



**ODDO BHF**  
ASSET MANAGEMENT

Responsible Investor Report  
*ARTICLE 29 OF LAW N°2019-1147 (EN-  
ERGY-CLIMATE LAW – KNOWN AS  
“LEC”)*

ODDO BHF ASSET MANAGEMENT SAS

**JUNE 2026**

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The present report (“LEC29” hereinafter) was established within the framework of the Article 29 of the Energy Climate Law (Decree No. 2021-663 of May 27, 2021). ODDO BHF Asset Management SAS presents the procedures to consider, in its investment strategies, the environmental, social and governance (ESG) criteria and the means implemented to contribute to the transition. This report meets the disclosure obligations arising from Article 29 for the entity and funds. The Statement on principal adverse impacts of investment decisions referred to in art. 4 of the Sustainable Finance Disclosures Regulation (SFDR) is published separately on our website. This report covers both our listed and private assets. For the first time, our LEC29 report aligns with the recommendations of the Taskforce on Climate-related Financial Disclosures (TCFD) and the Taskforce on Nature-related Financial Disclosures (TNFD).

All informational documents and general policies may be viewed on our web page devoted to sustainable investing<sup>1</sup>.

The shareholder engagement policy and reports may be viewed on our web page detailing regulatory information<sup>2</sup>.

All documents pertaining to funds may be viewed on our web page dedicated to our funds, after the desired fund has been selected<sup>3</sup>.

Correspondence table between the LEC29 report and the recommendations of the TCFD and TNFD:

TCFD / TNFD pillar	Correspondence in the LEC 29 report
<b>Governance</b>	3) Consideration of ESG criteria at the entity's governance level.
	6) Strategy of alignment with the international objectives of limiting global warming.
<b>Strategy</b>	7) Strategy of alignment with long-term biodiversity objectives.
	8) Consideration of ESG criteria in risk management.
<b>Risk management</b>	8) Consideration of ESG criteria in risk management.
	6) Strategy of alignment with the international objectives of limiting global warming.
<b>Metrics and targets</b>	7) Strategy of alignment with long-term biodiversity objectives.
	8) Consideration of ESG criteria in risk management.

<sup>1</sup> <https://am.oddo-bhf.com/fr-en/non-professional-investor/sustainability-publications/>

<sup>2</sup> <https://am.oddo-bhf.com/fr-en/non-professional-investor/regulatory-information/>

<sup>3</sup> Except professional and dedicated funds <https://am.oddo-bhf.com/fr-en/non-professional-investor/funds/>

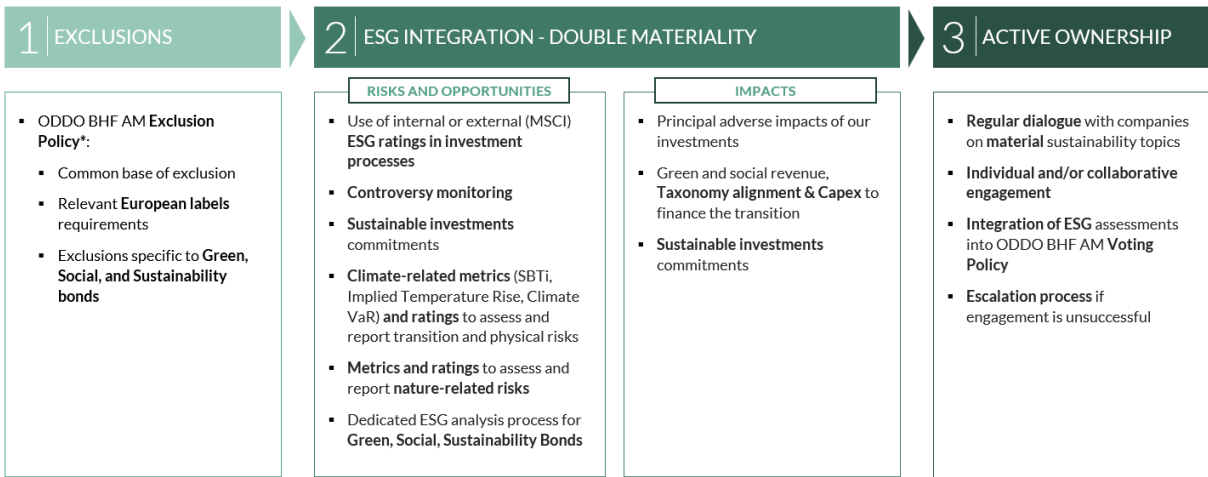
# 1° General approach of the entity

## 1. Entity's general approach to the consideration of environmental social and governance (ESG) criteria

### Listed assets

Our ESG approach is based on three pillars: exclusions, ESG integration, and active ownership. This approach aims to better manage our exposure to sectors and issuers presenting sustainability risks or significant negative impacts, while promoting investments in companies that offer sustainable solutions, both environmentally and socially.

### The three fundamental pillars of our ESG approach for our listed assets



Source: ODDO BHF Asset Management, 2026



## Scope of application of ODDO BHF Asset Management's ESG policies and processes for listed assets

		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	✔	✔	~	~
	ESG integration	✘	✔	✘	✔
Active ownership	Dialogue	~	✔	~	✔
	Individual engagement	✘	✔	✘	✔
	Collaborative engagement	~	✔	~	✔
	Voting <i>Minimum threshold</i>	✔	✔	~	~

✔ Yes    ~ Partially    ✘ No

Source: ODDO BHF Asset Management, 2026

### 1.1 Exclusion policy

Our Exclusion Policy details our **common base of exclusions**. These are the exclusions that apply to a majority of ODDO BHF Asset Management's open-ended funds, according to the scope specified in the policy, regardless of their SFDR classification.

The Exclusion Policy also states the exclusions that investment funds must comply with under the various European sustainable finance labels' requirements.

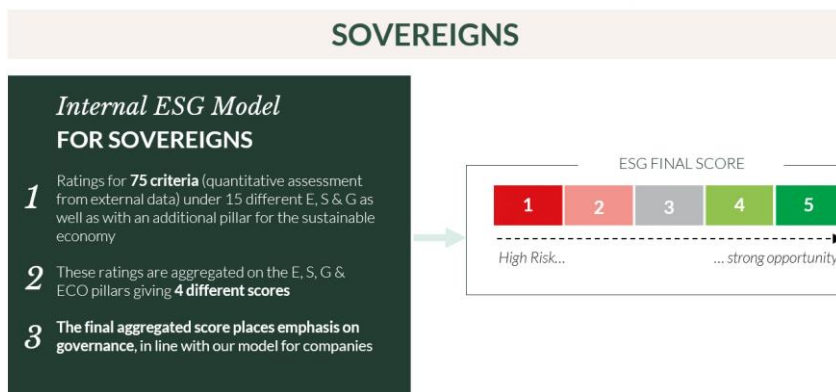
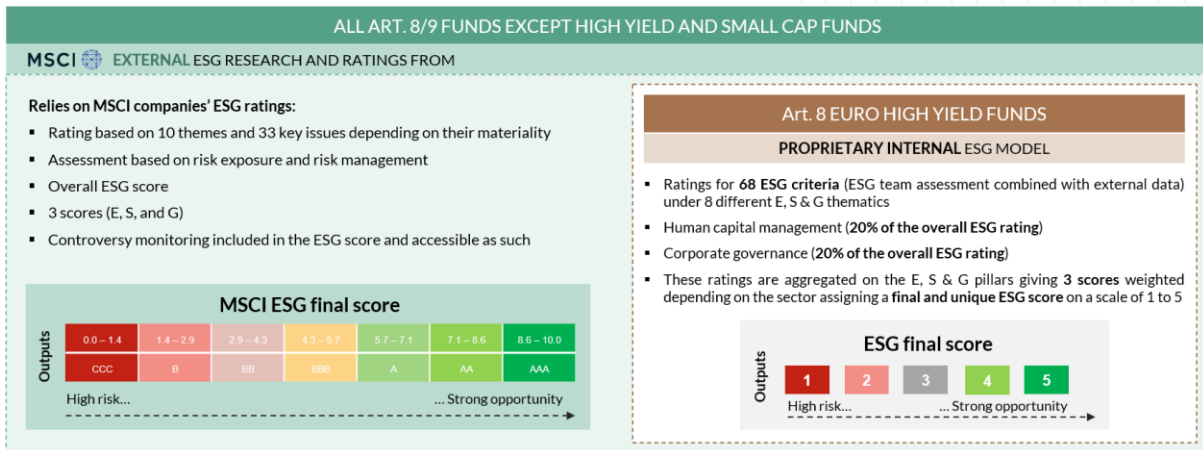
For further information, our Exclusion Policy is available on our website<sup>4</sup>.

### 1.2 ESG integration

We developed several years ago our own in-house ESG rating model for corporates and sovereign issuers. These internal ESG ratings are now applied to our European high-yield bond investment strategies. For the rest of our listed asset investment strategies, we rely on MSCI's ESG ratings.

<sup>4</sup><https://am.oddo-bhf.com/fr-en/non-professional-investor/sustainability-publications/>

## Sustainability analysis processes for listed assets

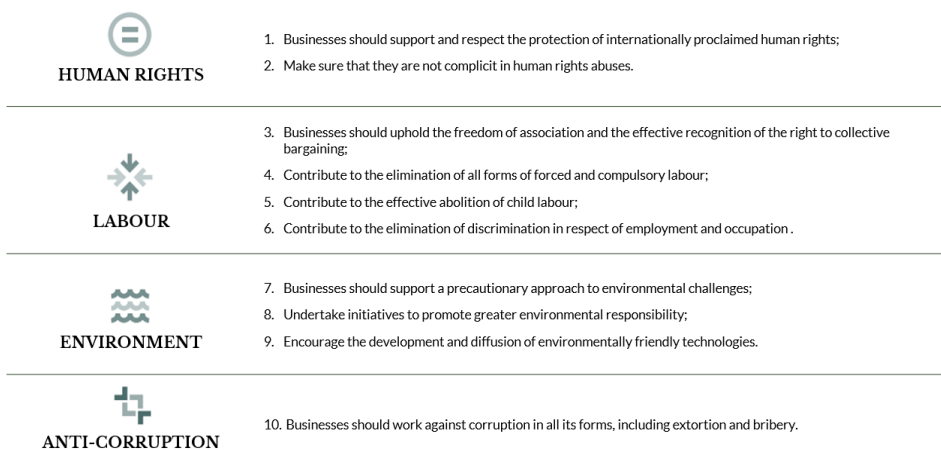


Source: ODDO BHF Asset Management, 2026

### 1.2.1 Our internal ESG model for companies

Our scoring model developed in-house by ODDO BHF Asset Management SAS is based on the United Nations Global Compact, of which ODDO BHF has been a signatory since 2015. The Global Compact is based on 10 principles dealing with human rights, labor rights, the environment, and the fight against corruption, and is based on major international norms and conventions.

### The 10 principles of the UN Global Compact



Source: United Nation



Our ESG model for companies is structured around 8 themes: two environmental, three social and three governance themes. The model encompasses some of the Principal Adverse Sustainability Impacts (PAI) as described in our statement on principal adverse impacts of investment decisions on sustainability factors<sup>5</sup>.

### 8 themes of the ESG research and rating model for listed companies linked to sustainable development goals



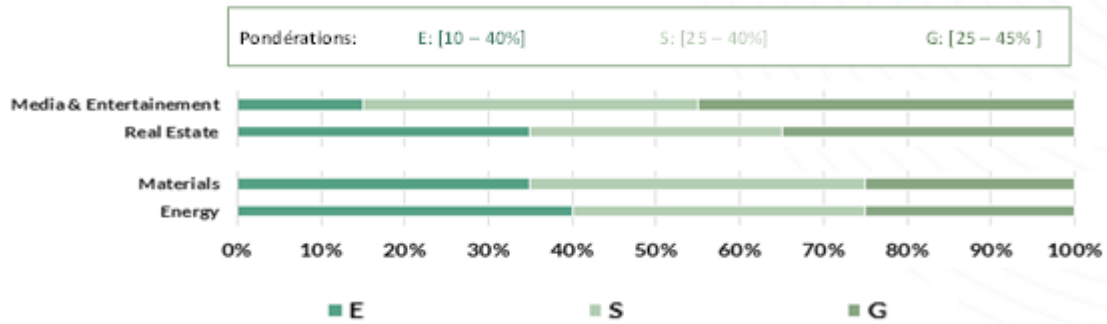
Source: ODDO BHF Asset Management, 2026

For each of the 8 themes, we define different categories for which we use a range of indicators to quantitatively and qualitatively assess companies' ESG profile. The model is built based on a double materiality approach for each of the three pillars: it means that we analyze the external risks that weigh on the company as well as the impacts that the company might have on society and the environment.

<sup>5</sup> <https://am.oddo-bhf.com/fr-en/non-professional-investor/regulatory-information/>

The weighting assigned to each of the “Environmental”, “Social” and “Governance” pillars is determined at the sectoral level according to long-term risks and opportunities. In practical terms, we use a grid that allows us to grasp each economic sector’s degree of exposure to sustainable development challenges.

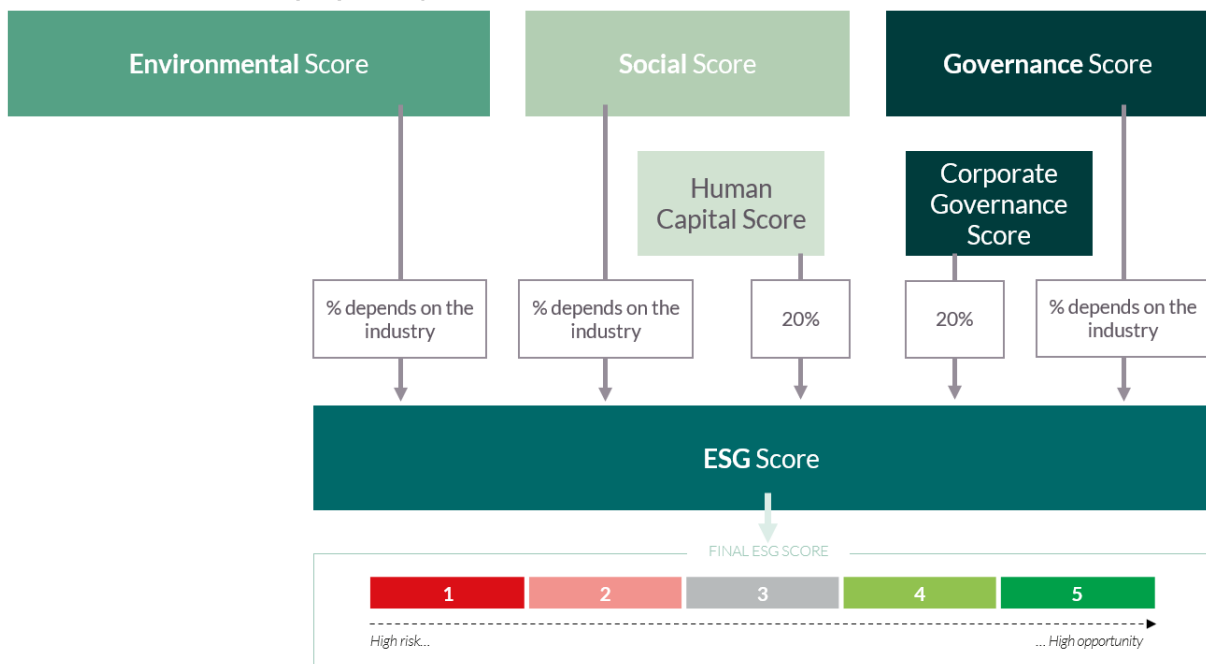
**Examples of pillar weighting by sector**



Source: ODDO BHF Asset Management, 2026

Each company that is analyzed obtains an absolute score out of 100 points for each of the three modules - E, S and G -, as well as two sub-scores for human capital management and corporate governance. An aggregate ESG score is calculated once each module has been weighted combined with the scores for human capital management and corporate governance accounting each for 20% of the overall ESG score. The scores allow us to classify companies on a scale of five levels: Strong Opportunity (5), Opportunity (4), Neutral (3), Moderate Risk (2) and High Risk (1). ESG scores are reviewed mainly for the following reasons: severe controversies, dialogue and/or engagement with the company, and deterioration of the ESG quality.

**Scores derived from our proprietary model for listed assets**



Source: ODDO BHF Asset Management, 2026



The ESG team has also implemented a monitoring system on controversies to support the ESG analysis of issuers. We rely on alerts and data feeds provided by our external provider, MSCI ESG Research. This monitoring system continuously reviews the holdings of Article 8 and 9 SFDR funds and flags companies involved in ESG controversies. The investment universe is updated quarterly.

A score of 1/10 (equivalent to an orange flag) based on MSCI's methodology automatically triggers a due diligence process conducted by the ESG research team to assess the materiality of the controversy. Less severe controversies (yellow flag or below) are communicated to us but do not require immediate action unless they worsen or are linked to a fund's ESG constraints.

Depending on the severity of the controversy in terms of frequency and level of risk, a structured escalation process is implemented. This process applies only to severe or very severe controversies. For moderate and minor controversies, we monitor the situation, and no immediate action is required unless their status deteriorates.

Severity	Frequency	Risk assessment by the ESG Research team <sup>1</sup>	Escalation
Severe	Repeated	High	Initiation of a dialogue or individual engagement if needed
Very severe	Isolated	High	Initiation of a dialogue or individual engagement if needed
Very severe	Repeated	Very high	Engagement (individual or collaborative), placement under watchlist
Very severe	Persistent (no improvement or worsening)	Very high	Further escalation (e.g. voting sanctions, reduction of position, or even exclusion)

<sup>1</sup> Risk levels: low, moderate, high, very high

### 1.2.2 MSCI model

The MSCI ESG Research tool assesses companies' exposure to and management of material environmental, social, and governance risks and opportunities. The ESG Ratings range from leader (AAA, AA), average (A, BBB, BB) to laggard (B, CCC). MSCI ESG Ratings model identifies the ESG risks (key issues) that are most material to a GICS® sub-industry or sector.

### Hierarchy of MSCI Research's ESG rating model

ESG (IVA) Rating									
Environmental Pillar				Social Pillar				Governance Pillar	
Climate change	Natural Capital	Pollution & Waste	Env. Opportunities	Human Capital	Product liability	Stakeholder Opposition	Social Opportunities	Corporate Governance	Corporate Behavior
Carbon emissions	Water stress	Toxic emissions & waste	Clean tech	Labor mgt	Product safety & quality	Controversial sourcing	Access to finance	Ownership	Business ethics
Product carbon footprint	Biodiversity & land use	Packaging material & waste	Green building	Health & safety	Chemical safety	Community relations	Access to health care	Board	Tax transparency
Financing env. impact	Raw material sourcing	Electronic waste	Renewable energy	Human capital development	Consumer financial protection		Opport. in nutrition & health	Pay	
Climate change vulnerability				Supply chain labor standards	Privacy & data security			Accounting	
					Responsible investment				

Source: MSCI ESG Key Issues

The MSCI ESG Ratings model measures:

- Risk exposure
- Risk management

Each of these two criteria are measured and then expressed in the form of scores, which are then combined, such that a higher level of exposure requires demonstrating higher management skills to obtain the same final Key Issue Score. Key Issue Scores are expressed on a scale of 0 to 10, where 0 means “very poor” and 10 means “very good”. More information on the methodology used by MSCI ESG Research is available on their website<sup>6</sup>.

#### 1.2.3 Our internal ESG model for sovereigns

Our internal ESG model for sovereigns is based on four pillars divided into 15 themes. 75 indicators are assessed, some of which are specific to certain countries based on their income levels, as high- or medium-income countries do not face the same challenges. It uses multiple reference sources<sup>7</sup>.

Sixty-five countries, plus the European Union, are assessed with this model. Each country receives a score ranging from 1 (= "high risk") to 5 (= "low risk"), as in our internal ESG model for companies.

<sup>6</sup> MSCI (2026) <https://www.msci.com/data-and-analytics/sustainability-solutions/esg-ratings>

<sup>7</sup> Amnesty International, Bündnis Entwicklung Hilft, Climate Watch, Convention on Biological Diversity, COP 21, COP 26, Financial Action Task Force, Food and Agriculture Organization, Freedomhouse, Garriga, International Energy Agency, International Labor Organization, International Monetary Fund, International Telecommunication Union, OECD, Population Reference Bureau, Programme for International Student Assessment, Transparency International, UNESCO, UNICEF, United Nations, Vision of Humanity, WHO, World Bank, World Intellectual Property Organization



## The 15 themes of our ESG research and rating model for sovereigns linked to the SDGs



Source: ODDO BHF Asset Management, 2026

### 1.3 Our active ownership approach

Please refer to the “Active Ownership” section below.

#### Private assets

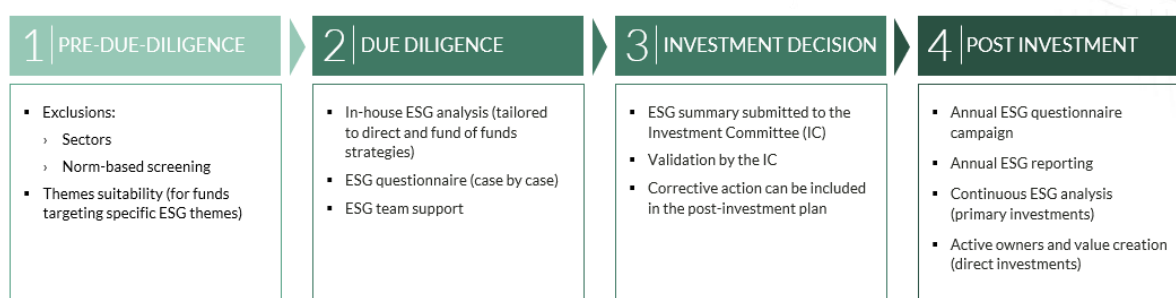
The Private Assets teams<sup>8</sup> acknowledge that identifying ESG criteria in our investment strategies can help better assess long-term risks, and effective management of these considerations can have a material impact on value creation. The development of innovative investment solutions is key to provide our clients with a comprehensive range of investment solutions that meet their investment needs and sustainability preferences:

<sup>8</sup> This relates to the Private Equity team, as Private Debt is not under the scope of this reporting.



ESG factors are taken into account according to the availability of information, the extent of our control over a given investment, and our ability to exert influence, which vary according to the type of investment (primary, secondary, co-investment, or direct investments). Our approach is based on four pillars.

### The four fundamental pillars of our ESG approach for our private assets



Source: ODDO BHF Asset Management SAS, 2026

Steps 1,2 and 3 are only applicable to SFDR Art. 8 Funds. For some of our SFDR Art. 6 funds, notably our secondaries investment strategy, we apply the Step 4 and more precisely the annual ESG questionnaire campaign and annual ESG reporting.

### 1.4 Pre-investment due diligence

We recognize the importance of mitigating potentially adverse environmental or social impacts of our investments. Therefore, we seek to avoid investing in companies that breach normative and sectorial guidelines as outlined in the ODDO BHF Asset Management Exclusion Policy<sup>9</sup>. The exclusion list (ODDO BHF Asset Management common base of exclusions) is a component of the preliminary due diligence on investment opportunities and is applied every time it is feasible. It may vary according to each investment strategy as stated in the fund's legal documentation:

- Art. 8 Direct Private Assets Funds<sup>10</sup>: we apply our Common base of exclusion to all our Art. 8 funds.
- Art. 8 Primaries, Secondaries, Co-Investment strategies (funds of funds):

<sup>9</sup> The ODDO BHF Asset Management exclusion policy is available at <https://am.oddo-bhf.com/fr-en/non-professional-investor/sustainability-publications/>

<sup>10</sup> Referring to funds managed by ODDO BHF Asset Management SAS



- For investments in funds as part of primary transactions, our common base of exclusions may apply depending on the availability of data on existing transactions already made at the time of the due diligence.
- For co-investments transactions as well as for some transactions with clear and strong visibility on the underlying assets (continuation funds – single assets), we apply our common base of exclusions.
- For investments in funds as part of secondary operations, we strive to avoid investing in funds and companies that breach our common base of exclusion. As such, the exclusion policy will be monitored on a best effort basis given the lack of visibility of underlying assets.

Some Art. 8 funds may apply additional exclusions that are listed in the respective fund legal documents. Further screening and exclusions can be applied on a case-by-case basis.

## 1.5 ESG Due diligence

If the investment opportunity passes the ESG pre-due diligence step, the ESG team, with the support of the Deal team, will do an ESG due diligence for investments in Art. 8 SFDR funds. This step aims to facilitate the identification and assessment of the main sustainability-related impacts, risks, and opportunities of the investment target. The approach may vary depending on the fund's strategy.

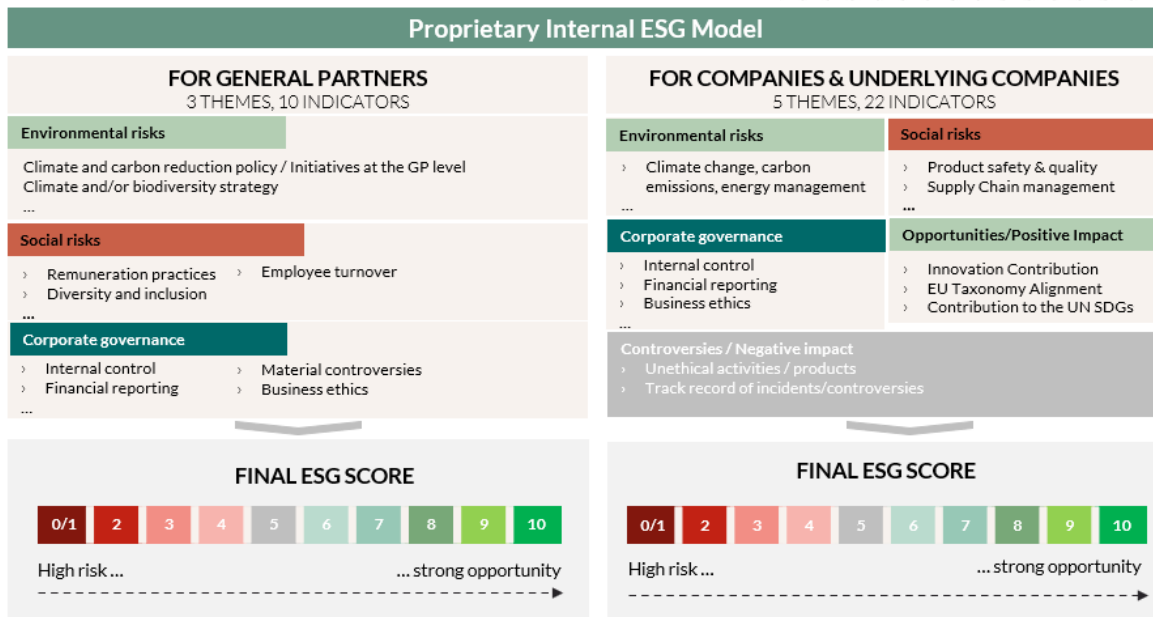
### 1.5.1 Due diligences for funds of funds investments

The breadth and depth of the ESG analysis necessarily depends on the availability of information, the extent of our control over a given investment, and our ability to exert influence as investors. We evaluate the ESG practices of General Partners (GPs) and their sustainability commitments and aim to ensure that GPs to whom we allocate capital have adequate ESG policies and procedures.

### 1.5.2 Due diligence for direct investments

The due diligence is focused on analyzing companies' ESG practices, depending on the sector and discussions with the management. Areas for value creation and improvement are identified in the ESG analysis.

## Proprietary internal ESG model for Private Equity Art. 8



Source: ODDO BHF Asset Management SAS, 2026

Each GP and/or company that is being analyzed obtains an absolute score out of 10. For direct investments, only the model for companies is applicable. This approach fits the investment teams' specific needs where access to information on sustainability may be limited.

The internal ESG due diligence for both GPs and companies may rely on external recognized frameworks such as the 10 principles of the United Nations Global Compact and the United Nations Principles for Responsible Investment (PRI). In addition, materiality level for the company analysis is determined with the help of tools such as the *Sustainability Accounting Standards Boards (SASB) Materiality Map*.

Some Art. 8 SFDR Private Equity funds managed by ODDO BHF Asset Management SAS have a sustainable investment objective. We disclose more information regarding's ODDO BHF Asset Management's methodology to define and compute sustainable investments across Art. 8 SFDR in the "Sustainable investments methodology" document available on ODDO BHF Asset Management's Website<sup>11</sup>.

### 1.6 Investment decision

After the due diligence process, an investment memorandum is presented to the Investment Committee, including the conclusion of the ESG diligences, prior to the final investment decision, for Art. 8 funds. This

<sup>11</sup> <https://am.oddo-bhf.com/fr-en/download-document/46919>



memorandum covers quantitative data such as overall ESG Scores as well as qualitative comments and alignment with the UN Sustainable Development Goals (SDGs) if applicable. The outcome of the ESG analysis can influence the final investment decision and some of our Art. 8 Funds have minimum ESG scoring requirement on GPs at the time of the investment.

Depending on ESG material risks level, a corrective action can be included in the post-investment plan. The blind-pool nature of Private Equity investment means it may not always be possible to screen out companies with material sustainability risks prior to investment. In such cases, we will seek to engage and influence the manager to improve standards of ESG integration and governance. Therefore, we may not exclude an underlying manager or direct investment if it displays weak ESG practices, as long as there is a commitment by the underlying manager or company to address these shortcomings. However, when we foresee that an underlying manager or direct investment will not or cannot address our ESG concerns, we are prepared to support them in helping them to address sustainability market practice in relation to their activities.

In addition, we may include a side-letter of any clarifications, precision of reporting obligations with regards to ESG, Fund Themes or Target SDGs, and/or rectifications or ESG improvement obligations, on the part of the third-party manager of a proposed Investment, as appropriate.

## **1.7 Post-investment**

### *1.7.1 Annual ESG Questionnaire Campaign*

During the post-investment phase, we continue to monitor the ESG status of fund investments through an annual ESG questionnaire campaign. This is done for both Art. 6 and Art. 8 funds. Sample datapoints include carbon intensity, percentage of non-renewable energy consumption, employee turnover, gender diversity etc. The list of indicators is subject to evolution year on year depending on market practice.

The ESG Questionnaire campaign is led by the ESG Team who oversees collecting and processing the data, with the support of the Deal Team for input. The ESG Team can work alongside third-party providers for the purpose of this campaign. The ESG Questionnaire is sent to all partner GPs managing an investee fund.

### *1.7.2 Annual ESG reporting*

The data collected in the questionnaire campaign is presented in the annual ESG report which also details the progress made on ESG metrics and priorities.

The report is available upon request. Additionally, as part of regulatory requirements under the Sustainable Finance Disclosure Regulation (SFDR), disclosures and annual required reporting are produced and available.

### 1.7.3 Continuous ESG analysis and monitoring

The ESG team and the Deal team continue to track the adherence of new investments with the ODDO BHF Asset Management's common base of exclusions, as well as where applicable, Funds themes alignment, and the SDGs.

In addition, a positive or negative development on an investment such as an ESG controversy may lead to a review of the ESG analysis and change a company's score at any time.

Some of our funds follow sustainability indicators using the ESG scoring assigned, such as a Fund average ESG score. Unless specified otherwise these indicators may only be recorded from the end of the Fund's first accounting year and until the start of the pre-liquidation period. If a transaction or fund is liquidated, the ESG score of the GP will be based on the last ESG score assigned pre-liquidation and the ESG monitoring will end.

### 1.7.4 Active ownership

Please refer to the "Active Ownership" section of this document.

## 2. Means used by the entity

### 2.1 ESG reports

#### Listed assets

For funds integrating ESG criteria into their investment process (Art. 8-9 SFDR), ODDO BHF Asset Management SAS reports the following information in its monthly ESG reports:

- › The fund ESG score compared to its benchmark
- › The carbon intensity (scope 1-2) of the portfolio compared to its benchmark
- › ESG ratings coverage.

For more information, please refer to products' documentation available on our website by selecting the fund and the reporting ESG<sup>12</sup>.

#### Private assets

Across our Art. 6 and 8 Funds, ODDO BHF Asset Management SAS provides dedicated funds' annual ESG reports with information on our ESG progress and priorities throughout the year and the results of the annual ESG campaigns.

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<sup>12</sup> <https://am.oddo-bhf.com/fr-en/non-professional-investor/funds/>



Each report is prepared for the Funds' investors and is available on request. Annual periodic disclosure reports aligned with the requirements of the delegated acts of SFDR are produced for SFDR Art. 8-9 funds.

## 2.2 Summary of sustainability-related documents

Documents	Scope	Description
<b>Annex II &amp; III: pre-contractual disclosures</b>	Fund <sup>13</sup>	Pre-contractual information for products art. 8-9 SFDR on sustainable investments (sustainable investment objective), environmental and/or social characteristics, sustainability indicators, do no significant harm principle, addressing principle adverse impacts (PAI), investment strategy, the committed minimum rate to reduce the scope of investments, or the policy to assess good governance.
<b>Article 10 SFDR: Website product disclosure</b>	Fund <sup>14</sup>	Document based on art. 10 SFDR summarizing the ESG profile of funds art. 8-9 SFDR, commitments to sustainable investments, etc.
<b>Annual PRI report</b>	ODDO BHF AM (private equity not considered)	PRI Reporting allows signatories to be aware of both their assets and their areas for improvement. Signatories are also confidentially rated and evaluated against their peers. Signatories can share private reports, and PRIs make certain information public to promote transparency. PRI annual reporting integrates different elements that combine transparency, engagement and performance.
<b>Annual report (Annex IV and V)</b>	Fund	This document provides information on investments and management of the fund with the management report, the SFDR management report/taxonomy, and the annual financial statement of the fund at the end of the reporting period. For some Private Assets funds, ESG reports are available on demand providing information on ESG progress & priorities throughout the year, ESG data analysis of investments and results of the Annual ESG Campaign
<b>ESG Report</b>	Art.8/9 funds listed assets	Monthly fund's report for which we integrate ESG criteria into their investment process to summarize ESG aspects considered.

<sup>13</sup> For Private Assets funds, on a case-by-case basis

<sup>14</sup> For Private Assets funds, on a case-by-case basis

<b>Exclusion Policy</b>	ODDO BHF AM	Investment rules covering a range of controversial activities across sectors and/or practices that are contrary to major international norms and conventions.
<b>Responsible Investment Policy</b>	ODDO BHF AM	The purpose of this document is to explain the sustainable approach, the ESG methodologies developed, the means implemented to promote sustainable development, and the good governance policy adopted by ODDO BHF Asset Management. There is one document for listed assets and one for private assets.
<b>Semiannual report</b>	Fund	This document is more succinct than the annual report providing only the inventory of the funds.
<b>Shareholder engagement policy</b>	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.
<b>Shareholder engagement report</b>	ODDO BHF AM	Report on dialogues, engagements, and voting annual statistics
<b>Sustainable Finance Disclosure Regulation (SFDR)</b>	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), Policy on the integration of sustainability risks into the remuneration policy (Art. 5)).

Source: ODDO BHF Asset Management, 2026

All documents with the scope "ODDO BHF AM" or "ODDO BHF AM SAS" can be found on our Sustainable investing webpage<sup>15</sup>.

<sup>15</sup> [https://am.oddo-bhf.com/france/en/professional\\_investor/ad/sustainability/1339/publication/1380](https://am.oddo-bhf.com/france/en/professional_investor/ad/sustainability/1339/publication/1380)



The Shareholder Engagement Policy and the Reports can be found on our Regulatory Information webpage<sup>16</sup>.

All documents with the scope “Fund” can be found on our Funds webpage by selecting the fund in question for non-professional funds<sup>17</sup>.

The various means of communication described above are adapted to the scope authorized by position AMF-2020-03.

### *3. Financial products: "Article 8" and "Article 9"*

As of 31/12/2025, ODDO BHF Asset Management SAS managed €15.9bn assets classified as Article 8 or 9. It amounts to 77% of its total €20.7bn in assets under management (AuM)<sup>18</sup>. This includes listed and private assets. To be classified as Article 8, in addition to SFDR requirements, ODDO BHF Asset Management SAS requires a clear integration of ESG in the investment and portfolio construction processes.

The SFDR classification of mutual funds is regularly updated and accessible online<sup>19</sup>.

### *4. Collaborative initiatives*

For several years now, ODDO BHF Asset Management SAS has been involved in international and national initiatives to promote ESG integration and stewardship, encourage dialogue on and raise awareness of sustainable investing among various stakeholders, as well as influence issuers to improve their ESG practices. Collaborative engagements are a powerful mechanism for investors to collectively have more leverage and influence on companies.

Our involvement in these initiatives allows us to address longer-term sustainability issues and provides material inputs for investment-decision making.

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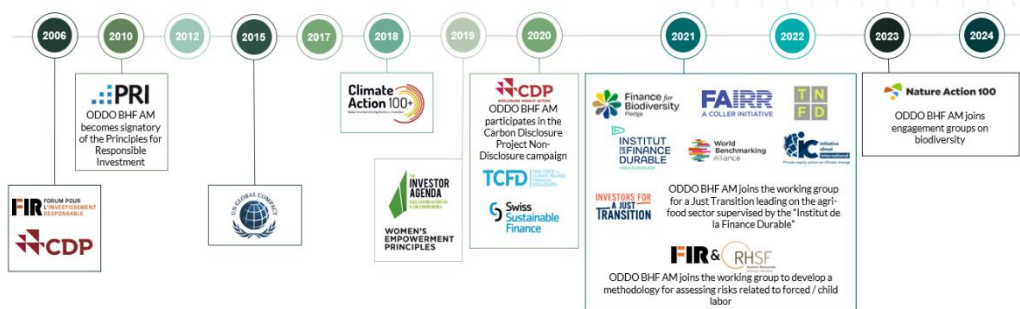
<sup>16</sup> <https://am.oddo-bhf.com/fr-en/non-professional-investor/regulatory-information/>

<sup>17</sup> <https://am.oddo-bhf.com/fr-en/non-professional-investor/funds/>

<sup>18</sup> Including all funds and mandates

<sup>19</sup> <https://am.oddo-bhf.com/fr-en/non-professional-investor/regulatory-information/>

## Membership & collaborative initiatives



Source: ODDO BHF Asset Management, 2026

## 2° Internal resources deployed by the entity

### 1. Resources dedicated to sustainable investing

#### 1.1 Human resources

Within the scope defined below in point 1.1.1-2, 9.5 FTEs allow the implementation of the ESG strategy, which amounts to 5.9% of ODDO BHF Asset Management SAS's FTEs. These are figures as of 31<sup>st</sup> December 2025. The calculation methodology used is based on estimates of the time each employee spends on ESG tasks.

##### 1.1.1 ESG Experts team

ODDO BHF Asset Management has been investing in ESG resources for many years. The team is made up of 4 ESG experts. The team helps produce ESG and thematic research, as well as analytical solutions that promote portfolio managers' understanding and awareness of ESG factors. It is also in charge of our internal ESG rating models and sustainable bonds framework and approval, as well as supporting portfolio managers in integrating ESG analyses and climate data into investment processes. The Global Head of Sustainable Investment Solutions reports to the CEO of ODDO BHF Asset Management SAS and is a member of the Global Management Committee of ODDO BHF Asset Management.

All investment teams work with the ESG Research team in structuring and implementing our sustainable ESG integration approach. 61 fund managers/analysts participate in this approach. To estimate the full-time equivalent (FTE), we consider that 5% of their working time is dedicated to ESG integration, which represents 3.05 FTE.

##### 1.1.2 Support teams

The Risk & Compliance team is responsible for monitoring sustainability risks. 6 employees are dealing with sustainability topics, among others. Considering the working time allocated to these subjects, we



estimate that this represents 0.6 FTE, or 0.375% of ODDO BHF Asset Management SAS's full-time equivalents

As regards the Legal team, there are 8 employees oversee sustainability subjects (e.g. updating pre-contractual annexes). Considering the working time allocated to these subjects, we estimate that this represents 0.56 FTE, or 0.35% of ODDO BHF Asset Management SAS's full-time equivalents

Regarding the Reporting team, 7 employees oversee sustainability subjects. Considering the working time allocated to these subjects, we estimate that this represents 1.25 FTE, or 0.78% of ODDO BHF Asset Management SAS's full-time equivalents.

## 1.2 Technical resources

### Listed assets

The ESG Research team feeds its internal research model with data from company publications (annual reports, investors presentations), from external ESG data providers, from external suppliers ESG and financial and from specialized broker publications (including thematic research):

#### Main external ESG data providers

› <b>MSCI ESG Research</b>	<u>Climate data &amp; metrics</u> <ul style="list-style-type: none"><li>- GHG emissions</li><li>- Temperature alignment</li><li>- Green share</li><li>- Taxonomy</li><li>- Climate VaR</li><li>- Etc.</li></ul> <u>Ratings</u> <p>ESG ratings and qualitative research for +10,000 issuers (corporates, sovereigns and quasi-sovereigns)</p> <u>Controversies</u> <p>UNGC, biodiversity or any other ESG-related controversies</p>
› <b>Carbone4 Finance</b>	Biodiversity impact assessment
› <b>ISS Proxy Voting</b>	Implementation of our Voting Policy and platform for votes

Source: ODDO BHF Asset Management, 2026

Over the past years, ODDO BHF Asset Management SAS has considerably raised its ESG tools and data budgets to support its ambitions in sustainability. Our overall amount allocated to deploying the ESG strategy (membership of coalitions and working groups, data providers, labels) is approximately 200,000 euros. The largest cost item remains access to ESG data, followed by voting services and memberships in associations/organizations.

## Private assets

The ESG due diligences may rely on data and information from:

- › An internal ESG guidance for the different criteria taken into account based on the materiality;
- › Documents made available via the GPs, sponsors or companies themselves; dedicated ESG fact books and the ESG sections of information memoranda;
- › Specialized broker publications (including thematic research);
- › External research providers to review controversies;
- › The analysis of an ESG questionnaire completed by the company on a case-by-case basis.

These are particularly important sources of information as we recognize that the companies invested in Private Equity may only provide a limited amount of information regarding their ESG performance.

We also leverage from external service providers to support with the analysis and review of ESG due diligence activities and conduct annual ESG questionnaires. Over the past years, we have raised the ESG budget in order to support our ambitions in sustainability. In 2025, the total amount allocated to our external ESG reporting platform is €96,000 (excluding taxes).

## *2. Actions taken to strengthen the entity's internal capacities*

### 2.1 ESG training

The ESG Research team holds regular in-house training sessions, with the aim of clarifying and better contextualizing issues related to sustainability including regulatory and methodological developments. In 2025, we trained multiple teams to continue building ESG knowledge. Following are some examples of training we have pursued in the last year:

- The ESG Research team regularly organized internal training sessions to clarify and better contextualize sustainability-related topics, market dynamics (evolution of Article 8 and Article 9 assets under management), and new regulations (SFDR 2.0, CSRD).
- Regular training sessions have been held with operational teams to ensure that ESG data is collected, processed and disseminated as effectively as possible.



## 2.2 ESG infrastructure and data/tools/models

### Listed assets

We have strengthened our ESG infrastructure and systems and developed tools to enhance the support provided to investment teams: integration of ESG data into Bloomberg AIM, development of a platform centralizing all ESG data, etc.

### Private assets

We have developed our internal ESG model for research and monitoring for our strategies Art.8 SFDR described in section 1 “Entity’s general approach to the consideration of environmental social and governance (ESG) criteria” dedicated to Private Assets (from page 11).

## 2.3 Enhanced ESG integration

### Listed assets

In 2025, we launched the development of an ESG data platform aimed at centralizing ESG data from our various providers and facilitating its use through consistent and automated analyses and calculations.

### Private assets

We finalized our internal ESG research and rating model for the various Article 8 Private Equity investment strategies.

## 2.4 Reporting and transparency

### Listed assets

A few of our ESG-related policies were updated in 2025, either to reflect regulatory developments or as part of their review cycle, such as our Exclusion Policy, our SFDR Article 3, 4 and 5 policies, and our Shareholder Engagement Policy.

### Private assets

We continued our Annual ESG reporting at Funds’ level and launched additional Annual ESG reports for our new Art. 8 Funds. The production of the reports is a collaboration between the Deal teams, the ESG team and an external third-party provider.

## 2.5 Development of ESG funds/mandates/other services

### Listed assets

In 2025, ODDO BHF AM SAS launched 2 funds classified SFDR Article 8: ODDO BHF Global High Yield and ODDO BHF Global Target 2031.

### Private assets

In 2025, one new Article 8 SFDR fund was launched.

## 3° Consideration of ESG criteria at the entity's governance level

### *1. Governance structure*

#### Listed assets

The ODDO BHF Asset Management's Global Management Committee (GMC) is composed of members who have been working on ESG issues for several years. As a permanent member of the committee, the Global Head of Sustainable Investment Solutions drives sustainable investment initiatives and facilitates their understanding among senior stakeholders (CEO, CIO, etc.). Strategic decisions relating to ESG are taken jointly by the executive committee.

ODDO BHF SCA has a Supervisory Board that oversees, among other things, the integration of sustainability considerations—across risks, opportunities, and impacts—within the various business lines of the ODDO BHF Group.

#### Private assets

The Private Assets executive committee at ODDO BHF Asset Management includes the CEO of ODDO BHF Asset Management, the Head of Operations & Business Management, the Head of Compliance, and the Managing Directors of the Private Equity business. Strategic decisions relating to ESG are taken jointly by the executive committee.

### *2. Compensation policy*

Since 2021, the remuneration policy has been adapted to integrate sustainability risks in accordance with the transparency requirement set out in Article 5 of the SFDR. It is available in the “Regulatory Information” section of our website<sup>20</sup>.

### *3. Integration of ESG criteria in the internal rules of the Supervisory Board*

At least once a year, the Supervisory Board of ODDO BHF SCA attends a presentation on the material impacts, risks, and opportunities of the Group's various divisions in connection with the application of the Corporate Sustainability Reporting Directive (CSRD). This dedicated presentation and materiality

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<sup>20</sup> <https://am.oddo-bhf.com/fr-en/non-professional-investor/regulatory-information/>



analysis includes the Asset Management division. In addition, the ODDO BHF Group's sustainability strategy is also presented to the Supervisory Board of ODDO BHF SCA.

## 4°Active Ownership Strategy

### *1. Presentation of the active ownership strategy*

The description of the approach is summarized in our Shareholder Engagement Policy, which also details ODDO BHF Asset Management's voting policy. Once a year, we publish a shareholder engagement report describing the results of our engagement approach. Both documents are available on our website<sup>21</sup>.

The scope of companies covered by the engagement strategy includes, as a priority, companies held in open-ended funds integrating an ESG process (SFDR Article 8 or 9).

#### Listed assets

Active ownership for listed assets can be summarized in three ways:

- 1. Dialogue with companies**
- 2. Individual or collaborative engagement**
- 3. Exercise of voting rights**

A reactive engagement approach is our first level control procedure. The ESG Research team performs a daily controversy check via multiple external providers alerts (MSCI, Bloomberg, specialized press). If the controversy is considered of major attention, the ESG Research team conducts a proprietary due diligence analysis to better understand the severity of the issue. If necessary, an engagement action is initiated and *ad hoc* objectives are established on a defined timeline, in line with the ESG targets of the fund holding the position. We use internal methodologies and monitoring files to classify the engagement actions and follow up the progress made. That helps to decide if an escalation process must be initiated, which in some cases may lead to divestment. This option remains rare and a last resort.

Regarding voting rights, ODDO BHF Asset Management votes at shareholder meetings of European companies that are listed on a regulated market in the European Union or the European Economic Area, for which the funds collectively hold - at the entity level - a stake of more than 0.05% of the capital.

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<sup>21</sup> <https://am.oddo-bhf.com/fr-en/non-professional-investor/regulatory-information/>

It is true that in very rare cases the investment management company cannot vote for reasons of efficiency, costs and timeliness. In specific case of dedicated funds, we may not vote following client very particular demands. ODDO BHF Asset Management may vote at the annual general meetings of portfolio companies that are traded on a market other than a regulated market in the European Union or the European economic area. Moreover, ODDO BHF Asset Management strives to vote at meetings for all the positions it holds at the entity level, when a company is invested in a portfolio that has a sustainable finance label, regardless of the related reference. The voting policy and the annual report on its implementation are available in the “Regulatory information” section of our website.

## Private assets

In addition to questionnaires sent, different dialogue approaches have been adopted for our fund of funds activity and our direct investments.

For our *Funds of Funds* investments, the team endeavors, whenever conditions allow, to:

- Engage with the GPs of portfolio funds to promote the importance of ESG characteristics and programs ;
- Have routine interactions with GPs and more specifically in relation to precise incidents ;
- Encourage an ESG dialogue in alignment with our internal practices and with relevant industry associations (France Invest, PRI, etc.) ;
- Keep our LPs aware of ESG-related topics through dedicated ESG reporting and encourage GPs to provide a similar level of reporting.

For our direct investments, we can have direct access to company management and therefore are more able to define tailored areas of progress in consultation between the management company and the portfolio company. These depend on material ESG issues identified during the due diligence and naturally on the sector of activity. A dedicated ESG action plan can be put in place and progress monitored throughout the investment cycle.

## 2. *Investment strategy decisions*

In terms of investment strategy, particularly sectoral disengagement, as per the “Common base of exclusions” of our exclusion policy, we apply decreasing thresholds to exit from the coal sector. These thresholds will be lowered to zero by 2030 for EU and OECD countries and by 2040 for the rest of the world. We also added in our common base exclusions like tobacco, severe impacts on biodiversity and Arctic oil and gas. It should, however, be emphasized that sectoral divestment is not a silver bullet for addressing local and/or global issues. While excluding a sector may create a sense of virtue, the financial



world is currently not aligned in disengaging from carbon-intensive sectors. The case of coal illustrates this limitation: despite the exclusion of this activity by a large majority of European investors, coal remains one of the world's primary sources of energy.

## 5° Information on the European Taxonomy and fossil fuels

### 1. EU Taxonomy

Below are the taxonomy aligned figures based on reported data<sup>22</sup>:

	Amount CapEx EUR	% CapEx	Amount Turnover EUR	% Turno- ver
<b>Aligned</b>	1 015 138 523	5.0%	740 993 418	3.6%
<b>Thereof nuclear</b>	19 212 435	0.1%	19 367 552	0.1%
<b>Thereof gas</b>	849 169	0.0%	340 207	0.0%

5% of ODDO BHF Asset Management SAS's assets under management are aligned with the taxonomy based on the CapEx KPI, and 3.6% based on the Revenue KPI. The scope used includes all our listed and private assets under management<sup>23</sup>, less investments in derivatives, sovereigns, and companies not eligible for Corporate Sustainability Reporting Directive (CSRD).

### 2. Fossil fuels

To define the share of our AuM invested in companies active in the fossil fuel sector as defined by the European Taxonomy, we rely on PAI 4 "exposure to companies operating in the fossil fuel sector". Fossil fuel investments represent 3.4% of all ODDO BHF Asset Management SAS listed AuM as of end December 2025.

<sup>22</sup> Reported companies' data from MSCI ESG Research

<sup>23</sup> Calculated based on ODDO BHF Asset Management total AuM at 31.12.2025 when ODDO BHF Asset Management SAS is the Management Company. For private assets, we are unable to provide reliable and consistent data on private equity investments, as the public data needed to align them with the taxonomy is not yet available.

## 6° Strategy to align with the international objectives of limiting global warming

To align our investment strategies with Paris Agreement (2015) and the National Low-Carbon Strategy (SNBC), our strategy and targets are based on:

1. Decarbonize our investment strategies. The assets covered by this objective are listed equities and corporate bonds, for which decarbonization data are available, which are part of the perimeter defined by the Article 29 LEC. At this stage, this does not apply to our private investment strategies due to the lack of data or the limited reliability of estimated data.
2. Assessment of companies' transition pathways based on internal analysis.
3. Investment in companies that develop the solutions and services required for the climate transition (also applicable to private equity).

### *1. Decarbonization of our investment strategies*

ODDO BHF Asset Management has formally incorporated, for certain open-ended SFDR Article 8 and 9 funds, a carbon intensity target (Scopes 1 and 2)<sup>24</sup>. For some funds, our portfolio managers take into account the impact of issuers' carbon emissions within the portfolio in order to achieve an aggregate carbon intensity lower than that of their benchmark or investment universe. The carbon intensity metric provides a better understanding of our funds' exposure to the most carbon-intensive companies and, by extension, to those that may face significant transition risks, as highlighted by the European Central Bank (ECB)<sup>25</sup>.

However, this metric also has its limitations. Carbon intensity uses revenue as its denominator, which is expected to grow in a context of economic expansion. As a result, reductions in carbon intensity may be driven more by inflation than by an actual decrease in carbon emissions.

Alongside this carbon intensity target, ODDO BHF AM has also defined constraints and a phase-out timeline for highly carbon-intensive sectors such as coal:

- › 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.

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<sup>24</sup> Private asset funds are not included, as we are currently unable to obtain data that is sufficiently reliable and measurable over time.

<sup>25</sup> European Central Bank (2024) *Climate change-related statistical indicators*



- › Power generation: any company where coal exceeds 10% of the production mix, or 10% of its installed capacity. These thresholds will be lowered to 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.

Other carbon-intensive sectors within the fossil fuel industry (e.g., conventional and unconventional oil and gas) are not subject to a phase-out timeline.

We have also updated our global voting policy to take into account the climate commitments made by companies, the level of transparency of these commitments and their results. We actively encourage companies to communicate the physical and transition risks they face in relation to climate change through our dialogues with companies.

### 1.1 Quantitative targets

Targets	Progress
Follow the intermediate alignment trajectory defined at 2.5°C for 2030, which as 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.	<i>Our tracking tool allows portfolio managers to monitor a fund's temperature and identify the main contributors in order to make investment decisions accordingly. 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.</i>
Addition of the carbon footprint metric in our monthly ESG reports for our Article 8 and 9 funds.	<i>The inclusion of the carbon footprint metric in our monthly ESG reporting is planned for 2026.</i>
Phase out investment in coal mining and electricity generation from coal by 2030 for OECD countries	<i>Lowering the threshold for electricity production from coal to 5% in 2028 of the production mix, or alternatively, of its installed capacity</i>

## 1.2 Methodology<sup>26</sup>

In 2023, we reviewed a number of commonly accepted decarbonization methodologies, including the “binary measurement method”, which targets companies with a net-zero alignment strategy certified by an external climate alignment methodology such as that of the Science Based Target Initiative (SBTi); the “sectoral decarbonization approach” (SDA), also known as the “benchmark divergence approach”; and the “implied temperature rise (ITR)” measurement method.

As part of the decarbonization of our investment strategies, we have opted for the implied temperature rise method established by MSCI<sup>27</sup>. The implied temperature rise of a portfolio gives an estimate of global warming if the world economy were to follow a decarbonization trajectory identical to that of the portfolio.

To limit global warming to less than 2°C by 2100, it is necessary to limit cumulative greenhouse gas emissions. Applied to a portfolio, the implied temperature rise method compares the excess carbon emissions financed for the portfolio (scope 1, 2 and 3) with its theoretical carbon budget derived from a climate scenario.

The assumptions used to establish a trajectory come from the NGFS (Network for Greening the Financial System)<sup>28</sup> Net Zero 2050 scenario. To simulate sectoral decarbonization, the NGFS Net Zero scenario takes into account various variables, such as climate policies, technological progress, energy prices and consumer behavior. These variables are then used to estimate the reductions of greenhouse gas emissions in different economic sectors and geographies in order to define the carbon budgets.

The amount by which the portfolio's financed carbon emissions exceed its budget is converted into temperature using the “TCRE (Transient climate response to cumulative CO<sub>2</sub> emissions)” factor. TCRE is defined as the global average temperature increase in response to a given amount of cumulative CO<sub>2</sub> emissions. The Intergovernmental Panel on Climate Change (IPCC) provides a TCRE estimate of 0.00045°C per GtCO<sub>2</sub>.

The implied temperature rise, like any methodology, has its limits. Its main limit is that carbon overshoot is based on projections, and actual realizations may differ from these. Moreover, since the concept of a carbon budget relies on an allocation across sectors and geographies, certain issuers with very specific economic activities may be penalized, as the model does not adequately capture these particular cases (e.g., companies in the industrial gases sector). Finally, we are still in the observation phase to assess the impact on our portfolios, including sovereign issuers, as they have been recently added to the MSCI

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<sup>26</sup> Private assets funds not included because we are currently unable to obtain sufficiently reliable data that can be measured over time

<sup>27</sup> <https://www.msci.com/documents/10199/7118a4c1-e446-ffa8-87f2-f4d6d2d07d36>

<sup>28</sup> <https://www.ngfs.net/ngfs-scenarios-portal/>



methodology. All these elements could lead us to revisit our commitment to the alignment trajectory defined in our objectives in Section 1.1

To date, we have calculated the implied temperature rise across all our assets under management as well as for our main funds. However, as mentioned previously, we will initially focus on implementing this alignment strategy for the individual funds covered by this Article 29.

In addition to our alignment strategy, we also use carbon data from MSCI to measure the carbon intensity of our investment strategies, as part of our reporting and portfolio management tools available to portfolio managers. Each month, we publish the weighted average carbon intensity (scopes 1 and 2) of our funds, compared with their benchmark index. Estimates are used when reported values are unavailable. Estimates are based on the revenues-normalized average values (scopes 1 and 2 emissions) of peers in the sector.

From a broader climate change perspective, we use another MSCI indicator, the Climate Value-at-Risk<sup>29</sup>, detailed in the final section of this document

### 1.3 Indicators

In accordance with the requirements of Article 29 LEC, funds and mandates with AuM of more than €500m are included in measuring key performance indicators:

EQUITY		BOND	
›	<i>ODDO BHF Artificial Intelligence</i>	›	<i>ODDO BHF Euro Credit Short Duration</i>
›	<i>ODDO BHF Avenir Europe</i>	›	<i>ODDO BHF Euro High Yield Bond</i>
		›	<i>ODDO BHF Global Target 2028</i>

#### 1.3.1 Carbon intensity

##### Carbon intensity of main funds and mandates as of December 30<sup>th</sup>, 2025

Fund name	Fund		Benchmark	
	Coverage rate <sup>30</sup>	Weighted carbon intensity	Coverage rate <sup>30</sup>	Weighted carbon intensity
ODDO BHF Artificial Intelligence	100%	19,7	100%	90,9

<sup>29</sup> <https://www.msci.com/our-solutions/climate-investing/climate-and-net-zero-solutions/scenario-analysis>

<sup>30</sup> As explained in the carbon intensity calculation methodology, estimates are used when reported values are unavailable or contradictory. Estimates are based on the revenues-normalized average values (Scopes 1 and 2 emissions) of peers in the sector.

ODDO BHF Avenir Europe	100%	15,8	100%	83,9
ODDO BHF Euro Credit Short Duration	100%	99,3	100%	148,7
ODDO BHF Euro High Yield Bond	100%	100,6	100%	159,0
ODDO BHF Global Target 2028	100%	116,4	100%	162,8

Source: ODDO BHF Asset Management, MSCI

At the level of ODDO BHF Asset Management SAS entity, we rely on the PAI 3 “GHG intensity of investee companies”, which represents the weighted average of the GHG intensity of issuers held at entity level (scope 1, scope 2 and estimated scope 3 GHG emissions / million euros of revenues). As of end December 2025, this intensity stood at 784.0 tCO<sub>2</sub>e/M EUR of revenues, compared to 858.8 tCO<sub>2</sub>e/M EUR of revenues as of end December 2024. Please consult our SFDR Article 4 report for more carbon metrics.

### 1.3.2 Climate trajectory

#### Implied Temperature Rise of main funds and mandates as of December 30<sup>th</sup>, 2025

Fund name	ITR
ODDO BHF Artificial Intelligence	2.3 °C
ODDO BHF Avenir Europe	2.1 °C
ODDO BHF Euro Credit Short Duration	2.4 °C
ODDO BHF Euro High Yield Bond	2.3 °C
ODDO BHF Global Target 2028	2.7 °C

Source: ODDO BHF Asset Management SAS based on MSCI ESG Research data as of May 2026

At the level of ODDO BHF Asset Management SAS, we obtained an ITR of 2.3 °C on our aggregate positions on December 30<sup>th</sup>, 2025.

Finally, for informational purposes, 47.8% of our listed investments were in companies operating in high climate impact sectors, as defined under the SFDR (NACE codes A to H and L), as of end-2025.

### 1.4 Role and use of alignment assessment in the investment strategy and complementarity between the assessment methodology selected and other indicators on environmental, social criteria, and quality of governance

#### Listed assets

While temperature data is a key element in our decarbonization strategy, it is not sufficient on its own. We need to combine it with other measures of performance indicators. For example, ESG integration into our investment processes is crucial not only to measure climate-related risks and opportunities, but also the credibility of the actions taken by companies to steer their activities towards a sustainable economy.



Engagement is a useful tool to discuss with companies the environmental, social and governance issues we deem relevant. It enables us to engage with companies whose decarbonization trajectory or actions are still too weak compared to the challenges facing their sector.




## Private assets

We include climate risks in the internal ESG due diligence were considered material. At the GP level, we systematically analyze whether there is a climate strategy and policy at a corporate level and in the investments, as well as targets and objectives set; at the underlying company level, we assess climate related risks such as climate change, carbon emissions, energy management depending on sector materiality as well as alignment with the EU Taxonomy where possible. There are additional climate-related assessment questions in the Annual ESG questionnaire including the Principle Adverse Impacts (PAIs) if data is available.

### 1.5 Impact on our investment strategies

As mentioned above, our exclusion policy already includes restrictions on coal, unconventional oil and gas, and conventional and unconventional oil and gas in the Arctic region in the common base of exclusions. The common base of exclusions applies to the majority of our open-ended funds' assets under management and also to delegated fund managers within the ODDO BHF Group and to Private Assets depending on the investment strategy<sup>31</sup>. However, certain funds open to the public whose management is delegated to or advised by third parties are not affected by these exclusions unless otherwise stated in the prospectus. These exclusions may also apply to management mandates or dedicated funds, if explicitly named in the relevant prospectus or information memorandum. The fund ODDO BHF Merger Arbitrage managed by ODDO BHF Asset Management SAS is excluded from this policy, except for the following unconventional weapons: anti-personnel mines, cluster munitions, biological and chemical weapons.

### Fossil fuel related exclusions from the common base of exclusions

Sectors	Exclusion thresholds	Activities
 <b>Coal</b>	>8 millions tonnes ou 5% <sup>1</sup>	Coal mining – EU & OECD : 0% (2030), Rest of the world: 0% (2040)
	>10% <sup>2</sup>	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
 <b>Unconventional oil &amp; gas<sup>3</sup></b>	>5% <sup>1</sup>	Exploration-production & exploitation
 <b>Arctic exploration</b>	>10% <sup>1</sup>	Exploration-production & exploitation of (conventional & unconventional) oil & gas in the Arctic

All details in ODDO BHF AM Exclusion Policy.

<sup>1</sup> % of revenues | <sup>2</sup> % of production mix or alternatively of installed capacity | <sup>3</sup> Incl. shale oil & gas, oil sands

Source: ODDO BHF Asset Management, 2026

<sup>31</sup> More details in our Exclusion Policy available at: <https://am.oddo-bhf.com/fr-en/non-professional-investor/sustainability-publications/>

## 1.6 Frequency of assessment

### Listed assets

The frequency of assessment depends on the metric considered:

- › Carbon intensity is reviewed on a monthly basis
- › The Implied Temperature Rise will be updated regularly in our reports from 2026

### Private assets

For our Private Equity strategies, we continue to monitor investments' climate and carbon performance through the annual ESG questionnaire campaign where comparisons can be made on a year-over-year basis. Sample data points include carbon intensity, percentage of non-renewable energy consumption, among others.

## 2 Evaluate companies' transition pathway

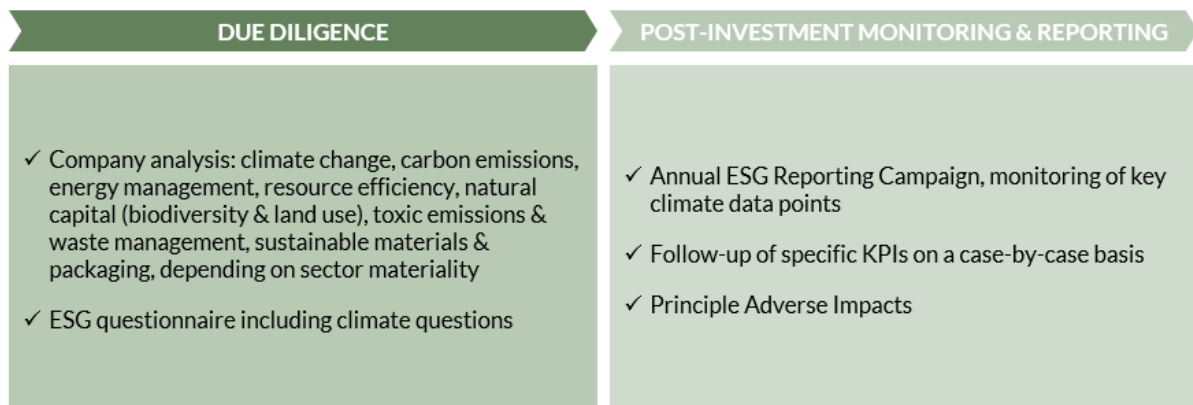
### Listed assets

Transition risks are important factors in the risk profile of the companies in which we invest. We primarily use the Implied Temperature Rise method developed by MSCI ESG Research.

### Private assets

Climate is considered at several stages of the investment cycle, alongside other ESG risks, where conditions permit. For SFDR article 8 funds, climate indicators are included in the due diligence phase if considered material, before an investment is made, as well as post-investment during the monitoring and annual reporting cycle.

### Investment cycle for private assets and consideration of climate issues





Data availability for climate metrics ranges from scarce to non-existent in non-listed assets, and the expectation of climate data disclosed by companies in a harmonized way is still rather limited. As such, establishing clear and robust transition trajectories for our holdings and portfolios still presents challenges.

### *3. Promote climate solutions<sup>32</sup>*

#### Listed assets

We aim to innovate within our fund range to provide our clients investment opportunities in in companies contributing to a low-carbon economy. Over the past few years, we have launched several strategies focused on economic activities that contribute to the transition:

- ODDO BHF Green Planet (article 9 SFDR):  
This global 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 objectives 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.

## 7° Strategy for alignment with long-term biodiversity objectives

### *1. Measuring compliance with the objectives of the Convention on Biological Diversity*

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<sup>32</sup> During the year, we did not launch any new Private Assets products promoting climate solutions.

We included biodiversity into the pillars of our sustainability strategy to better align with the Convention on Biological Diversity:

1. The impact materiality meaning the impact of company activities on biodiversity and nature, using natural resources use, soil exploitation, as well as its impact in terms of pollution and indirectly through its impact on global warming (feedback effect)
2. The financial materiality or dependency materiality which is defined as companies’ exposure to losses resulting from the declining performance their economic activities or their assets that depend upon biodiversity.

### 1.1 Exclusions

We defined exclusions specific to biodiversity based on two axes:

1. The first specifically concerns palm oil, since any company generating more than 5% of its revenue from palm oil production is excluded.
2. The second relates to controversies, as we exclude any company involved in very severe controversies related to biodiversity or deforestation.

The Exclusion Policy includes other activities which may negatively impact biodiversity such as coal or non-conventional oil and gas related ones.





To find out more about these exclusions, you can look at our Exclusion Policy available on our website<sup>33</sup>.

### 1.2 Integration

#### Listed assets

Our internal ESG model for corporates integrates biodiversity-related risks and opportunities on several criteria.

#### Biodiversity risks and opportunities are integrated into our internal ESG model for corporates

  DOUBLE MATERIALITY APPROACH		 	
<i>Direct effects</i>			
> Biodiversity footprint (BIA-GBS)	(1)	> Natural capital risk	(1)
> Use of resources	(2)	> Waste & pollution risk	(1)
> Waste management & pollution	(2)		
<i>Indirect effects</i>			
> Climate change	(7)	> Climate risk	(3)

(1) : number of criteria to score in our internal ESG model for corporates

<sup>33</sup> <https://am.oddo-bhf.com/app/uploads/sites/4/2026/01/exclusion-policy-2026.pdf>



Source: ODDO BHF Asset Management, 2026

Companies' impacts on their environment are assessed through 12 criteria, 5 being directly linked to pressures on biodiversity and 7 through indirect effects linked to climate change. Some data points are directly imported from MSCI and supplemented with our own qualitative evaluation.

We have established a partnership with Carbon4 Finance, a provider of climate data, and CDC Biodiversité, a specialist in corporate biodiversity footprint, which jointly developed the BIA-GBS tool in 2021. This database measures the biodiversity footprint of more than 7,000 entities, expressed as Mean Species Abundance (MSA). Based on this, we have developed a sector-based ranking according to biodiversity footprint intensity to reduce company size bias.

### Use of resources

Depending on the sector of activity in which the company operates, we capture the risks linked to the main raw materials used such as deforestation or soil erosion as well as a company's water consumption and its location in water stress areas. We assess the policies and processes that are put in place to limit these risks, consider external certifications, judge the credibility of the strategy, and look to understand whether alternatives are considered. Some examples include:

- Water risks: looking at the amount of water consumed (in comparison with similar companies), the location of a company's direct and indirect activities in areas of hydric stress, the existence of an effective strategy for limiting water consumption, setting up circular systems (particularly for cooling systems), considering the water needs of all stakeholders on a territorial scale, etc.
- Waste management and pollution: we are particularly interested in systems and policies to prevent high impacts as well as the strategy that has been adopted and its different targets. For example, we look at waste levels (in comparison with similar companies), strategies to limit toxic waste and plastic use (particularly disposable plastic), waste-recycling rate, reducing percentage of waste sent to landfills, circularity strategy, etc.

### Climate change

Climate change is appraised from two perspectives: the current situation of the company and its transition strategy to align on a well below to 2°C trajectory, pursuing efforts to limit to 1.5°C.

### Climate risks and opportunities

For climate risk, two components are analyzed: transition risks (including regulatory risks) and physical risks:

- **Transition risk:** we assess the degree of alignment with a decarbonization trajectory, the strategic resilience of companies, the risk of stranded assets, technological and regulatory risks, as well as risks linked to consumer behavior. We can rely on several indicators, including our materiality maps, the implied temperature rise (ITR), the TCFD analysis of companies (if available), the MSCI's Climate Value-at-Risk (Climate VaR), etc.
- **Physical risks:** These are an integral part of climate change risks, making the study of their impact on the valuation of assets necessary. These risks are mainly linked to the location of the company's operations and value chains. To date, we monitor Climate Value-at-Risk (climate VaR), which, among other things, makes it possible to measure the potential impact of physical risks on companies' valuations.

## Private assets

For direct investments strategy, we take biodiversity risk into account as part of our internal rating model and during the due diligence phase for our Art funds. 8. For funds of funds strategy, we analyze at GP level whether there are a biodiversity strategy and policy for the investments, and whether targets and objectives have been set.

With regards to establishing clear alignment paths on biodiversity, this still presents challenges for the time being for several reasons:

- Firstly, measuring the impact of companies on biodiversity requires the consideration of a multiplicity of variables compared to measuring the climate impact of an investment or a portfolio, which can be captured through CO2 emissions
- Secondly, the data availability for each of the variables ranges from scarce to non-existent in non-listed assets, and the expectation of biodiversity-related data disclosed by companies in a harmonized way seems very limited for the moment
- Thirdly, impacts on ecosystems are more geolocated in contrast to impacts on climate, which are more global. This complicates even more the measurement exercise at a company level

Finally, the methodologies for measuring the impact on biodiversity vary widely from one provider to the other and are not harmonized.

### 1.3 Dialogue & active ownership

## Listed assets



We structure our active ownership approach for listed assets in three ways: dialogue with companies, individual or collaborative engagement, exercise of voting rights. These elements are detailed in the shareholder engagement report<sup>34</sup>.

Through our sectoral materiality matrices, we have also identified the sectors for which biodiversity risk has the greatest impact. Consequently, the biodiversity criterion is considered in the weighting of the environmental pillar for each of these sectors, including:

- Aerospace & defense
- Automobiles & components
- Chemicals
- Commercial services sub-sector (waste treatment)
- Construction materials
- Consumer durables & apparel
- Consumer services (hotels, restaurant)
- Energy
- Financials
- Food, beverage & tobacco
- Metals & mining
- Pharma, biotech & life science
- Real estate
- Semiconductors
- Utilities

On this basis, the theme of biodiversity and its challenges have been regularly discussed with companies exposed to high risks in these sectors.

ODDO BHF Asset Management is also a signatory to the *Finance for Biodiversity Pledge* and a member of the *Foundation Finance for Biodiversity*. The Finance for Biodiversity Pledge was launched on 25 September 2020 and has now over 190 financial institutions from 29 countries among its signatories. The objective is to protect and restore biodiversity through finance and investment activities.

## Private assets

Post-investment, we continue to monitor the ESG status of the companies in which we have invested through the annual ESG questionnaire campaign. We have added biodiversity-related assessment questions in the Annual ESG questionnaire.

## *2. Contribution to the reduction of the main pressures and impacts on biodiversity*

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<sup>34</sup> <https://am.oddo-bhf.com/fr-en/non-professional-investor/regulatory-information/>

Given the challenges mentioned above, reducing the main pressures and impacts on biodiversity is difficult to demonstrate.

### 3. Biodiversity footprint indicator<sup>35</sup>

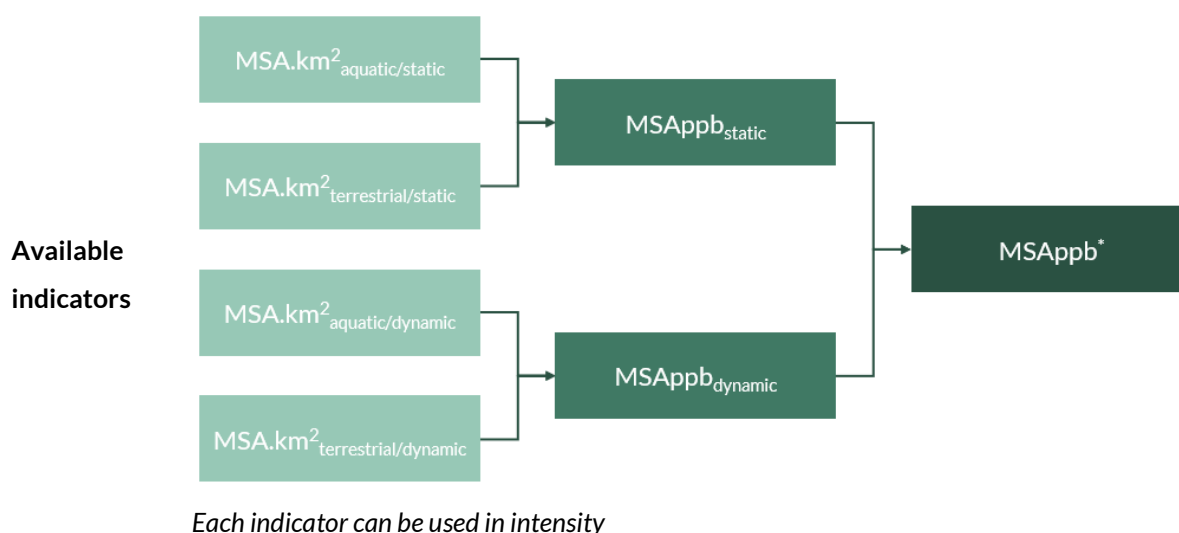
#### Listed assets

##### 3.1 Methodology

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 Mean Species Abundance (MSA). The model has the following characteristics:

<b>Pressures</b>	<ul style="list-style-type: none"> <li>› 5 terrestrial pressures</li> <li>› 6 aquatic pressures</li> <li>› Marine is not covered yet</li> </ul>
<b>Time accountancy</b>	<ul style="list-style-type: none"> <li>› Static</li> <li>› Dynamic</li> </ul>
<b>Value chain</b>	<ul style="list-style-type: none"> <li>› Scope 1</li> <li>› Scope 2</li> <li>› Scope 3 upstream (downstream in a case by case)</li> </ul>
<b>Metric</b>	<p>MSA (mean species abundance):</p> <ul style="list-style-type: none"> <li>› It represents the ratio of observed biodiversity to intact biodiversity (optimal baseline without human impact), a measure of the quality of observed biodiversity</li> </ul>
<b>Basic indicator</b>	<p>MSA.km2:</p> <ul style="list-style-type: none"> <li>› The loss of 1 MSA.km<sup>2</sup> = artificialization of 1 km<sup>2</sup> of intact biodiversity</li> </ul>

<sup>35</sup> This section does not cover our private assets because we do not yet have exhaustive data to be able to develop a methodology equivalent to the one for listed assets



With these characteristics, BIA-GBS data is aligned with the CBD and other international objectives. They can be used to identify the main pressures and impacts on biodiversity that need to be reduced. First, considering biodiversity realms and time accountancy allows to better capture the different dimensions of an ecosystem. Second, all IPBES pressures are covered except for invasive species, which is planned for the years to come. Third, it covers most of the value chain. Finally, the metric is the one used by the IPBES, the CBD, and the IPCC. More information can be found on Carbon4 Finance’s website<sup>36</sup>.

However, we identify two main limits that encourage us to adopt a cautious approach for the moment. Firstly, the marine realm is not covered yet. It is quite difficult to predict the impact on aggregate MSAppb\* scores once it is available. However, 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 score. Secondly, regarding the coverage, although the database is gradually expanding, it is not necessarily representative of certain portfolios, particularly those focused on small-cap stocks and high-yield universes.

## 3.2 Results

### 3.2.1 Entity-level

The first indicator we use is the MSAppb\*/€bn invested that provides a picture of our aggregated impact on biodiversity calculated on all our positions as of December 30<sup>th</sup>, 2025. We obtain a coverage of 64%.

<sup>36</sup> <https://www.carbon4finance.com/product/biodiversity-impacts>

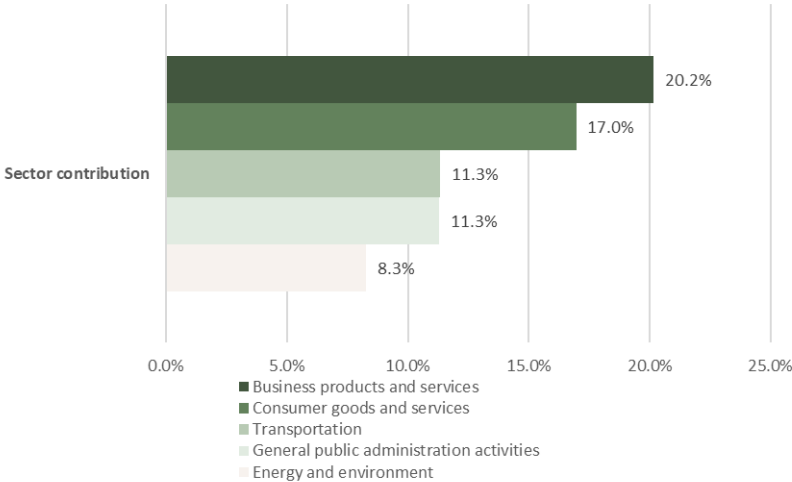
The MSAppb\* is the most comprehensive aggregate biodiversity metric and scaling it by amount invested allows us to avoid a size bias. MSAppb\* is derived from pressures in km<sup>2</sup>. While the latter are easy to interpret, as the MSAppb\* is a composite aggregated measure, it should be more interpreted as a useful metric for tracking our impact over time.

	MSAppb*/€bn invested	
Entity	Entity	Stoxx600
ODDO BHF Asset Management SAS	51	66

Source: ODDO BHF Asset Management SAS, BIA-GBS Carbon4 Finance (data as of April 2026)

Based on this aggregated metric, it is essential to understand the origin of the most significant impacts by sector.

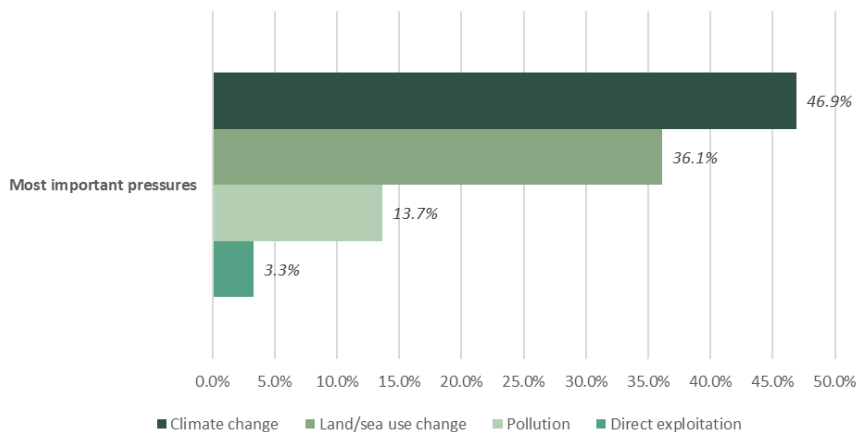
**Top sector contribution of ODDO BHF Asset Management SAS impact on biodiversity**



Source: ODDO BHF Asset Management SAS, BIA-GBS Carbon4 Finance (data as of April 2026)

In addition, we assess the most significant underlying pressures across all our assets under management. This enables us to better target risks related to companies’ practices and to provide more effective support through our engagement activities.

**Most important pressures of ODDO BHF Asset Management SAS impact on biodiversity**



Source: ODDO BHF Asset Management SAS, BIA-GBS Carbon4 Finance (data as of April 2026)

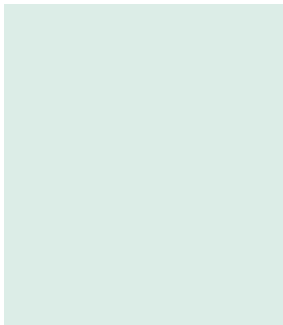
The main pressure on the biodiversity of our investments stems from climate change, which alters the distribution of ecosystems and threatens the species that inhabit them, which struggle to adapt. The second most significant pressure is land and sea use change, which notably includes deforestation.

These results are consistent with the fact that climate change has a major impact on biodiversity loss, acting as a feedback loop with amplifying effects. This reinforces our conviction that both issues must be addressed simultaneously.

#### Definition of GBS pressures and associated IPBES pressures

IPBES Pressures	GBS Pressures	Definitions
<b>Terrestrial Pressures</b>		
<b>Land/sea use change</b>	Encroachment	Human encroachment comprises anthropogenic activities in otherwise natural areas. Direct (noise, light, etc.) and indirect (right of way for hunting, tourism, etc.) disturbance caused by human activities are accounted for.
	Fragmentation	Fragmentation is the pressure caused by the reduction and subdivision of natural habitats and the disappearance of ecological corridors preventing species movement and limiting their living spaces (a species' population size is positively correlated to its habitat area size).
	Land use	The intensity of land management impacts natural habitat quality and quantity. High-intensity land uses such as intensive cropland maintain a high level of pressures which prevents ecosystem from reverting towards more natural states. The conversion of natural ecosystems into urban areas, croplands, managed forests, etc. also directly deteriorates ecological integrity.

<b>Climate change</b>	Climate change	Excess of emitted greenhouse gas leads to disturbance of the global climate. The global mean temperature increase (GMTI) and the induced climate change modify the repartition areas of different biomes, which threatens the survival of numerous species who cannot adapt fast enough to this phenomenon.
<b>Pollution</b>	Atmospheric nitrogen deposition	Agricultural and industrial activities cause nitrogen emissions into the atmosphere. Transported by the wind or water (acid rains), the nitrogen deposits on terrestrial ecosystems. When the critical load of the ecosystem is exceeded, the imbalance caused by additional nitrogen deposition harms ecological integrity via, for instance, eutrophication and shifts in plant competition.
	Terrestrial ecotoxicity	Terrestrial ecotoxicity is the pressure caused by chemical substances (organic substances and metal ions) on terrestrial ecosystems. This includes for instance the damage caused by some pesticides on ecosystems.
<b>Aquatic (freshwater) pressures</b>		
<b>Land/sea use change</b>	Wetland conversion	The conversion and draining of wetlands for human purposes lead to the loss of aquatic ecosystems (converted into degraded terrestrial ecosystems).
<b>Direct exploitation</b>	Hydrological disturbance due to direct water use	Hydrological disturbance is caused by the deviation of current river flows from the natural ones. Causes of flow deviation are multiple. In the GBS, the hydrological disturbance pressure is further split into a direct water use and a climate change component, based on the source of flow deviation (other causes of flow deviation include river dams used for hydropower, water storage and/or other purposes). The flow deviation associated to hydrological disturbance due to direct water use is caused by anthropic water abstraction.
<b>Climate change</b>	Hydrological disturbance due to climate change	Hydrological disturbance is caused by the deviation of current river flows from the natural ones. The second component of this pressure assessed in the GBS is the flow deviation caused by climate change (through changes in rainfall or evaporation).
<b>Pollution</b>	Freshwater ecotoxicity	Freshwater ecotoxicity is the mirror of terrestrial ecotoxicity affecting freshwater ecosystems: it is the pressure caused by chemical substances on aquatic ecosystems.
	Freshwater eutrophication	Human activities can lead to excess of nutrients leaching into water bodies. The imbalances overstimulate algal and aquatic plant growth, which may result in oxygen depletion, harming other organisms.



Land use in catchment of rivers/wetlands

Upstream land use changes, and in particular the intensification of a watershed's upstream land uses through urbanization or agricultural intensification, has an indirect negative impact on downstream water bodies. Land use type (and intensity) is indeed a good proxy for the nutrient emissions leaching from human activities to ecosystems. In the GBS, this pressure is split in two, depending on the type of ecosystems affected: rivers or wetlands.

Source: BIA-GBS Carbon4 Finance

### 3.2.2 Funds-level

When it comes to funds with AuM of more than €500m, the following figures are obtained:

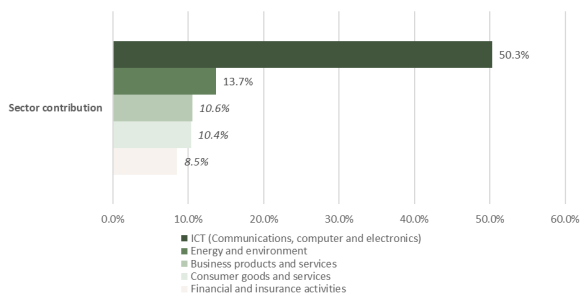
ODDO BHF Artificial Intelligence

MSAppb*/€/bn invested	Coverage
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13

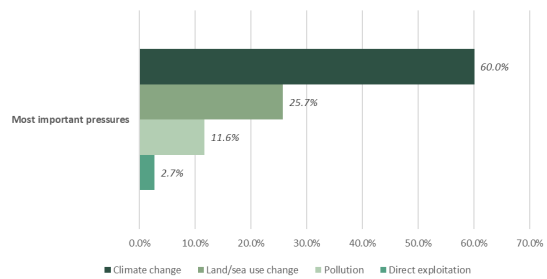
95%

#### Top sector contribution of ODDO BHF Artificial Intelligence impact on biodiversity



Source: ODDO BHF Asset Management SAS, BIA-GBS Carbon4 Finance (data as of April 2026)

#### Most important pressures of ODDO BHF Artificial Intelligence impact on biodiversity



Source: ODDO BHF Asset Management SAS, BIA-GBS Carbon4 Finance (data as of April 2026)

ODDO BHF Avenir Europe

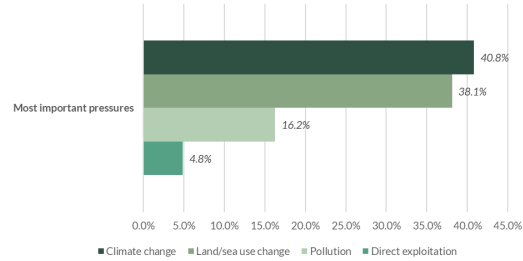
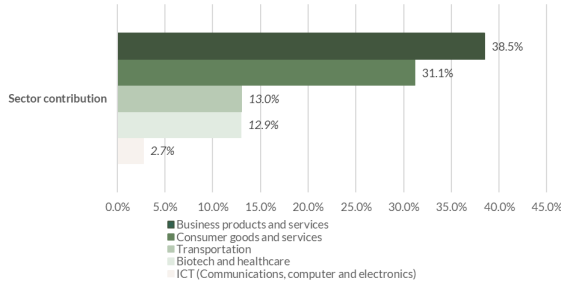
**MSAppb\*/€/bn invested** **Coverage**

58

85%

**Top sector contribution of ODDO Avenir Europe impact on biodiversity**

**Most important pressures of ODDO BHF Avenir Europe impact on biodiversity**



Source: ODDO BHF Asset Management SAS, BIA-GBS Carbon4 Finance (data as of April 2026)

Source: ODDO BHF Asset Management SAS, BIA-GBS Carbon4 Finance (data as of April 2026)

ODDO BHF Euro Credit Short Duration

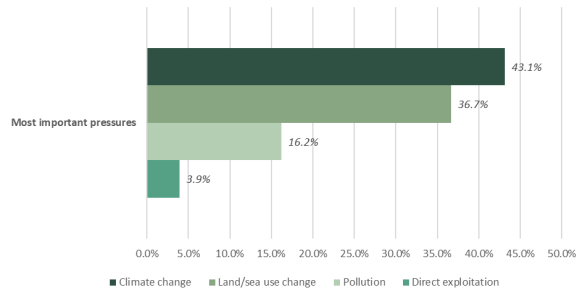
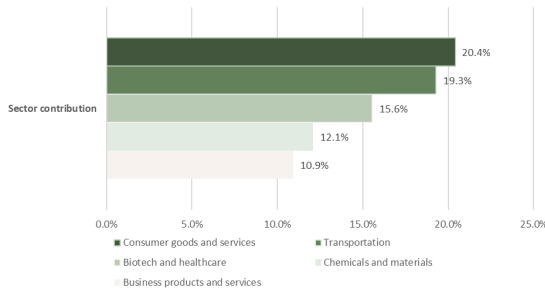
**MSAppb\*/€/bn invested** **Coverage**

59

43%

**Top sector contribution of ODDO BHF Euro Credit Short Duration impact on biodiversity**

**Most important pressures of ODDO BHF Euro Credit Short Duration impact on biodiversity**



Source: ODDO BHF Asset Management SAS, BIA-GBS Carbon4 Finance (data as of April 2026)

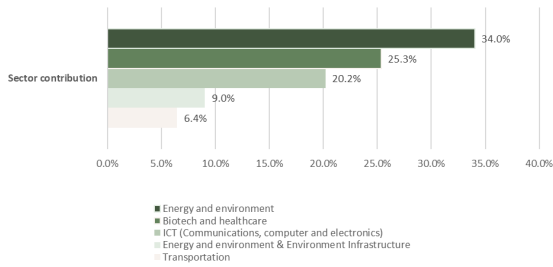
Source: ODDO BHF Asset Management SAS, BIA-GBS Carbon4 Finance (data as of April 2026)



ODDO BHF Euro High Yield Bond

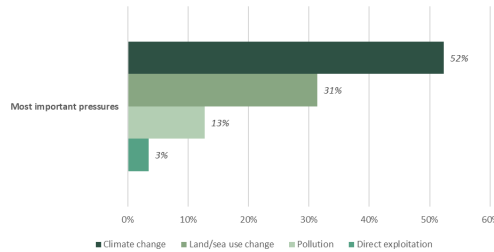
MSAppb*/€/bn invested	Coverage
53	26%

Top sector contribution of ODDO BHF Euro High Yield Bond impact on biodiversity



Source: ODDO BHF Asset Management SAS, BIA-GBS Carbon4 Finance (data as of April 2026)

Most important pressures of ODDO BHF Euro High Yield Bond impact on biodiversity

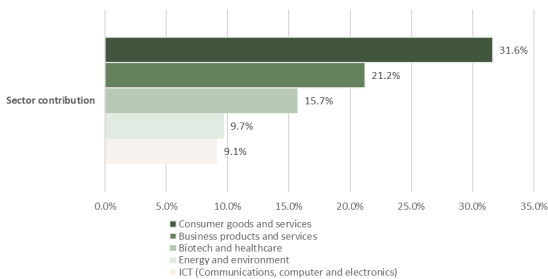


Source: ODDO BHF Asset Management SAS, BIA-GBS Carbon4 Finance (data as of April 2026)

ODDO BHF Global Target 2028

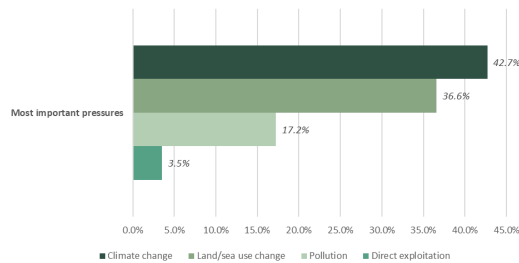
MSAppb*/€/bn invested	Coverage
75	40%

Top sector contribution of ODDO BHF Global Target 2028 impact on biodiversity



Source: ODDO BHF Asset Management SAS, BIA-GBS Carbon4 Finance (data as of April 2026)

Most important pressures of ODDO BHF Global Target 2028 impact on biodiversity



Source: ODDO BHF Asset Management SAS, BIA-GBS Carbon4 Finance (data as of April 2026)

In line with TNFD recommendations, as of end December 2025, we estimate that 7.6% of our investments are in companies with sites or activities located in biodiversity-sensitive areas and associated with negative impacts (see PAI indicator 7).

In addition, 19.2% of our listed assets are invested in sectors with significant impacts and/or dependencies on nature (see [TNFD guidance for financial institutions](#)). The main sector exposures for this second metric are detailed below:

Division NACE	Exposition (% of AUM)
Manufacture of motor vehicles, trailers and semi-trailers	2.61%
Electricity, gas, steam and air conditioning supply	2.11%
Manufacture of chemicals and chemical products	1.87%
Manufacture of computer, electronic and optical products	1.82%
Manufacture of machinery and equipment n.e.c.	1.33%
Civil engineering	1.07%
Manufacture of beverages	0.64%
Warehousing and support activities for transportation	0.63%
Manufacture of electrical equipment	0.61%
Extraction of crude petroleum and natural gas	0.49%

## 8° Consideration of ESG criteria in risk management

### 1. *Description of the risk management process*

#### Listed assets

The ESG Research team is responsible for rating companies to reflect sustainability risks using its internal rating model and facilitating the integration of ESG ratings from its external provider (MSCI ESG Research). Sustainability risks are then managed by the Risks & Compliance team, which is independent and reports directly to the CEO of ODDO BHF Asset Management SAS. The Risks & Compliance team oversees the market, liquidity and counterparty risks of the funds managed by ODDO BHF Asset Management SAS.

The first step in identifying and managing sustainability risks is our exclusion policy. As mentioned above in section 1° *General approach of the entity*, exclusion rules may vary from one fund or mandate to another. The exclusion lists are drawn up monthly by the ESG Research team and sent to the fund management teams, as well as to the Risks & Compliance team to be implemented in the control system.

The second step in identifying and managing sustainability risks involves our own rules for our Article 8-9 funds and mandates. This may involve exclusions based on certain ESG ratings, either derived from our internal model or from MSCI ESG ratings, as well as sectoral exclusions based on data provided by our external service provider.



The exclusion lists and ESG selection rules are configured into the pre-trade compliance system (Bloomberg AIM). This option is used to apply an exclusion list to funds or mandates and to generate blocking messages before transactions are executed or orders sent to the desk:

- On a pre-trade basis in Bloomberg AIM (buy-side blocking), based on portfolios in real time.
- On a post-trade basis via the in-house Sentinel tool (which sends out a reminder in the event of non-compliance), based on accounting inventories.

When there are certain investment limits to be complied with, the managers are informed immediately by the Risks department of any incident or breach of such limits. Corrections are then made in the portfolios as soon as the fund management team is informed of them. For all breaches that have already been processed but not yet resolved, the internal controls team first sends reminders by email. There is also an escalation procedure in place. All proven breaches are reported by email to the managers concerned and to the desk head and are filed in an audit trail. In the event of a persistent breach, the Compliance Committee or, failing that, the Executive Committee, is asked to rule on the matter. To ensure regular monitoring of the situation, material breaches are reported weekly by email to the Compliance and Internal Controls Department and to the Group Co-Chief Investment Officer.

To ensure compliance with these rules and a better understanding of sustainability challenges, there are regular contacts between Risk & Compliance, the fund management teams and the ESG Research team.

To find out more about our policy on integrating sustainability risks into the decision-making process under Article 3 of the SFDR, please refer to webpage dedicated to regulatory information<sup>37</sup>.

## Private assets

In terms of organization, the Risk & Compliance department is independent of the managers and reports directly to the CEO of ODDO BHF Asset Management.

Controls are organized at two independent levels:

- First level controls are carried out by operations teams (including portfolio managers and analysts) and the middle office.
- Second-level controls are carried out by the Compliance & Risk team, independently of operational activities, in accordance with the Annual Control Plan.

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<sup>37</sup> [https://am.oddo-bhf.com/france/en/professional\\_investor/infos\\_reglementaire](https://am.oddo-bhf.com/france/en/professional_investor/infos_reglementaire)

The Compliance function checks and controls compliance with this Responsible Investment policy as part of the Annual Control Plan.

The results of the second level controls are communicated in the Compliance and Risk Committee. In case of breach, the Compliance and Risk function informs the management of the ODDO BHF Asset Management and implements an action plan. This action plan is monitored until any breach is resolved.

## *2. Sustainability risks*

According to the SFDR, sustainability risk is defined as “an environmental, social or governance event or condition that, if it occurs, could cause an actual or a potential material negative impact on the value of the investment.”

**Transition risks** refer to risks arising from the transition to a more sustainable economy and can be broken down into several sub-risks:

**Regulatory risks:** Regulatory risks arise from changes in legislative and regulatory frameworks aimed at limiting activities with negative impacts on climate and nature, and at promoting more sustainable business models. They may result in the introduction of new operational constraints, increased compliance costs, or restrictions on access to certain markets. Some regulatory developments may lead to the impairment or even premature obsolescence of certain assets (“stranded assets”), particularly in sectors most exposed to climate and environmental challenges. Carbon pricing mechanisms or policies for the gradual phase-out of internal combustion engine vehicles in Europe are examples of such dynamics. These developments relate to both climate issues and the preservation of biodiversity and ecosystems. By nature, these risks have a strong geographical dimension, reflecting the heterogeneity of public policies and regulatory frameworks across jurisdictions.

**Technological risks:** Technological risks arise from innovations associated with the transition to a low-carbon and nature-friendly economy, which may render certain assets, processes, or business models obsolete. They can lead to a loss of competitiveness, asset impairments, or the need for significant investments to adapt to new technologies, as some innovations may prematurely render existing assets obsolete and result in “stranded assets.” These developments notably concern technologies that contribute to the preservation of natural resources, ecosystems, and the services they provide. Although their materialization may be influenced by regulatory frameworks, these risks have a largely cross-cutting dimension, as the diffusion of innovations occurs rapidly on a global scale.



**Market (products, services, commodities) and reputational risks:** Market and reputational risks arise from evolving consumer and investor preferences, as well as increasing awareness of companies' impacts on climate and nature, including biodiversity and ecosystems. They may result in changes in demand, loss of market share, or deterioration in brand image or social acceptability. These risks also include indirect effects related to constraints affecting supply chains and production capacities, particularly when these are impacted by environmental factors. They are especially pronounced in geographic areas and market segments most sensitive to sustainability issues and are expected to intensify as environmental awareness grows and the frequency of extreme climate events increases.

**Physical risks** refer to the direct consequences of climate change and biodiversity loss. They can be broken down into several sub-risks:

**Acute physical risks:** Acute physical risks refer to extreme and sudden climate events, such as storms, floods, heatwaves, or wildfires. They can result in direct damage to infrastructure, business interruptions, or logistical disruptions, with immediate impacts on assets, production capacities, and supply chains. These events may also affect local ecosystems and the associated ecosystem services, thereby increasing operational vulnerabilities. Their intensity and frequency are likely to rise as a result of climate change, particularly in certain exposed geographic areas, thereby increasing their materiality for companies.

**Chronic physical risks:** Chronic physical risks refer to the gradual and long-term effects of climate and environmental changes, such as rising average temperatures, shifts in precipitation patterns, water stress, and the degradation of ecosystems and biodiversity. These phenomena can affect the availability and cost of natural resources, as well as ecosystem services—particularly those related to water, soil, pollination, and climate regulation—on which economic activities depend. They may lead to a lasting deterioration in operating conditions by affecting asset productivity, the resilience of supply chains, and the location of operations. As such, these risks can progressively impair production capacity, increase operating costs, and affect the financial performance of exposed companies.

The ESG Research Team maintains a sector materiality roadmap to take into account the most recent research on sustainability risks and challenges. The weighting of the internal ESG model for corporates is adjusted by sectors similar to MSCI ESG Research ESG rating model. The perimeter of the products covered is described in section 1. *Entity's general approach to the consideration of environmental social and governance (ESG) criteria.*

Below are details of the risk assessment, the associated criteria from our internal ESG model for listed assets, and some of the sources and/or tools used.

Risk	Criteria	Source
<b>Transition risks</b>	› Ambition and relevance of the de-carbonization strategy	› MSCI ESG Research
	› Biodiversity policies and companies’ preventive measures	› Companies’ annual and sustainability reports
	› Exposure to carbon regulations	› Engagement with companies
	› Regulated activities and/or activities posing a risk to nature	› CDP
	› Green CapEx	› SBTi
	› Sustainable product offering	› Carbon4 Finance
	› Stranded assets	› Urgewald
	› Environmental controversies, notably deforestation	› Bloomberg
<b>Physical risks</b>	› Exposure of production sites and value chains to physical risks (droughts, hurricanes, etc.)	› MSCI ESG Research
	› Dependence on natural resources and ecosystem services (water, pollination, etc.)	› Companies’ annual and sustainability reports
	› Operational resilience and business continuity planning	› Climate VaR (MSCI)
		› Bloomberg
		› Broker research
		› Carbon4 Finance
		› Engagement with companies

### 3. Frequency of review of the risk management framework

The first-level risk management framework is reviewed on a continuous basis including the review of the Responsible Investment Policy both for listed and private assets, following their annual review.

### 4. Action plan to reduce sustainability risks

Our ESG strategy at entity level described in section 1 of this document has been structured to reduce sustainability risks during the entire investment cycle.



Pillar	How it reduces sustainability risks
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Under a double materiality approach and in alignment with the provisions of the TCFD, TNFD, and Article 29, our exclusion policy aims to reduce exposure to activities most vulnerable to transition risks, as well as to those generating significant negative impacts on the environment and society.

Our exclusions targeting the most critical fossil fuels (coal, unconventional oil and gas) structurally limit our exposure to the energy sector, which is particularly exposed to transition risks, while maintaining a limited, prudent, and nuanced exposure to this sector.

Our biodiversity-specific exclusions, notably relating to palm oil and certain environmental controversies, aim to reduce our exposure to issuers with significant negative impacts on nature, ecosystems, and ecosystem services.

**Exclusions**

In addition, our normative exclusions, based on violations of the United Nations Global Compact and the OECD Guidelines for Multinational Enterprises, help reduce our exposure to companies involved in controversies across a broad range of sustainability principles, including human rights and impacts on local communities.

Furthermore, additional exclusions may also be applied, particularly in the context of labeled funds or in line with the investment philosophy of the relevant products.

Established and updated monthly based on data provided by MSCI ESG Research and Urgewald, these exclusions are integrated by the Risk & Compliance team into risk management and control tools. They are subject to systematic pre-trade and post-trade checks.

For further information, please refer to our exclusion policy, available on our website.

**ESG & Climate Integration**

To reduce sustainability risks, our SFDR Article 8 funds aim to outperform their benchmark either in terms of ESG score or carbon intensity (Scopes 1 and 2). These requirements are monitored by the Risk & Compliance team through their systems.

The ESG score, whether derived from MSCI ESG Research or from our proprietary model, aims to assess issuers based on their ability to manage risks and capture opportunities related to sustainable development, considering the materiality of these issues for their activities, such as climate transition, natural capital, or human rights. A fund with a higher score than its benchmark is therefore considered to be less exposed to sustainability risks and/or better positioned to benefit from related opportunities.

A fund's carbon intensity is an indicator of its exposure to the most carbon-intensive issuers. Funds that rely on this metric therefore aim to reduce their exposure to the highest-emitting companies, thereby limiting transition risks while contributing to the financing of the climate transition.

**Active  
Ownership**

Our shareholder engagement approach is a key lever for identifying and managing sustainability risks.

Each year, we engage with dozens of companies in which we invest in order to assess their material risks and opportunities. Climate change, natural capital, and environmental opportunities are among the main topics discussed, in line with our climate and biodiversity strategy, and with the aim of strengthening our understanding and management of sustainability risks.

In addition, we conduct long-term engagement on climate and biodiversity issues, notably through collective initiatives such as Climate Action 100+, Nature Action 100+, and the CDP non-disclosure campaign. These initiatives aim to encourage improvements in companies' sustainability strategies and reporting, thereby contributing to better identification and management of their sustainability risks.

All investment rules can be found in the respective product prospectus and appendices available on our funds page<sup>38</sup>.

## *5. Financial impact of the main sustainability risks*

Mitigating global warming and adapting to the impacts of climate change expose issuers to transition risks, physical risks, as well as potential opportunities. MSCI ESG Research has developed Climate Value-at-Risk ("Climate VaR"), an indicator that provides a quantitative and forward-looking estimate of the impact of climate change on issuers' valuations by comparing discounted future climate-related costs to the company's current market value, under different climate scenarios (2°C, 5°C, etc.), as well as varying levels of physical risk severity (moderate and extreme scenarios).

Like the implied temperature rise metric, Climate VaR has certain limitations, notably related to the complexity of the models used and the inherent uncertainties associated with future scenario projections. Nevertheless, we consider it to be a relevant and complementary analytical tool. For further information, please refer to the documentation published by MSCI ESG Research.

In 2025, we organized a detailed presentation on Climate VaR for the Risk teams and initiated a monthly internal dissemination of this indicator for our main funds, across several climate scenarios. We selected a central 3°C scenario, a more favorable 2°C scenario, as well as two adverse scenarios (4°C and 5°C), to cover a broad and realistic range of possible pathways. This analytical tool complements our overall sustainability risk management framework by providing a forward-looking and scenario-based view of climate change impacts, alongside our exclusion policies, ESG integration, and shareholder engagement activities.

<sup>38</sup> <https://am.oddo-bhf.com/fr-en/non-professional-investor/funds/>



Below is the Climate VaR of our main funds as of end-2025 under several scenarios:

ODDO BHF Artificial Intelligence				
scenario	2°C	3°C	4°C	5°C
Climate VaR Average	-0.47%	-0.65%	-1.12%	-1.44%
Climate VaR Aggressive	-0.70%	-0.94%	-1.59%	-1.98%

ODDO BHF Avenir Europe				
scenario	2°C	3°C	4°C	5°C
Climate VaR Average	-0.55%	-0.00%	-2.09%	-2.74%
Climate VaR Aggressive	-0.81%	-0.34%	-2.69%	-3.48%

ODDO BHF Euro Credit Short Duration				
scenario	2°C	3°C	4°C	5°C
Climate VaR Average	-0.80%	-1.97%	-0.50%	-0.74%
Climate VaR Aggressive	-0.87%	-2.12%	-0.80%	-0.97%

ODDO BHF Euro High Yield				
scenario	2°C	3°C	4°C	5°C
Climate VaR Average	-0.52%	-2.06%	-0.56%	-0.80%
Climate VaR Aggressive	-0.68%	-2.35%	-1.21%	-1.44%

ODDO BHF Global Target 2028				
scenario	2°C	3°C	4°C	5°C
Climate VaR Average	-0.37%	-2.71%	-0.46%	-0.86%
Climate VaR Aggressive	-0.39%	-2.75%	-0.89%	-1.26%

**ODDO BHF Asset Management SAS (France)**

Portfolio management company approved by the Autorité des Markets Financiers under GP 99011.

*Société par actions simplifiée* with capital of €21,500,000. Trade Register (RCS) 340 902 857

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