The Taskforce on Nature-related Financial Disclosure, launched in 2021, aims at providing companies & investors with a harmonized and comprehensive framework for their reporting on biodiversity-related risks (// TCFD on climate).

LABELS

FNG label

German sustainability label (exclusions on environmental & ethics grounds). <https://fng-siegel.org/>

ISR label

French sustainability label (focus on transparency and exclusion of 20% of investment universe). www.llelabelisr.fr/

« Towards Sustainability » label (Febelfin)

Belgian sustainability label (exclusions on environmental & ethics grounds). <https://towardssustainability.be/>

Sustainability APPROACHES

CONCEPTS

Exclusion

This approach is to exclude an issuer based on the results of the internal ESG analysis and/or the exclusion policy of the management company.

Exclusions

CONCEPTS

Conventional oil & gas

Crude oil and gas that are obtained through traditional methods, i.e., vertical well extraction.

Conventional weapons

Weapons of war that comply with international conventions governing warfare.

GMOs

Organisms (animal, plant, fungus, microorganism) whose genetic material has been modified in a way that does not occur naturally, to give it one or more desired characteristics.

Unconventional oil & gas

Crude oil and gas that are obtained through methods other than traditional vertical well extraction including shale oil and gas, oil sands, directional drilling, and fracking.

Unconventional weapons

Specific weapons that can cause widespread destruction, which have been defined by international conventions such as the Convention ratified in Paris in 1993, the Ottawa Treaty in 1999, the 2008 Oslo Convention.

INTERNATIONAL CONVENTION

UN Global Compact (UNGC)

The United Nations Global Compact is a United Nations initiative to encourage businesses worldwide to adopt sustainable and socially responsible policies, and to report on their implementation. The UN Global Compact is a principle-based framework for businesses, stating ten principles in the areas of human rights, labor, the environment and anti-corruption. The initiative brings the 13000 corporate participants and other stakeholders over 170 countries with two objectives: "Mainstream the ten principles in business activities around the world" and "Catalyze actions in support of broader UN goals, such as the Sustainable Development Goals (SDGs)".

Sustainable Development Goals (SDGs)

The United Nations Sustainable Development Goals are a collection of 17 interrelated global goals set out by the United Nations. The SDGs cover a broad range of social development issues, such as poverty, hunger, health, education, climate change, gender equality, water, sanitation, energy, environment, and social justice. On 25 September 2015, the 193 countries of the United Nations General Assembly adopted the 2030 Development Agenda titled "Transforming our world: the 2030 Agenda for Sustainable Development".

Just TRANSITION

CONCEPT

Just transition

The concept of "just transition" aims at ensuring that the transition to a low carbon/climate neutral economy take place in a socially acceptable way, by providing assistance and funding to vulnerable populations.

COLLABORATIVE INITIATIVES

F4T Just Transition Coalition

Launched in June 2021, the Just Transition Coalition is the first global investor engagement coalition on the just transition.

Finance for Tomorrow (F4T)

Sustainable arm of Paris Euro place, F4T seeks to establish the Parisian marketplace as a leader of sustainable finance by strengthening public-private synergies.

World Benchmarking Alliance

The alliance provides policymakers, investors and companies with benchmarks and indicators assessing corporate performance on the SDGs.

Regulatory FRAMEWORK

REPORTING REQUIREMENTS

SFDR regulation

Entering into force on March 10, 2021, Regulation 2019/2088 on "Sustainability Disclosure in the Financial Services Sector" (also called the "Disclosure" or "SFDR") aims to provide more transparency in terms of environmental and social responsibility within the financial markets through the publication of sustainability information on financial products (integration of sustainability risks and negative impacts). Its objectives are to ensure an alignment between commercial documents and the reality of practices, to ensure the comparability of products and to lead private investments towards more sustainable investments. This regulation is applied at the entity level (management companies, investment companies, financial advisors), and at the product level by classifying all products based on their features.

Art. 6 Fund

SFDR classification: The management team does not consider sustainability risks or adverse effects of investment decisions on sustainability factors in the investment decision making process.

Art. 8 Fund

SFDR classification: The management team addresses sustainability risks by integrating ESG criteria (Environment and/or Social and/or Governance) into its investment decision making process.

Art. 9 Fund

SFDR classification: The management team follows a strict sustainable investment objective that significantly contributes to the challenges of the ecological transition, and addresses Sustainability Risks through ratings provided by the Management Company's external ESG data provider.

TRANSLATION OF EU REGULATION & CLIMATE NEUTRALITY IMPERATIVES IN STATE LAWS

Art. 29

Part of the French "Energie-Climat" law adopted in May 2021, it is the translation of the EU regulation on reporting requirements regarding ESG & climate risks for institutional investors (incl. Asset managers), while also integrating a few criteria on biodiversity.

Loi Climat & Résilience

French law adopted in July 2021 with a focus on renewable energy, energy efficiency, sustainable transportation, sustainable food production & healthy

ODDO BHF ASSET MANAGEMENT SAS (FRANCE)

Portfolio management company approved by the Autorité des Marchés Financiers sous le n° d'agrément GP 99011.
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