

**Periodic disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852**

**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.

**Product name:**  
ODDO BHF German Equities

**Legal Entity Identifier (LEI):**  
529900ZQYZQ8H2PF7W26

## Environmental and/or social characteristics

**Did this financial product have a sustainable investment objective?**

<p><input checked="" type="radio"/> <input checked="" type="radio"/> <input type="checkbox"/> <b>Yes</b></p>	<p><input checked="" type="radio"/> <input type="radio"/> <input checked="" type="checkbox"/> <b>No</b></p>
<p><input type="checkbox"/> It made <b>sustainable investments with an environmental objective</b>: %</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 made <b>sustainable investments with a social objective</b>: %</p>	<p><input checked="" type="checkbox"/> It <b>promoted Environmental/Social (E/S) characteristics</b> and while it did not have as its objective a sustainable investment, it had a proportion of 78.30% of sustainable investments</p> <ul style="list-style-type: none"> <li><input checked="" 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 promoted E/S characteristics, but <b>did not make any sustainable investments.</b></p>

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



## To what extent were the environmental and/or social characteristics promoted by this financial product met?

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

The environmental and social characteristics promoted by the Fund were met during the reporting period by the following measures:

- Effective implementation of the ODDO BHF Asset Management exclusion policy (coal, non-compliance with the UNGC Principles, unconventional oil and gas resources, controversial weapons, tobacco, destruction of biodiversity, exploration, production and use of conventional and unconventional oil and gas in the Arctic) and Fund-specific exclusions;
- Implementation of our voting rights policy wherever the Fund exercises its voting rights;
- Implementation of dialogue and engagement procedures in keeping with our engagement policy;
- Consideration of the adverse impacts of investment decisions in accordance with Article 4 of the SFDR; and
- Implementation of our approach to monitor the significant harms of our sustainable investments.

### ● How did the sustainability indicators perform?

	30 September 2025	
	Fund	Share of analysed securities in %
MSCI ESG Rating (CCC to AAA) *	AA	98.8
MSCI ESG Quality Score (/10)	7.7	98.8
Weighted average E ranking (/10)	7	98.8
Weighted average S ranking (/10)	5.3	98.8
Weighted average G ranking (/10)	5.9	98.8
Weighted average carbon intensity (tons of CO <sub>2</sub> equivalent per EUR million of turnover)	74.3	100.0
Sustainable investments under Art. 2(17) SFDR (%)	78.3	98.7
Taxonomy-aligned investments (%)	6.8	46.0
Use of fossil fuels (%) **	4.1	99.1
Use of carbon-free solutions ("green proportion") (%) ***	52.8	99.1

\*\*CCC is the lowest rating and AAA is the highest rating

\*\*Sum of the weightings of the companies in the portfolio whose turnover is partly generated through the use of fossil fuels

\*\*\*Sum of the weightings of the companies in the portfolio whose turnover is partly generated through the use of carbon-free solutions (renewable energies, sustainable mobility, etc.)

● *...and compared to previous periods?*

30 September 2024		
	Fund	Share of analysed securities in %
ESG ranking*	3.9	99.7
Weighted average E ranking	3.9	99.7
Weighted average S ranking	3.7	99.7
Weighted average G ranking	3.9	99.7
Weighted average carbon intensity (tons of CO <sub>2</sub> equivalent per EUR million of turnover)	86.2	99.8
Sustainable investments under Art. 2(17) SFDR (%)	45.4	98.9
Taxonomy-aligned investments (%)	5.3	67.6
Use of fossil fuels (%) **	2.9	2.9
Use of carbon-free solutions ("green proportion") (%) ***	53.5	53.9

\*1/5 is high risk and 5/5 is high opportunity

\*\*Sum of the weightings of the companies in the portfolio whose turnover is partly generated through the use of fossil fuels

\*\*\*Sum of the weightings of the companies in the portfolio whose turnover is partly generated through the use of carbon-free solutions (renewable energies, sustainable mobility, etc.)

30 September 2023		
	Fund	Share of analysed securities in %
ESG ranking*	3.9	100.0
Weighted average E ranking	3.7	100.0
Weighted average S ranking	3.7	100.0
Weighted average G ranking	3.9	100.0
Weighted average carbon intensity (tons of CO <sub>2</sub> equivalent per EUR million of turnover)	114.5	100.0
Sustainable investments under Art. 2(17) SFDR (%)	51.0	97.9
Taxonomy-aligned investments (%)	3.6	34.6
Use of fossil fuels (%) **	0.9	0.9
Use of carbon-free solutions ("green proportion") (%) ***	53.7	54.8

\*1/5 is high risk and 5/5 is high opportunity

\*\*Sum of the weightings of the companies in the portfolio whose turnover is partly generated through the use of fossil fuels

\*\*\*Sum of the weightings of the companies in the portfolio whose turnover is partly generated through the use of carbon-free solutions (renewable energies, sustainable mobility, etc.)

● ***What were the objectives of the sustainable investments that the financial product partially made and how did the sustainable investment contribute to such objectives?***

The investment objectives of the sustainable investments of the Fund were as follows:

1. No environmental objectives within the meaning of Art. 9 of the Taxonomy Regulation were pursued during the period under review.
2. Environmental contribution to environmental impacts as defined by MSCI ESG Research through the "sustainable impact" section in relation to the environmental objectives. This includes impacts on the following categories: alternative energy, energy efficiency, green building, sustainable water supply, pollution prevention and control, sustainable agriculture.

In its ESG strategy, the Fund refers to the objectives described above, but does not try to select its investments solely on the basis of one or more of these objectives. The ESG strategy's sustainability indicators take account of the contributions to these objectives.

The Fund intends to consider two aspects of a company's contribution: 1. its positive environmental and/or social contribution resulting from revenue generated from company products and/or services; and 2. its contribution to environmental and/or social objectives resulting from the company's operating activities in the broader sense if these activities are consistent with environmental and/or social objectives.

Due to the lack of concrete regulatory provisions on how to define sustainable investments pursuant to Article 2(17) of the SFDR, we have determined an individual approach to their assessment, which is subject to inherent uncertainties.

To qualify as a sustainable investment, a company must meet one of the following criteria at a minimum:

a) Criteria based on the company's activities:

- Implied Temperature Rise (ITR):

company initiatives to achieve climate goals to limit the increase in temperature to 2°C or less – corresponding to the pathway to the Paris Agreement – will be regarded as a contribution to an environmental objective and thus as a sustainable investment. We use ITR data from MSCI to assess alignment with the temperature targets.

- SBTi-recognised emission target:

one way of measuring the environmental objective is greenhouse gas emissions. Our approach to assessing sustainable investments includes companies whose greenhouse gas emission reduction targets are recognised by the Science-Based Targets Initiative (SBTi).

b) Criteria on the basis of the company's revenue from activities:

- Sustainable impact revenue:

we analyse how a commercial activity contributes to the achievement of certain environmental or social objectives. In this context, the MSCI indicator "Sustainable Impact Revenue" is used. The indicator goes from 0 to 100%, representing the percentage of the company's total revenue.

- EU Taxonomy-aligned revenue:

the EU Taxonomy is for identifying economic activities that pursue environmental or social objectives. Currently, however, only two of the six environmental objectives set out are fully covered. We base Taxonomy-alignment on the reported revenue from taxonomy-aligned activities for the company in question.

- EU Taxonomy-aligned investment spending:

at the company level, we calculate taxonomy-alignment as a percentage of investment spending generated by taxonomy-aligned activities.

- Percentage of "green" company patents:

this indicator enables us to identify companies that generate revenues and hold patents for technologies and practices to reduce emissions, which contribute to an environmental objective.

● ***How did the sustainable investments that the financial product partially made not cause significant harm to any environmental or social sustainable investment objective?***

Significant harms to the Fund's sustainable investment objectives were monitored using a three-step process:

1. Any company with a serious environmental, social or governance controversy is not considered sustainable;
2. Any company excluded under the ODDO BHF Asset Management exclusion policy (coal, non-compliance with the UNGC principles, unconventional oil and resources, controversial weapons, tobacco, destruction of biodiversity, exploration, production and use of conventional and unconventional oil and gas in the Arctic) is not considered sustainable and is not eligible for investment;

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.

3. Any company with exposure to banned weapons and/or in breach of UNGC principles is not considered sustainable and is not eligible for investment;

The Company's controlling teams are responsible for monitoring significant harms.

***How have the indicators for adverse impacts on sustainability factors been taken into account?***

Consideration of the principal adverse impacts (PAIs) is based on negative screening for three PAIs (PAI 7:

Activities negatively affecting biodiversity-sensitive areas; PAI 10: Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises; and PAI 14:

Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)), and on ESG Ratings, dialogue, engagement and the voting rights policy (where voting rights are exercised for the Fund) for the remaining PAIs.

***Were sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:***

The management company shall ensure that the Fund's sustainable investments comply with the United Nations Global Compact (UNGC) exclusion list as described in the management company's exclusion policy.

The Management Company ensures that the Fund's sustainable investments comply with the exclusion list of the United Nations Global Compact (UNGC).

Due to poor data quality, OECD Guidelines for Multinational Enterprises and the United Nations Guiding Principles on Business and Human Rights are currently not considered directly.

However, individual aspects from the aforementioned Guidelines and Guiding Principles are considered indirectly (via the ESG Ratings of MSCI ESG Research).

*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 principle of "do no significant harm" applies only to those investments underlying a financial product that take account of the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining part of this financial product do not take account of the EU criteria for environmentally sustainable economic activities.

*Furthermore, any other sustainable investments must not cause significant harm to any environmental or social objectives.*



**How did this financial product consider principal adverse impacts on sustainability factors?**

Consideration of the PAIs on sustainability factors in the Fund is achieved through exclusions in conjunction with pre and post-trading controls, as well as on the basis of ESG ratings, dialogue, engagement and the voting rights policy, where applicable.

Consideration of the principal adverse impacts (PAIs) is based on negative screening for three PAIs (PAI 7: Activities negatively affecting biodiversity-sensitive areas; PAI 10: Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises; and PAI 14: Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)), and on ESG Ratings, dialogue, engagement and the voting rights policy (where voting rights are exercised for the Fund) for the remaining PAIs.



### What were the top investments of this financial product?

The list includes the investments constituting **the greatest proportion of investments** of the financial product during the reference period which is:

1 October 2024 –  
30 September 2025

Largest investments	Sector	Assets*	Country
Sap Se	Information technology	9.8%	Germany
Siemens AG-Reg	Industrials	9.0%	Germany
Allianz Se-Reg	Financials	7.7%	Germany
Deutsche Telekom AG-Reg	Communication services	5.7%	Germany
Münchener Rückver AG-Reg	Financials	4.0%	Germany
Infineon Technologies AG	Information technology	3.7%	Germany
Adidas AG	Consumer cyclicals	3.1%	Germany
Siemens Energy AG	Industrials	2.8%	Germany
Rheinmetall AG	Industrials	2.7%	Germany
Deutsche Bank AG	Financials	2.7%	Germany

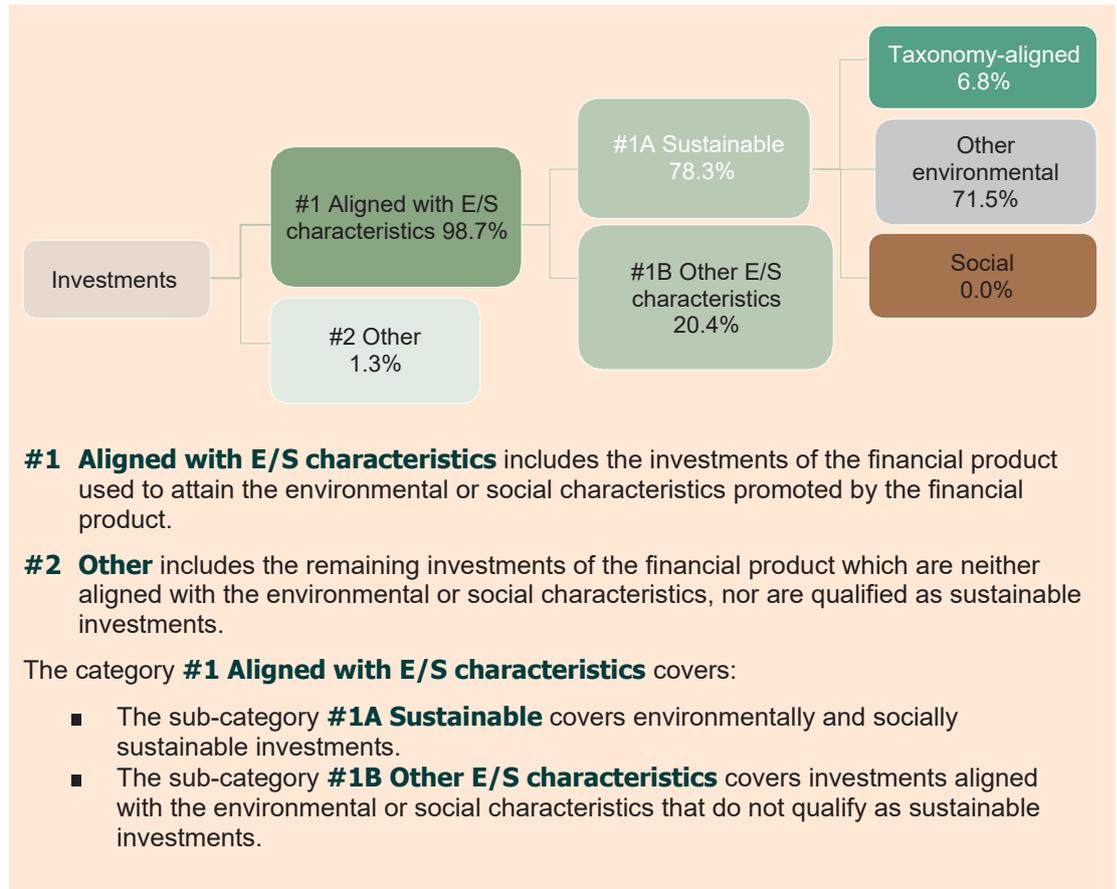
\*Calculation method: based on the average of assets at four times during the Fund's financial year.



Asset allocation describes the share of investments in specific assets.

## What was the proportion of sustainability-related investments?

### ● What was the asset allocation?



Other investments consist of 0.1% cash instruments and 1.2% instruments without an ESG rating.

### ● In which economic sectors were the investments made?

Sectors	Assets as at 30 September 2025
Industrials	31.0%
Financials	19.0%
Information technology	15.6%
Consumer cyclicals	10.4%
Health care	7.8%
Communication services	6.3%
Materials	6.0%
Consumer goods	1.7%
Utilities	1.0%

Real estate	0.8%
Energy	0.2%
Cash	0.1%

The weight of investments in companies that generate income from the exploration, mining, extraction, manufacture, processing, storage, refining or distribution, including transportation, storage and trade of fossil fuels, is 4.1%.



**To what minimum extent were the sustainable investments with an environmental objective aligned with the EU Taxonomy?**

● **Did the financial product invest in fossil gas and/or nuclear energy related activities complying with the EU Taxonomy<sup>1</sup>?**

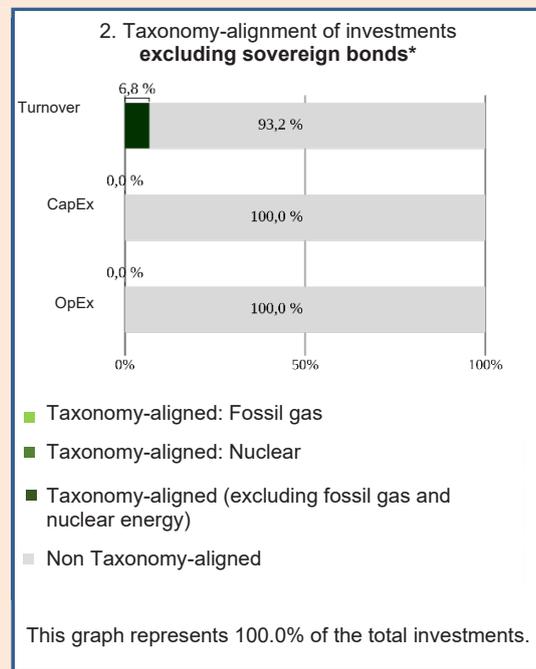
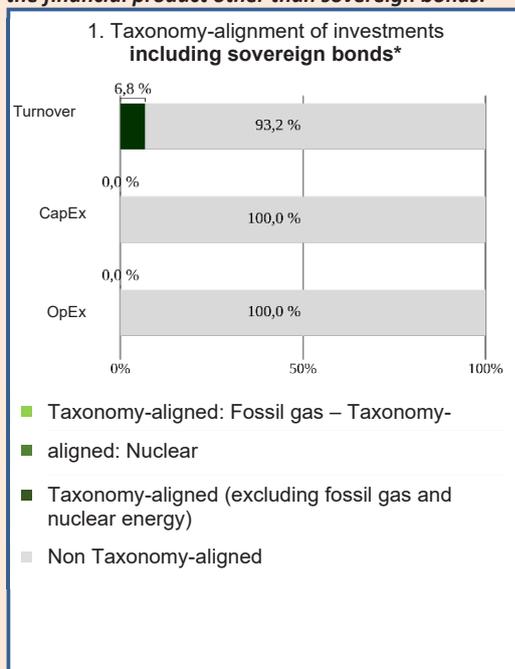
- Yes:
- In fossil gas                       In nuclear energy
- No

With regards to alignment with the EU Taxonomy, the criteria for **fossil gas** include restricting emissions and conversion to renewable energy or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

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.

*The graphs below show in green the percentage of investments that were 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.

<sup>1</sup> Activities in the field of fossil gas and/or nuclear energy are only aligned with the EU Taxonomy if they contribute to mitigating climate change ("climate protection") and do no significant harm to any of the objectives of the EU Taxonomy. The full criteria for economic activities in the field of fossil gas and nuclear energy which are aligned with the EU Taxonomy are defined in Commission Delegated Regulation (EU) 2022/1214.

**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.

● **What was the share of investments made in transitional and enabling activities?**

The share of investments made in transitional and enabling activities is 0%.

● **How did the percentage of investments that were aligned with the EU Taxonomy compare with previous reference periods?**

This information is contained in the tables “How did the sustainability indicators perform?” on page 3.



Are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under Regulation (EU) 2020/852.



**What was the share of sustainable investments with an environmental objective not aligned with the EU Taxonomy?**

The proportion of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy was 71.5%. These investments were made because they invest in activities which, while not Taxonomy-aligned, are Taxonomy-eligible. Such activities include: low-carbon energy, energy efficiency, green real estate, sustainable use of water, sustainable agriculture, pollution prevention and control. Unfortunately, some companies do not provide any EU Taxonomy-aligned data as yet, or are not subject to the EU Taxonomy themselves. Despite that, the turnover of these companies is aligned to green activities as long as they fulfil our “Do No Significant Harm” principle.



**What was the share of socially sustainable investments?**

The Fund has no sustainable investments with a social objective.



**What investments were included under "other", what was their purpose and were there any minimum environmental or social safeguards?**

The investments included in “#2 Other” are investments in liquidity, commodities, and securities without an ESG Rating:

**Commodities:** Commodities include precious metals (e.g. gold), non-precious metals (e.g. copper), energy (e.g. oil) and agricultural commodities (e.g. wheat). The Company primarily invests in gold in the form of Xetra-Gold certificates. The portfolio holds gold as a hedge against inflation and for diversification purposes. Xetra-Gold is a security that is tradeable in the same way as a share. Xetra-Gold represents the economic value of gold and thus enables investors to participate in the performance of the gold price. No minimum social or environmental safeguards are considered.

**Securities without an ESG Rating:** Some securities could not be covered by our current provider of sustainability data. The Company carries out sustainability due diligence (minimum safeguards control) on securities without a sustainability rating. However, the Company cannot guarantee that the security meets its sustainability criteria and exclusions.



## What actions have been taken to meet the environmental and/or social characteristics during the reference period?

The manager has put in place its active ownership strategy:

1. Exercise of voting rights during Annual General Meetings if the Fund comes within the bounds of the voting rights policy of the manager
2. Dialogue with investee companies and potential investee companies
3. Engagement with companies in accordance with the manager's engagement policy
4. Application of the ODDO BHF Asset Management exclusion policy and fund-specific exclusions
5. Consideration of the principal adverse impacts in accordance with the manager's Principal Adverse Impacts policy



## How did this financial product perform compared with the reference benchmark?

### ● *How does the reference benchmark differ from a broad market index?*

The Fund uses a composite benchmark comprised of: 33.33% EURO STOXX TMI SMALL NR + 33.33% Euro Stoxx (Net return) + 33.34% MSCI Germany NR EUR. The Fund's benchmark index is a broad market index. The Fund's ESG strategy is not based on the index.

### ● *How did this financial product perform with regard to the sustainability indicators to determine the alignment of the reference benchmark with the environmental or social characteristics promoted?*

The benchmark index or indices are not aligned with the environmental or social characteristics promoted by the financial product. The environmental and social characteristics are covered by the Fund's ESG investment strategy.

### ● *How did this financial product perform compared with the reference benchmark?*

The Fund is not based on a benchmark.

### ● *How did this financial product perform compared with the broad market index?*

The Fund is not based on a benchmark.

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