

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

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

Environmental and/or social characteristics

Product name: ODDO BHF US EQUITY TREND

ODDO BHF US Equity Trend ("Sub-Fund" or "Fund") is a Sub-Fund of SICAV ODDO BHF ("SICAV")

Legal entity identifier: 54930015XWO4PJRGW22

DOES THIS FINANCIAL PRODUCT HAVE A SUSTAINABLE INVESTMENT OBJECTIVE?

●● <input type="checkbox"/> Yes	●● <input checked="" type="checkbox"/> No
<input type="checkbox"/> It will make a minimum of sustainable investments with an environmental objective: N/A <ul style="list-style-type: none"> <input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy <input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy <input type="checkbox"/> It will make a minimum of sustainable investments with a social objective: N/A	<input type="checkbox"/> It promotes Environmental/Social (E/S) characteristics and while it does not have as its objective a sustainable investment, it will have a minimum proportion of N/A of sustainable investments <ul style="list-style-type: none"> <input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy <input type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy <input type="checkbox"/> with a social objective <input checked="" type="checkbox"/> It promotes E/S characteristics, but will not make any sustainable investments.



WHAT ENVIRONMENTAL AND/OR SOCIAL CHARACTERISTICS ARE PROMOTED BY THIS FINANCIAL PRODUCT?

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

The Sub-Fund promotes: (1) climate transition (i.e. a reduction in carbon emissions); (2) natural capital (i.e. the protection of biodiversity and reduction of environmental damage); and (3) human rights and human capital (i.e. health and safety, human capital development, labour management, community relations, privacy and data security and product safety and quality) by applying a combination of exclusions and an external ESG rating system from MSCI. ESG criteria are taken into consideration through an approach which can be broken down into two stages.

I: First stage: exclusions:

The Sub-Fund applies the common exclusion framework as detailed in the Management Company's exclusion policy, which is available at am.oddo-bhf.com. The exclusions are the following:

Non-conventional weapons: all companies that manufacture or distribute weapons prohibited under certain international conventions. Companies shall have no activity of manufacturing or of manufacturing tailor-made components, using, repairing, putting up for sale, selling, distributing, importing or exporting, storing or transporting controversial or indiscriminate weapons such as: anti-personnel mines, submunitions, inert ammunition and armor containing depleted uranium or any other industrial uranium, weapons containing white phosphorus, biological, chemical or nuclear weapons (in the case of companies incorporated in a country that does not form part of the Nuclear Non-Proliferation Treaty).

Coal mining: Any company with annual production in excess of 8 million tons or, alternatively, production equivalent to 5% of its revenues.

Coal power: Any company for which coal accounts for more than 15% of its production mix or, alternatively, more than 15% of its installed capacity.

Coal development projects: Any company engaged in coal mining or coal-fired power generation that is developing new projects involving thermal coal, regardless of the project's size. This includes coal infrastructure projects such as port or road developments favoring the development of coal production.

Tobacco: all companies that generate more than 0% of their revenues from the production of tobacco.

Unconventional oil and gas: all companies from the energy sector that generate more than 5% of their revenues from the extraction and production of unconventional oil and gas. This includes shale oil and gas as well as oil sands.

Arctic exploration: all companies from the energy sector that generate more than 10% of their revenues from the extraction and production of (conventional and unconventional) oil and gas in the Arctic.

Governance and international norms and conventions: all companies violating the United Nations Global Compact as well as OECD Guidelines for Multinational Enterprises.

Biodiversity: all companies that generate more than 5% of their revenues from the production of palm oil as well as any company involved (according to data provided by MSCI) in serious controversies linked to biodiversity.

II. Second stage: ESG rating

This involves assessing the ESG rating of the securities comprising the investment universe in order to select investments which will enable the Sub-Fund to meet its commitment to maintain a weighted average ESG score that is better than that of the S&P 500 NR (Net Return) (the "Benchmark."). To this end, the management team relies on ESG ratings provided by the external data provider, MSCI and at least 90% of the Sub-Fund's net assets will be invested in securities for which such data is available and has been assessed by the Investment Manager.

MSCI uses a rules-based methodology by assigning issuers an industry-relative letter rating from AAA to CCC based on how well they manage sustainability risks and opportunities (those relevant to the environmental and social characteristics set out above being: (1) Climate transition: carbon emissions, climate change vulnerability, opportunities in cleantech, opportunities in green building, and opportunities in renewable energy; (2) Natural capital: biodiversity and land use, raw material sourcing, and water stress; and (3) Human rights and human capital: Health and safety, human capital development, labor management, community relations, privacy and data security and product safety and quality; together the SRO) relative to their peers. AAA is the best rating on the rating scale and CCC is the worst.

The Investment Manager takes into account the weighting of the securities held in the Sub-Fund when calculating the average ESG score of the Sub-Fund. In the event of a deterioration in the ESG ratings of the securities in the Sub-Fund or a change in the ESG rating methodology affecting the average ESG rating of the Sub-Fund, the average ESG rating of the Sub-Fund will be restored to a level higher than that of the benchmark index, taking into account the interests of unitholders and market conditions. The Sub-Fund does not target a specific level of outperformance in terms of this rating compared to that of the Benchmark (i.e. the margin by which the weighted average MSCI ESG score of the Fund will be better than that of the Benchmark may ultimately be minimal).

The Sub-Fund has not designated a reference benchmark for the purpose of attaining the environmental and social characteristics it promotes.

WHAT SUSTAINABILITY INDICATORS ARE USED TO MEASURE THE ATTAINMENT OF EACH OF THE ENVIRONMENTAL OR SOCIAL CHARACTERISTICS PROMOTED BY THIS FINANCIAL PRODUCT?

The following sustainability indicators are used to measure the achievement of the Sub-Fund's ESG characteristics:

- The ESG coverage of the Sub-Fund, notably given the pledge that at least 90% of the Sub-Fund's net assets will be invested in securities with an ESG rating (accounting for the weight of each security).
- The internal weighted ESG score of the Sub-Fund to assess the overall achievement of environmental, social and governance characteristics.

Principal adverse impacts are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

WHAT ARE THE OBJECTIVES OF THE SUSTAINABLE INVESTMENTS THAT THE FINANCIAL PRODUCT PARTIALLY INTENDS TO MAKE AND HOW DOES THE SUSTAINABLE INVESTMENT CONTRIBUTE TO SUCH OBJECTIVES?

N/A – the Sub-Fund does not make any sustainable investments.

HOW DO THE SUSTAINABLE INVESTMENTS THAT THE FINANCIAL PRODUCT PARTIALLY INTENDS TO MAKE, NOT CAUSE SIGNIFICANT HARM TO ANY ENVIRONMENTAL OR SOCIAL SUSTAINABLE INVESTMENT OBJECTIVE?

N/A – the Sub-Fund does not make any sustainable investments.

HOW HAVE THE INDICATORS FOR ADVERSE IMPACTS ON SUSTAINABILITY FACTORS BEEN TAKEN INTO ACCOUNT?

N/A – the Sub-Fund does not make any sustainable investments.

HOW ARE THE SUSTAINABLE INVESTMENTS ALIGNED WITH THE OECD GUIDELINES FOR MULTINATIONAL ENTERPRISES AND THE UN GUIDING PRINCIPLES ON BUSINESS AND HUMAN RIGHTS? DETAILS:

N/A – the Sub-Fund does not make any sustainable investments.

The EU Taxonomy sets out a “do not significant harm” principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria. The “do no significant harm” principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities. Any other sustainable investments must also not significantly harm any environmental or social objectives.



DOES THIS FINANCIAL PRODUCT CONSIDER PRINCIPAL ADVERSE IMPACTS ON SUSTAINABILITY FACTORS?

Yes, in accordance with the provisions of Article 8 of Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector (SFDR), the Investment Manager takes sustainability risks into account by integrating ESG (Environmental, Social and Governance) criteria into its investment decision-making process, as set out in the “Investment Strategy” section. This process also makes it possible to assess the management team’s ability to manage the adverse sustainability impacts of their business activities.

No



WHAT INVESTMENT STRATEGY DOES THIS FINANCIAL PRODUCT FOLLOW?

The Sub-Fund is actively managed and references a benchmark, the S&P 500 NR (Net return) in EUR, dividend reinvested (the “Benchmark”), by seeking to outperform it and for performance fee calculation purposes, if any. The Sub-Fund shall invest at least 70% of its net assets in equities that are contained in the Benchmark. Subject to market conditions, the Sub-Fund may invest up to 30% of its net assets in debt instruments denominated in euro with a rating “investment grade” (at least BBB- by Standard & Poor’s or deemed equivalent by the Investment Manager or using the Investment Manager’s internal rating) issued by corporate or sovereign issuers.

The investment process is based on ESG integration, ESG ratings, normative and sector exclusions (including UNGC and controversial weapons) and positive selection. In addition, the Investment Manager will observe the United Nations Principles for Responsible Investment with respect to ESG issues and will apply them in its commitments by actively exercising shareholder and creditor rights. The investment process consists of two stages. The first is based on sector-based exclusions and the exclusion of controversial activities. The Sub-Fund will not invest in issuers involved in the manufacture and distribution of non-conventional weapons or in coal development projects or infrastructure. In addition, issuers in other controversial business sectors are excluded if a certain turnover threshold is exceeded. These include coal mining, coal-fired power generation,

coal development projects or infrastructure, tobacco and fossil fuel extraction in the Arctic or the exploration, production and use of unconventional oil and gas (shale oil/gas and oil sands). Issuers that significantly violate the UNGC principles and OECD guidelines are also excluded. The Investment Manager will rely on MSCI's data to determine whether companies are considered to have breached any of these exclusions.

ESG ratings by MSCI or another internal or external rating acceptable to the Investment Manager will be applied at the second level. In addition, this results in positive bias for issuers with lower sustainability risks (best-in-class approach).

The Sub-Fund will focus on issuers with a high sustainability performance. The Investment Manager will construct the Sub-Fund with an average ESG score better than the average ESG score of the Benchmark.

Direct investments acquired for the Sub-Fund are subject to the minimum exclusions which guarantee a minimum level of environmental or social safeguards. However, there is no look-through approach in relation to financial instruments (no look-through at the assets of a target fund or certificates).

WHAT ARE THE BINDING ELEMENTS OF THE INVESTMENT STRATEGY USED TO SELECT THE INVESTMENTS TO ATTAIN EACH OF THE ENVIRONMENTAL OR SOCIAL CHARACTERISTICS PROMOTED BY THIS FINANCIAL PRODUCT?

The Fund will not invest in companies that violate the UN Global Compact principles or involved in serious controversies related to biodiversity, in addition to companies that are involved in the manufacture or distribution of non-conventional weapons, or that are involved in coal development projects or infrastructure. Additionally, the Sub-Fund will not invest in companies involved in the following activities, subject to the specified thresholds: coal mining (any company with an annual production in excess of 8 million tons or, alternatively, a production equivalent to 5% of its revenues), coal-fired power generation (any company for which coal accounts for more than 15% of its production mix or, alternatively, more than 15% of its installed capacity), tobacco (all companies that generate more than 0% of their revenues from the production of tobacco), fossil fuel extraction in the Arctic (all companies from the energy sector that generate more than 10% of their revenues from the extraction and production of (conventional and unconventional) oil and gas in the Arctic), unconventional oil and gas and extraction (all companies from the energy sector that generate more than 5% of their revenues from the extraction and production of unconventional oil and gas, including shale oil and gas, as well as oil sands) and palm oil production (all companies that generate more than 5% of their revenues from the production of palm oil).

The Investment Manager will construct the Sub-Fund to have a weighted average ESG score that is at all times better than the Benchmark's, resulting (as indicated above) in a positive bias towards selecting investments in issuers with relatively lower sustainability risks and higher sustainability performance (particularly in relation to the SRO listed in the What environmental and/or social characteristics are promoted by this financial product? above), in order to attain the related environmental and social characteristics that it promotes. To this end, at least 90% of the Sub-Fund's net assets will be invested in securities for which the requisite MSCI data is available and has been assessed by the Investment Manager.

WHAT IS THE COMMITTED MINIMUM RATE TO REDUCE THE SCOPE OF THE INVESTMENTS CONSIDERED PRIOR TO THE APPLICATION OF THAT INVESTMENT STRATEGY?

The Sub-Fund has no commitment to reduce the scope of investments.

WHAT IS THE POLICY TO ASSESS GOOD GOVERNANCE PRACTICES OF THE INVESTEE COMPANIES?

The Management Company's Responsible Investment Policy details our definition and assessment of what constitutes good governance practices. Good governance practices rely on the quality of the management team, the sustainable development strategy, minority shareholders' rights, the anti-corruption processes and track record, as well as other criteria. A good indicator for the degree of alignment of companies' strategies with sustainable aspects is their positioning regarding the UN Global Compact. By committing to the ten principles on human rights, labor, environment, and anticorruption, the company sends a positive signal of strong ambitions towards a long-term oriented financial ecosystem.

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



WHAT IS THE ASSET ALLOCATION PLANNED FOR THIS FINANCIAL PRODUCT?

Asset Allocation describes the share of investments in specific assets.

The Sub-Fund is actively managed and aims to generate a sustainable return out of income from growth in investments in securities while keeping financial risk low. The Sub-Fund shall invest at least 70% of its net assets in equities that are contained in the Benchmark.

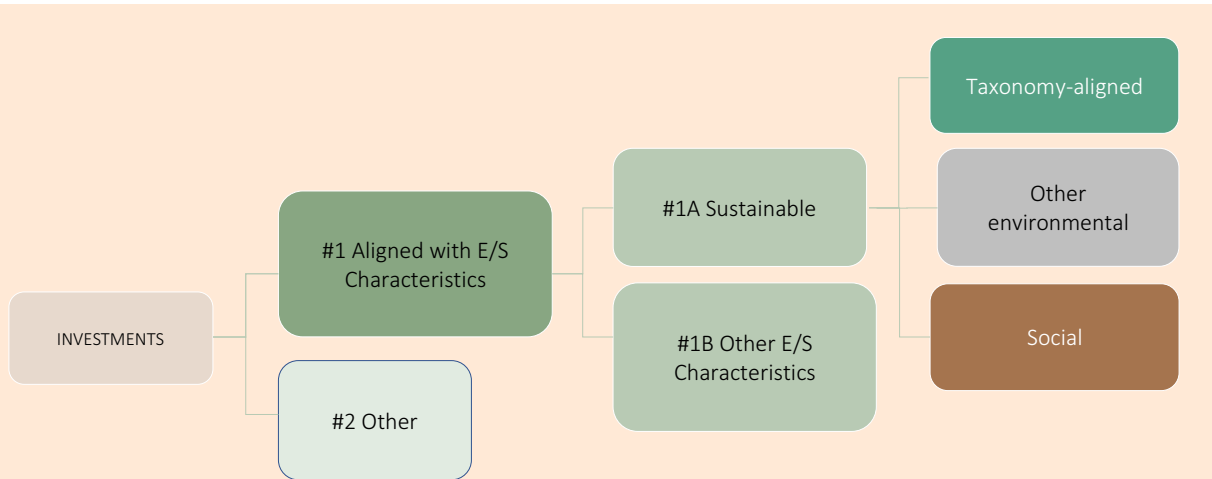
At least 90% of the Sub-Fund’s net assets will be aligned with the environmental and social characteristics promoted by the Sub-Fund (#Aligned with E/S characteristics), but do not have to qualify as sustainable investments. Up to 10% of the investments of the Sub-Fund are not aligned with these characteristics (#2 Other).

Taxonomy-aligned activities are expressed as a share of:

- **turnover**, reflecting the share of revenue from green activities of investee companies

- **capital expenditure (CapEx)** showing the green investments made by investee companies, e.g. for a transition to a green economy.

- **operational expenditure (OpEx)** reflecting green operational activities of investee companies.



#1 Aligned with E/S characteristics includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

#2 Other includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The category **#1 Aligned with E/S characteristics** covers:

The sub-category **#1A Sustainable** covers sustainable investments with environmental or social objectives.

The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

HOW DOES THE USE OF DERIVATIVES ATTAIN THE ENVIRONMENTAL OR SOCIAL CHARACTERISTICS PROMOTED BY THE FINANCIAL PRODUCT?

Derivatives are not actively used to enhance ESG alignment or decrease ESG risk. As part of the investment strategy, the Sub-Fund is allowed to enter into derivatives for investment and hedging purposes.



TO WHAT MINIMUM EXTENT ARE SUSTAINABLE INVESTMENTS WITH AN ENVIRONMENTAL OBJECTIVE ALIGNED WITH THE EU TAXONOMY?

DOES THE FINANCIAL PRODUCT INVEST IN FOSSIL GAS AND/OR NUCLEAR ENERGY RELATED ACTIVITIES THAT COMPLY WITH THE EU TAXONOMY¹?

Yes

In fossil gas

In nuclear energy

No

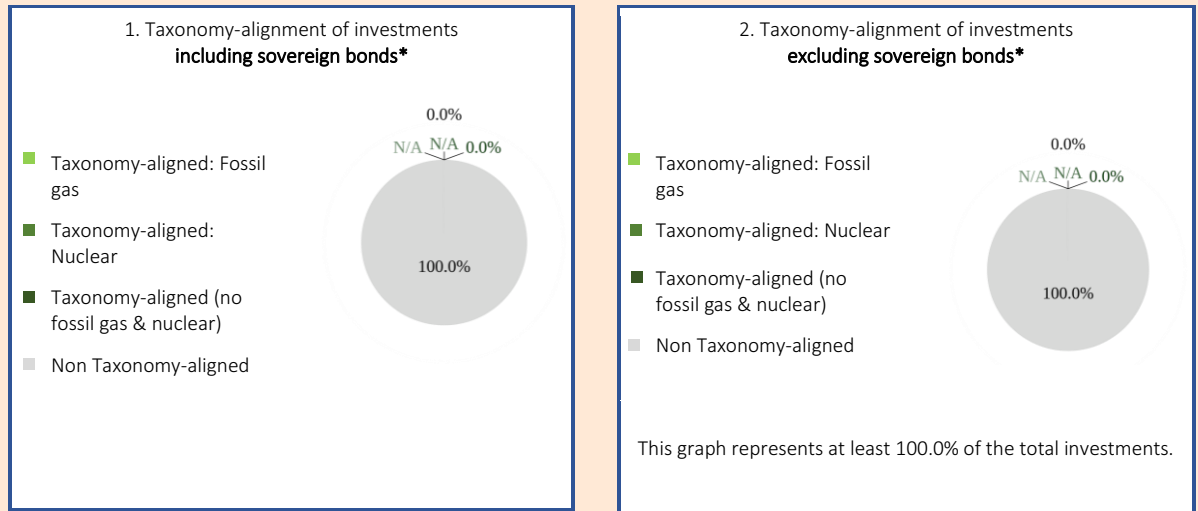
¹ Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change (“climate change mitigation”) and do not significantly harm any EU Taxonomy objective – see explanatory not on the left hand margin. The full criteria for fossil gas and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

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

Enabling activities, directly enable other activities to make a substantial contribution to an environmental objective.

Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds*, the first graph shows the Taxonomy-alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy-alignment only in relation to the investments of the financial product other than sovereign bonds.



* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures.

WHAT IS THE MINIMUM SHARE OF INVESTMENTS IN TRANSITIONAL AND ENABLING ACTIVITIES?

N/A – the Sub-Fund has no minimum proportion of investment in transitional or enabling activities.

 **WHAT IS THE MINIMUM SHARE OF SUSTAINABLE INVESTMENTS WITH AN ENVIRONMENTAL OBJECTIVE THAT ARE NOT ALIGNED WITH THE EU TAXONOMY?**


N/A – the Sub-Fund has no minimum share of investments with an environmental objective that is not aligned with the EU Taxonomy Regulation.

 **WHAT IS THE MINIMUM SHARE OF SOCIALLY SUSTAINABLE INVESTMENTS?**

N/A – the Sub-Fund has no minimum share of socially sustainable investments.

 **WHAT INVESTMENTS ARE INCLUDED UNDER “#2 OTHER”, WHAT IS THEIR PURPOSE AND ARE THERE ANY MINIMUM ENVIRONMENTAL OR SOCIAL SAFEGUARDS?**

The Sub-Fund predominantly makes investments that are aligned with environmental and social characteristics (1 Aligned with E/S characteristics). Those investments included under “#2 Other” may include ancillary liquid assets, money market instruments, investments in ETFs authorized as UCITS, futures, currency swaps and currency forwards. It may also include securities which no longer meet the environmental and/or social criteria described above. There are no minimum environmental or social safeguards.

 **IS A SPECIFIC INDEX DESIGNATED AS A REFERENCE BENCHMARK TO DETERMINE WHETHER THIS FINANCIAL PRODUCT IS ALIGNED WITH THE ENVIRONMENTAL AND/OR SOCIAL CHARACTERISTICS THAT IT PROMOTES?**

The Sub-Fund has not designated a specific index to use as a reference benchmark to determine whether the Sub-Fund is aligned with the environmental and/or social characteristics it promotes.

 are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.

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

HOW IS THE REFERENCE BENCHMARK CONTINUOUSLY ALIGNED WITH EACH OF THE ENVIRONMENTAL OR SOCIAL CHARACTERISTICS PROMOTED BY THE FINANCIAL PRODUCT?

Non applicable.

HOW IS THE ALIGNMENT OF THE INVESTMENT STRATEGY WITH THE METHODOLOGY OF THE INDEX ENSURED ON A CONTINUOUS BASIS?

Non applicable.

HOW DOES THE DESIGNATED INDEX DIFFER FROM A RELEVANT BROAD MARKET INDEX?

Non applicable.

WHERE CAN THE METHODOLOGY USED FOR THE CALCULATION OF THE DESIGNATED INDEX BE FOUND?

Non applicable.



WHERE CAN I FIND MORE PRODUCT SPECIFIC INFORMATION ONLINE?

More product-specific information can be found on the website: am.oddo-bhf.com