

# Environmental and/or social characteristics

Product name: ODDO BHF Active Small Cap

Legal entity identifier: 969500LOWA7AB7MPC981

DOES THIS FINANCIAL PRODUCT HAVE A SUSTAINABLE INVESTMENT OBJECTIVE?

●● <input type="checkbox"/> Yes	●● <input checked="" type="checkbox"/> No
<p><input type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective</b>: N/A</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> </ul> <p><input type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective</b>: N/A</p>	<p><input checked="" type="checkbox"/> It <b>promotes Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 20.0% of sustainable investments</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with a social objective</li> </ul> <p><input type="checkbox"/> It promotes E/S characteristics, but <b>will not make any sustainable investments</b>.</p>

**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 not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.



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

The Fund's ESG approach aims to promote good general sustainability practices, on the one hand by excluding issuers involved in sectors or with practices that run counter to the main sustainable development objectives, and on the other by ensuring the fund has a better carbon intensity score than its benchmark.

### I. First stage: exclusions

The Fund applies the common exclusion framework detailed in the Management Company's Exclusion Policy, which is available at [am.oddo-bhf.com](http://am.oddo-bhf.com). This framework covers coal, tobacco and non-conventional weapons, in particular.

### II. Second stage: ESG rating

The Fund uses MSCI ESG Research ESG scores and undertakes to have ESG coverage of at least 75% in order to be aware of the main sustainability opportunities and risks facing the majority of its assets under management.

The Management Company has two options if an issuer has not been rated by MSCI ESG Research:

- o First, it can use the ESG rating that the Management Company has awarded to securities of the issuer concerned.

- o Second, if the Management Company has not awarded an ESG rating to securities of the issuer concerned, then it can create an alternative ESG rating based, amongst other things, on MSCI's average rating for the relevant industry, capitalisation or country. This alternative rating will stop being used if MSCI ESG Research creates its own ESG rating for the issuer concerned, or if the Management Company awards its own ESG rating.

### III. Third stage: Carbon Intensity

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

The Management Company also takes into account the Fund's carbon intensity, which must be lower than that of its benchmark index.

In addition, at least 75% of the Fund's net assets have a carbon intensity assessment once weightings have been taken into account.

#### 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 attainment of the fund's ESG characteristics and published in its monthly ESG report:

- ESG coverage of the portfolio, particularly in view of the commitment that at least 75% of the portfolio's securities should be covered, taking into account the weightings;
- The Fund undertakes to have a lower carbon intensity (weighted average of scope 1 and 2 CO<sub>2</sub> emissions divided by the revenue of each company in which the Fund invests) than its benchmark (MSCI Europe Small Cap).
- A minimum coverage rate of 75% also applies to carbon intensity.

#### 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?

The Fund does not seek to select its investments solely on the basis of one or more of these objectives. Contributions to these objectives are taken into account by the sustainability indicators used in the ESG strategy.

As such, the Fund seeks to take advantage of both aspects of a company's contribution: its positive social and/or environmental contribution arising from 1/ the revenue generated by the company's products and/or services or 2/ its contribution to the environmental and/or social objective arising more broadly from its operations where these are aligned with the environmental and/or social objectives.

To be eligible as a Sustainable Investment, a company must meet at least one of the criteria detailed below:

a) Criteria based on the company's activities:

- Implied Temperature Rise (ITR):

The activities of companies where climate target initiatives are aimed at keeping the temperature increase at or below 2°C, in line with the Paris Agreement trajectory of 2°C or less, are considered to contribute to an environmental objective and, as such, qualify as a sustainable investment. To assess temperature alignment, we use MSCI's ITR data.

- Emissions targets approved by the SBTi (Science Based Targets Initiative):

Greenhouse gas emissions are one of the factors used to measure an environmental objective. Our approach to measuring sustainable investments also includes companies whose GHG emissions reduction targets have been approved by the SBTi.

b) Criteria based on the company's sustainable solutions revenues:

- Economic activity contributing to the achievement of specific environmental or social objectives.

We assess how an economic activity contributes to the achievement of specific environmental or social objectives. To do this, we use the sustainable solutions revenues calculated by MSCI. Sustainable solutions revenues range from 0 to 100% and represent a specific proportion of a company's overall income.

- EU Taxonomy-aligned income:

The EU taxonomy is designed to identify economic activities that meet environmental objectives. For each company, we will base taxonomy alignment on the percentage of income generated by activities that are aligned with the taxonomy.

- Capital expenditure aligned with the EU taxonomy:

**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.

For each company, we will base taxonomy alignment on the percentage of investment expenditure resulting from activities that are aligned with the taxonomy.

- “Green percentage” of a company patent:

This indicator enables us to identify companies that generate revenues and hold patents on emission reduction technologies and practices that contribute to an environmental objective.

#### 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?

The following approach is taken to comply with Article 2(17) of the SFDR.

**Sectors excluded from investments:** The Management Company’s exclusion policy is applied to eliminate sectors that have the most significant adverse impacts on sustainability objectives. The Fund applies strict exclusions to companies that do not respect the UN Global Compact, and sectoral exclusions for coal mining, coal-based power generation and development projects or infrastructure related to coal, weapons (conventional and non-conventional), tobacco, the non-conventional production and processing of oil and gas, operations and production in the Arctic region, companies active in the palm oil industry that contravene sustainability principles and companies that have a history of involvement in serious breaches and environmental controversies.

**Controversies:** After the ESG team has double-checked, companies that are the most controversial according to our MSCI ESG data will not be considered sustainable.

**Consideration of the principal adverse impacts:** In order to ensure no significant harm to the sustainability objectives, the Management Company sets (pre-trade) testing rules for selected significantly harmful activities: exposure to controversial weapons (PAI 14, zero tolerance), activities negatively affecting biodiversity-sensitive areas (zero tolerance) and serious violations of the principles of the UN Global Compact and OECD Guidelines for Multinational Enterprises (PAI 10, zero tolerance).

**Dialogue and engagement:** our dialogue and engagement approach helps identify significant risks and gives us a voice to encourage changes and improvements.

#### HOW WERE THE INDICATORS FOR ADVERSE IMPACTS ON SUSTAINABILITY FACTORS TAKEN INTO ACCOUNT?

Regulation (EU) 2020/852 establishes certain areas of concern that may have an adverse impact (“PAI”).

The Management Company applies pre-trade rules to the following PAIs:

- exposure to controversial weapons (PAI 14 and zero tolerance)
- serious violations of the principles of the UN Global Compact and OECD Guidelines for Multinational Enterprises (PAI 10 and zero tolerance)

MSCI ESG Research’s ESG ratings incorporate environmental, social and governance themes. Other PAI data on companies and sovereign states may be collected to support the ESG rating. For companies, assuming the data is available and the subject is material, the ESG analysis includes greenhouse gas emissions (PAI 1), carbon footprint (PAI 2), greenhouse gas intensity of investee companies (PAI 3), activities negatively affecting biodiversity-sensitive areas (PAI 7), hazardous waste and radioactive waste ratio (PAI 9), violations of United Nations Global Compact principles and the OECD Guidelines for Multinational Enterprises (PAI 10), lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises (PAI 11), the unadjusted gender pay gap (PAI 12), and board gender diversity (PAI 13). In particular, for sovereign issuers, it may also include greenhouse gas intensity (PAI 15).

However, the management company does not set specific targets or monitoring rules for these other PAIs, with the exception of those mentioned in the first paragraph.

More information on MSCI ESG ratings: <https://www.msci.com/en/esg-ratings>

However, taking MSCI ESG Research scores into account does not result in any specific constraints other than the coverage rate mentioned previously.

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

The Management Company ensures that the Fund's sustainable investments are aligned by applying its UN Global Compact exclusion list, as well as its list of exclusions for breaches of the OECD Guidelines for Multinational Enterprises, as indicated in the Management Company's exclusion policy.

The EU Taxonomy sets out a "do no 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 other underlying investments do not take into account EU criteria on 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 management company takes sustainability risks into account by integrating ESG (Environmental and/or Social and/or 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 impacts of their business activities on sustainable development. For more information, please refer to the Fund prospectus, which is available on the Management Company's website: [am.oddo-bhf.com](http://am.oddo-bhf.com).

No



#### WHAT INVESTMENT STRATEGY DOES THIS FINANCIAL PRODUCT FOLLOW?

The Fund meets the PEA and PEA-PME eligibility criteria.

The Fund shall invest between 75% and 100% of net assets in shares of companies of all market capitalisations, and from all sectors, with at least 75% in small and mid caps issued by SMEs (small and medium-sized enterprises) or intermediate-sized enterprises (ETI) headquartered in the European Union or in the European Economic Area.

The Fund invests at least 51% of its total value in equity participations, within the meaning of Section 2 Para. 8 of the German Investment Tax Act (GITA) and as laid down in the "Tax regime" section of this Prospectus.

These companies will meet PEA-PME (French equity savings plan) eligibility criteria. Firstly, the management team takes non-financial criteria into account.

The Fund's ESG approach aims to promote good general sustainability practices, on the one hand by excluding issuers involved in sectors or with practices that run counter to the main sustainable development objectives, and on the other by ensuring the fund has a better carbon intensity score than its benchmark.

I. First stage: exclusions

The Fund applies the common exclusion framework detailed in the Management Company's Exclusion Policy, which is available at [am.oddo-bhf.com](http://am.oddo-bhf.com). This framework covers coal, tobacco and non-conventional weapons, in particular.

II. Second stage: ESG rating

The Fund uses MSCI ESG Research ESG scores and undertakes to have ESG coverage of at least 75% in order to be aware of the main sustainability opportunities and risks facing the majority of its assets under management.

The Management Company has two options if an issuer has not been rated by MSCI ESG Research:

- o First, it can use the ESG rating that the Management Company has awarded to securities of the issuer concerned.
- o Second, if the Management Company has not awarded an ESG rating to securities of the issuer concerned, then it can create an alternative ESG rating based, amongst other things, on MSCI's average rating for the relevant industry, capitalisation or country. This alternative rating will stop being used if MSCI ESG Research creates its own ESG rating for the issuer concerned, or if the Management Company awards its own ESG rating.

III. Third stage: Carbon Intensity

The Management Company also takes into account the Fund's carbon intensity, which must be lower than that of its benchmark index.

In addition, at least 75% of the Fund's net assets have a carbon intensity assessment once their weightings have been taken into account.

Secondly, the investment strategy implemented is one of discretionary management based on a stock-picking approach. It favours companies whose income growth is above the market average and is careful not to pay too much for these growth stocks (Growth at a Reasonable Price).

The stock-picking strategy is based on three types of positions:

- Long-term positions rely on the management team's fundamental convictions. These fundamental convictions are built on the basis of a certain number of (non-exhaustive) criteria, including company management, the company's competitive edge, the quality of the management team, business visibility, financial solidity, as well as the potential for growth and, where applicable, for capital gains through a delisting of the stock (takeover bid, public exchange offer, etc.).
- Strategic and tactical positions invested as part of portfolio risk management, in order to correct factor, sector, or geographic biases. Tracking error management and risk management are integral parts of choosing to invest in these positions.
- Short-term tactical positions based on financial releases of company sales or earnings per share revisions, analyst recommendation changes, as well as flow analysis.

Depending on the market situation, assessed on a discretionary basis by the manager, the proportion of positions resulting from the implementation of strategies based on short-term, medium-term or long-term expectations varies (no pre-established range).

The portfolio's maximum exposure to the different asset classes (equities, debt securities, UCIs and derivatives) may not exceed 100%, it being understood that the maximum exposure is the sum of the net exposures to each of the markets (equity, fixed income, money, credit) to which the Fund is exposed (the sum of long and hedging positions).

The Fund shall be hedged against foreign exchange risk, with no more than 10% of the portfolio remaining unhedged.

The **investment strategy** guides investment decisions based on factors such as investment objectives and risk tolerance.

### 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 binding elements of the investment strategy guarantee that investments are aligned with the stated environmental and/or social characteristics.

The binding elements are as follows:

- The Fund applies the common exclusion framework as detailed in the Management Company's exclusion policy, which is available at [am.oddo-bhf.com](http://am.oddo-bhf.com). This framework covers coal, tobacco and non-conventional weapons, in particular.
- The Fund undertakes to have a lower carbon intensity (weighted average of scope 1 and 2 CO<sub>2</sub> emissions divided by the revenue of each company in which the Fund invests) than its benchmark (MSCI Europe Small Cap). A minimum coverage rate of 75% also applies to carbon intensity.
- At least 75% of the Fund's net assets have an ESG rating once the weighting of each security has been taken into account. Target funds with an ESG rating at fund level are also considered.

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

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

The fund management team does not have any committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy.

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



ODDO BHF Asset Management's Responsible Investment Policy describes our definition and assessment of good governance practices. Good governance practices can be assessed using a number of criteria, such as anti-corruption policies and practices, executive remuneration policies, shareholder structure, quality of financial reporting and business ethics.

### WHAT IS THE ASSET ALLOCATION PLANNED FOR THIS FINANCIAL PRODUCT?

The Fund's net assets are made up of equities.

At least 75% of net assets must be aligned with environmental and social characteristics. The Fund may hold up to 25% of its net assets in the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The Fund has a minimum 20% of sustainable investments. However, the Fund may hold investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

The Fund does not have a minimum Taxonomy alignment and/or social investments rate. However, the Fund may hold investments that present these characteristics. A minimum of 10% of the Fund's net assets are invested in other environmental investments.

At least 75% of the issuers in the portfolio are subject to an ESG rating once the weighting of each security has been taken into account.

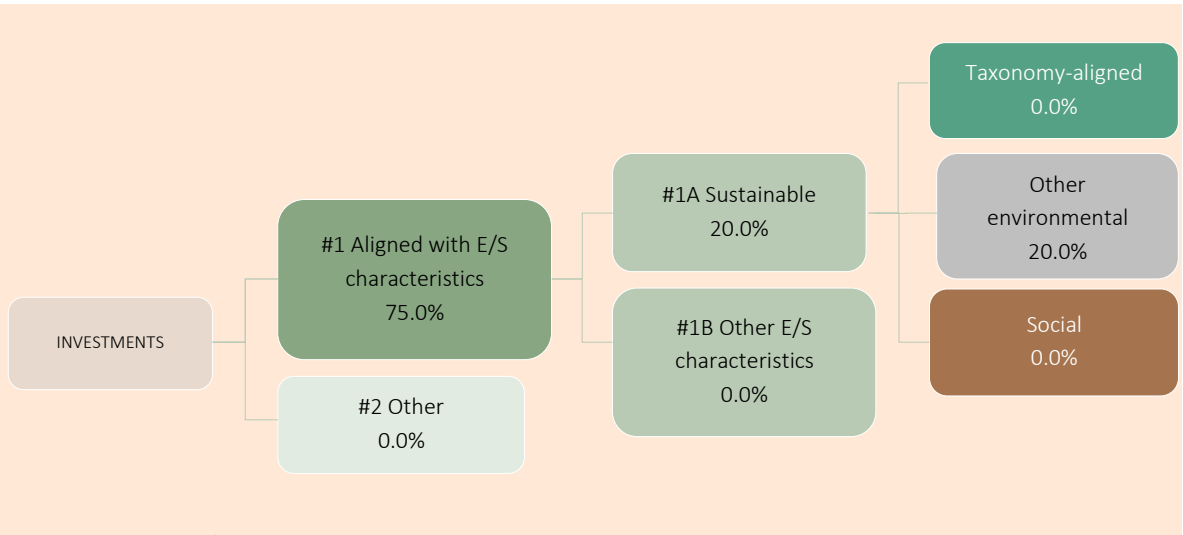
**Asset allocation** describes the share of investments in specific assets.

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 used to improve ESG alignment or reduce ESG risk. As part of the investment strategy, the Fund is authorised to use derivatives for hedging and exposure 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 TAXONOMY?

Yes

In fossil gas

In nuclear

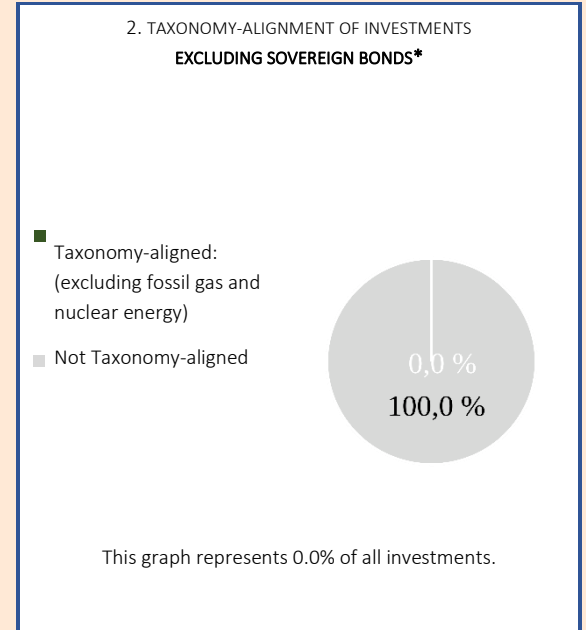
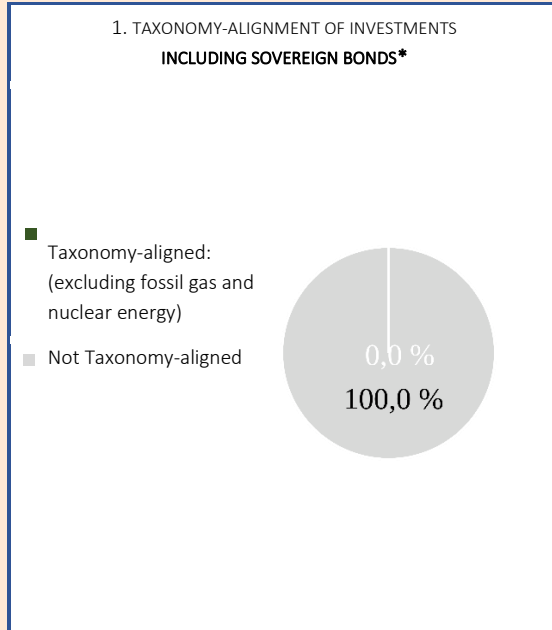
No

The Fund management team analyses the portfolio’s positions on the basis of ESG criteria. The Fund does not rule out investing in nuclear energy and/or fossil gas activities. A minimum share of EU Taxonomy-aligned activities within the field of fossil gas and/or nuclear energy is not planned for the Fund.

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.

**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.



\*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?

The percentage is not yet known.

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

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

The minimum share of sustainable investments with an environmental objective but which are not aligned with the EU Taxonomy is 20%.

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

There is no minimum share of sustainable investments with a social objective, but the Fund may make investments with a social objective.

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

Investments included under "#2 Other" may be derivatives and other ancillary assets.



#### WHERE CAN I FIND MORE PRODUCT-SPECIFIC INFORMATION ONLINE?

More detailed information on the product is available at: [am.oddo-bhf.com](http://am.oddo-bhf.com)