

## • *Sustainability-related disclosures*

Nom du produit : ODDO BHF Polaris Flexible

Identifiant de l'entité juridique (LEI-Code) : 5299003TOG95JF98Z011

### SUMMARY

El Fondo promueve características ambientales y/o sociales. Esto se refleja en la construcción y ponderación de la cartera basada en el proceso de calificación ESG y en la consideración de análisis y datos externos. Los detalles de la estrategia de inversión se proporcionan en el Folleto del Fondo y, en particular, en el Anexo «Características medioambientales y/o sociales» sobre divulgación precontractual de los productos financieros a que se refiere el artículo 8, apartados 1, 2 y 2 bis, del Reglamento (UE) 2019/2088 y el artículo 6, párrafo primero, del Reglamento (UE) 2020/852. Los principales impactos adversos sobre los factores de sostenibilidad se tienen en cuenta en las decisiones de inversión, en particular mediante el cumplimiento de la política de exclusión de la Sociedad Gestora. El Fondo contribuye a la mitigación del cambio climático y a la adaptación al mismo. El cumplimiento de las directrices de inversión ESG es supervisado por el departamento de control de riesgos independiente. La metodología de investigación y evaluación de las características medioambientales y sociales del Fondo se basa en el modelo ESG de la Sociedad Gestora. Dependiendo de la categoría de activos y la estrategia, este modelo ESG se basa, total o parcialmente, en la metodología y los datos de MSCI. La Sociedad Gestora no utiliza estimaciones para los datos de la Taxonomía. Todas las inversiones directas adquiridas para el Fondo están sujetas a las exclusiones mínimas del Fondo, que garantizan un nivel mínimo de protección ambiental o social.

### NO SUSTAINABLE INVESTMENT OBJECTIVE

This financial product promotes environmental or social characteristics.

The following approach is defined to be consistent with Article 2 (17) of Regulation (EU) 2019/2088 on sustainability-related disclosure requirements in the financial services sector ("SFDR").

**1. Sector and standard-related exclusions:** The Sub-Fund applies general exclusions which are described in the Management Company's exclusion policy which is available at "am.oddo-bhf.com". This exclusion policy covers among others the coal, tobacco and non-conventional weapons sector. Issuers in the gambling and adult entertainment industries are also excluded. In addition, an insufficient score according to the Freedom House Index for government bonds that are to be acquired for the Sub-Fund (direct investment) will result in exclusion.

**2. Consideration of the main adverse impacts:** In order to ensure no significant harm to sustainability objectives, the Investment Manager sets (pre-trade) control rules for certain selected significantly harmful activities. Exposure to controversial weapons (PAI 14 and 0% tolerance) and serious violations of the principles of the UN Global Compact and the Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises (PAI 10 and 0% tolerance).

**3. Controversies:** The most controversial companies according to MSCI ESG Research are not considered sustainable.

**4. Dialogue, engagement and voting:** Our policy of dialogue, engagement and voting supports the goal of avoiding significant harm by identifying key risks and making our voices heard to drive change and improvement.

Regulation (EU) 2020/852 defines certain areas that may have significant adverse impact ("PAI").

The Investment Manager applies the pre-trade rules to two PAIs:

- Exposure to controversial weapons (PAI 14 and 0% tolerance) and
- serious violations of the principles of the UN Global Compact and the Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises (PAI 10 and 0% tolerance).

MSCI ESG scores also incorporate environmental, social and governance issues for which the collection of other PAI data for companies and sovereign issuers can support the ESG score. For companies, ESG analysis includes, where data is available, monitoring of greenhouse gas emissions (PAI 1), carbon footprint (PAI 2), GHG intensity of investee companies (PAI 3), activities negatively affecting biodiversity sensitive areas (PAI 7), hazardous waste and radioactive waste ratio (PAI 9), violations of the principles of the UN Global Compact and the Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises (PAI 10), lack of processes and compliance mechanisms to monitor compliance with the principles of the UN Global Compact and the OECD Guidelines for Multinational Enterprises (PAI 11), unadjusted gender pay gap (PAI 12), and board gender diversity (PAI 13). For government issuers, it may also include the intensity greenhouse gas emissions per capita (PAI 15, usually based on gross domestic product rather than per population). However, the Investment Manager does not set specific objectives or defined control rules for these other PAIs apart from the PAIs mentioned in the first paragraph.

For more information about MSCI ESG Scores visit <https://www.msci.com/data-and-analytics/sustainabilitysolutions/esg-ratings>

The Company ensures that the Fund's sustainable investments are in line with the exclusion list drawn up according to the criteria of the United Nations Global Compact (UNGCG), as further described in the Company's exclusion policy. Proven violations of the OECD Guidelines for Multinational Enterprises and/or the UN Guiding Principles on Business and Human Rights also result in exclusion.

## ENVIRONMENTAL OR SOCIAL CHARACTERISTICS OF THE FINANCIAL PRODUCT

The fund promotes climate protection and adaptation to climate change through sustainable investments under the EU taxonomy and sustainable investments under Art. 2 No. 17 SFDR.

## INVESTMENT STRATEGY

ODDO BHF Polaris Flexible follows a flexible investment policy, actively investing globally in equities, bonds, certificates and money market investments. The Investment Manager incorporates sustainability risks into its investment process by considering ESG (environmental, social and governance) characteristics in investment decisions as well as any principal adverse impacts that investment decisions may have on sustainability factors. The Management Company observes the United Nations Principles for Responsible Investment (UN PRI) with respect to environmental, social and governance issues, and also applies the UN PRI in its commitments by exercising voting rights, actively exercising shareholder and creditor rights, and by engaging in dialogue with issuers. The Sub-Fund's initial investment universe for both equities and corporate bonds are issuers in the MSCI ACWI Index ("Investment universe"). The Sub-Fund may also invest in companies or issuers from OECD countries with a market capitalisation of at least EUR 100 million or with at least EUR 100 million in bonds issued. These are also subject to ESG analysis. ESG criteria are considered using an approach that can be broken down in three stages:

### 1. stage: Exclusions

The Sub-Fund applies general exclusions which are described in the Management Company's exclusion policy which is available at "am.oddo-bhf.com". This exclusion policy covers among others the coal, tobacco and non-conventional weapons sectors. Issuers in the gambling and adult entertainment industries are also excluded. In addition, an insufficient score according to the Freedom House Index for government bonds that are to be acquired for the Sub-Fund (direct investment) will result in exclusion.

## 2. stage: ESG score

The ESG scores of the securities that are to be included in the Sub-Fund are taken into account. The basis is the ESG score of data provider MSCI Research. At least 90 % of the issuers in the portfolio have - taking into account the weighting of the individual securities - an ESG score.

## 3. stage: Carbon intensity

The Investment Manager takes extra-financial criteria into account to a significant extent, insofar as the Sub-Fund's carbon intensity must be at least 20 % lower than that calculated for the investment universe. At least 90 % of the issuers in the portfolio have - taking into account the weighting of individual securities (excluding cash, derivatives and sovereign and quasi-sovereign issuers) - carbon intensity data available.

At least 0.5 % of the Sub-Fund's net asset value is invested in Taxonomy-aligned investments. The Sub-Fund is required to invest a minimum of 10 % of its assets in sustainable investments.

Additional ESG assessments conducted by in-house research or by third parties may also be used.

## PROPORTION OF INVESTMENTS

At least 80 % of the Sub-Fund's net asset value is aligned with environmental and/or social characteristics. The Sub-Fund may also hold up to 20 % of its net asset value in "Other", as defined below, which includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

At least 10 % of the Sub-Fund's net asset value is invested in sustainable investments. The Sub-Fund may also hold assets aligned with the environmental or social characteristics that do not qualify as sustainable investments. At least 0.5 % of the Sub-Fund's net asset value is invested in Taxonomy-aligned investments. There is no minimum commitment for other environmental or social investments.

At least 90 % of the issuers in the portfolio have - taking into account the weighting of the individual securities - an ESG score.

## MONITORING OF ENVIRONMENTAL OR SOCIAL CHARACTERISTICS

The company's risk management team is responsible for the internal control of the fund's investment guidelines. These include the fund's environmental and/or social characteristics. The fund managers regularly monitor the fund's environmental or social characteristics.

## METHODOLOGIES

The methodology for analysing and evaluating the environmental or social characteristics of the fund is based on the company's ESG model. Depending on the asset class and strategy, this ESG model is based entirely or only partially on MSCI methodology or data. Further information is available on: <https://am.oddo-bhf.com/>

## DATA SOURCES AND PROCESSING

The company uses various data sources in its ESG model to analyse and evaluate environmental or social characteristics. This data comes from external sources such as MSCI, CDP, Carbon 4 Finance (biodiversity data) and Bloomberg, and is supplemented by internal analyses. Taxonomy data is obtained from Refinitiv. The company does not use estimates from taxonomy data.

The data is subject to an internal quality check. The company ensures data quality and consistency by holding regular meetings with its data providers to correct any errors, recommend possible improvements and provide feedback from investor or company meetings. Data processing is carried out by importing data into the company's IT systems.

## LIMITATIONS TO METHODOLOGIES AND DATA

All rights to the data and reports provided by data suppliers are held by these data suppliers and/or their content providers. None of these data suppliers or their affiliated companies or their content providers accept any liability for errors, omissions or interruptions in such data/reports in terms of completeness, accuracy or timeliness. Copying or redistribution of such data/reports is not permitted without the express written consent of these data suppliers. The manager is in regular contact with its data suppliers to ensure the quality and reliability of the data used. The Company does not use any estimates of taxonomy data. After internal review, a range of external data sources are thus available to the fund manager, which the Company generally considers to be reliable.

## DUE DILIGENCE

The due diligence processes are subject to a fundamental analysis by the fund manager. In addition, internal ESG ratings are used. The ESG investment limits are monitored by the independent control department, Investment Controlling.

All direct investments acquired for the fund are subject to the minimum exclusions applicable to the fund, which ensure a minimum level of environmental or social protection. However, there is no look-through for individual financial instruments (no look-through for investments of a target fund or certificates).

## ENGAGEMENT POLICIES

The Company's engagement policy is available on: [am.oddo-bhf.com](https://am.oddo-bhf.com)

## DESIGNATED REFERENCE BENCHMARK

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

Dated as of 16/04/2026 (updated following a change in the ESG investment strategy)