# *Sustainability-related disclosures*

Product name: ODDO BHF Europe Equity Trend

Legal Entity Identifier (LEI): 529900IUS5S32WQ63L11

## SUMMARY

The fund promotes environmental and/or social characteristics. This is reflected in the construction and weighting of the portfolio on the basis of the ESG rating process, the consideration of external research and data. Details of the investment strategy are provided in the Annex to the Fund's prospectus "Environmental and/or social characteristics". This contains pre-contractual disclosures for financial products referred to in Article 8 (1), (2) and (2a) of Regulation (EU) 2019/2088 and Article 6 (1) of Regulation (EU) 2020/852. Principal adverse impacts of investment decisions on sustainability factors are taken into consideration in particular by adhering to the Company's exclusion policy. The Fund promotes climate change mitigation and adaptation. Compliance with ESG-related investment guidelines is monitored by the independent risk controlling unit. The methodology for the analysis and evaluation of 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 partly or entirely on MSCI methodology/MSCI data. The company does not use any Taxonomy data estimates. All direct investments acquired for the Fund are subject to the minimum exclusions applicable to the Fund, which guarantee a minimum level of environmental or social safeguards.

## NO SUSTAINABLE INVESTMENT OBJECTIVE

This financial product promotes E/S characteristics, but does not have a sustainable investment objective.

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. Sectors excluded from the investment:** The Company's exclusion policy is applied to exclude sectors that have a significant adverse impact on the sustainability objectives. The Fund applies general exclusions which are described in the Company's exclusion policy which is available at am.oddo-bhf.com. This exclusion policy specifically applies to coal, tobacco, non-conventional weapons and non-conventional oil and gas. Issuers in the alcohol, gambling and adult entertainment industries are also excluded.

**2. Controversies:** Companies classified by MSCI ESG Research as particularly controversial – where applicable, following confirmation by the ESG team based on a second review – are considered unsustainable.

**3. Consideration of the principal adverse impacts:** In order not to materially compromise its sustainability objectives, the Company sets control rules (prior to trading) on selected activities that do significant harm: 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).

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

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

The Fund Manager applies pre-trade rules to the following PAIs:

- Exposure to controversial weapons (PAI 14 and 0% tolerance) and

- Serious violations of UN Global Compact principles and Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises (PAI 10 and 0% tolerance).

MSCI scores from MSCI ESG Research also take environmental, social and governance issues into account when the use of additional PAI data for companies and sovereign issuers can support their ESG score. Where data is available for companies, ESG analysis includes: monitoring of GHG emissions (PAI 1), carbon footprint (PAI 2), GHG intensity of investee companies (PAI 3), activities negatively affecting biodiversity sensitive areas (PAI 7), the hazardous waste and radioactive waste ratio (PAI 9), violations of UN Global Compact principles and Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises (PAI 10), the 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). For issuers in the public sector, analysis may also include GHG emission intensity (PAI 15). However, the Company does not set specific objectives or control rules for these other PAIs, with the exception of those mentioned in the first paragraph.

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

The Company ensures that the Fund's sustainable investments comply with the exclusion list informed by the United Nations Global Compact (UNGC) criteria, as described in the Company's exclusion policy. Proven breaches of the OECD Guidelines for Multinational Enterprises and/or the United Nations Guiding Principles on Business and Human Rights also result in exclusion.

## ENVIRONMENTAL OR SOCIAL CHARACTERISTICS OF THE FINANCIAL PRODUCT

The Fund promotes climate change mitigation and adaptation through sustainable investment in accordance with the EU Taxonomy and sustainable investment pursuant to Article 2(17) of the SFDR.

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.

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 operations"

- Implied Temperature Rise (ITR):

Business activities that are consistent with the Paris Agreement's goal of limiting global warming to within 2°C are classified as contributing to an environmental objective and therefore qualify as sustainable investments. MSCI ITR data is used to assess temperature alignment.

- SBTi-recognised emission target:

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

b) Criteria “based on company turnover from operational activities”

- Sustainable impact revenue:

Commercial activities are analysed to determine how they contribute 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. For the time being, however, only two of the six environmental objectives set out are fully covered. The reported revenue from taxonomy-aligned activities for the company in question is used to determine Taxonomy-alignment.

- EU Taxonomy-aligned investment spending:

The reported taxonomy-aligned investment spending for the company in question is used to determine Taxonomy-alignment.

- Percentage of “green” company patents:

This indicator helps to identify companies that generate revenues from patents related to technologies and procedures to reduce emissions, which contribute to an environmental objective.

## INVESTMENT STRATEGY

The Fund invests in European equities. Equities are rated using a trend-following model and on the basis of ESG research. This model uses extensive historical data to analyse trends and send buy and sell signals. The portfolio composition process involves optimising ESG and risk management by applying various constraints in terms of ESG valuation, beta, sector/country concentration, tracking error and turnover rate of the final portfolio. As part of our investment strategy, the sustainability activities of issuers are analysed and sustainability opportunities and risks are taken into account when making investment decisions, as well as the principal adverse impacts of investment decisions on sustainability factors.

ESG criteria are taken into account through a selectivity approach, which results in the exclusion of at least 20% of the investment universe of the Fund. This approach can be broken down into two stages:

First stage: Exclusions

The Fund applies general exclusions which are described in the Company's exclusion policy which is available at am.oddo-bhf.com. This exclusion policy specifically applies to coal, tobacco, non-conventional weapons and non-conventional oil and gas. Issuers in the alcohol, gambling and adult entertainment industries are also excluded.

Second stage: ESG score

The ESG score of securities to be included in the Fund is considered. The basis is the ESG scores of data provider MSCI Research. MSCI uses a methodology whereby issuers are assigned an industry-specific rating of between 0 (worst in the industry) and 10 (best in the industry); this rating is based on their ability to manage the risks and opportunities relevant to their operating activities in the area of sustainable development. In particular, MSCI analyses the following environmental and social characteristics already mentioned above: (1) climate change adaptation (carbon emissions, vulnerability to climate change, opportunities in the area of clean technologies and renewable energies); (2) natural capital (biodiversity and land use, raw material supply and water stress); and (3) human rights and human capital (health and safety, human capital development, personnel management, community relations, data protection/security, and product safety/quality). In addition to the ESG scores for issuers described above, MSCI also assigns ESG scores for funds.

In the event that an issuer does not have an MSCI ESG rating, there are two options:

- either the ESG score assigned by the Company to the relevant security of the issuer is used, or

- if the Company has not assigned an ESG score to that issuer's securities, the Company can substitute an ESG score, determined among other things by an average based on the ESG scores of MSCI according to sector of activity, company size, and the issuer's place of business. This substitute score will no longer be used if MSCI ESG Research generates its own ESG score for the issuer concerned or if an ESG score is assigned by the Company.

In addition, the Company can review an ESG rating provided by MSCI. This review is carried out by the ESG team and can result in replacement of the MSCI ESG rating with a new internal ESG score.

The ESG scores influence the portfolio structure of the Fund, which aims to achieve a better weighted average ESG score than its investment universe. In the event of a deterioration in the ESG scores of the securities in which the Fund invests, or a change in the ESG scoring methodology that affects the average ESG score of the Fund, the average ESG score of the Fund is restored to a level above that of the investment universe, taking the interests of unitholders and market conditions into account.

At least 90% of the assets (excluding bank deposits) in the portfolio have – taking into account the weighting of the individual assets – an ESG score.

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

## BREAKDOWN OF INVESTMENTS

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

At least 20% of the Fund's net asset value is invested in sustainable investments. The 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 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 assets (excluding bank deposits) in the portfolio have – taking into account the weighting of the individual assets – 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 environmental and/or social characteristics of the Fund. The fund managers regularly monitor the environmental or social characteristics of the Fund.

## METHODS

The methodology for the analysis and evaluation of environmental or social characteristics of the Fund is based on the Company's ESG model. More information is available at: am.oddo-bhf.com

## DATA SOURCES AND PROCESSING

The Company uses various data sources in its ESG model in order to carry out and substantiate the analysis and evaluation of environmental or social characteristics. These data come from external data sources, such as MSCI, CDP, Carbon 4 Finance (biodiversity data) and Bloomberg, and are supplemented with internal analyses. MSCI provides the Taxonomy data. The company does not use any Taxonomy data estimates.

The data undergo an internal quality check. The Company ensures the quality and consistency of data by having regular meetings with the providers of the data to correct any errors, recommend possible improvements and to give feedback from investor or company engagement. Data processing involves importing data into the Company's IT systems.

## RESTRICTIONS ON METHODS AND DATA

All rights to the data and reports provided by data suppliers rest with these data suppliers and/or their content providers. None of these data suppliers or their affiliated companies or their content providers assume liability for errors, omissions or interruptions in such data/reports in terms of completeness, accuracy or currency. The reproduction or distribution of such data/reports is not permitted without the express written permission of these data suppliers. The manager maintains regular contact with the data suppliers in order to ensure the quality and reliability of the data used. The company does not use any Taxonomy data estimates. After an internal check, an array of external data sources which the Company deems reliable is thus available to the fund manager.

## DUE DILIGENCE

Due diligence processes undergo fundamental analysis by the fund manager. In addition, internal ESG ratings are used. The ESG investment limits are monitored by the independent Investment Controlling unit.

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

## ENGAGEMENT POLICIES

The Company's engagement policies are available at: am.oddo-bhf.com

## DESIGNATED REFERENCE BENCHMARK

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

As at 1 October 2026 (updated following a change in the ESG investment strategy)