ODDO BHF
ASSET MANAGEMENT

# *Prospectus and Terms of Investment*

## ODDO BHF German Equities

1 November 2026

Investment management company:
ODDO BHF Asset Management GmbH

**Fund units are bought and sold on the basis of the Prospectus, the Key Information Document and the General Terms of Investment in conjunction with the Specific Terms of Investment, each as amended from time to time. The General Terms of Investment and Specific Terms of Investment are included in this document after the Prospectus. The Prospectus is to be provided on request and free of charge to potential purchasers of Fund units and to all investors in the Fund. It will be supplied together with the most recent published annual report and any subsequent half-yearly report. Potential purchasers of Fund units are also to be provided with the Key Information Document free of charge in good time prior to entering into any agreement. No information may be provided and no declarations made that deviate from the Prospectus. Any unit purchase based on information or declarations that are not contained in the Prospectus or the Key Information Document is exclusively at the buyer's own risk. The content of the Prospectus is supplemented by the latest annual report and any subsequent half-yearly report.**

## INVESTMENT RESTRICTIONS FOR US PERSONS

**ODDO BHF Asset Management GmbH and/or the Fund are not and will not be registered in accordance with the United States Investment Company Act of 1940, as amended. Units in the Fund are not and will not be registered in accordance with the United States Securities Act of 1933 as amended, or under the securities legislation of any state of the United States of America. Units in the Fund may not be offered or sold in the United States or to US Persons or for the account of US Persons. Potential purchasers of units may be required to state that they are not US Persons, are not acquiring units on behalf of US Persons and will not sell units on to US Persons. US Persons include, inter alia, private individuals who are resident in the United States. Partnerships or corporations may also be US Persons if they have been established in accordance with the laws of the USA or any US state, territory or possession.**

## IMPORTANT LEGAL EFFECTS OF THE CONTRACTUAL RELATIONSHIP

By purchasing units, investors become co-owners of the assets held by the Fund in proportion to the number of units they own. The investor has no power of disposal over the assets. Units do not carry voting rights.

### Enforcement of rights

The legal relationship between ODDO BHF Asset Management GmbH and the investor is based on German law, as are any pre-contractual relations. The venue for any complaints arising from the contractual relationship brought against ODDO BHF Asset Management GmbH by the investor is the location of the registered office of ODDO BHF Asset Management GmbH. Investors who are consumers (see definition below) and live in another member state of the EU may also bring complaints before a competent court in their place of residence. Court judgments shall be enforced according to the German Code of Civil Procedure (*Zivilprozessordnung*), and where applicable the Act on Enforced Auction and Receivership (*Gesetz über die Zwangsversteigerung und die Zwangsverwaltung*) and the Insolvency Code (*Insolvenzordnung*). Since ODDO BHF Asset Management GmbH is subject to German law, judgments issued in Germany do not have to be recognised prior to their enforcement. Investors may assert their rights by bringing legal proceedings before the ordinary courts or by way of alternative dispute resolution proceedings, where such a procedure is available. ODDO BHF Asset Management GmbH has undertaken to participate in dispute resolution proceedings before a consumer arbitration body.

In the event of disputes, consumers may call upon the Investment Funds Ombudsman operated by the German Investment Funds Association (BVI Bundesverband Investment und Asset Management e.V.) as the competent consumer arbitration body. ODDO BHF Asset Management GmbH participates in arbitration proceedings before this body.

Contact details for the Investment Funds Ombudsman are as follows:

**Büro der Ombudsstelle des BVI**
Bundesverband Investment und Asset Management e.V.

Unter den Linden 42
10117 Berlin

Tel.: +49 (0)30 6449046-0
Fax: +49 (0)30 6449046-29
E-mail: info@ombudsstelle-investmentfonds.de
www.ombudsstelle-investmentfonds.de

Consumers are private individuals who invest in the Fund for a purpose that cannot primarily be attributed to their trade or self-employment, i.e. who do so for personal reasons.

For disputes concerning the application of the rules under the German Civil Code (Bürgerliches Gesetzbuch) on remote sales (distance selling) of financial services, the relevant mediation body is the Mediation Body (Schlichtungsstelle) of the Deutsche Bundesbank.

Its contact details are as follows:

**Deutsche Bundesbank**
Mediation body

Postfach 100602
60006 Frankfurt am Main
https://www.bundesbank.de/de/service/schlichtungsstelle

Arbitration proceedings do not affect your right to bring a dispute before the courts.

## RIGHT TO CANCEL A PURCHASE MADE OUTSIDE OF PERMANENT BUSINESS PREMISES

If units in open-ended funds are purchased on the basis of oral negotiations that take place outside the permanent premises of the seller or intermediary, the buyer has the right to cancel his/her undertaking to purchase within a period of two weeks without giving reasons; this cancellation must be given in text form. Buyers must be informed about their right of cancellation in the notice of sale or copy thereof. A right of cancellation also exists where the seller of the units or intermediary has no permanent business premises. No right of cancellation exists where the seller can prove that the buyer is either not a private individual entering into a legal transaction that cannot be attributed to his occupation (i.e. not a consumer) or that the negotiation took place at the buyer's initiative, i.e. the seller contacted the buyer for the negotiations on the basis of a prior solicitation by the buyer. No right of cancellation exists in respect of distance selling contracts, i.e. contracts that are made exclusively by remote communications (e.g. letters, telephone calls, email).

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# PROSPECTUS

## BASIC INFORMATION

ODDO BHF German Equities (the "Fund") is a collective investment undertaking that pools capital from a number of investors in order to invest it for the benefit of those investors in accordance with a defined investment strategy (an "investment fund"). The Fund is an investment fund that conforms to Directive 2009/65/EC of the European Parliament and of the Council of 13 July 2009 on the coordination of laws, regulations and administrative provisions relating to undertakings for collective investment in transferable securities (a "UCITS"), as referred to in the German Investment Code (Kapitalanlagegesetzbuch – the "Investment Code"). The Fund is managed by ODDO BHF Asset Management GmbH (the "Company"). The Company invests the capital invested with it in its own name for the common account of the investors in investments permitted under the Investment Code and in accordance with the principle of risk spreading. Such investments are made in the form of a common fund held separately from the Company's own assets. The object of the Fund is limited to making capital investments using the monies invested in it in accordance with a defined investment strategy, such investments being managed on a collective basis; it may not conduct an operating business or undertake the active entrepreneurial management of the assets held. The assets in which the Company may invest the investors' money and the conditions to which it must adhere in so doing are derived from the Investment Code, the Regulations issued in connection therewith, the German Investment Tax Act (*Investmentsteuergesetz*) and the Terms of Investment, which govern the legal relationship between the investors and the Company. The Terms of Investment are made up of a General part and a Specific part (the "General Terms of Investment" and the "Specific Terms of Investment"). The Terms of Investment for retail investment funds must be approved by the German Federal Financial Supervisory Authority (*Bundesanstalt für Finanzdienstleistungsaufsicht* – "BaFin") before use. In the event of the Company's insolvency, the Fund will not form part of the insolvency estate.

### Sales documentation and disclosure of information

The Prospectus, the Key Information Document, the Terms of Investment and the current annual and half-yearly reports can be obtained free of charge from the Company and the Depositary. Please visit am.oddo-bhf.com for information on the Company's strategies for integrating sustainability risks into the investment process and on how it takes account of the principal adverse sustainability impacts of investment decisions for individual funds. Additional information on the investment limits applied in relation to the Fund's risk management, the risk management methods and the latest developments in relation to the risk and rewards of the main categories of assets is available from the Company in electronic or written form. Additional information is available on request. Provided that a justified interest can be demonstrated, this will include information on the portfolios of all retail funds domiciled in Germany that are managed by ODDO BHF Asset Management GmbH, subject to a reasonable delay.

### Terms of Investment and changes thereto

A copy of the Terms of Investment is included in this document after the Prospectus. The Company may change the Terms of Investment. Changes to the Terms of Investment require the approval of BaFin. Changes to the Fund's investment principles are only permitted on condition that the Company offers the investors the opportunity either to redeem their units at no additional cost before the change takes effect or to exchange their units free of charge for units in investment funds with similar investment principles, insofar as such funds are managed by the Company or another company in the Group. Planned changes are announced in the *Bundesanzeiger* (German Federal Gazette) and on the Company's website, am.oddo-bhf.com. If the changes concern fees and costs that may be taken from the Fund, or if they concern the investment principles of the Fund or significant investor rights, the investors will also be informed, via their custody account provider, through a medium on which information can be stored, accessed and reproduced unchanged for a period of time adequate for the purposes of the information, such as on paper or electronically (a "durable medium"). Such information will include the main content of the planned changes, the background thereto, the rights of investors in connection with the changes and an indication of where and how further information can be obtained. The changes will take effect on the day after their announcement at the earliest. Changes to rules regarding fees and costs will take effect no earlier than four weeks after their announcement, unless an earlier date has been set with BaFin's consent. Changes to the Fund's investment principles will likewise take effect no earlier than four weeks after their announcement.

## MANAGEMENT COMPANY

The Company is an investment management company within the meaning of the Investment Code, founded on 15 November 1969 and taking the legal form of a company with limited liability (GmbH). The name of the company is ODDO BHF Asset Management GmbH. The Company's registered office is in Düsseldorf. The Company has been authorised since 1970 to manage securities funds for private and institutional investors. The Company is licensed under section 20

of the German Investment Code to manage investment funds coming under the UCITS Directive (since 2006), Mixed Investment Funds (since 2006), Other Investment Funds (since 2009), Hedge Funds and Funds of Hedge Funds (since 2009), Domestic Closed-End Retail Investor AIFs (since 2009), Domestic Closed-End Special AIFs (since 2006), General Domestic Open-Ended Special AIFs (since 2006), and Special AIFs with Fixed Terms of Investment (since 2006), as well as being licensed for financial portfolio management, private wealth management and investment advice, the sale of units or shares in third-party investment funds and investment broking. The Company merged with FRANKFURT-TRUST Investment-Gesellschaft on 30 April 2018.

### Management and Supervisory Board

Further details of the management and the members of the Supervisory Board can be found at the end of the Prospectus. This information is updated in the annual report.

### Equity capital and additional own funds

Details of the authorised and paid-up capital of the Company can be found at the end of the Prospectus. The Company has covered the professional liability risks that arise from the management of alternative investment funds ("AIFs", i.e. investment funds that do not conform to the UCITS Directive) and are attributable to the professional negligence of its boards or employees as follows: own funds of at least 0.01% of the portfolio value of all AIFs under management, this amount being subject to annual review and adjustment. This amount of own funds is covered by the amount of paid-up capital.

## DEPOSITARY

### Duties of the Depositary

The Investment Code requires the management and custodianship of funds to be kept separate. The Depositary holds the assets in blocked broker or bank accounts. Where the Depositary is unable to hold an asset, it checks whether the management company has acquired ownership of that asset. It monitors whether legal dispositions over the asset by the Company conform to the requirements of the Investment Code and to the Terms of Investment. The making and withdrawal of bank deposits at other credit institutions and dispositions over such bank deposits requires the Depositary's consent. The Depositary must grant such consent if making or disposition over deposits conforms to the Terms of Investment and the provisions of the Investment Code.

The Depositary also has the following specific tasks:

- issuing and redeeming units in the Fund,
- ensuring that the issue and redemption of units and the determination of unit values conform to the provisions of the Investment Code and to the Terms of Investment of the Fund,
- ensuring that the proceeds of transactions carried out for the common account of the investors are received into custody within the usual periods,
- ensuring that the income of the Fund is used in accordance with the provisions of the Investment Code and with the Terms of Investment,
- Monitoring any borrowing undertaken by the Company for the account of the Fund and approving such borrowing where required,
- ensuring that legally effective collateral is provided for securities loans and is available at all times.

### Conflicts of interest

Potential conflicts of interest are covered by the Company's conflict-of-interest management policy (see "Conflicts of interest" section).

### Liability of the Depositary

The Depositary is in principle responsible for all assets held in its custody or held with its consent in the custody of another entity. In the event of the loss of such an asset, the Depositary is liable to the Fund and its investors, unless the loss is attributable to events outside the Depositary's control. The Depositary will generally not be liable for damage that does not involve the loss of an asset unless it has failed to comply with its duties under the Investment Code, with negligence as the minimum criterion.

### Name, legal form and registered office of the Depositary

The Bank of New York Mellon SA/NV, Asset Servicing, Frankfurt am Main branch, Tower 185, Friedrich-Ebert-Anlage 35-37, 60327 Frankfurt am Main, has assumed the role of Depositary for the Fund. The Bank of New York Mellon

SA/NV is a bank licensed in Belgium and supervised by the Belgian financial supervisor, which is the National Bank of Belgium. Custodial operations and associated services in Germany are carried out by the German branch office: The Bank of New York Mellon SA/NV, Asset Servicing, Frankfurt am Main branch. This branch office is subject to prudential supervision by BaFin.

### Sub-custodians

Assets held for the account of the Fund are held in safekeeping by the Depositary and by sub-custodians engaged by the Depositary. The sub-custodians for the various markets are listed at the end of the Prospectus. Central securities depositories are not listed, as they are not sub-custodians actively engaged by the Depositary.
The following conflicts of interest may arise in relation to sub-custodians:

- With regard to conflicts of interest, please note that The Bank of New York Mellon SA/NV, Asset Servicing, Frankfurt am Main branch uses The Bank of New York Mellon (parent company) as a sub-custodian and vice versa.
- Where sub-custodians (third parties) or their group companies provide other services to The Bank of New York Mellon SA/NV, Asset Servicing, Frankfurt am Main branch in addition to custodianship, the risk of conflicts of interest is minimised by the fact that the companies/business units concerned have a duty of proper performance under the terms of their contract with The Bank of New York Mellon SA/NV, Asset Servicing, Frankfurt am Main branch.

The Depositary has stated that it deals with conflicts of interest as follows:

- In relation to its operating activities, The Bank of New York Mellon SA/NV, Asset Servicing, Frankfurt am Main branch, has developed guidelines for its companies and group affiliates that specify how conflicts of interest are to be dealt with. Functional and hierarchical separation is in place in order to prevent potential conflicts of interest from arising, for instance, when accepting tasks to be performed in relation to the Fund or for the Company acting for the account of the Fund. Company-wide codes lay down standards and methods for identifying potential or actual conflicts of interest that may arise from operating activities. These standards and methods include formalised processes for the regular monitoring and disclosure of conflicts of interest via an internal reporting system. Departments are obliged to disclose, monitor, manage and/or eliminate conflicts of interest in relation to current and planned activities and business relationships.

The foregoing information was provided to the Company by the Depositary. The Company has reviewed the plausibility of this information. However, it relies on information provided by the Depositary and cannot review its accuracy and completeness in detail.

### Additional information

On request, the Company will send investors up-to-date information about the Depositary and its duties, on the sub-custodians and on potential conflicts of interest in connection with the activities of the Depositary or sub-custodians.

## RISK INFORMATION

**Before deciding whether to purchase units in the Fund, investors should read carefully the following risk information along with the other information in this Prospectus and take it into consideration in their investment decision. The occurrence of one or more of these risks may, either directly or in combination with other circumstances, have an adverse impact on the performance of the Fund and/or its assets and thus on the unit value. If investors sell units in the Fund when the market prices of the assets held by the Fund are lower than they were when the units were purchased, they will not recoup the full amount of capital they originally invested. Investors may lose some or even all of the capital they have invested in the Fund. Capital growth cannot be guaranteed. The investor's risk is limited to the amount invested. Investors are under no obligation to invest additional capital over and above the amount they originally invested. In addition to the risks and uncertainties described below or elsewhere in the Prospectus, the performance of the Fund may be adversely affected by other risks and uncertainties which are currently unknown. The order in which risks are listed below does not express any statement as to the likelihood of their occurrence or as to their extent or significance if they do occur.**

The section below is a description of the risks typically associated with investing in an investment fund. These risks may have an adverse impact on unit values, on the capital invested by the investor and on the time for which the investor plans to remain invested in the Fund.

### Fluctuation of unit values

The value of Fund units is calculated by dividing the value of the Fund by the number of units in circulation. The value of the Fund is the sum of the market values of all assets held in the Fund, less the sum of the market values of all liabilities of the Fund. The value of a Fund unit therefore depends on the value of assets held in the Fund and the amount of

the liabilities of the Fund. If the value of those assets falls, or the value of the liabilities rises, the value of a fund unit will fall.

**Reduction of the unit value of the Fund due to capital distributions from the Fund**

Capital distributions from the Fund reduce the Fund assets above and beyond the interest, dividends and income from investment units, fees from lending and repurchase transactions as well as realised gains on disposals and other income accrued during the financial year for the account of the Fund and not used to cover costs. Distribution may thus take place even if no profits are made.

**Tax effects on personal outcomes**

The tax treatment of gains and income from investments depends on the investor's personal circumstances and may change in the future. Investors should consult their personal tax advisors on any specific queries, particularly as regards their personal tax situation.

**Changes to the investment policy or Terms of Investment**

The Company may change the Terms of Investment, subject to approval by BaFin. Such changes may affect the rights of investors. By amending the Terms of Investment, the Company may, for example, alter the investment policy of the Fund or increase the fees charged to the Fund. The Company may also change the investment policy within the scope of the legally and contractually permitted spectrum of investments without changing the Terms of Investment or obtaining approval from BaFin. The risk associated with the Fund may change as a result.

**Suspension of the issue and redemption of units**

The Company may temporarily suspend the issue and redemption of units in exceptional circumstances where it appears necessary to do so, having regard to the interests of the investors. Exceptional circumstances in this sense may include Difficulty in valuing assets; Serious liquidity problems (e.g. margin calls in securities trading, significant investor redemptions), where the sale of the Fund's assets must be carried out and which could lead to liquidity problems for the Fund (e.g. significant discounts on the sale of assets, significant dilution effects); A critical cyber incident that affects the Fund, the Company and/or the operational capability of one of the Company's service providers; Unforeseen market closures, trading restrictions; Closure of trading venues; A serious financial and/or political crisis; The discovery of serious criminal activity; A natural disaster. In addition, following consultation with the Company, BaFin may order the Company to suspend or resume the issue and redemption of units if there are risks pertaining to investor protection or financial stability which, upon reasonable and balanced consideration, necessitate the suspension or resumption of issues and redemptions. Investors may not redeem their units during this period. New investors may not acquire units during this period. Unit values may fall while the issue and redemption of units are suspended, for instance if the Company is compelled to sell assets at below their market value during the suspension period. Once issues and redemptions have resumed, unit values may be lower than they were before the suspension period. Suspension may lead directly to the winding-up of the Fund without issues and redemptions having been resumed, for instance if the Company ceases management of the Fund in order to wind it up. The risk therefore exists for investors that they will not be able to achieve their planned holding period and that significant parts of their invested capital may be unavailable for an indefinite time or lost completely.

**Winding-up of the Fund**

The Company has the right to terminate its management of the Fund, to be announced in the German Federal Gazette and also in the annual or half-yearly report. Upon announcement of termination, the Company is obliged to wind up the fund and distribute the proceeds from the sale of the Fund's assets to investors in proportion to their holdings. If the Company's right of management ceases for reasons other than the termination or winding-up of the Fund – for example, if insolvency proceedings are opened in respect of the Company's assets – the Depositary shall wind up the Fund. This means that there is a risk that investors will not be able to achieve the holding period they planned. The investor may be liable to income taxes when the units are removed from the investor's custody account following the winding-up process.

**Full transfer of Fund assets to another open-ended retail investment fund (merger)**

The Company may transfer all of the Fund's assets to another UCITS. If this occurs, investors may redeem their units, keep them and become investors in the UCITS taking over the Fund, or exchange them for units in an open-ended retail investment fund with similar investment principles, provided that the Company or one of its affiliates manages such an investment fund with similar investment principles. The same shall apply if the Company transfers all of the assets of another open-ended retail investment fund into the Fund. In such an event, investors will therefore have to make a new investment decision earlier than planned. Redemption of the units may trigger a liability to income tax. If the units are exchanged for units in another investment fund with similar investment principles, the investor may be liable to tax, for

instance if the value of the units received is higher than the value of the old units at the time of the original purchase.

**Transfer of the Fund to another investment management company**

The Company may transfer the Fund to another investment management company. This will have no effect on the Fund or on the position of the investor. However, in the course of the transfer, investors will have to decide whether they believe the new investment management company is as suitable as the old one. If they do not wish to remain invested in the Fund under new management, they will have to redeem their units. A liability to income tax may arise.

**Profitability and fulfilment of the investor's objectives**

It cannot be guaranteed that the investment will perform in line with the investor's expectations. The unit value of the Fund may fall, causing the investor to incur losses. Neither the Company nor any third party offers any guarantee as to a minimum redemption amount or the level of performance that the Fund will achieve. Investors may therefore receive less back than the original amount invested. Any entry charge levied on purchases of units or any exit charge levied on the sale of units may also reduce or entirely cancel out the positive returns from an investment, especially for short holding periods.

## RISK OF ADVERSE PERFORMANCE (MARKET RISK)

The risks associated with the Fund's investment in individual assets are set out below. These risks may adversely affect the performance of the Fund and its assets, and thus have an adverse impact on unit values and on the capital invested by the investor.

**Sustainability risks**

Sustainability risks can jeopardise the Fund's assets. The term "sustainability risk" refers to environmental, social and governance (ESG) events and/or conditions that, if they occur, could have an actual or potential material adverse impact on the Fund's assets. Sustainability risks can either constitute risks in themselves or can affect and materially exacerbate other risks, such as price change risks, liquidity risks, counterparty risks or operational risks. These events or conditions are broken down into environmental, social and governance (ESG) categories and concern, for example, the following:

### ENVIRONMENTAL:

- Climate change
- Adaptation to climate change
- Biodiversity protection
- Sustainable use and protection of water and marine resources
- Transition to a circular economy, waste prevention and recycling
- Pollution prevention and control
- Preservation of healthy ecosystems
- Sustainable land use

### SOCIAL

- Compliance with recognised labour law standards (no child or forced labour, no discrimination)
- Compliance with health and safety requirements
- Adequate pay, fair conditions in the workplace, diversity and opportunities for continuing professional development
- Freedom to organise and freedom of assembly
- Guarantees of sufficient product safety, including health protection
- Identical requirements for companies in the supply chain
- Inclusive projects and consideration of the interests of communities and minorities

## GOVERNANCE:

- Tax compliance
- Anti-corruption measures
- Sustainability management from the Board of Directors
- Director remuneration tied to sustainability
- Whistleblowing system
- Employee rights guarantees
- Data protection guarantees
- Disclosure of information

Issuers whose securities are held by the fund either directly or indirectly may be exposed to financial or reputational risks resulting from non-compliance with ESG standards or from physical risks of climate change. Sustainability risks can lead to a material deterioration in the underlying investment's financial profile, liquidity, profitability or reputation. If sustainability risks are not anticipated and taken into account within investment valuations, they may have a considerable adverse impact on the anticipated/estimated market price and/or on the liquidity of the investment and, by extension, on the Fund's return.

### The impact of ESG risks

The application of ESG criteria may influence the Fund's performance, which may therefore differ on the upside or on the downside from that of similar funds that do not apply ESG criteria. If exclusion criteria have been defined for a fund on the basis of environmental, social or ethical criteria, this may mean that the fund refrains from buying certain assets even if doing so would be advantageous; equally, the fund might sell assets even if doing so would be detrimental. The Fund's sector exclusions may not directly correlate with each individual investor's subjective ethical perspective. The assessment of a security or an issuer based on ESG criteria may rely on information and data from external ESG ratings providers that may be incomplete, incorrect or unavailable. There is therefore a risk that the assessment is inaccurate. ESG criteria may be incomplete, inaccurate, incorrectly applied, inappropriate or irrelevant, or the Fund may be indirectly exposed to issuers that do not fulfil the ESG criteria.

### Risk of change in value

The assets in which the Company invests on the Fund's behalf are subject to risks. For instance, losses may occur if the market value of assets falls relative to their acquisition price or if spot and forward prices move by different amounts.

### Capital markets risk

How financial products perform in terms of price or market value depends in particular on the performance of the capital markets, which is influenced in turn both by the general global economic climate and by the overall economic and political conditions in the relevant countries. On a stock exchange in particular, general price performance can also be influenced by irrational factors such as sentiment, opinions and rumours. Fluctuations in prices and market values may also occur as a result of changes in interest rates, exchange rates or the credit rating of an issuer.

### Equity price risk

Experience shows that equities are subject to sharp fluctuations in price, so they are also at risk of price drops. These fluctuations are affected in particular by the issuing company's profits, as well as developments in the industry and the economy as a whole. The confidence of market players in an individual company can also affect share price development. This is especially true of companies whose equities have only been admitted to the stock exchange or another organised market for a short time; for such companies, even minor changes in forecasts can cause sharp price movements. If the free float held by many shareholders is low, even small purchase or sale orders can have a significant effect on the market price of the stock, and thus lead to greater fluctuations in price.

### Interest rate risk

Investments in fixed-income securities are associated with the possibility that the market interest rate that prevailed at the time a security was issued may change. If market interest rates rise compared with the interest rate at the time of issue, then the prices of fixed-income securities tend to go down. Conversely, if the market interest rate drops, the price of fixed-income securities goes up. Such price movements mean that the current yield on a fixed-income security is more or less the same as the current market interest rate. The severity of these price fluctuations varies depending on the time to maturity of the securities. Fixed-income securities with shorter maturities present less price risk than

those with longer maturities. However, fixed-income securities with shorter maturities also tend to have lower yields than those with longer maturities. Money market instruments tend to have lower price risks, because of their short maturity periods that do not exceed 397 days. In addition, interest rate movements for different interest-bearing financial instruments denominated in the same currency with comparable residual terms may not be the same.

**Risk of negative interest on credit balances**

The Company invests the Fund's liquid assets with the Depositary or other banks for the account of the Fund. In some cases, an interest rate is agreed for these bank balances which is equal to the Euro Short Term Rate (€STR) less a certain margin. If the €STR falls to less than the agreed margin, the interest rate on the account in question will be negative. Depending on how the interest rate policy pursued by the European Central Bank develops, short-term, medium-term and long-term bank deposits may generate negative interest.

**Price risk of convertible bonds and bonds with warrants**

Convertible bonds and bonds with warrants carry the right to convert the bond into equities or to acquire equities. The performance of convertible bonds and bonds with warrants therefore depends on the price development of the underlying share. The risks associated with the performance of underlying shares can therefore also have an effect on the performance of the convertible bond or bond with warrant. Bonds with warrants that grant the issuer the right to offer the investor a predetermined number of shares instead of repayment of a nominal amount (reverse convertibles) depend greatly on the price of the corresponding equities.

**Risks in connection with derivatives transactions**

The Company may enter into derivatives transactions for the Fund. The following risks are associated with the purchase and sale of options and entering into futures contracts or swaps:

- The use of derivatives may entail losses that are not foreseeable and may even exceed the amounts staked on the derivatives transaction.
- Changes in the price of the underlying may reduce the value of an option or futures contract. If the value falls and the derivative thus becomes worthless, the Company may be forced to allow the acquired rights to lapse. The Fund may also experience losses due to changes in the value of an asset underlying a swap.
- There may be no liquid secondary market for a certain instrument at a certain time. In this case, it might not be possible to economically neutralise (close out) a derivatives position.
- The leverage effect of options may have a greater impact on the value of the Fund than the direct purchase of the underlyings would. It may not be possible to measure the risk of loss when entering into the transaction.
- The purchase of options entails the risk that the option cannot be exercised because the prices of the underlyings do not change as expected, resulting in the forfeit of the option premium paid by the Fund. The sale of options entails the risk that the Fund will be obliged to buy assets at a higher market price than the current price or to deliver assets at a lower market price than the current price. The Fund would then experience a loss amounting to the price differential less the option premium received.
- Futures contracts entail the risk that the Company will be obliged to cover, for the account of the Fund, the difference between the initial price at the time of entering into the contract and the market price at the time of closing out or maturity of the contract. The Fund would thus suffer losses. It is not possible to measure the risk of loss when entering into the futures contract.
- It may be necessary to conclude an offsetting transaction (closing out), which entails costs.
- The Company's forecasts on the future performance of underlying assets, interest rates, prices and currency markets may subsequently prove incorrect.
- It may not be possible to buy or sell the assets underlying the derivatives at a favourable time or they may have to be bought or sold at an unfavourable time.

Over-the-counter (OTC) transactions may entail the following risks:

- There may be no organised market, making it difficult or impossible for the Company to sell the financial instruments acquired on the OTC market for the account of the Fund.
- Based on the individual agreement, the conclusion of an offsetting transaction (closing out) may be difficult, impossible or entail considerable costs.

### Risks in relation to securities lending transactions

If the Company, acting for the account of the Fund, grants a loan of securities, this means that it transfers said securities to a borrower who shall return securities of an identical type, quantity and rating at the end of the transaction (a "securities loan"). The Company has no power of disposition over the loaned securities for the term of the transaction. If the security loses value during the term of the transaction and the Company wishes to sell it, it must terminate the loan transaction and await completion of the usual settlement cycle, which may give rise to a risk of loss for the Fund.

### Risks in relation to repurchase transactions

If the Company sells securities under a repurchase transaction, this means that it sells them and undertakes to buy them back at a premium at the end of the term. The premium and the buy-back price to be paid by the seller at the end of the term are set when the transaction is entered into. If the securities sold under the repurchase agreement lose value during the term of the transaction and the Company wishes to sell them in order to limit the losses, it can only do so by exercising its right to early termination. Early termination of the transaction may cause the Fund to incur financial penalties. The premium payable at the end of the term may also turn out to be higher than the returns made by the Company from reinvesting the cash received as the sale price. If the Company acquires securities under a repurchase transaction, this means that it buys them and undertakes to sell them again at the end of a specific term. The buy-back price and a premium are set in advance when the transaction is entered into. The securities purchased under repurchase agreements serve as collateral for the provision of liquidity to the counterparty. The Fund will not benefit from any rise in the value of the securities.

### Risks in connection with the receipt of collateral

The Company receives collateral for derivatives, securities lending and repurchase transactions. Derivatives, loaned securities or securities sold under repurchase agreements may rise in value. In such an event, the collateral received may no longer be sufficient to cover the full amount of the Company's claim against the counterparty for delivery or return. The Company may invest cash collateral in blocked bank accounts, in high-quality sovereign bonds or in short-term money market funds. However, the credit institution holding the bank deposit may default. Government bonds and money market funds may also exhibit negative performance. When the transaction ends, the invested collateral may no longer be available in full, even though the Company must return the collateral on the Fund's behalf in the amount originally granted. The Fund would then have to bear the losses incurred on the collateral.

### Risks in relation to securitised exposures with no deductible

The Fund may only purchase securities that securitise receivables (securitised exposures) that were issued after 1 January 2011 if the obligor retains at least 5% of the volume of the securitisation as a "deductible" and also complies with further requirements. The Company is therefore obliged to take remedial action in the interests of the investors if any securitisations are held in the Fund that do not meet these EU standards. The Company may be compelled to sell any such securitised exposures as part of this remedial action. Owing to the legal requirements on banks, fund companies and insurance companies, there is a risk that the Company may be unable to sell such securitised exposures or may only be able to do so at heavily discounted prices and/or after a long delay.

### Inflation risk

Inflation carries a risk of devaluation for all assets. This includes the assets held by the Fund. The inflation rate may exceed the increase in the value of the Fund.

### Currency risk

Fund assets may be invested in a currency other than the Fund currency. The Fund receives the income, redemptions and proceeds from such investments in the other currency. If the value of this currency falls against the Fund currency, the value of such investments will fall, and thus the value of the Fund.

### Concentration risk

If investments are concentrated in particular assets or markets, the Fund will be especially dependent on the performance of those assets or markets.

### Risks in connection with investment in fund units

The risks of units in other investment funds that are acquired for the Fund ("target funds") are closely related to the risks of the assets held in these target funds and the investment strategies pursued by these target funds. However, since the fund managers of the individual target funds act independently of one another, it is possible for multiple target funds to pursue similar or opposing investment strategies. As a result, existing risks may accumulate and any opportunities may cancel each other out. As a rule, the Company has no control over the management of the target funds. Their investment decisions do not necessarily coincide with the assumptions or expectations of the Company. The Company will often not

have timely knowledge of the current composition of the target funds. If the composition does not correspond to its assumptions or expectations, then it might not be able to react without a considerable delay by redeeming target fund units. Open-ended investment funds in which the Fund acquires units could also temporarily restrict or suspend the redemption of units. In this case, the Company would be prevented from selling target fund units by redeeming them in return for payment of the redemption price at the management company or depositary of the target fund.

### Risks arising from the range of permissible investments

Subject to the investment principles and investment limits prescribed by law and by the Terms of Investment, which offer a very wide scope to the Fund, the actual investment policy may be formulated so as to focus on the acquisition of assets in, for instance, a small number of sectors, markets, regions or countries. Concentration on a few specific investment sectors may involve risks, such as narrow markets or high volatility within a particular economic cycle. The annual report provides information about the investment policy followed in the previous year.

### Market risks in connection with sustainability risks

Environmental, social or governance (ESG) risks can also have an impact on market prices. For instance, if companies do not act sustainably or make sustainable investments, this may affect market prices. Likewise, the strategic approaches of companies that do not take sustainability into account may have the effect of depressing their share price. The resultant reputational risk if a company fails to act sustainably can also have a negative impact. Last but not least, physical damage caused by climate change or measures for converting to a low-carbon economy may also have a negative impact on the market price.

## RISKS OF LIMITED OR INCREASED FUND LIQUIDITY AND RISKS IN CONNECTION WITH HIGH VOLUMES OF ISSUES OR REDEMPTIONS (LIQUIDITY RISK)

Risks that may adversely affect the liquidity of the Fund are set out below. Such liquidity risks may result in the Company implementing procedures designed to reduce the risk of dilution for investors remaining in the Fund when units are issued and/or redeemed, or may result in the Fund being temporarily or permanently unable to fulfil its payment obligations, or in the Company being temporarily or permanently unable to meet investors' redemption requests. Investors may, where necessary, only be able to purchase units at an increased issue price and/or only receive a reduced redemption price when redeeming units. In addition, investors may, in some circumstances, be unable to realise their planned holding period or have no access to their invested capital or part thereof for an indefinite length of time. The materialisation of liquidity risks may also cause the value of the Fund, and thus the unit price, to fall, for instance if the Company is compelled, insofar as legally permitted, to sell assets on behalf of the Fund at below market value. If the Company is not able to satisfy the redemption requests of investors, this may also lead to the restriction or suspension of unit issues and redemptions and in extreme cases to the subsequent winding-up of the Fund.

### Restrictions on redemptions

The Company may partially and temporarily restrict the redemption of units if the investors' redemption requests on a settlement date reach a predefined threshold above which such requests can no longer be carried out in the interest of all investors due to the Fund's liquidity position. If the threshold is reached, the Company will decide at its discretion whether to limit redemption on that settlement date. If the Company decides to restrict redemptions, it will only redeem units on a pro rata basis at the redemption price applicable on the settlement date; otherwise the redemption obligation ceases to be applicable. This means that each redemption request will only be carried out on a pro rata basis, according to a quota determined by the Company. Neither will the unfulfilled portion of the order be carried out at a later date, but will be forfeited. The investor is therefore exposed to the risk that its order for the redemption of units will only be carried out on a pro rata basis and that it will have to place the outstanding remaining order again. This measure is intended to protect investors and is to be regarded as a less severe measure than suspending the issue and redemption of units.

### Risk of investing in assets

Assets may be purchased for the Fund which are not admitted to an exchange or admitted to or included in another organised market. In some cases, it may not be possible to resell such assets, or resale may only be possible at heavily discounted prices or after a long delay. Even if the assets are admitted to an exchange, resale may be impossible or may only be possible at heavily discounted prices, depending on the market conditions, volume, timeframe and projected costs. Although assets may only be purchased for the Fund that can in principle be liquidated at any time, it cannot be ruled out that it may be temporarily or permanently impossible to sell those assets except at a loss.

### Borrowing risk

The Company may take out loans for the account of the Fund. Loans with variable interest rates may have a negative effect on the Fund's assets if interest rates rise. If the Company must repay a loan but is unable to settle the amount

through refinancing or from the Fund's existing liquidity, it may be compelled to sell assets prematurely or on worse terms than planned.

**Risks from high issue or redemption volumes**

Purchase or sale orders from investors cause liquidity to flow into or out of the Fund. Such inflows and outflows may lead to an overall net cash inflow or outflow. This net inflow or outflow may cause the Fund manager to buy or sell assets, causing transaction costs to be incurred. This is especially the case when the inflows or outflows cause the Fund to breach a minimum or maximum cash allocation set for the Fund by the Company. The resulting transaction fees are charged to the Fund and may reduce the Fund's performance. In the case of inflows, increased Fund liquidity may adversely affect the Fund's performance if the Company is unable to invest the cash on suitable terms or is unable to do so quickly. In order to manage liquidity risks, the Company may implement procedures whereby the costs arising from the issue and/or redemption of units (e.g. transaction costs resulting from the necessary sale or purchase of Fund assets) are apportioned to new investors or redeeming investors according to origin, thereby reducing the risk of dilution for investors remaining in the Fund. For investors redeeming their units, there is a risk that the unit value may be adjusted by a certain factor when these procedures are applied. For new investors, there is also a risk that the unit value may be adjusted by a certain factor when these procedures are applied.

**Risks in relation to public holidays in certain regions or countries**

Depending on the investment strategy, investments may be made on behalf of the Fund in particular regions or countries. Local public holidays in these regions or countries may mean that there are divergences between the trading days at exchanges in these regions or countries and the Fund's valuation days. On days that are not valuation days, the Fund may be unable to react to market developments in these regions or countries on the same day; on valuation days that are not trading days in these regions or countries, the Fund may be unable to trade on the markets there. The Fund may thus be prevented from selling assets within the necessary timeframe. This may impair the Fund's ability to fulfil redemption requests or other payment obligations.

## COUNTERPARTY RISK INCLUDING LENDING AND RECEIVABLES RISK

Risks that could arise for the Fund from a business relationship with another party (a "counterparty") are set out below. The risk exists that a counterparty may no longer be able to fulfil its agreed obligations. This may adversely affect the Fund's performance and thus have a negative impact on the unit value and the capital invested by investors.

**Default risk/counterparty risks (excluding central counterparties)**

The Fund may incur losses due to the default of an issuer ("issuer") or a contracting partner ("counterparty") against which the Fund has claims. Issuer risk refers to the impact of particular developments concerning a given issuer, which, together with general trends on capital markets, affect the price of a security. Even if securities are selected carefully, losses resulting from the deterioration of an issuer's financial situation cannot be ruled out. The counterparty to an agreement entered into for the account of the Fund may default partially or in full ("counterparty risk"). This applies to all agreements concluded for the account of the Fund.

**Central counterparty risk**

A central counterparty or "CCP" acts as an intermediary institution in certain transactions concluded on behalf of the Fund, especially trades involving derivative financial instruments. In such cases, the CCP acts as a buyer towards the seller and as a seller towards the buyer. To protect itself against the risk that its counterparty may not be able to perform its agreed obligations, a CCP takes a range of protective measures that enable it to compensate any losses arising from the trades it enters into (e.g. through collateral). Despite these protective measures, it cannot be ruled out that a CCP may itself become insolvent, which could have an impact on claims held by the Company on behalf of the Fund. The fund may incur losses as a result.

**Default risk in relation to repurchase transactions**

If the Company, acting for the account of the Fund, sells securities under repurchase agreements, it must arrange to be furnished with sufficient collateral to cover the default of the counterparty. The Company has the right to realise the collateral if the counterparty defaults during the term of the repurchase transaction. A risk of loss may ensue for the Fund if the collateral is no longer sufficient to cover the Company's claim for the return of the securities, for instance because the securities sold under the repurchase agreement have risen in price.

**Default risk in relation to securities lending transactions**

If the Company, acting for the account of the Fund, grants a loan of securities it must arrange to be furnished with sufficient collateral to cover the default of the counterparty. The amount of the furnished collateral will as a minimum correspond to the quoted price of the securities transferred as a securities loan. The borrower will post further collateral if

the value of the loaned securities rises, the quality of the furnished collateral falls, or its economic circumstances deteriorate and the existing collateral is not sufficient. If the borrower cannot fulfil this obligation to post additional collateral, then there is a risk that the right to recover the loaned instruments will not be fully covered against the default of the counterparty. If the collateral is held at an institution other than the Fund's Depositary, the risk also exists that it may not be possible to realise it immediately and/or in full in the event of default by the borrower.

## OPERATIONAL AND OTHER RISKS PERTAINING TO THE FUND

Risks that may result from, for instance, inadequate internal processes, human error or system failure at the Company or an outside third party are set out below. Such risks may adversely affect the Fund's performance and thus have a negative impact on the unit value and the capital invested by investors.

### Risk of criminal wrongdoing, irregularities or natural disaster

The Fund may be the victim of fraud or other criminal wrongdoing. It may incur losses due to errors by employees of the Company or external third parties, or suffer harm as a result of exogenous events such as pandemics or natural disasters. These events can be brought about or exacerbated by, for example, the failure by an issuer and/or the Fund management to take account of sustainability requirements.

### Cybercrime

The Fund, the Depositary or service providers or counterparties with whom the Fund works may be affected by events that impair the security of electronic data processing, which may give rise to operational and data protection risks. Such events may result from targeted attacks or the unintended (side) effects of other events, such as unauthorised access to electronic systems due to hacking, trojans, viruses, phishing or pharming carried out in order to unlawfully appropriate assets or sensitive data, alter data or cause the failure of one or more systems. The latter may also occur even if no unauthorised access is obtained to IT systems, for instance when a website is slowed down or unavailable because a large number of outside users attempt to access it for its normal intended purpose. If the Fund, Management Company, portfolio manager, Depositary or financial intermediaries are affected by IT security impairments, this may impact business operations, e.g. the ability of the Fund to determine its net asset value, enter into transactions or issue or redeem units. As a result, financial losses may arise for which the Fund may not receive compensation. Furthermore, data protection breaches or breaches of applicable regulatory requirements may give rise to fines, costs and losses, including reputational damage, which the Fund may have to bear. Similar consequences may arise from IT security impairments at the issuers of assets in which the Fund invests, at the counterparties of the Fund's transactions, at government authorities or other regulators, at exchanges or financial market operators, or at banks, brokers, traders, insurers and other parties. Although information risk management systems and emergency business continuity plans have been devised to reduce these risks, such measures have inherent limits, including the risk that some risks may not have been identified.

### Country or transfer risk

The risk exists that a foreign debtor, despite being solvent, may be unable to make payment, unable to make payment on time, or only able to make payment in an alternative currency because a currency is not transferable, because its home country is unwilling to permit transfers or for similar reasons. This may result, for example, in payments to which the Company is entitled for the account of the Fund not being made, being made in a currency that is no longer convertible due to currency restrictions, or being made in an alternative currency. If the debtor pays in an alternative currency, this position will be subject to currency risk as described above.

### Legal and political risk

Investments may be made on behalf of the Fund in jurisdictions in which German law is not applied or where the venue for legal disputes is outside Germany. The Company's rights and duties on behalf of the Fund may differ from those in Germany, to the detriment of the Fund and/or the investors. Political or legal developments, including changes in the legal framework in such jurisdictions, may go unnoticed by the Company, may not be noticed until too late or may lead to restrictions on assets that are acquirable or have already been acquired. These consequences may also arise if the legal framework for the Company and/or the management of the Fund changes in Germany.

### Changes in tax regime, tax risk

The tax information in this Prospectus is based on the current legal position. The brief details of tax regulations are aimed at persons with unrestricted income tax liability or unrestricted corporate income tax liability in Germany. However, there is no guarantee that the current tax treatment will not change due to legislation, court judgments or decisions of the tax authority.

### Key person risk

If the investment performance in a particular period is very positive, this success may be due inter alia to the aptitude of

the individuals in charge and thus to the making of correct decisions by the management. However, the composition of the Fund's management team may change. New decision-makers may then be less successful.

**Custody risk**

The safekeeping of assets, particularly abroad, is associated with a risk of loss which can result from the insolvency of the Depositary, from breaches of duty by the Depositary and/or from force majeure.

**Risks arising from settlement fails for securities transactions via central securities depositories within the EU**

On 1 February 2022, the Regulatory Technical Standards ("RTS") on the settlement discipline regime under Regulation (EU) No 909/2014 and Commission Delegated Regulation (EU) 2018/1229 (hereinafter jointly referred to as the Central Securities Depositories Regulation – "CSDR") came into force. These RTS require central securities depositories ("CSDs") to apply cash penalties to users for the delayed settlement of a security and to credit these penalties to those participants affected by the delayed delivery or payment. Participants are depositaries and brokers. The Depositary of the Fund will debit or credit any cash penalties charged by or received from a central securities depository to the Fund. The Company monitors negative cash penalties and reimburses the Fund for any amount by which negative penalties exceed penalty receipts within an accounting period, or will agree on a corresponding reimbursement from any external portfolio managers ("netting procedure"). Thresholds may be applied to reimbursement demands if cash penalties are so low that the transfer or administration costs exceed the amount for reimbursement. Penalty receipts can be used to offset penalties charged. Subject to the application of thresholds, the Fund will not therefore suffer a net loss during a single accounting period as a result of cash penalties due to application of the CSDR, and may receive a net positive amount in some accounting periods.

**Risks arising from trading and clearing mechanisms (settlement risk)**

During the settlement of securities trades, the risk exists that one of the counterparties may delay payment, fail to pay in accordance with the agreement or fail to deliver the securities on time. Likewise, such settlement risk also applies to trading in other assets conducted on behalf of the Fund.

**Differing performance of unit classes**

The economic performance of unit classes may vary as a result of the differing legal rules and limits for the units in different unit classes. Examples include distribution, reinvestment or different levels of management fees. If one unit class distributes income but another reinvests it, the values of the units in the two classes will differ as a result; the same applies if different unit classes are entitled to different shares of the Fund's income. This also applies in relation to different levels of management fees: Fees are regularly paid from the Fund, so different fee levels will reduce unit values by different amounts.

## RISK PROFILE OF THE FUND

Due to the following investment objectives and principles, the Fund is exposed in particular to risks predominantly associated with investing in equities.

In terms of investing in equities, these include market risk, liquidity risk and company-specific risk. Furthermore, the Fund may be exposed to currency risk.

Other risks that may arise for the Fund in connection with the investment objectives and principles are described in detail in the previous paragraph ("Risk information").

## HIGH VOLATILITY

Based on its composition, the Fund has a high level of volatility; i.e. the unit values can fluctuate significantly up and down, including within a short space of time.

## ODDO BHF German Equities

ODDO BHF German Equities was established on 27 May 1974 for an unlimited duration. Multiple unit classes may be issued for the Fund that vary in terms of the income distribution policy, the entry charge, the currency of the unit value including the use of currency hedging transactions, the management fee, the depositary fee, the minimum investment amount, the form of issue or a combination of these features. The Fund consists of different unit classes, which means that the units issued carry different rights depending on the class to which they belong. Units are currently available in four unit classes, which differ with regard to the income distribution policy, the entry charge amount, the management fee and the minimum investment. The unit classes are referred to as DR-EUR, CNw-EUR, CRw-EUR and AVDw-EUR. The different features of the unit classes are set out in the overview below and explained in more detail in the section on "Fair treatment of investors and unit classes". Due to their different characteristics, the returns that investors achieve from their investments in the Fund may vary depending on the class of unit purchased. This applies to both the

pre-tax and post-tax rate of return for the investor. Assets may only be acquired for the Fund as a whole, and may not be acquired for individual unit classes or groups of unit classes. New unit classes may be formed at any time at the Company's discretion. A unit class may exist even if no units are currently in issue. If a new unit class is formed, the units do not need to be issued immediately. However, the rights of investors who have purchased units in existing unit classes will remain unaffected. Costs incurred in connection with the introduction of a new unit class may only be charged to investors in this new unit class. When units in a unit class are issued for the first time, their value must be calculated based on the value determined for the entire Fund in accordance with section 168(1) sentence 1 of the Investment Code. The annual and half-yearly reports contain information on the terms under which units with different rights are issued and which rights are allocated to individual unit classes. For each unit class, the number of units in issue on the reporting date and the unit value determined as at the reporting date are also indicated.

Overview of the unit classes:

| ODDO BHF German Equities DR-EUR | |
|---|---|
| Launch | 27 May 1974 |
| Financial year | 1 October to 30 September |
| German Securities Code (WKN) | 847805 |
| ISIN | DE0008478058 |
| Currency | Euro |
| Income distribution policy | Distributing |
| Management fee | Up to 2.0% p.a., currently 1.8% p.a. |
| Performance fee | No performance fee is charged. |
| Depositary fee | Up to 0.1% p.a., currently 0.00833% p.a. (at least EUR 5,000 p.a.*) |
| Entry charge | up to 5% |
| Minimum initial investment | EUR 100 lump sum, or EUR 50 per month |
| Order cut-off time | 2:00p.m. |

| ODDO BHF German Equities CNw-EUR<br>The units may only be acquired as part of a portfolio management mandate or fee-based investment advisory service. | |
|---|---|
| Launch | 2 June 2025 |
| Financial year | 1 October to 30 September |
| German Securities Code (WKN) | A3E2ZK |
| ISIN | DE000A3E2ZK9 |
| Currency | Euro |
| Income distribution policy | Reinvesting |
| Management fee | Up to 2.0% p.a., currently 1.4% p.a. |
| Performance fee | No performance fee is charged. |
| Depositary fee | Up to 0.1% p.a., currently 0.00833% p.a. (at least EUR 5,000 p.a.*) |
| Entry charge | up to 5% |
| Minimum initial investment | EUR 100 lump sum, or EUR 50 per month |
| Order cut-off time | 2:00p.m. |

| ODDO BHF German Equities CRw-EUR | |
|---|---|
| Launch | 15 September 2025 |
| Financial year | 1 October to 30 September |
| German Securities Code (WKN) | DE000A40NT12 |
| ISIN | A40NT1 |
| Currency | Euro |
| Income distribution policy | Reinvesting |
| Management fee | Up to 2.0% p.a., currently 1.8% p.a. |
| Performance fee | No performance fee is charged. |
| Depositary fee | Up to 0.1% p.a., currently 0.00833% p.a. (at least EUR 5,000 p.a.*) |
| Entry charge | up to 5% |
| Minimum initial investment | EUR 100 lump sum, or EUR 50 per month |
| Order cut-off time | 2:00p.m. |

| ODDO BHF German Equities AVDw-EUR<br>Units may only be acquired by institutions acting on behalf of pension schemes, retirement savings plans or similar long-term investment programmes, including those set up within the scope of specific national provisions – such as the German *Altersvorsorgedepot* (pension savings account) or other similar regulations. Subscriptions require the prior consent of, and a written agreement with, the Company. | |
|---|---|
| Launch | 1 October 2026 |
| Financial year | 1 October to 30 September |
| German Securities Code (WKN) | A40NT9 |
| ISIN | DE000A40NT95 |
| Currency | Euro |
| Income distribution policy | Reinvesting |
| Management fee | Up to 2.0% p.a., currently 0.70% p.a. |
| Performance fee | No performance fee is charged. |
| Depositary fee | Up to 0.1% p.a., currently 0.00833% p.a. (at least EUR 5,000 p.a.*) |
| Entry charge | Currently not charged. |
| Minimum initial investment | EUR 25 |
| Order cut-off time | 2:00p.m. |

* The minimum fee is charged to the fund only once, regardless of the number of unit classes.

## TYPICAL INVESTOR PROFILE

The Fund is aimed at all investors whose objective is wealth creation and/or optimisation. Investors should be in a position to sustain fluctuations in value and considerable losses and should need no guarantee that the original amount invested will be returned. In some circumstances, the Fund may not be suitable for investors who wish to liquidate their investment in the Fund within five years. The Company's assessment does not constitute investment advice. Its purpose is to give investors an initial indication of whether the Fund is appropriate for them, given their level of experience, risk appetite and investment horizon.

## INVESTMENT OBJECTIVES

The objective of the Fund is to participate in the performance of German equities. The Fund invests primarily in German equities. To a limited extent, the fund manager may also invest in shares from other euro countries. The Fund offers a mix of large and mid-cap companies. The Company pursues a sustainable investment strategy in its management of the Fund. The Fund incorporates financial criteria as well as environmental, social and governance (ESG) characteristics. As part of our sustainable 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.

The Fund's benchmark is the MSCI Germany NR EUR[1], which it seeks to outperform rather than replicate. As a result of this, significant differences, both positive and negative, between it and the benchmark index are possible. The Fund is actively managed, with a constant search for promising target assets that are expected to perform well. Stock selection and asset allocation are also based on in-depth market analyses and macroeconomic studies.

The Fund is an Article 8 fund under the SFDR[2]. The principle of "do no significant harm" applies only to those investments underlying a 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.

Information on the Fund's environmental and/or social characteristics can be found in the Annex to this Prospectus.

Information on the principal adverse impacts of investment decisions on sustainability factors is available in the Annual Report pursuant to Article 11(2) of the SFDR.

The Company has drawn up robust written plans containing measures it would take if the benchmark index changes significantly or becomes unavailable.

No guarantee can be provided that the objectives of the investment policy will actually be achieved.

## INVESTMENT PRINCIPLES

The Company may purchase the following assets for the Fund:

1. Transferable securities as per section 5 of the General Terms of Investment,
2. Money market instruments as per section 6 of the General Terms of Investment,
3. Bank deposits as per section 7 of the General Terms of Investment.
4. Fund units as per section 8 of the General Terms of Investment,
5. Derivatives as per section 9 of the General Terms of Investment,
6. Other investment instruments as per section 10 of the General Terms of Investment.

The company may acquire these assets within the investment limits described. Details of these eligible assets and the applicable investment limits are set out below.

**Securities**

The Company, acting for the account of the Fund, may acquire securities of German and foreign issuers

1. if they are admitted to an exchange in a Member State of the European Union (EU) or another signatory state to the Agreement on the European Economic Area (EEA) or are admitted to or included in another organised market in one of these states,
2. if they are exclusively admitted to an exchange outside the Member States of the EU or outside the other signatory states to the EEA Agreement, or are admitted to or included in another organised market outside those states, provided that BaFin has approved the selection of that exchange or organised market.

Securities from new issues may be acquired if, under their terms of issue, admittance to or inclusion in one of the exchanges or organised markets mentioned under 1. and 2. must be sought, and admittance or inclusion is granted within one year after issue.

The following are considered securities for these purposes:

- Units of closed-end investment funds in contractual or corporate form under the control of shareholders ("corporate control"); i.e. the shareholders must have voting rights for important decisions as well as the right to control the investment policy using appropriate mechanisms. The investment fund must additionally be managed by a legal entity that is subject to investor protection regulations, unless the investment fund is established in corporate form and the task of asset management is not carried out by a different legal entity.

[1] MSCI Germany NR EUR is a registered trademark of MSCI Limited, which is the administrator. The administrator is included in a public register of benchmark administrators and benchmarks maintained by the European Securities and Markets Authority (ESMA).

[2] Regulation (EU) 2019/2088 on sustainability-related disclosure requirements in the financial services sector

- Financial instruments that are secured by other assets or are pegged to the performance of other assets. To the extent that derivative components are embedded in such financial instruments, further requirements must be met for the Company to acquire these as securities.

The securities may only be acquired under the following conditions:

- The potential loss exposure for the Fund may not exceed the purchase price of the security. There must be no obligation to invest additional capital.
- Insufficient liquidity of the security acquired by the Fund must not result in the Fund being unable to fulfil the legal requirements concerning the redemption of units. This applies in consideration of the legal possibility of being able to restrict or suspend unit redemptions in special cases (see under "Units" – "Issue and redemption of units" and "Suspension of the issue and redemption of units").
- A reliable valuation of the security, based on exact, reliable and current prices, must be available; these prices must be either market prices or provided by a valuation system that is independent from the issuer of the security.
- Suitable information about the security must be available, in the form of regular, exact and comprehensive market information about the security or any associated securitised portfolio.
- The security is tradable.
- The acquisition of the security is in keeping with the investment objectives or the investment strategy of the Fund.
- The risks associated with the security are adequately covered by Fund risk management.

Securities may additionally be acquired in the following form:

- Shares to which the Fund is entitled by virtue of a bonus issue.
- Securities acquired through the exercise of subscription rights belonging to the Fund.

Subscription rights may be acquired for the Fund as securities within this meaning provided that the securities on which the subscription rights are founded are permitted in the Fund.

**Money market instruments**

The Company may invest for the account of the Fund in money market instruments that are normally traded on the money market, as well as in interest-bearing securities that either

- have a maturity or remaining maturity of no more than 397 days at the time of their acquisition for the Fund.
- have a maturity or remaining maturity of longer than 397 days at the time of their acquisition for the Fund and bear interest at a rate that according to the terms of issue must be regularly adjusted to market terms at least once every 397 days.
- have a risk profile which matches the risk profile of securities that meet the remaining maturity criterion or the interest rate reset criterion.

Money market instruments may be purchased for the Fund if they

1. are admitted to an exchange in a Member State of the EU or another signatory state to the EEA Agreement, or are admitted to or included in another organised market in one of these states,
2. are exclusively admitted to an exchange outside the Member States of the EU and other signatory states to the EEA Agreement, or are admitted to or included in another organised market outside those states, provided that BaFin has approved the selection of that exchange or organised market,
3. are issued or guaranteed by the EU, the German Federal Government, a special fund (Sondervermögen) of the German Federal Government, a German Federal State, another Member State or another governmental, regional or local authority or the central bank of an EU Member State, by the European Central Bank or European Investment Bank, by a third country or, in the case of a country that is a federation, a member of the federation, or by an international public institution to which at least one EU Member State belongs,
4. are issued by an undertaking whose securities are traded on the markets referred to in (1) and (2) above,
5. are issued or guaranteed by a credit institution subject to prudential supervision in accordance with the criteria laid down in EU law or by a credit institution that is subject to and complies with prudential rules considered by BaFin as equivalent to those laid down in Community law, or
6. are issued by other issuers provided that each such issuer

a) is an undertaking with equity of at least EUR 10 million that prepares and publishes its financial statements in accordance with the European Directive on the annual accounts of companies,

b) is a legal entity that is responsible for the financing of a corporate group that includes one or more exchange-listed companies,

c) is a legal entity that issues money market instruments backed by liabilities arising from the use of a credit facility granted by a bank. These are products that securitise the loan receivables of banks ("asset backed securities").

The aforementioned money market instruments may only be acquired if they are liquid and their value can be accurately determined at any time. Money market instruments are liquid if they can be sold within a sufficiently short period at limited cost. Account should be taken in this regard of the Company's obligation to redeem units in the Fund on request by the investors and to be able to sell such money market instruments at short notice accordingly. A precise, reliable valuation system must also exist for the money market instruments that allows the net portfolio value of the instruments to be determined and is based on market data or valuation models (including systems based on amortised cost). Money market instruments are deemed liquid if they are admitted to or included in an organised market within the EEA or are admitted to or included in an organised market outside the EEA where BaFin has approved the choice of that market. This does not apply if the Company has indications that the instruments are not sufficiently liquid.

For money market instruments that are not listed on an exchange or admitted to trading on a regulated market (see nos. 3 to 6 above), the issue or the issuer of the instruments must be subject to deposit and investor protection regulations. Sufficient information must therefore be available for these instruments to enable the credit risks associated with them to be appropriately evaluated, and the instruments must be freely transferable. Credit risks may, for instance, be assessed by way of a creditworthiness check by a rating agency.

The following requirements also apply to these money market instruments, unless they are issued or guaranteed by the European Central Bank or the central bank of an EU Member State:

- If they are issued or guaranteed by the following institutions (referred to in no. 3 above):
  - the EU,
  - the German Federal Government,
  - a special fund (Sondervermögen) of the German Federal Government,
  - a German Federal State,
  - another Member State,
  - another central government authority,
  - the European Investment Bank,
  - a third country or, in the case of a country that is a federation, a member of the federation,
  - – an international public institution to which at least one EU Member State belongs, suitable information must be available about the issue and/or issue programme or about the legal and financial status of the issuer prior to the issue of the instrument.
- If they are issued or guaranteed by a credit institution supervised in the EEA, (see no. 5 above), suitable information must be available about the issue and/or issue programme or about the legal and financial status of the issuer prior to the issue of the instrument, which must be updated at regular intervals and upon the occurrence of significant events. In addition, data (e.g. statistics) must be available on the issue and/or the issue programme to enable an appropriate evaluation to be made of the credit risks associated with the investment.
- If they are issued by a credit institution outside the EEA that is subject to prudential rules which BaFin considers to be equivalent to the requirements for credit institutions in the EEA, one of the following conditions must be met:
  - The credit institution maintains a registered office in a member state of the Organisation for Economic Cooperation and Development (the "OECD") that belongs to the Group of Ten (the group of the foremost industrial nations – G10).
  - The credit institution has a rating that qualifies as investment grade. "Investment grade" refers to a score of BBB/Baa or higher from a rating agency following a creditworthiness check.
  - It can be shown by way of a detailed analysis of the issuer that the supervisory regulations applying to this credit institution are at least as stringent as those under EU law.
- For other money market instruments that are not listed on an exchange or admitted to trading on a regulated market (see under nos. 4, 6 and relevant parts of 3 above), suitable information must be available about the issue and/or issue programme or about the legal and financial status of the issuer prior to the issue of the instrument, which must be updated at regular intervals and upon the occurrence of significant events and reviewed by qualified third parties independent of the issuer. In addition, data (e.g. statistics) must be available on the issue and/or the issue programme to enable an appropriate evaluation to be made of the credit risks associated with the investment.

### Bank deposits

The Company may hold bank deposits for the account of the Fund with a maturity of up to 12 months. These deposits are to be held in blocked accounts at credit institutions whose registered office is in an EU Member State or another signatory state to the EEA Agreement. They may also be held at credit institutions whose registered office is in a third country whose prudential rules are considered by BaFin as equivalent to those laid down in EU law. Bank deposits may only be held in euro.

### Investment limits for other assets

The Company may invest a total of up to 10% of the value of the Fund in the following assets:

- Securities not admitted to trading on an exchange or admitted to or included in another organised market but which fundamentally meet the criteria for securities. Contrary to the traded/admitted securities, the reliable valuation for these securities must be available in the form of a valuation carried out at regular intervals, which is based on information from the issuer or on a competent financial analysis. Suitable information about the not admitted or not included security or about any associated securitised portfolio, must be available in the form of regular and exact information for the Fund.
- Money market instruments from issuers that do not meet the aforementioned requirements, if they are liquid and their value can be accurately determined at any time. Money market instruments are liquid if they can be sold within a sufficiently short period at limited cost. Account should be taken in this regard of the Company's obligation to redeem units in the Fund on request by the investors and to be able to sell such money market instruments at short notice accordingly. A precise, reliable valuation system must also exist for the money market instruments that allows the net portfolio value of the instruments to be determined and is based on market data or valuation models (including systems based on amortised cost). Money market instruments are deemed liquid if they are admitted to or included in an organised market within the EEA or are admitted to or included in an organised market outside the EEA where BaFin has approved the choice of that market.
- Equities from new issues if, under their terms of issue,

  – admittance to trading on an exchange in a Member State of the EU or another signatory state to the EEA Agreement or admittance to or inclusion in an organised market in a Member State of the EU or in another signatory state to the EEA Agreement is to be applied for, or

  – admittance to trading on an exchange or admittance to or inclusion in an organised market outside the Member States of the EU or outside the other signatory states to the Agreement on the EEA is to be applied for, provided that the choice of that exchange or organised market is approved by BaFin and that the admission or inclusion takes place within one year of their issue.
- Bonded loans that may be assigned at least twice after acquisition for the Fund and were granted by one of the following institutions:

  a) the German Federal Government, a special fund (Sondervermögen) of the German Federal Government, a German Federal State, the EU or a member state of the OECD,

  b) another German government authority or a regional government or local authority of another Member State of the EU or another signatory state to the EEA Agreement, provided that, under the regulation on prudential requirements for credit institutions and investment firms, the claim can be treated in the same manner as a claim against the central state in whose territory the regional government or local authority is located,

  c) other public-law corporations or institutions located in Germany or in another Member State of the EU or another signatory state to the EEA Agreement,

  d) companies that have issued securities which are admitted to trading on an organised market within the EEA or which are admitted to trading on another regulated market that meets the basic requirements for "regulated markets" according to the Directive on markets in financial instruments, as last amended, or

  e) other debtors, provided that one of the entities in a) to c) guarantee the payment of interest and repayment.

## INVESTMENT LIMITS FOR SECURITIES, MONEY MARKET INSTRUMENTS, INCLUDING WITH THE USE OF DERIVATIVES, AND BANK DEPOSITS

At least 85% of the assets (excluding bank deposits) in the portfolio have – taking into account the weighting of the individual assets – an ESG rating. As part of our sustainable 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.

The following issuers are excluded: issuers who

- manufacture or distribute non-conventional weapons;

- are involved in the production of tobacco;

- are in violation of the United Nations Global Compact (UNGC) principles or the Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises.

Issuers are also excluded if they exceed a specific turnover threshold in the following activities:

- coal mining or coal-fired power generation; or

- the extraction and production of non-conventional oil and gas (shale oil and gas and oil sands).

Other issuers may also be excluded as part of the sustainable investment strategy.

Investment limits for securities and money market instruments

At least 51% of the value of the Fund must be invested in equities of German issuers. Securities held under repurchase contracts are to be included in the total for the purposes of the investment limits as per section 206(1) to (3) of the Investment Code. Taking into account the investment focus pursuant to paragraph 1 of the Specific Terms of Investment, no more than 40% of the value of the Fund may be invested in securities of foreign issuers. The Company may invest a total of up to 49% of the value of the Fund in money market instruments denominated in euro as per section 6 of the General Terms of Investment. Money market instruments held under repurchase contracts are to be included in the total for the purposes of the investment limits as per section 206(1) to (3) of the Investment Code. The Company may invest up to 10% of the value of the Fund in securities and money market instruments issued by the same issuer (debtor). The total value of the securities and money market instruments issued by such issuers (debtors) may not exceed 40% of the value of the Fund. Beyond this point, the Company may only invest 5% of the value of the Fund in securities and money market instruments issued by any one issuer. Securities held under repurchase agreements are included in the total for the purposes of this investment limit. The issuers of securities and money market instruments are also to be taken into account within the aforementioned limits if the securities and money market instruments issued by them are acquired indirectly via other securities included in the Fund which are linked to their performance.

Investment limits for bonds with specific cover assets

The Company may invest up to 25% of the value of the Fund per issuer in

a) covered bonds (Pflandbriefe), municipal bonds and bonds issued by credit institutions whose registered office is in an EU Member State or another signatory state to the EEA Agreement prior to 8 July 2022. This is subject to the condition that the money raised from the bonds is invested so as to cover the liabilities on the bonds throughout their lifetime and to be used on a priority basis for the repayment of the principal and interest in the event that the bond issuer defaults.

b) covered bonds, within the meaning of Article 3 number 1 of Directive (EU) 2019/2162 on the issue of covered bonds and covered bond public supervision, that were issued after 7 July 2022.

Insofar as it is permitted to invest more than 5% of the value of the Fund in such bonds referred to in a) and b) that were issued by the same issuer, the total amount of such bonds must not exceed 80% of the value of the Fund. Securities held under repurchase agreements are included in the total for the purposes of this investment limit.

Investment limits for public-sector issuers

The Company may invest up to 35% of the value of the Fund in each of the following: bonds, bonded loans and money market instruments issued by particular national and supranational public-sector issuers. These public-sector issuers are the German Federal Government, the German Federal States, EU Member States or their local or regional authorities, third countries and supranational public institutions to which at least one EU Member State belongs.

Investment limits for bank deposits

The Company may invest a total of up to 49% of the value of the Fund in bank deposits as per section 7 sentence 1 of the General Terms of Investment. The Company may not invest more than 20% of the value of the Fund in bank deposits at any one credit institution.

Combination of investment limits

The Company may invest no more than 20% of the value of the Fund in a combination of the following assets:

- securities or money market instruments issued by a single institution,
- deposits with this institution, i.e. bank deposits,

- attributable amounts for the counterparty risk on derivatives, securities lending and repurchase transactions entered into with the same institution.

In the case of certain public issuers (see under "Investment limits for securities, money market instruments, including with the use of derivatives, and bank deposits"), a combination of the above assets may not exceed 35% of the value of the Fund. The individual upper limits continue to apply.

Investment limits with the use of derivatives

The amounts of securities and money market instruments of an issuer that count towards the aforementioned limits may be lower if hedging derivatives are used whose underlyings are securities or money market instruments of the same issuer. Above and beyond the aforementioned limits, therefore, securities or money market instruments of an issuer may be acquired for account of the Fund if the higher issuer risk that results is reduced by hedging transactions.

Investment limits for tax reasons

Over 50% of the Fund's assets (the amount of the assets is determined according to the value of the investment fund's assets without taking liabilities into account) is invested in such equity investments (within the meaning of section 2(8) of the Investment Tax Act) which may be acquired for the Fund pursuant to these Terms of Investment. In the case of target investment funds, pursuant to section 2(6) sentences 2 and 3 of the German Investment Tax Act, the basis is the actual equity participation rates published each valuation day, where available.

Investment limits for fund units

The Company may invest a total of up to 10% of the value of the Fund in fund units as per section 8 of the General Terms of Investment.

- For the Fund, a maximum of 10% may be invested in units in UCITS or EU-UCITS which, pursuant to their terms of investment, predominantly invest in equities (equity funds),
- For the Fund, a maximum of 10% may be invested in UCITS or EU-UCITS which, pursuant to their terms of investment, predominantly invest in interest-bearing securities (bond funds),
- For the Fund, a maximum of 10% may be invested in units in UCITS or EU-UCITS which meet the criteria of the Guideline establishing fund categories pursuant to section 4(2) of the Investment Code for short-term money market funds or money market funds.

Fund units held under repurchase contracts are to be included in the total for the purposes of the investment limits as per sections 207 and 210(3) of the Investment Code. Under their terms of investment or articles of association, the target funds may invest no more than 10% in units of other open-ended investment funds. The Company may not acquire more than 25% of the units in issue of a target fund for account of the Fund.

Informing investors in the event of the suspension of the redemption of target fund units

Within the framework of the law, target funds may temporarily suspend the redemption of units. In this case, the Company would not be able to redeem the target fund units in return for payment of the redemption price at the management company or depositary of the target fund (see "Risk information"). The Company's website (am.oddo-bhf.com) states whether and to what extent the Fund holds target fund units for which redemption is currently suspended.

**Derivatives**

A derivative is an instrument whose price depends on the fluctuations in or expectations of the price of another asset (the "underlying"). The statements below refer both to derivatives and financial instruments with derivative components (collectively "derivatives").

The Company may engage in derivatives transactions for the Fund as part of its investment strategy as well as for hedging purposes. This includes derivatives transactions for the purposes of efficient portfolio management and to achieve additional returns; i.e. also for speculative purposes. The risk of loss for the Fund may increase as a result, at least temporarily.

The use of derivatives may no more than double the Fund's market risk (the "market risk limit"). Market risk is the risk of loss resulting from fluctuations in the market value of assets held in the Fund, which can be attributed to changes in variable prices or market rates, such as interest rates, exchange rates, equity and commodities prices or to changes in the credit rating of an issuer. The Company must stay within the market risk limit on an ongoing basis. The Company must determine the extent to which the market risk limit has been reached on a daily basis according to the legal requirements; these can be found in the German Regulation on Risk Management and Risk Measurement in the Use of Derivatives, Securities Loans and Repurchase Agreements in Investment Funds in accordance with the Investment Code (the "Derivatives Regulation").

## Derivatives – simple approach

In order to determine the extent to which the market risk limit has been reached, the Company uses the simple approach as defined in the Derivatives Regulation. It adds up the attributable amounts of all derivatives as well as securities lending and repurchase transactions that increase the investment ratio. The attributable amount for derivatives and financial instruments with derivative components is generally based on the market value of the underlying. In aggregate, the attributable amounts for market risk as a result of the use of derivatives and financial instruments with derivative components may not exceed the value of the investment fund.

The Company may usually only acquire derivatives if it may acquire the underlyings of such derivatives for the account of the Fund or if assets in the investment fund that the Company may acquire for the account of the Fund could also give rise to the risks that these underlyings represent. The Company may acquire the following for the account of the Fund:

- Basic forms of derivatives
- Combinations of these derivatives
- Combinations of these derivatives with other assets that may be acquired for the Fund.

The Company can identify and measure with adequate accuracy all the market risks within the Fund arising from the use of derivatives. It pursues long/short or market-neutral strategies.

The Company may acquire the following types of derivatives for the account of the Fund:

a) futures contracts on securities, money market instruments, interest rates, exchange rates or currencies, as well as on financial indices which are sufficiently diversified, represent an adequate benchmark for the market to which they refer and are published in an appropriate manner ("qualified financial indices").

b) options or warrants on securities, money market instruments, interest rates, exchange rates or currencies and on forward or futures contracts as per a), as well as qualified financial indices, where the options or warrants have the following features:

ba) exercise is possible either throughout the term or at the end of the term and

bb) the option value at the time of exercise exhibits a linear dependency on the positive or negative difference between the strike price and the market price of the underlying asset and is zero if the difference has the opposite sign;

c) interest rate swaps, currency swaps and cross-currency swaps;

d) options on swaps as per c), provided that they exhibit the features described in b) (swaptions);

e) credit default swaps based on a single underlying asset (single name credit default swaps).

The investment strategy may only be based on a "complex" strategy to a negligible degree. In addition, the Company may only invest in complex derivatives to a negligible degree. A "negligible degree" means, assuming maximum loss, not exceeding 1% of the value of the Fund.

## Futures contracts

Futures contracts are agreements that bind both parties unconditionally to buy or sell a certain quantity of a certain underlying at a predetermined price at a certain time – the expiration date – or within a certain timeframe. The Company may enter into futures contracts on securities and money market instruments that may be acquired for the Fund, interest rates, exchange rates or currencies, as well as on qualified financial indices for the account of the Fund in line with the investment principles.

## Options transactions

Options transactions grant a third party the right – for a fee (option premium) – to deliver or buy assets or to demand the payment of the difference or to acquire corresponding option rights within a certain timeframe or at the end of a certain period at a price agreed in advance (strike price). The Company may buy and sell call options and put options as well as trade in warrants for the account of the Fund in line with the investment principles. The options transactions must be based on securities, money market instruments, interest rates, exchange rates or currencies, as well as on financial indices which are sufficiently diversified, represent an adequate benchmark for the market to which they refer and are published in an appropriate manner. The options or warrants must provide for exercise any time before the expiration date or on the expiration date. In addition, the option value at the time of exercise must exhibit a linear dependency on the positive or negative difference between the strike price and the market price of the underlying asset and be zero if the difference has the opposite sign.

Swaps

A swap is a contract through which the parties exchange the cash flows or risks underlying the transaction. The Company may enter into interest rate swaps, currency swaps, cross-currency swaps, variance swaps, equity and credit default swaps for the account of the Fund in line with the investment principles.

Swaptions

Swaptions are options on swaps. A swaption is the right but not the obligation to enter into a swap at a certain time or within a certain timeframe, the conditions of which are precisely specified. For the rest, the principles relating to options transactions apply. The Company may only enter into swaptions that are composed of the options and swaps described above for the account of the Fund.

Credit default swaps

A credit default swap is a credit derivative that allows potential credit losses to be transferred to others. In return for taking on the credit default risk, the risk seller pays a premium to the counterparty. For the rest, the statements about swaps apply mutatis mutandis.

Securitised financial instruments

The Company may also acquire the aforementioned financial instruments if they are securitised. The transactions involving financial instruments may also be partly securitised (e.g. bonds with warrants). The statements concerning risks and opportunities apply mutatis mutandis for such securitised financial instruments, but with the proviso that the risk of loss associated with securitised financial instruments is limited to the value of the security.

OTC derivatives transactions

The Company may engage in both derivatives transactions admitted to trading on an exchange or admitted to or included in another organised market and over-the-counter (OTC) transactions for the account of the Fund. The Company may only engage in derivatives transactions not admitted to trading on an exchange or admitted to or included in another organised market with suitable credit institutions or financial services institutions on the basis of standardised framework agreements. In the case of OTC derivatives, the counterparty risk in relation to a counterparty is limited to 5% of the value of the Fund. If the counterparty is a credit institution whose registered office is in an EU Member State, in another signatory state to the EEA Agreement or in a third country with a comparable level of supervision, the counterparty risk may be up to 10% of the value of the Fund. OTC derivatives transactions in which a central clearing house of an exchange or of another organised market is the counterparty do not count towards the counterparty limits if the derivatives are marked to market daily and subject to daily margining. However, the Fund's claims against an intermediary count towards the limits even if the derivative is traded on an exchange or on another organised market.

**Securities lending transactions**

The securities, money market instruments and fund units held in the Fund may be transferred to third parties in the form of a loan in exchange for a fair market fee. In order to limit the default risk, the Company only uses counterparties from OECD countries, giving preference to counterparties contracting under the law of a European state. Only counterparties with an investment grade rating are selected. Furthermore, counterparties are chosen on the basis of the Company's best execution policy. The Fund's entire portfolio of securities, money market instruments and fund units may be loaned to third parties for indefinite periods only. The Company expects that as a rule no more than 10% of the Fund assets will be the subject of lending transactions. However, this is only an estimated value which may be exceeded in individual cases. The Company shall have the option of cancelling the lending transaction at any time. It must be contractually agreed that securities, money market instruments or fund units of the same type, quality and quantity will be transferred back to the Fund within the usual settlement period once the lending transaction is ended. Transfers in the form of loans may only be made if the Fund is granted sufficient collateral. Deposits may be assigned or pledged as collateral for this purpose. The Fund shall be entitled to the returns from investing the collateral. The borrower shall also be obliged to pay any interest payable on securities, money market instruments or fund units received in the form of a loan to the Depositary for the account of the Fund as and when it falls due. The total of securities, money market instruments or fund units transferred to any one borrower must not exceed 10% of the value of the Fund. The Company may make use of an organised system for the brokerage and settlement of securities loans of a central securities depository. Where securities loans are settled via organised systems, the securities transferred to any one borrower may exceed 10% of the value of the Fund. If settlement is carried out via an organised system, the Company must have the right to cancel the securities loan at any time. No securities lending transactions are currently in the process of being carried out. The Company reserves the right, in the interests of the Fund, to enter into these transactions itself at any time or to commission ODDO BHF SE or ODDO BHF SCA to carry out these transactions. Potential conflicts of interest are covered by the Company's conflict-of-interest management policy (see "Conflicts of interest" section). The Company may not lend money to third parties for the account of the Fund.

### Repurchase transactions

The Company may enter into repurchase transactions with a maximum duration of 12 months for the account of the Fund with credit institutions and financial services institutions. In order to limit the default risk, the Company only uses counterparties from OECD countries, giving preference to counterparties contracting under the law of a European state. Only counterparties with an investment grade rating are selected. Furthermore, counterparties are chosen on the basis of the Company's best execution policy. The Fund may transfer its securities, money market instruments or fund units to a buyer for a fee (standard repurchase transaction) and also accept securities, money market instruments or fund units, subject to the relevant investment limits, from another party (reverse repurchase transaction). The Fund's entire portfolio of securities, money market instruments or fund units may be transferred to third parties by way of repurchase transactions. The Company expects that as a rule no more than 10% of the Fund assets will be the subject of repurchase transactions. However, this is only an estimated value which may be exceeded in individual cases. The Company shall have the option of terminating the repurchase transaction at any time; this shall not apply to repurchase transactions with a term of one week or less. In the event that a standard repurchase transaction is terminated, the Company shall be entitled to demand the return of the securities, money market instruments or fund units transferred. In the event that a reverse repurchase transaction is terminated, either the full monetary amount shall be repaid or the accrued monetary amount shall be repaid at its current market value. Only "genuine" repurchase transactions are permitted. In a genuine repurchase transaction, the buyer assumes the obligation either to retransfer the securities, money market instruments or fund units at a predetermined time or at a time to be set by the seller, or to pay back the monetary amount with interest. Repurchase transactions are carried out in order to earn additional income for the Fund (reverse repurchase agreement) or to generate temporary additional liquidity for the Fund (standard repurchase agreement). No repurchase transactions are currently in the process of being carried out. The Company reserves the right, in the interests of the Fund, to enter into these transactions itself at any time or to commission ODDO BHF SE or ODDO BHF SCA to carry out these transactions. Potential conflicts of interest are covered by the Company's conflict-of-interest management policy (see "Conflicts of interest" section).

## COLLATERAL STRATEGY

The Company accepts collateral for the account of the Fund in the course of derivatives, securities lending and repurchase transactions. The collateral serves to fully or partially mitigate the risk that the counterparty to such transactions will default.

### Permitted types of collateral

The Company accepts the following assets as collateral for the Fund in respect of derivatives, securities lending transactions and repurchase transactions:

- cash securities in the form of bank deposits

### Scope of collateral

Securities lending transactions are fully collateralised. The collateral value is equal to the listed price of the securities loaned plus the corresponding income. Collateral furnished by the borrower may not fall below the collateral value plus a premium in line with standard market practice.

Moreover, derivatives, securities lending and repurchase transactions must be sufficiently collateralised to ensure that the attributable amount for counterparty default risk does not exceed 5% of the value of the Fund. If the counterparty is a credit institution whose registered office is in an EU Member State, in another signatory state to the EEA Agreement or in a third country in which equal supervisory provisions apply, the attributable amount for default risk may be 10% of the value of the Fund.

### Valuation of collateral and valuation discount strategy ("haircut strategy")

The Company follows a haircut strategy whereby certain valuation discounts are applied to assets accepted as collateral. The term "haircut" is used for discounts applied to the current market value of collateral. The strategy applies to all assets permitted as collateral. The Company's haircut strategy contains a description of the minimum requirements in relation to permitted collateral and its valuation. The strategy takes account of features such as the credit rating of the issuer, the maturity of permitted bonds, currency and price volatility. Market prices are used for securities collateral. Furnished collateral is valued at least once every trading day. Margin settlement takes place every trading day. The amount of the haircut is chosen to ensure that any fluctuations in the value of the collateral occurring during the liquidation period will generally be covered in the event that a counterparty defaults. No haircut is applied to cash collateral. Irrespective of the quality of the furnished collateral or, in the case of reinvested collateral, the purchased investments, the Fund will be exposed to a risk of loss if the price of the collateral fluctuates more severely than was assumed when the haircut was set or the counterparty of the furnished collateral becomes insolvent.

### Investment of cash collateral

Cash collateral in the form of bank deposits may only be held in the currency of the original deposit in blocked accounts either at the Depositary or, with the Depositary's consent, at another credit institution, or invested in high quality bonds or short-term money market funds. It may only be reinvested in high-quality government bonds or short-term money market funds. Cash collateral may also be invested at a credit institution by way of a reverse repurchase transaction, provided that the accrued deposit is repayable on demand at all times.

## BORROWING

Short-term loans of up to 10% of the value of the Fund may be taken out for the common account of the investors, provided that the loan is subject to normal market conditions and the Depositary consents to the loan.

## LEVERAGE

Leverage means any method used by the Company to increase the Fund's investment ratio (gearing). Such methods include, in particular, borrowing, entering into securities lending or repurchase transactions and the acquisition of derivatives with embedded leverage. The Company may use such methods for the Fund within the scope described in this Prospectus. The option to use derivatives and enter into securities lending and repurchase transactions is set out in the sections on "Investment principles", "Derivatives" or "Securities lending transactions" and "Repurchase transactions". The option to take out loans is set out under "Borrowing". The Company may at most double the market risk of the Fund by this method ("market risk limit": see under "Derivatives"). Short-term borrowing is not taken into account when calculating this limit. It restricts the use of leverage in the Fund.

## GENERAL RULES FOR ASSET VALUATION

### Assets admitted to an exchange or traded on an organised market

Assets that are admitted to trading on an exchange or admitted to or included in another organised market, and subscription rights held for the Fund, are valued at the last available trading price offering a reliable valuation, unless otherwise stated under "Special rules for the valuation of specific assets" below.

### Assets not listed on an exchange or traded on an organised market/Assets with no trading price

Assets that are neither admitted to trading on exchanges nor admitted to or included in another organised market, or for which no trading price is available, are valued at the current fair value that is appropriate on the basis of a careful assessment using suitable valuation models and taking overall market circumstances into account, unless otherwise stated under "Special rules for the valuation of specific assets" below.

## SPECIAL RULES FOR THE VALUATION OF SPECIFIC ASSETS

### Unlisted bonds and bonded loans

For the valuation of debt securities that are neither admitted to trading on an exchange nor admitted to or included in another organised market (e.g. unlisted bonds, commercial paper and certificates of deposit) and for the valuation of bonded loans, the agreed prices for similar bonds and bonded loans and, where appropriate, the market prices of bonds from similar issuers with the same maturity period and interest rate are used, subject where necessary to a discount to reflect limited saleability.

### Options and futures contracts

Where they are admitted to trading on an exchange or are admitted to or included in another organised market, options belonging to the Fund and liabilities on any options granted to a third party are valued at the latest available trading price that guarantees a reliable valuation. The same applies to receivables and liabilities on any futures contracts sold for the account of the Fund. Any margin payments made at the Fund's expense shall count towards the value of the Fund, taking account of the valuation gains and losses ascertained on the trading day.

### Bank deposits, fixed-term deposits, units in investment funds and loans

Bank deposits are generally valued at their nominal value plus accrued interest. Fixed-term deposits are valued at their fair value, where the deposit can be terminated at any time and the repayment on termination is not made at the nominal value plus interest. Units in investment funds are essentially valued at their most recently determined redemption price or the most recent available tradable price that ensures reliable valuation. If these values are not available, units in investment funds are valued at the current fair value that is appropriate on the basis of a careful assessment using suitable valuation models and taking current market circumstances into account. Claims for the repayment of lending transactions are valued at the market price of the loaned assets.

### Assets denominated in foreign currency

Assets denominated in foreign currency are converted at the 17:00 fixing of the valuation day of the World Market Rates (source: Datastream).

## SUB-FUNDS

The Fund is not a subdivision of an umbrella fund.

## UNITS

The rights of investors are certified in unit certificates or issued as electronic unit certificates. Certified unit certificates are certified in global certificates only. These global certificates are deposited with a central securities depository. Investors may not demand the issue of individual unit certificates. Units may only be purchased for holding in custody accounts. Units are made out to the bearer.

### Mandatory deposit of physical securities

In the past, bearer units in the form of physical securities with the original name FT Frankfurt-Effekten-Fonds were issued for the Fund. Under the Investment Code, investors may no longer retain possession of these physical securities. Instead, the securities must be held in collective custody at a custodian bank, an approved or recognised German or foreign central securities depositary or another suitable foreign depositary, including any coupons yet to mature. Investors are not entitled to request that these physical securities be reissued to them. The Company may replace the deposited physical securities with a securitisation of the units concerned in a global certificate. Bearer units not held in collective custody at one of the above entities by 31 December 2016 became void after this date. This also applied to any coupons yet to mature.

Since 1 January 2017, the rights of the investors concerned have instead been securitised in a global certificate. The investors became co-owners of this global certificate, or in other words of the collective holdings securitised by this certificate, in proportion to their share in the Fund. You can now submit your void bearer units to the Fund Depositary and request that your units in the Fund be credited to you in a custody account. If you have any questions, please contact your principal bank or call us on + 49 (0) 69 9 20 50 – 0. You can also email us at kundenservice@oddo-bhf.com.

## ISSUE AND REDEMPTION OF UNITS

### Issue of units

The number of units that can be issued is in principle unlimited. Units may be purchased from the Company. They are issued by the Depositary at the issue price, which represents the net asset value per unit (the “unit value”) plus an entry charge. The Company expresses the entry charge as a percentage of the unit value. Calculation of the net asset value is explained in the section “Issue and redemption prices, charges”, subsection “Issue and redemption price”. Units may also be acquired via third-party intermediaries; additional costs may arise in this case. The Company reserves the right to discontinue the issue of units wholly or in part, either temporarily or permanently. Fractions (one-thousandth) of a unit may be acquired. The minimum initial investment for unit certificates in the AVDw-EUR unit class is EUR 25. Unitholders of the DR-EUR, CNw-EUR and CRw-EUR unit classes can agree a savings plan with regular deposits from EUR 50 per month. The minimum initial lump-sum investment is EUR 100.

### Redemption of units

Investors may request redemption of their units unless the Company has imposed restrictions on the redemption of units (see “Restrictions on redemptions”) or temporarily suspended the issue and redemption of units (see “Suspension of the issue and redemption of units”). Redemption orders should be submitted to the Depositary, the Company itself or to an intermediary third party (e.g. custodian).

### Restrictions on redemptions

The Company may temporarily (i.e. for up to 15 consecutive business days) and partially restrict the redemption of units if, on a settlement date, the investors' redemption requests reach a threshold specified in the Terms of Investment as a percentage of the net asset value. If the threshold is reached, the Company will decide at its discretion whether to limit redemption on that settlement date. The decision to limit redemption may be taken if the redemption requests can no longer be executed in the interest of all investors due to the Fund's liquidity position. This may be the case, for example, if the liquidity of the Fund's assets deteriorates due to political, economic or other events on the markets and is therefore no longer sufficient to fully satisfy the redemption requests on the settlement date, or if, due to the Fund’s investor structure, redemptions on a significant scale lead to liquidity problems. The restriction on redemptions is intended to protect investors and is to be regarded as a less severe measure than suspending the issue and redemption of units. The option to suspend issues and redemptions remains unaffected. If the Company decides

to restrict redemptions, it will only redeem units on a pro rata basis at the redemption price applicable on the settlement date. On the day the restriction is activated, redemption orders from all investors must be executed on a pro rata basis at least in the amount of the threshold; otherwise the redemption obligation ceases to be applicable. This means that each redemption order will only be carried out on a pro rata basis, according to a quota determined by the Company. The Company determines the quota in the interest of the investors according to the available liquidity and the total order volume for the respective settlement date. The amount of liquidity available depends largely on the current market environment. The quota determines the percentage share at which the redemption requests are paid out on the settlement date. The unfulfilled part of the order (remaining order) will not be executed by the Company at a later date either, but will be forfeited (pro rata approach with forfeiture of the outstanding remaining order). The Company must publish information on the restrictions on redemptions and the lifting thereof on its website without delay. The redemption price is equal to the unit value determined on that day – less an exit charge, if applicable. Redemption may also be made via third party intermediaries (e.g. the custodian bank); additional costs may be incurred by the investor in this case.

The restriction on unit redemptions may also be applied in conjunction with partial swing pricing.

**Settlement of unit issues and redemptions**

The Company conforms to the principle of the equal treatment of investors in that it ensures that no investor can obtain an advantage by buying or selling units at known unit values. It therefore imposes a daily cut-off time for orders. Orders for the issue and redemption of units received by the Company or Depositary by 2:00 p.m. at the latest ("order cut-off time") on a valuation day will be settled on the basis of the unit value for this valuation day, which is calculated on the next valuation day. Orders that reach the Company or the Depositary after 2:00 p.m. are settled on the basis of the unit value for the following valuation day, which is calculated on the next valuation day but one. If the redemption of units is suspended, orders for the redemption of units will only be settled on the valuation day following the end of the day on which redemptions resume, at the unit value then determined. If the issue of units is suspended, orders for the issue of units will only be settled on the valuation day following the end of the day on which issues resume, at the unit value then determined. Furthermore, third parties, for example the institution at which the investor's custody account is held, may act as intermediaries for the issue and redemption of units. This may result in longer settlement times. The Company has no influence over the different settlement terms of institutions providing custody accounts.

**Suspension of the issue and redemption of units**

The Company can temporarily suspend the issue and redemption of units in exceptional circumstances where it appears necessary to do so, having regard to the interests of the investors. Such exceptional circumstances arise, for example, where

- an exchange on which a material portion of the Fund's securities are traded is unexpectedly closed or trading is restricted;
- the Fund's assets cannot be valued;
- the Fund faces serious liquidity problems (e.g. as a result of an increase in redemptions), where the sale of the Fund's assets must be carried out and which could lead to further liquidity problems for the Fund (e.g. as a result of significant discounts on the sale of assets or the incurring of additional transaction costs);
- a critical cyber incident occurs that affects the Fund and/or the Company and/or impacts the operational capability of the Company's service providers;
- a serious financial and/or political crisis arises;
- serious criminal activity takes place;
- a natural disaster occurs.

In addition, following consultation with the Company, BaFin may order the Company to suspend or resume the issue and redemption of units if there are risks pertaining to investor protection and financial stability which, upon reasonable and balanced consideration, necessitate the suspension or resumption of unit issues and redemptions. The Company reserves the right not to issue, redeem or exchange units until it has promptly sold assets belonging to the Fund; in so doing, it must have regard to the interest of all investors. Such redemptions will be made at the redemption price valid after the sales. Temporary suspension may be followed directly by the winding-up of the Fund without any resumption of redemptions (in this regard, see under "Winding-up, transfer and merger of the Fund"). The Company shall inform investors of the suspension and resumption of unit issues and redemptions by way of an announcement in the Bundesanzeiger (German Federal Gazette) and also on the Company's website, am.oddo-bhf.com. Investors will also be informed by means of a durable medium, for instance in paper or electronic form, via their custody account provider.

### Exchange of units

Units in a unit class cannot be exchanged for units in another unit class. When a unit class is liquidated, the company is not obliged to offer the investor units in another unit class of the Fund (for details of the liquidation of a unit class, see "Winding-up, transfer and merger of the Fund").

## REMOVAL FOR CAUSE BY THE COMPANY

The Company is entitled to remove an investor for cause. Cause exists, in particular,

- if the investor is a U.S. Person (i.e. a natural person resident in the U.S.A. or a partnership or corporation established in accordance with the laws of the U.S.A. or any U.S. state, territory or possession) or a U.S. taxpayer or
- the name of the investor is on the EU consolidated list of persons, groups and entities subject to financial sanctions.

Upon receipt of the notice of termination, the investor is obliged to return the units received to the Company without delay. The Company is obliged to redeem the units at the applicable redemption price for the account of the Fund.

The payment of the equivalent is subject to compliance with any legal ban or relevant sanctions and can be deferred until the sanctions or the legal ban are/is lifted, as the case may be.

## LIQUIDITY MANAGEMENT

The Company has laid down written principles and procedures for the Fund that enable it to monitor the Fund's liquidity risks and ensure that the liquidity profile of the Fund's investments covers the underlying liabilities. The principles and procedures comprise the following:

- The Company monitors liquidity risks that may arise at Fund or asset level. In doing so, it assesses the liquidity of the assets held in the Fund in relation to the Fund assets and determines a liquidity ratio for this purpose. The assessment of liquidity includes, for example, an analysis of the trading volume, the complexity of the asset, the number of trading days needed to dispose of the asset without impacting the market risk.
- The Company monitors liquidity risks that may arise as a result of increased investor demand for redemptions of units. In doing so, it forms expectations of changes in net funds taking into account available information about the investor structure and past experience of net historical changes. It takes into account the effects of wholesale recall risks and other risks (for example reputational risks).
- The Company has set adequate limits for liquidity risks for the Fund. It monitors compliance with these limits and has established procedures for exceeding or possibly exceeding the limits.
- The procedures established by the Company ensure consistency between the liquidity ratio, the liquidity risk limits and the expected net asset changes.

The Company reviews these principles regularly and updates them accordingly.

The Company performs regular stress tests at least once a month with which it can evaluate the Fund's liquidity risks. The Company performs the stress tests on the basis of reliable, up-to-date quantitative or, if this is unsuitable, qualitative information. Where appropriate, the stress tests simulate a lack of liquidity in the Fund's assets.

Issue and redemption rights under normal and exceptional circumstances as well as the restriction or suspension of unit issues and redemptions are described under "Units" – "Issue and redemption of units" – "Restrictions on redemptions" / "Suspension of the issue and redemption of units", and the use of measures such as swing pricing in order to prevent dilution effects on the Fund is set out under "Issue and redemption prices". The associated risks are described under "Risk information" – "Restrictions on redemptions" / "Suspension of the issue and redemption of units" and "Risk of limited Fund liquidity (liquidity risk)".

## EXCHANGES AND MARKETS

The Company does not intend for the Fund units to be listed or traded on exchanges or other markets. It cannot be ruled out that units may be traded on markets without the Company's consent. A third party may cause units to be traded on unregulated markets or included in another form of off-exchange trading. The market price underlying trading on an exchange or another market will not be determined solely by the value of the assets held in the Fund, but also by supply and demand. Such a market price may therefore deviate from the unit value determined by the Company or the Depositary.

## FAIR TREATMENT OF INVESTORS AND UNIT CLASSES

Under section 16(5) of the Fund's General Terms of Investment, multiple unit classes may be issued that vary in terms of the income distribution policy, the entry charge, the currency of the unit value including the use of currency hedging

transactions, the management fee, the depositary fee, the minimum investment amount, the form of issue or a combination of these features. New unit classes may be formed at any time at the Company's discretion. A unit class may exist even if no units are currently in issue. If a new unit class is formed, the units do not need to be issued immediately. The Company has launched the following unit classes, which differ in terms of the investors permitted to acquire and hold the units.

- CNw-EUR unit class

  – Investors who acquire the units through a financial intermediary that offers independent investment advice in line with MiFID II,

  – Investors who acquire the units through a financial intermediary under an agreement on fees stipulating that the intermediary is paid solely by the investor,

  – Companies that offer portfolio management services in line with MiFID II,

  – Undertakings for collective investment managed by ODDO BHF Group companies, and

  – ODDO BHF Group companies that offer investors investment advice under the terms of an agreement on fees.

- AVDw-EUR unit class

  – Units may only be acquired by institutions acting on behalf of pension schemes, retirement savings plans or similar long-term investment programmes, including those set up within the scope of specific national provisions – such as the German *Altersvorsorgedepot* (pension savings account) or other similar regulations. Subscriptions require the prior consent of, and a written agreement with, the Company.

The Company must treat the investors in the Fund fairly. In the course of managing liquidity risk and unit redemptions, it must not place the interests of one investor or group of investors above the interests of another investor or group of investors. See under "Settlement of unit issues and redemptions" and "Liquidity management" for the procedures the Company uses to ensure the fair treatment of investors.

## ISSUE AND REDEMPTION PRICES, CHARGES

### Issue and redemption prices

To calculate issue and redemption prices for the units, the Company determines a net asset value on each valuation day, subject to review by the Depositary. To calculate issue and redemption prices for the units of each unit class, the Company determines the net asset value on each valuation day, subject to review by the Depositary. The Company uses partial swing pricing for all unit issues and redemptions of a valuation day.

Swing pricing is a method of calculating the unit price where the transaction costs arising from unit redemptions or issues are apportioned according to origin. First, the net asset value is determined by ascertaining the value of the Fund's assets less its liabilities. Dividing the net asset value thus determined by the number of units in issue gives the value of each unit, which is then adjusted up or down (swing factor). In the case of partial swing pricing, this mechanism only applies if net unit redemptions or issues on the valuation day in question exceed a threshold set by the Company. The Company determines the threshold on the basis of a number of criteria, including market liquidity, Fund size or the assets held by the Fund. The swing factor accounts for the transaction costs incurred as a result of net redemption or issue requests. The swing factor is determined by the Company. The swing factor comprises the estimated transaction costs that are incurred directly by the Fund when purchasing or selling assets, are of a fixed amount and can be quantified in advance of the transaction (e.g. brokerage fees, trading levies, taxes and settlement fees). The swing factor also includes the best possible estimate of implied transaction costs. Implied transaction costs are costs incurred indirectly by the Fund when purchasing or selling assets, and they arise primarily from the spread between the bid and ask prices, as well as from any significant market impact resulting from asset purchases or sales made to fulfil these issue or redemption orders; they may vary depending on the nature of the underlying assets and market conditions.

The swing factor will not exceed 1.5% of the net asset value.

In an exceptional market environment (this may be the case, for example, if Fund assets cannot be valued or if market trading of financial instruments is significantly affected by political, economic or other events), a higher swing factor may be set. If, on a settlement date, net redemptions exceed the threshold, the swing factor is deducted from the net asset value per unit or share. If, on a settlement date, net issues exceed the threshold, the swing factor is added to the net asset value per unit or share.

More details can be found at am.oddo-bhf.com.

The net asset value, the unit value as well as the issue and redemption prices are calculated Monday to Friday except on New Year's Day, Shrove Monday, Good Friday, Easter Monday, May Day, Ascension Day, Whit Monday, Corpus Christi, German Unity Day, All Saints' Day, Christmas Eve, Christmas Day, Boxing Day and New Year's Eve ("valuation days").

**Suspension of issue/redemption price calculation**

The Company may temporarily suspend the calculation of issue and redemption prices under the same conditions as for unit redemptions. These are explained in more detail under "Issue and redemption of units" – "Suspension of the issue and redemption of units".

**Entry charge**

When setting the issue price, an entry charge may be added to the unit value. For each unit class, the entry charge is up to 5% of the unit value. For example, a unit value of EUR 100 and an entry charge of 5% of the unit value will give an issue price of EUR 105. The entry charge may reduce or entirely cancel out the performance of purchased units, especially for short holding periods. The entry charge is essentially a fee for the sale of units in the Fund. The Company may pass on the entry charge to any intermediaries to pay for sales services.

**Exit charge**

No exit charge is levied.

**Charges upon unit issue and redemption**

Units are issued and redeemed by the Company or Depositary at the issue price (unit value plus entry charge) and redemption price (unit value) respectively, without the levying of any additional charges. If an investor acquires units via an intermediary, the charges levied by the intermediary may be higher than the entry charge. If an investor redeems units via an intermediary, the intermediary may levy its own charges upon redemption.

**Publication of issue and redemption prices**

The issue and redemption prices and, where appropriate, the net asset value per unit are published on the Company's website, am.oddo-bhf.com.

## MANAGEMENT AND OTHER CHARGES

The following applies to all fees calculated pro rata:

For calendar days that are valuation days within the meaning of section 20(4) of the General Terms of Investment, the net asset value or unit value determined for the valuation day forms the basis of calculation. For a calendar day that is not a valuation day within the meaning of section 20(4) of the General Terms of Investment, the net asset value or unit value determined for the last preceding valuation day forms the basis of calculation.

1. Fees payable to the Company are as follows:

a) The Company receives an annual fee for the Fund's management of up to 2% of the average net asset value of the Fund in the accounting period. The average net asset value is calculated using the individual net asset values applicable to the calendar days in question. It is entitled to charge monthly pro rata advances on this amount. The management fee may be withdrawn from the Fund at any time. The Company is free to charge a lower management fee for one or more unit classes. The Company shall state the management fee charged in the Prospectus and in the annual and half-yearly reports.

b)Where the Company initiates, arranges and executes securities lending and repurchase transactions for the account of the Fund, the Company receives a customary fee of up to one third of the gross income from these transactions. Costs arising in connection with the preparation and execution of such transactions, including fees payable to third parties, are borne by the Company.

2. Fees payable to third parties are as follows:

a) The Company pays an annual fee from the Fund for market risk and liquidity risk measurement as per the German Derivatives Regulation (Derivateverordnung) of up to 0.1% of the average net asset value of the Fund in the accounting period. The average net asset value is calculated using the individual net asset values applicable to the calendar days in question. The fee is not covered by the management fee pursuant to paragraph 1a) and is thus additionally charged to the Fund.

b) The Company pays an annual fee from the Fund for the employment of a collateral manager ("collateral manager fee") of up to 0.2% of the average net asset value of the Fund in the accounting period. The average net asset value is

calculated using the individual net asset values applicable to the calendar days in question. The Company is entitled to charge monthly pro rata advances on this amount. The Company is free to charge a lower fee or no fee at all. The fee is not covered by the management fee pursuant to paragraph 1a) and is thus additionally charged to the Fund.

3. Depositary

The Depositary receives an annual fee from the Fund for its services of up to 0.1% of the average net asset value of the Fund in the accounting period, subject to a minimum of EUR 5,000 p.a. and taking paragraph 4 into account. The average net asset value is calculated using the individual net asset values applicable to the calendar days in question. It is entitled to charge monthly pro rata advances on this amount. The depositary fee may be withdrawn from the Fund at any time. The Depositary is free to charge a lower fee for one or more unit classes. The Company shall state the depositary fee charged in the Prospectus and in the annual and half-yearly reports.

4. Annual maximum amount permitted as per paragraphs 1(a), 2, 3 and 5(l)

The total amount withdrawn annually from the Fund pursuant to paragraphs 1(a), 2 and 3 by way of fees and pursuant to paragraph 5(l) for reimbursement of expenses may be up to 2.49% of the average net asset value of the Fund in the accounting period. The average net asset value is calculated using the individual net asset values applicable to the calendar days in question.

5. Expenses

In addition to the above fees, the following expenses are borne by the Fund:

a) normal bank charges for custody accounts and bank accounts, including where relevant normal bank charges for the custody of foreign assets abroad;

b) the costs of printing and distributing the legally prescribed marketing documents intended for investors (annual and half-yearly reports, prospectuses, Key Information Documents);

c) the costs of publicising the annual and half-yearly reports, the issue and redemption prices and, where applicable, any distributions or income reinvestments and the winding-up report;

d) the costs of the audit of the Fund performed by the Fund's auditor;

e) the costs of the assertion and enforcement by the Company of legal claims for the account of the Fund and of defence by the Company against claims made against the Company to the detriment of the Fund;

f) fees and charges levied by government bodies in relation to the Fund;

g) the costs of legal and tax advice with regard to the Fund;

h) costs and any fees that may be incurred in connection with the acquisition and/or use or setting of a benchmark or benchmark index;

i) the costs of appointing proxy voters;

j) costs for the analysis by third parties of the Fund's investment performance;

k) the costs of creating and using a durable medium provided for by contract or law, except in the case of notices about mergers of investment funds or notices about measures in connection with breaches of investment limits or calculation errors in the determination of unit values;

l) the costs of the provision by third parties of analysis material or services in relation to one or more financial instruments or other assets or in relation to the issuers or potential issuers of financial instruments or in close connection with a particular industry or market, up to an amount of 0.09% p.a. of the average net asset value of the Fund in the accounting period. The average net asset value is calculated using the individual net asset values applicable to the calendar days in question;

m) costs arising in connection with the acquisition and disposal of assets (transaction costs);

n) the costs of publicising the basis of assessment and the notice that the tax information was determined in accordance with the provisions of German tax law.

o) taxes, in particular VAT, incurred in connection with the expenses mentioned in letters a) to n) above and to be reimbursed by the Fund.

6. Acquisition of investment fund units

The Company must disclose in the annual and half-yearly report the entry charge and exit charge amounts that were charged to the Fund in the period under review for the subscription and redemption of units within the meaning of

section 1(4) of the Specific Terms of Investment. For the acquisition of units managed directly or indirectly by the Company itself or another company with which the Company is associated by way of a substantial direct or indirect holding, the Company or the other company may not charge any entry or exit charges for subscription and redemption. The Company must disclose in the annual and half-yearly report the fee that was charged to the Fund by the Company itself, by another (investment) management company or another company with which the Company is associated by way of a substantial direct or indirect holding for managing the units held in the Fund.

Please note that the fees stated above are maximum rates. Actual fees and entry charges are indicated in the section headed "ODDO BHF German Equities". However, the Company reserves the right to raise fees up to the maximum fee rates.

The Company has not agreed any cap on the expenses or transaction costs referred to above under paragraphs 5 and 6. Transaction costs are expected to be up to 0.14% of Fund assets. This estimate may be exceeded where additional costs are shown to exist. The amount of transaction costs borne by the Fund depends on the number of transactions actually carried out during the financial year. Expenses are expected to amount to up to 0.02% of Fund assets. This estimate may be exceeded where additional costs are shown to exist. The Fund will only bear the expenses and transaction costs that are actually incurred, irrespective of whether they fall below or exceed the amount of any cap. Actual expenses and transaction costs charged can be found in the annual report.

A material amount of the fees paid to the Company from the Fund, as well as part of the entry charge (if levied), may be used to remunerate distribution firms for the brokering of Fund units on the basis of the volume of units brokered. The amount of the distribution charges is measured for each sales channel based on the volume brokered. The Company also grants further benefits to its distributors in the form of non-cash support (e.g. staff training), which are likewise connected to the brokerage services. Such benefits are not contrary to the interests of the investors, but are designed to further improve the quality of the services provided by the distribution firms.

The Company and the Depositary may at their discretion agree partial refunds of management/depositary fees with individual investors. This will come into consideration in particular if institutional investors directly invest large amounts on a long-term basis. Queries in relation to such matters should be directed to the Retail Funds Sales Department at the Company.

## SPECIAL CONSIDERATIONS WITH INVESTMENT FUND UNITS

In addition to the management fee, the target fund costs – in particular the depositary fee, performance fees, other fees, entry charges and exit charges, reimbursement of expenses and other costs – are charged directly or indirectly to the Fund.

The annual and half-yearly report discloses the entry charges and exit charges that were charged to the Fund in the period under review for the subscription and redemption of units in the target fund. The fee that was charged to the Fund by a German or foreign company or a company with which the Company is associated by way of a substantial direct or indirect holding for managing the target fund units held in the Fund is also disclosed.

## INDICATION OF TOTAL EXPENSE RATIO (ONGOING CHARGES)

Management expenses incurred by the Fund are disclosed in the annual report and presented as a proportion of the average fund size ("total expense ratio"). Management expenses comprise the fees for the management of the Fund and the depositary fees, plus the additional expenses that may be charged to the Fund (see under "Management and other charges" and "Special considerations with investment fund units"). The total expense ratio does not include charges and ancillary expenses incurred upon the purchase and sale of assets (transaction costs).

## DIFFERENT PRICES QUOTED BY DISTRIBUTORS

If third parties advise the investor on unit purchases or broker a sale, they may disclose charges or expense ratios which do not match the details of charges given in this Prospectus and in the Key Information Document and may exceed the total expense ratio described here. In particular, this may be because the third party has added on the costs of its own activity (e.g. brokerage, advice or custody account management). The third party may also include one-off costs such as entry charges, and will generally use different calculation methods or estimates for the expenses incurred at Fund level, which may in particular include the Fund's transaction costs. Discrepancies in quoted costs may arise both in pre-contract information and in regular information on charges on an existing fund investment provided in the course of a long-term customer relationship.

## REMUNERATION POLICY

### Company's remuneration policy

As an investment management company, the Company has drawn up a remuneration guideline in line with section 37 of

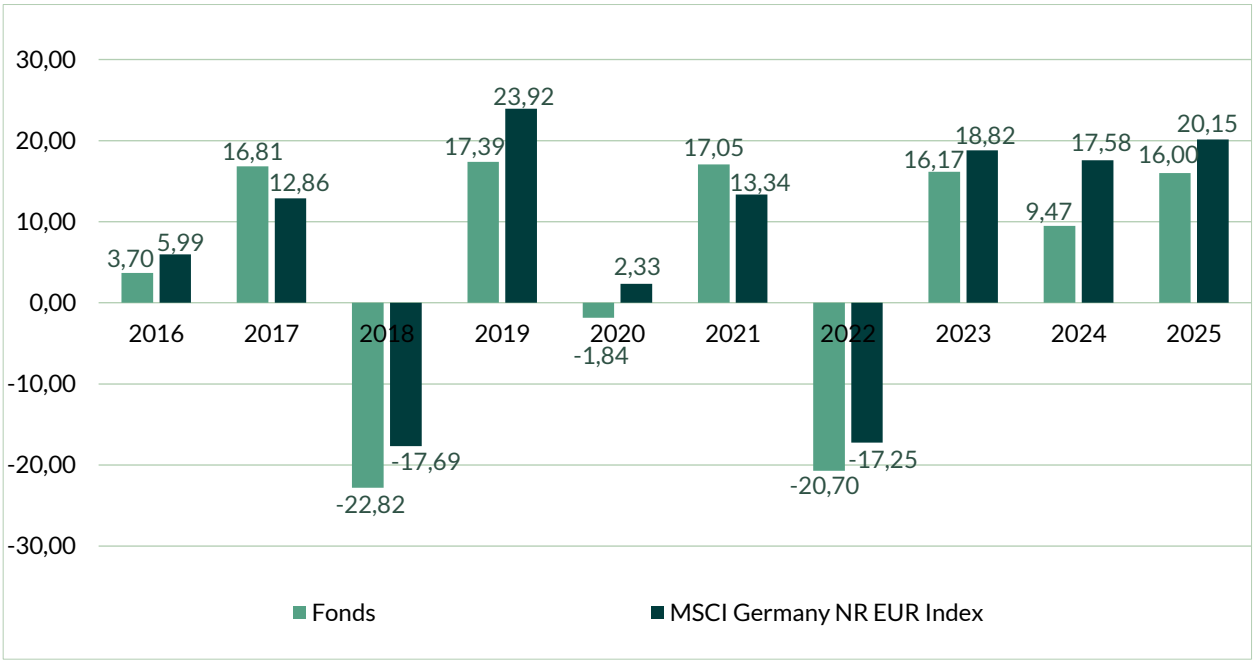
the Investment Code. The remuneration guideline applies to all of the Company's employees and includes specific remuneration rules for senior management, employees whose activities may have a material influence on the management company's risk profile or investments under management (risk bearers), employees with a control function and all employees receiving overall remuneration that puts them in the same income bracket as senior management and risk bearers. The remuneration system aims to be compatible with a sound and effective risk management system. It should be conducive to this system and should not provide incentives to take risks that are incompatible with the Fund's risk profile and Terms of Investment. The remuneration policy should also be in harmony with the business strategy, aims, values and interests of the Company as well as those of the funds it manages and their investors, as well as including measures to prevent conflicts of interest. The Company's Supervisory Board oversees the remuneration systems, policy and structures, as well as the other benefits provided for the Company's employees. The Company has a remuneration committee. The majority of the committee's members are independent of the Company and consists of three members of the Supervisory Board of ODDO BHF SCA who have sufficient seniority and a sufficient overview of the ODDO BHF Group's remuneration practices and governance and who are not an employee or officer of the Company. The remuneration committee deals with remuneration matters on behalf of the Company's management board in accordance with the remuneration guideline. The remuneration of an employee of the Company is based on his/her role, the complexity thereof and the associated duties, and the normal remuneration for such roles in the market. Variable remuneration is designed in accordance, among other things, with the nature of the individual divisions. No employee in a control function (e.g. in the Investment Controlling or Compliance departments) receives remuneration that is linked to the results of the division that he/she oversees or controls. In addition to the management board, all division heads within the Investment Management divisional who report directly to the CEO of the company and have decision-making powers regarding model portfolios or asset allocation were included in the group of identified employees. The Head of Investment Controlling and the Company's Compliance Officer have been identified as key employees responsible for independent control functions that have a direct influence on the Fund. Employees with a comparable overall remuneration level are identified each year and taken into account accordingly. Details of the company's current remuneration policy are available at am.oddo-bhf.com. This includes a description of the methods used to calculate the remuneration and benefits paid to specific groups of employees, as well as the identities of the persons responsible for awarding remuneration and benefits and the integration of sustainability risk management into the remuneration. A paper copy may be requested from the Company free of charge.

## PERFORMANCE

## ODDO BHF GERMAN EQUITIES DR-EUR

**Past performance is not a reliable indicator of future performance. Markets could take a completely different course in the future. The chart enables you to evaluate how the Fund was managed in the past.**

### Annual performance* from 2016 to 2025




Source: Own calculations using BVI method

***Basis of calculation: Unit price (excluding entry charge), dividends reinvested. Not a guarantee of future performance. This chart shows the Fund's performance as a percentage loss or gain per annum over the past 10 years in comparison to its benchmark. The chart enables you to evaluate how**

the Fund was managed in the past. The performance shown is the figure after the deduction of ongoing costs. Entry and exit costs are not taken into account in the calculation.

## ODDO BHF GERMAN EQUITIES CNw-EUR, CRw-EUR AND AVDw-EUR

Sufficient information is not yet available to illustrate the performance over a full calendar year.

Current performance data can be found in the annual and half-yearly reports, as well as on the Company's website at am.oddo-bhf.com.

Past performance of the Fund is not a guide to future performance.

## DETERMINATION OF INCOME, INCOME EQUALISATION PROCEDURE

The Fund obtains income in the form of accrued interest, dividends and other income earned during the year, less costs. Additional income may result from the disposal of assets held for the account of the Fund. The Company applies an income equalisation procedure to each unit class. This prevents the proportion of distributable income contained within the unit price from fluctuating as a result of cash paid into and out of the Fund. Otherwise every new investment into the Fund during the year would mean there was less income per unit available for distribution on the distribution dates than would be the case if the number of units in issue were constant. Conversely, cash paid out on redemptions would mean that more income per unit was available for distribution than would be the case with a constant number of units in circulation. To prevent this, the amount of distributable income which unit purchasers must pay for as part of the issue price and which unit sellers receive as part of the redemption price is computed on an ongoing basis, such amounts being treated as a distributable item in the income statement. It is accepted that investors who, for example, purchase units shortly before the distribution date will be repaid the portion of the issue price that relates to accrued income in the form of a dividend, even though the capital they paid in played no part in earning it.

## FINANCIAL YEAR AND INCOME DISTRIBUTION POLICY

### Financial year

The Fund's financial year ends on 30 September.

### Distribution

DR-EUR unit class

The Company generally distributes all interest, dividends and other income earned for the account of the Fund during the financial year, minus expenses and taking account of the income equalisation process. Realised gains on disposals may also be distributed, taking account of the income equalisation process.

Furthermore, bank deposits available on the date of distribution may also be distributed. This means that the Company may also use liquid assets for distributions for the Fund or for distributing unit classes if the intended distribution amount cannot be covered by interest, dividends and other income or by an existing carry-forward for distribution in later financial years. A transfer from the Fund – also referred to as capital distribution – may arise if, for example, the realised losses are not taken into account in the distribution calculation. The transfer from the Fund shall be shown in the annual report and included in the notes.

A transfer from the Fund may also be made in full out of the liquid assets held in the Fund.

### Crediting of distributions

Where units are held in a custody account at the Depositary, the Depositary will credit the distributions free of charge. Additional costs may arise if the custody account is held at another bank or savings institution. In the past, bearer units in the form of physical securities with the original name FT Frankfurt-Effekten-Fonds were issued for the Fund. Under the Investment Code, these physical securities must be held in collective custody. Bearer units not held in collective custody by 31 December 2016 became void after this date, including any coupons yet to mature (see the chapter "Mandatory deposit of physical securities"). Coupons that matured before 1 January 2017 can be sent to the Depositary, The Bank of New York Mellon SA/NV, Asset Servicing, Frankfurt am Main branch, to receive the income due on them. However, the amount must be credited to a German custody account held by the investor, not paid out in cash.

### Reinvestment

CNw-EUR, CRw-EUR and AVDw-EUR unit classes

Income is not distributed but is instead reinvested in the Fund ("accumulation").

## WINDING-UP, TRANSFER AND MERGER OF THE FUND

### Preconditions for the winding-up of the Fund

Investors are not entitled to demand the liquidation of the Fund. However, the Company may terminate its management of the Fund, to be announced in the German Federal Gazette and also in the annual or half-yearly report. Investors will also be informed of the termination by means of a durable medium, for instance in paper or electronic form, via their domestic custody account provider. In such cases, the obligation of the Company to manage the Fund shall only cease once the Company has wound up the Fund. The Company's right to manage the Fund shall cease if insolvency proceedings are opened in respect of the Company's assets or when a legal decision rejecting an application to open insolvency proceedings on the grounds of lack of assets becomes final and absolute.

### Procedure upon winding-up of the Fund

Upon the Company's announcement of termination, the issue and redemption of shares will cease. Upon announcement of termination, the Company is obliged to wind up the Fund and distribute the proceeds from the sale of the Fund's assets, less any costs still to be borne by the Fund and the costs incurred as a result of the winding-up, to investors in proportion to their holdings. Investment limits no longer apply during the winding-up process. The obligation to manage the Fund shall only cease once the Company has wound up the Fund. On the date on which it winds up the Fund, the Company must prepare a liquidation report that complies with the requirements for an annual report.

In cases where the Company's right to manage the Fund ceases, the right of management and disposition over the Fund's assets shall pass to the Depositary, who shall either wind up the Fund while safeguarding the interests of investors and distribute the proceeds to investors or, subject to approval from BaFin, transfer management to another investment management company. The Depositary shall draw up a liquidation report once a year and as at the completion date of the winding-up; said report shall meet the requirements for an annual report.

### Transfer of the Fund

The Company may transfer the right to manage and the right of disposal over the Fund to another investment management company. The transfer requires prior approval from BaFin. The authorised transfer shall be announced in the German Federal Gazette, the annual or half-yearly report of the Fund, and on the Company's website: am.oddo-bhf.com. The time at which the transfer takes effect will be determined by the contractual agreements between the Company and the investment management company taking over. However, the transfer may not take effect until at least three months after its announcement in the German Federal Gazette. All rights and obligations of the Company in relation to the Fund shall then pass to the investment management company taking over.

### Preconditions for the merger of the Fund

All assets of this Fund may, subject to authorisation by BaFin, be transferred to another existing investment fund or a new investment fund to be created by the merger; such investment fund must satisfy the requirements for a UCITS established in Germany or another EU or EEA state. The transfer shall take effect as of the financial year-end of the merging fund (the "transfer date"), unless another transfer date is specified.

### Rights of the investors upon a merger of the Fund

Up until five working days before the planned transfer date, the investors shall have the option either to redeem their units at no extra charge other than costs to cover the winding-up of the Fund or to exchange their units for units in another open-ended retail investment fund that is also managed by the Company or by a company in the same Group and whose investment principles are similar to those of the Fund. The Company must inform investors in the Fund before the planned transfer date of the reasons for the merger, the potential effects for investors, their rights in connection with the merger and of significant aspects of the procedure by means of a durable medium, for instance in paper or electronic form. The Key Information Document for the investment fund to which the Fund's assets will be transferred must also be provided to the investors. Investors must receive the above information at least 30 days before the deadline for the redemption or exchange of their units. On the transfer date, the respective net asset values of the Fund and of the absorbing investment fund shall be calculated, the unit conversion ratio shall be set and the entire conversion process shall be reviewed by the auditor. The unit conversion ratio shall be determined in accordance with the ratio of the net asset value per unit of the Fund to the net asset value per unit of the absorbing investment fund as at the time of the merger. Investors shall receive the number of units in the absorbing investment fund that corresponds to the value of their units in the Fund. If the investors do not exercise their right to redeem or exchange, they will become investors in the absorbing investment fund on the transfer date. The Company may also decide in conjunction with the management company of the absorbing investment fund that up to 10% of the value of the investors' units should be paid out to them in cash. Upon the transfer of all its assets, the Fund will cease to exist. If the transfer takes place during the course of the Fund's financial year, the Company must draw up a report as at the transfer date which meets the requirements for an

annual report. The Company shall announce in the German Federal Gazette and additionally on the Company's website at am.oddo-bhf.com that the Fund has been merged into another investment fund managed by the Company and that the merger has become effective. If the Fund is merged into another investment fund that is not managed by the Company, the management company that manages the absorbing or newly established investment fund shall assume responsibility for announcing the taking effect of the merger.

## DELEGATION

The Company has delegated the following activities:

### Fund manager

The fund managers of the German & Austrian Equities team are responsible for the investment strategy of the Fund and have delegated a portion of their investment decisions to their colleagues at the sister company, ODDO BHF Asset Management SAS, 12 Boulevard de la Madeleine, 75009 Paris, France.

### Fund administration

Fund administration has been delegated to Universal-Investment-Gesellschaft mbH, Europa-Allee 92-96, 60486 Frankfurt am Main.

### Other delegated activities

The following activities have been delegated to ODDO BHF SE, Gallusanlage 8, 60329 Frankfurt am Main:

- Measures to enhance and monitor IT security
- Internal audit section
- Human resources section
- Archiving section
- Company's accounting section

The execution of trades (order desk) for some funds has been delegated to Baader Bank AG, Weihenstephaner Strasse 4, 85716 Unterschleissheim, Germany and ODDO BHF Asset Management SAS, 12, Boulevard de la Madeleine, 75009 Paris, France. Information technology (IT) has been delegated to ODDO BHF SCA, 12, Boulevard de la Madeleine, 75009 Paris, France. Collateral management and reporting to the trade repository have been outsourced to CACEIS Bank, Luxembourg branch, 5, allée Scheffer, 2520 Luxembourg. Middle and back office activities were partially outsourced to ODDO BHF Solutions GmbH, Berliner Promenade 1-2, 66111 Saarbrücken, Germany. ESG research and internal ESG ratings have been delegated to ODDO BHF SCA, 12 Boulevard de la Madeleine, 75009 Paris, France.

The Company has the right to issue instructions to the above companies at any time in relation to the delegated activities. It may also terminate their contracts and either delegate the tasks in question to third parties or perform them itself.

The following conflicts of interest may arise due to delegation:

- The subcontractor may be an affiliate of the Company.
- The interests of the subcontractor may conflict with the Company, the Fund or the Fund's investors.
- Financial benefits or an absence of financial disadvantages on the part of the subcontractor, to the detriment of the Company, the Fund or the Fund's investors.
- The subcontractor may receive or grant benefits that are liable to influence conduct in a way that is contrary to the interests of the Company, the Fund or the Fund's investors.
- The fund manager may not act exclusively for the Company and may be permitted to carry out fund management for other investment funds.
- The fund manager may not be prohibited in principle from acquiring, within the context of its investment strategy, its own issues or other investment funds that it manages or advises.

## CONFLICTS OF INTEREST

Conflicts of interest may arise with the Company. The interests of the investors may conflict with the following interests:

- interests of the Company and affiliates of the Company,
- interests of the Company's employees,

- interests of any other person directly or indirectly associated with the Company by way of a control relationship, or
- interests of other investors in the Fund or another fund.

Circumstances or relationships that may give rise to conflicts of interest include in particular:

- incentive systems for the Company's employees,
- employee trades,
- benefits granted to the Company's employees,
- acquisition of products issued by affiliates or in whose issue an affiliate was involved,
- reallocations within the Fund,
- window-dressing of fund performance at the year-end,
- transactions between the Company and investment funds or personal portfolios under the Company's management, or
- transactions between investment funds or personal portfolios under the Company's management,
- aggregation of multiple orders (block trades),
- hiring of affiliates and related persons,
- large individual investments,
- where, following the oversubscription of a share issue, the Company has subscribed for shares on behalf of several investment funds or personal portfolios ("IPO allotments"),
- late trading, i.e. transactions made after the close of trading at the known closing price for the day,
- exercise of voting rights.

The Company may obtain benefits in kind (broker research, financial analysis, market and pricing information systems) in connection with transactions made for the account of the Fund; use is made of such benefits when taking investment decisions in the interests of the investors. The Company does not receive any rebates on fees and expense reimbursements paid from the Fund to the Depositary or any third parties. The Company grants brokerage fees in the form of broker trail commissions to intermediaries, e.g. credit institutions, on a recurring basis, generally annually. The amount of such commissions is essentially dependent on the volume brokered. Payment is borne by the Company. Broker trail commissions do not constitute an additional charge for the investors.

The Company employs the following organisational measures to identify, prevent, manage, monitor and disclose conflicts of interest:

- Existence of a compliance department, which monitors compliance with laws and regulations and to which conflicts of interests must be notified,
- duties of disclosure,
- organisational measures such as
  - segregation of duties and physical segregation,
  - retention of existing and creation of new confidentiality zones and the establishment of an information management system, so as to prevent the misuse of confidential information,
  - allocating responsibilities in such a way as to prevent undue exertion of influence,
  - establishing organisational rules and defining and documenting workflows,
- rules of conduct for employees in relation to employee trading, imposition of obligations to comply with insider trading law and training courses,
- setting principles for the remuneration system and rules on the acceptance, granting and disclosure of benefits,
- setting rules in relation to the receipt of other benefits in kind.
- principles for taking account of clients' interests and providing advice that is appropriate for clients and investments, as well as observation of the agreed investment principles,
- best execution policy for the acquisition and disposal of financial instruments,

- proxy voting policy,
- existence of a conflict-of-interest policy,
- implementing procedures and measures to prevent transaction costs from having an unreasonable impact on investors' interests,
- setting a limit for portfolio churn,
- establishing order cut-off times,
- investment advisors and fund managers are contractually bound to avoid conflicts of interest.

## BRIEF DETAILS OF TAX REGULATIONS

These comments on tax regulations apply only to investors with an unrestricted liability to tax in[3] Germany. We recommend[4] that foreign investors contact their tax advisors before purchasing units in the Fund described in this Prospectus and clarify the potential tax consequences of purchasing units that apply to them in their home country. As a special-purpose fund (*Zweckvermögen*), the Fund is in principle exempt from corporation tax and trade tax. However, under the rules for limited income tax liability, it is partially liable to corporation tax in respect of its (from the perspective of German tax law) domestic equity income and other forms of domestic income, although gains made on the sale of holdings in corporate entities are generally exempt; gains made on the disposal of holdings in domestic or foreign corporate entities, more than 50% of the unit value of which is based directly or indirectly on domestic immovable property may, under certain circumstances, be liable to corporation tax at the Fund level (as "other domestic income" for financial years commencing before 10 February 2026, and as "domestic property income" for financial years commencing after 9 February 2026). The tax rate is 15%. Insofar as the tax is collected by way of the investment income withholding tax (capital gains tax), the solidarity surcharge is included in the 15% tax rate. For private investors, however, earnings obtained from the Fund are classed as income from capital assets. As such, they are subject to income tax to the extent that the investor's total income from capital assets exceeds the annual savings allowance of EUR 1,000 (for taxpayers assessed individually) or EUR 2,000 (for married couples assessed jointly). Income from capital assets is generally subject to a 25% tax deduction at source (plus solidarity surcharge and church tax, where applicable). Income from capital assets also includes income from investment funds ("Investmenterträge"), i.e. fund distributions, advance lump sums and gains on the disposal of fund units. Under certain conditions investors will receive a fixed part of this investment income tax-free (a "partial tax exemption"). For private investors, the tax deduction at source generally functions as a "final withholding tax", i.e. it settles the tax liability once and for all. Normally, therefore, income from capital assets does not need to be declared in your income tax declaration. When it levies the tax deduction, your custody account provider will generally offset any eligible losses and any foreign withholding taxes arising on direct investments. However, if your personal tax rate is lower than the 25% tax deduction rate, the tax deduction will not rank as final settlement. In this case, it is possible to declare the income from capital assets in your income tax return. The Tax Office will then apply your lower personal tax rate and count the tax deduction as a prepayment against your total personal tax liability (this is called the "most favourable treatment test"). Any income from capital assets that has not been subject to a tax deduction (e.g. a gain realised on the sale of Fund units held in a custody account outside Germany) must be declared in your tax declaration. Such income will then be assessed to tax either at the final withholding tax rate of 25% or at your personal tax rate, whichever is lower. Where units are held as part of the assets of a business, any income will be treated as business income for tax purposes.

## UNITS HELD AS PERSONAL ASSETS (GERMAN TAXPAYERS)

### Distributions

Distributions from the Fund are generally taxable. However, the Fund meets the tax criteria to qualify as an equity fund, so 30% of distributions are tax-exempt. Taxable distributions are generally subject to the 25% tax deduction (plus solidarity surcharge and church tax, where applicable). No deduction is made if the investor is a German taxpayer and has presented an exemption form, to the extent that the taxable part of the income does not exceed EUR 1,000 (for taxpayers assessed individually) or EUR 2,000 (for taxpayers assessed as married couples). The same applies if a "non-assessment notice" (Nichtveranlagungsbescheinigung) has been presented for a person who is not expected to be assessed to income tax. If a German-resident investor holds units in a German custody account, the custody account provider will not deduct tax in its capacity as paying agent if it is presented with one of these forms before the set distribution date, i.e. either an exemption form complying with the official model and covering a sufficiently large amount or a non-assessment notice issued by the Tax Office for a period of up to three years. Where this is the case, the investor will be credited

[3] Investors with an unlimited liability to tax are referred to below as German taxpayers.
[4] Foreign investors are investors who do not have an unlimited liability to tax in Germany. They are referred to below as non-German taxpayers.

with the full gross amount of the distribution.

### Advance lump sums

The advance lump sum (Vorabpauschale) is the amount by which the Fund's distributions fall short of its "base income" in a given calendar year. The base income is determined by multiplying the unit redemption price at the start of the calendar year by 70% of the base interest rate, which is derived from the long-term yield achievable from public-sector bonds. The base income is limited to the amount by which the last redemption price set in the calendar year exceeds the first redemption price, plus any distributions made within the year. In the year in which the units are acquired, the advance lump sum is reduced by one twelfth for each full month preceding the month of acquisition. Investors are deemed to have received the advance lump sum on the first working day of the following calendar year. Advance lump sums are generally taxable. However, the Fund meets the tax criteria to qualify as an equity fund, so 30% of advance lump sums are tax-exempt. The taxable part of the advance lump sum is generally subject to the 25% tax deduction (plus solidarity surcharge and church tax, where applicable). No deduction is made if the investor is a German taxpayer and has presented an exemption form, to the extent that the taxable part of the income does not exceed EUR 1,000 (for taxpayers assessed individually) or EUR 2,000 (for taxpayers assessed as married couples). The same applies if a "non-assessment notice" (Nichtveranlagungsbescheinigung) has been presented for a person who is not expected to be assessed to income tax. If a German-resident investor holds units in a German custody account, the custody account provider will not deduct tax in its capacity as paying agent if is presented with one of these forms before the date of receipt, i.e. either an exemption form complying with the official model and covering a sufficiently large amount or a non-assessment notice issued by the Tax Office for a period of up to three years. In this case, no tax is levied. Otherwise, the investor must make the amount of the withholding tax available to his or her custody account provider. To this end, the custody account provider may take the amount of the withholding tax from any bank account at the institution in the investor's name without the investor's consent. Unless the investor objects prior to the receipt of the advance lump sum, the custody account provider may also debit the amount of the tax deduction from a bank account in the investor's name as if there were an agreed overdraft available on this account. If the investor does not comply with his/her duty to make the amount of the tax deduction available to his/her German custody account provider, the custody account provider is obliged to notify this fact to the Tax Office responsible for the investor. In this case, the investor must declare the advance lump sums in his or her income tax declaration.

### Gains on disposals at the level of the investor

Gains made on the disposal of units in the Fund are generally taxable. However, the Fund meets the tax criteria to qualify as an equity fund, so 30% of gains on disposal are tax-exempt. Where the units are held in a German custody account, the tax deduction will be made by the custody account provider, less any partial exemptions. The 25% tax deduction (plus solidarity surcharge and church tax, where applicable) may be avoided by presenting an exemption form covering the amount in question or a non-assessment form. If a private investor sells such units at a loss, the loss – possibly reduced on the basis of a partial exemption – may be offset against other positive income from capital assets. If the units are held in a German custody account and positive income from capital assets is obtained in the same account in the same calendar year, the custody account provider will offset the losses accordingly. Gains on disposal are reduced by the amount of any advance lump sums assessed during the holding period.

### Negative taxable income

Negative taxable income cannot be allocated to individual investors.

### Tax on winding-up

Distributions made in the course of the Fund's winding-up are deemed to be a tax-free repayment of capital provided that the last redemption price set in that calendar year is lower than the amortised cost This applies for a maximum period of ten calendar years after the calendar year in which winding-up begins.

### Expatriation tax

The Fund units are deemed to have been sold for tax purposes if an investor's unlimited tax liability ends when they cease to have their domicile or habitual residence in the Federal Republic of Germany or the units were transferred free of charge to a person who does not have an unlimited tax liability or if the right of taxation of the Federal Republic of Germany with respect to the gains made on the disposal of the Fund units is excluded or limited for any other reason. In these cases, the increase in value accrued up to that point is assessed. Expatriation tax is only applicable if the investor directly or indirectly held at least 1% of the outstanding units of the Fund in question in the five years prior to the notional disposal or if the investor directly or indirectly holds Fund units at the time of the notional disposal, the cost of acquisition of which was at least EUR 500,000; note that holdings in different investment funds are to be considered separately rather than aggregating the cost of acquisition, and the sum of taxable gains on all Fund units is positive overall. The assessment is made in the tax return.

## UNITS HELD AS BUSINESS ASSETS (GERMAN TAXPAYERS)

### Repayment of Fund's corporation tax

The Fund can obtain a refund of corporation tax levied at Fund level to pass on to an investor, provided that the tax levied does not relate to other domestic income as defined in section 6(5), sentence 1, numbers 2 and 3 of the *Investmentsteuergesetz* (for Fund financial years commencing after 9 February 2026) and where this investor is (i) a German corporation, association of persons or pool of assets which, according to its articles of association, deed of foundation or other constitutive document and in its actual course of business, exclusively serves non-profit, charitable or church purposes, or (ii) a foundation under public law that exclusively serves non-profit or charitable purposes, or (iii) a legal entity under public law that exclusively and directly serves church purposes; this shall not apply if the units are held within a commercial business. The same applies in respect of comparable foreign investors whose registered office and management is located in a foreign country that provides official tax cooperation. This is provided that any such investor makes an application accordingly and a portion of the corporation tax incurred is attributable to the investor's holding period. The investor must also have been the legal and economic owner of the units for at least three months before the Fund's taxable income was received, without there being any obligation to transfer the units to another person. Furthermore, neither a usufruct in the investment income may have been granted nor any other commitment may have arisen to pay the investment income in whole or in part, directly or indirectly to other persons. With respect to corporation tax to which the Fund is liable on German dividends and income from German equity-like participation rights, repayment is also essentially conditional on the German shares or equity-like participation rights being held by the Fund as economic owner for an uninterrupted period of 45 days within the time from 45 days before to 45 days after the payment date of the investment income, while being exposed to a minimum value change risk of 70% without interruption during that 45-day period (the "45-day rule"). The application shall be accompanied by evidence of tax exemption and a certificate of the unit holding issued by the custody account provider. The unit holding certificate is a certificate, issued in accordance with an official template, that shows the number of units held by the investor throughout the calendar year and the dates and amounts of purchases and sales of units during the calendar year. The Fund can also obtain a refund of corporation tax levied at Fund level for forwarding to an investor where the Fund units are held in retirement plans or basic pension plans that have been certified under the German Certification of Retirement Plans Act (*Altersvorsorgeverträge-Zertifizierungsgesetz*). This is subject to the requirement that the provider of the retirement or basic pension plan notifies the Fund within one month after its year end of the timing and amount of the purchase and disposal of units. In addition, the aforementioned 45-day rule must be taken into consideration. Neither the Fund nor the Company has an obligation to claim repayment of the relevant corporation tax for forwarding to the investor. Given the complexity of the rules, it is advisable to consult a tax advisor.

### Distributions

Distributions made by the Fund are generally subject to income tax or corporation tax and to trade tax. However, the Fund meets the tax criteria to qualify as an equity fund, so 60% of distributions are tax-exempt for the purposes of income tax and 30% for the purposes of trade tax, if the units are held by private individuals as business assets. For corporations liable to tax generally 80% of distributions are tax-exempt for the purposes of corporation tax and 40% for the purposes of trade tax. For corporations that are life or health insurance undertakings or pension funds holding the units as part of their capital investments, or are credit institutions and the units are allocable to the trading portfolio within the meaning of section 340e(3) of the Commercial Code or are to be reported as current assets at the time of addition to the assets of the business, 30% of distributions are tax-exempt for the purposes of corporation tax and 15% for the purposes of trade tax. Distributions are generally subject to the 25% tax deduction (plus solidarity surcharge). Since the Fund meets the tax criteria to qualify as an equity fund, account is taken of the partial exemption of 30% when deducting tax.

### Advance lump sums

The advance lump sum (Vorabpauschale) is the amount by which the Fund's distributions fall short of its "base income" in a given calendar year. The base income is determined by multiplying the unit redemption price at the start of the calendar year by 70% of the base interest rate, which is derived from the long-term yield achievable from public-sector bonds. The base income is limited to the amount by which the last redemption price set in the calendar year exceeds the first redemption price, plus any distributions made within the year. In the year in which the units are acquired, the advance lump sum is reduced by one twelfth for each full month preceding the month of acquisition. Investors are deemed to have received the advance lump sum on the first working day of the following calendar year. Advance lump sums are generally subject to income tax or corporation tax and trade tax. However, the Fund meets the tax criteria to qualify as an equity fund, so 60% of advance lump sums are tax-exempt for the purposes of income tax and 30% for the purposes of trade tax, if the units are held by private individuals as business assets. For corporations liable to tax generally 80% of advance lump sums are tax-exempt for the purposes of corporation tax and 40% for the purposes of trade tax. For corporations that are life or health insurance undertakings or pension funds holding the units as part of their

capital investments, or are credit institutions and the units are allocable to the trading portfolio within the meaning of section 340e(3) of the Commercial Code or are to be reported as current assets at the time of addition to the assets of the business, 30% of advance lump sums are tax-exempt for the purposes of corporation tax and 15% for the purposes of trade tax. Advance lump sums are generally subject to the 25% tax deduction (plus solidarity surcharge). Since the Fund meets the tax criteria to qualify as an equity fund, account is taken of the partial exemption of 30% when deducting tax.

### Gains on disposals at the level of the investor

Gains on the disposal of Fund units are generally subject to income tax or corporation tax and trade tax. Gains on disposal are reduced by the amount of any advance lump sums assessed during the holding period. However, the Fund meets the tax criteria to qualify as an equity fund, so 60% of gains on disposal are tax-exempt for the purposes of income tax and 30% for the purposes of trade tax, if the units are held by private individuals as business assets. For corporations liable to tax generally 80% of gains on disposal are tax-exempt for the purposes of corporation tax and 40% for the purposes of trade tax. For corporations that are life or health insurance undertakings or pension funds holding the units as part of their capital investments, or are credit institutions and the units are allocable to the trading portfolio within the meaning of section 340e(3) of the Commercial Code or are to be reported as current assets at the time of addition to the assets of the business, 30% of gains on disposal are tax-exempt for the purposes of corporation tax and 15% for the purposes of trade tax. In the event of a loss on disposal, the loss, in the amount of the applicable partial exemption, is not deductible at the investor level. The gain made on the notional disposal must be determined separately for units that are attributable to an investor's business assets. Gains on the disposal of Fund units are generally not subject to capital gains tax.

### Negative taxable income

Negative taxable income cannot be allocated to individual investors.

### Tax on winding-up

Distributions made in the course of the Fund's winding-up are deemed to be a tax-free repayment of capital provided that the last redemption price set in that calendar year is lower than the amortised cost This applies for a maximum period of ten calendar years after the calendar year in which winding-up begins.

## SUMMARY OF TAX TREATMENT FOR COMMON TYPES OF INVESTOR

| | Distributions | Advance lump sums | Gains on disposal |
|---|---|---|---|
| German investors | | | |
| Sole traders | **Capital gains tax:**<br>25% (account is taken of the 30% partial exemption for equity funds and the 15% partial exemption for mixed-asset funds) | | **Capital gains tax:**<br>No tax deducted |
| | **Material taxation:**<br>Income tax and trade tax, taking account of partial exemptions where applicable (equity funds: 60% for income tax/30% for trade tax; mixed-asset funds: 30% for income tax/15% for trade tax) | | |
| Corporations (standard tax regime) (typically industrial firms; banks, except where units are held as trading assets; general insurers) | **Capital gains tax:**<br>No tax deducted for banks, otherwise 25% (account is taken of the 30% partial exemption for equity funds and the 15% partial exemption for mixed-asset funds) | | **Capital gains tax:**<br>No tax deducted |
| | **Material taxation:**<br>Corporation tax and trade tax, taking account of partial exemptions where applicable (equity funds: 80% for corporation tax/40% for trade tax; mixed-asset funds: 40% for corporation tax/20% for trade tax) | | |
| Life and health insurance undertakings and pension funds holding fund units as part of their capital investments | **Capital gains tax:**<br>No tax deducted | | |
| | **Material taxation:**<br>Corporation tax and trade tax, except insofar as tax-allowable provisions for premium rebates have been made in the balance sheet. Where applicable, account is taken of partial exemptions (equity funds: 30% for corporation tax/15% for trade tax; mixed-asset funds: 15% for corporation tax/7.5% for trade tax) | | |
| Banks holding fund units as trading assets | **Capital gains tax:**<br>No tax deducted | | |
| | **Material taxation:**<br>Corporation tax and trade tax, taking account of partial exemptions where applicable (equity funds: 30% for corporation tax/15% for trade tax; mixed-asset funds: 15% for corporation tax/7.5% for trade tax) | | |
| Tax-exempt non-profit charitable or church investors (particularly churches, non-profit foundations) | **Capital gains tax:**<br>No tax deducted | | |
| | **Material taxation:**<br>Tax-exempt – corporation tax levied at Fund level for Fund financial years commencing after 9 February 2026 may also be refunded on request (subject to certain conditions and with some exceptions) | | |
| Other tax-exempt investors (particularly pension funds, funeral expense funds and benevolent funds, provided that the requirements set out in the Corporation Tax Act are met) | **Capital gains tax:**<br>No tax deducted | | |
| | **Material taxation:**<br>Tax-exempt – corporation tax levied at Fund level on domestic property income derived from corporate domestic property entities and – for Fund financial years commencing after 9 February 2026 – on certain other domestic income may also be refunded on request (subject to certain conditions) | | |

It is assumed that the units will be held in a German custody account. A solidarity surcharge is levied on top of capital gains tax, income tax and corporation tax. Where no capital gains tax is deducted, certificates may need to be presented to the custody account provider by the appropriate deadline to ensure that the deduction is not made.

## NON-GERMAN TAXPAYERS

Where a non-German taxpayer holds Fund units in a custody account at a German institution, no tax will be deducted in relation to distributions, advance lump sums and gains on disposal provided that the account holder provides evidence that he/she is not tax-resident in Germany. If the custody account provider is unaware that the account holder is a non-resident or is not made aware of this fact by the relevant deadline, the foreign investor must apply for a refund of the tax deduction in accordance with section 37(2) of the German Tax Code (Abgabenordnung). This should be submitted to the Tax Office responsible for the custody account provider. If a non-German taxpayer is equivalent to a German investor for whom a refund of the corporation tax incurred at the Fund level is possible, then a refund is also possible in principle. Please refer to the above information on German taxpayers. Another requirement is that the non-German taxpayer has its registered office and management in a foreign country that provides official tax cooperation.

## SOLIDARITY SURCHARGE

Tax deductions made on distributions, advance lump sums and gains on disposals of units are subject to an additional solidarity surcharge of 5.5%.

## CHURCH TAX

Where income tax is collected by way of a tax deduction at source made by the custody account provider (the withholding agent), any church tax chargeable will routinely be collected as an additional part of the tax deduction, at the church tax rate set by the religious denomination to which the taxpayer belongs. Account is taken of the deductibility of church tax as "special expenditure" when the deduction is made, which reduces the amount payable.

## FOREIGN WITHHOLDING TAXES

Some of the Fund's foreign income is subject to withholding taxes levied at source in the country of origin. Such withholding taxes cannot be used to reduce the investor's liability to German tax.

## PLAN D'EPARGNE EN ACTIONS (PEA)

The Fund is suitable for the French stocks and shares savings plan "Plan d'Epargne en Actions (PEA)".

## CONSEQUENCES OF FUND MERGERS

Where a German investment fund is merged into another German investment fund, to which the same partial exemption rate applies, this will not trigger the release of any hidden reserves either at the level of the investor or at the level of the investment funds themselves, i.e. this procedure is tax-neutral. If the merger plan provides for a cash payment to be made to the investors of the merging investment fund[5], this will be treated as a distribution. If the partial exemption rate applicable to the merging investment fund is different to that of the absorbing investment fund, then the investment fund unit of the merging investment fund is deemed to have been sold and that of the absorbing investment fund is deemed to have been purchased. The gain on the notional disposal is not deemed to have been made until the investment fund unit of the absorbing investment fund is actually sold or, in certain cases, is deemed to have been sold.

## AUTOMATIC EXCHANGE OF TAX INFORMATION

The significance of the automated international exchange of information aimed at combating cross-border tax fraud and tax evasion has increased significantly in recent years. For this, and among other things, the OECD has published a global standard – the Common Reporting Standard or "CRS" – for the automated sharing of information on financial accounts in tax matters. The CRS was established by Council Directive 2014/107/EU of 9 December 2014 amending Directive 2011/16/EU as regards mandatory automatic exchange of information in the field of taxation. The participating states (all EU Member States plus a number of third countries) now apply the CRS. Germany transposed the CRS into German law in the Financial Accounts Information Exchange Act of 21 December 2015. The CRS obligates reporting financial institutions (essentially banks and securities firms) to obtain certain information about their customers. If customers (private individuals or legal entities) are notifiable persons resident in other participating states (this excludes e.g. listed companies and financial institutions), bank accounts and custody accounts belonging to those persons are classed as notifiable accounts. Each reporting financial institution will then pass certain information on every notifiable account to the tax authority in its home country. The authority will then pass the information to the tax authority in the home country of the customer. The information to be reported essentially comprises the personal data of the reportable client (name; address; tax identification number or numbers; date and place of birth for private individuals; country of residence) and information about the bank accounts and custody accounts (e.g. account number; account balance/value; total gross income such as interest, dividends or fund distributions; total gross proceeds from the sale or redemption of

[5] (section 190 sentence 2 no. 2 of the Investment Code)

financial assets, including fund units).

Specifically, therefore, the regime affects notifiable investors who hold a bank account and/or custody account at a financial institution which is resident in a participating state. German financial institutions will therefore report information about investors resident in other participating states to the Federal Central Tax Office, which forwards the information to the tax authorities in the investors' respective countries of residence. Financial institutions in other participating states will likewise forward information about investors resident in Germany to their home tax authority, which forwards it to the Federal Central Tax Office. It is also conceivable that financial institutions located in other participating states will report information about investors resident in a third participating state to their home tax authorities, which will then forward the information to the tax authorities in the investors' respective countries of residence.

## GENERAL INFORMATION

The tax information is based on the current legal position. It is aimed at persons with an unrestricted liability to income tax or corporation tax in Germany. However, there is no guarantee that the current tax treatment will not change due to legislation, court judgments or decisions of the tax authority.

## AUDITOR

The auditor of the Fund and the annual report is KPMG AG Wirtschaftsprüfungsgesellschaft, Frankfurt am Main. The auditor audits the annual report of the Fund. The auditor summarises the result of the audit in an audit opinion, which must be reproduced verbatim in the annual report. In the course of the audit, the auditor must also determine whether the management of the Fund has been conducted in accordance with the Investment Code and the Terms of Investment. The auditor must submit its report on the audit of the Fund to BaFin.

## SERVICE PROVIDERS

Firms that carry out functions delegated by the Company are described under "Delegation".

The Company has also engaged the following service providers:

### Legal advisors

The Company monitors potential investor claims that may be enforced through capital market class actions and the ability to participate in disbursements of US settlement pools through the law firm DRRT, Diaz Reus & Targ LLP, Frankfurt am Main, Miami, Dubai. Engagement of the firm does not create a legal relationship between the firm and the investors in the Fund.

The Company has not engaged any other service providers relevant to the management of the Fund.

## PAYMENTS TO INVESTORS/DISTRIBUTION OF REPORTS AND OTHER INFORMATION

The engagement of the Depositary ensures that reinvested earnings are credited to the investors, distributions are received by investors and units are redeemed. The investor information referred to in this Prospectus can be requested in the ways described under "Sales documentation and disclosure of information". These documents can also be obtained from the Depositary and sales offices.

## OTHER INVESTMENT FUNDS MANAGED BY THE COMPANY

The Company also manages the following retail investment funds, which are not covered by this Prospectus:

| Fund name |
|---|
| Accellerate V |
| Basis-Fonds I Nachhaltig |
| Böhke & Co. Family Office Fonds |
| DC Value Global Balanced |
| DC Value Global Equity |
| DC Value Global Flexible |
| Global Multi Invest |
| Kapital Privat Portfolio |
| Managed ETF$^{plus}$ – Portfolio Balance |
| Managed ETF$^{plus}$ – Portfolio Opportunity |
| Mauselus |
| ODDO BHF Europe Equity Trend |
| ODDO BHF Global Equity Trend |
| ODDO BHF Green Bond |
| ODDO BHF Money Market |
| ODDO BHF Polaris Moderate |
| ODDO BHF Polaris Moderate LV |
| ODDO BHF *Werte*Fonds |
| SARA global balanced |
| SARA global income |
| Schmitz & Partner Global Defensiv |
| Schmitz & Partner Global Offensiv |
| Westfalicafonds Aktien Renten |

The Company also manages 51 special investment funds.

# SUB-CUSTODIANS

The Depositary has subcontracted custodial services to another company (a sub-custodian) in the following countries:

| Country/market | Sub-custodian | Country/market | Sub-custodian |
|---|---|---|---|
| **Egypt** | HSBC Bank Egypt S.A.E. | **Ireland** | The Bank of New York Mellon |
| **Argentina** | The Branch of Citibank N.A. in the Republic of Argentina | **Iceland** | Landsbankinn hf. |
| **Australia** | Citigroup Pty Limited<br>The Hongkong and Shanghai Banking Corporation Limited | **Israel** | Bank Hapoalim B.M. |
| **Bahrain** | HSBC Bank Middle East Limited | **Italy** | The Bank of New York Mellon SA/NV |
| **Bangladesh** | The Hongkong and Shanghai Banking Corporation Limited | **Japan** | Mizuho Bank, Ltd.<br>MUFG Bank, Ltd. |
| **Belgium** | The Bank of New York Mellon SA/NV | **Jordan** | Bank of Jordan PLC |
| **Bermuda** | HSBC Bank Bermuda Limited | **Cayman Islands** | The Bank of New York Mellon |
| **Botswana** | Stanbic Bank Botswana Limited | **Canada** | CIBC Mellon Trust Company (CIBC Mellon) |
| **Brazil** | Citibank N.A., Brazil<br>Banco Santander (Brasil) S.A. | **Channel Islands** | The Bank of New York Mellon |
| **Bulgaria** | Citibank Europe plc, Bulgaria Branch | **Kazakhstan** | Citibank Kazakhstan Joint-Stock Company |
| **Chile** | Banco Santander Chile | **Qatar** | Qatar National Bank<br>The Hongkong and Shanghai Banking Corporation Limited |
| **China** | HSBC Bank (China) Company Limited<br>Agricultural Bank of China Limited<br>Bank of China Limited | **Kenya** | Stanbic Bank Kenya Limited |
| **Costa Rica** | Banco Nacional de Costa Rica | **Colombia** | Cititrust Colombia S.A. Sociedad Fiduciaria<br>S3 CACEIS Colombia S.A. Sociedad Fiduciaria |
| **Denmark** | Skandinaviska Enskilda Banken AB (Publ)<br>The Bank of New York Mellon SA/NV | **Croatia** | Privredna banka Zagreb d.d. |
| **Germany** | The Bank of New York Mellon SA/NV, Asset Servicing, Frankfurt am Main branch | **Kuwait** | HSBC Bank Middle East Limited, Kuwait |
| **Estonia** | AS SEB Pank<br>The Bank of New York Mello SA/NV, Asset Servicing, Frankfurt am Main branch | **Latvia** | AS SEB banka<br>The Bank of New York Mello SA/NV, Asset Servicing, Frankfurt am Main branch |
| **Euromarket** | Clearstream Banking S.A.<br>Euroclear Bank SA/NV | **Lithuania** | AB SEB bankas<br>The Bank of New York Mello SA/NV, Asset Servicing, Frankfurt am Main branch |
| **Finland** | Skandinaviska Enskilda Banken AB (Publ) | **Luxembourg** | Euroclear Bank SA/NV |
| **France** | BNP Paribas S.A.<br>The Bank of New York Mellon SA/NV | **Malawi** | Standard Bank PLC |
| **Ghana** | Stanbic Bank Ghana Limited | **Malaysia** | Standard Chartered Bank Malaysia Berhad |
| **Greece** | Citibank Europe Plc, Greece Branch | **Malta** | The Bank of New York Mellon SA/NV, Asset Servicing, Frankfurt am Main branch |
| **United Kingdom** | The Bank of New York Mellon | **Morocco** | Citibank Maghreb S.A. |
| **Hong Kong** | Citibank N.A.<br>The Hongkong and Shanghai Banking Corporation Limited | **Mauritius** | The Hongkong and Shanghai Banking Corporation Limited |
| **India** | Deutsche Bank AG<br>The Hongkong and Shanghai Banking Corporation Limited<br>Standard Chartered Bank, India Branch | **Mexico** | Banco S3 CACEIS México S.A. Institutión de Banca Múltiple<br>Banco Citi México, S.A., Institución de Banca Múltiple Grupo Financiero Citi México |
| **Indonesia** | Deutsche Bank AG<br>Standard Chartered Bank, Indonesia Branch | **Namibia** | Standard Bank Namibia Limited |

| Country/market | Sub-custodian | Country/market | Sub-custodian |
|---|---|---|---|
| **New Zealand** | The Hongkong and Shanghai Banking Corporation Limited | **Slovenia** | UniCredit Banka Slovenija d.d. |
| **Netherlands** | The Bank of New York Mellon SA/NV | **Spain** | Banco Bilbao Vizcaya Argentaria, S.A.<br>CACEIS Bank Spain, S.A.U. |
| **Nigeria** | Stanbic IBTC Bank Ltd. | **Sri Lanka** | The Hongkong and Shanghai Banking Corporation Limited |
| **Norway** | Skandinaviska Enskilda Banken AB (Publ) | **South Africa** | Standard Chartered Bank, Johannesburg Branch<br>The Standard Bank of South Africa Limited |
| **Oman** | Standard Chartered Bank | **South Korea** | Deutsche Bank AG<br>The Hongkong and Shanghai Banking Corporation Limited<br>Standard Chartered Bank Korean Limited |
| **Austria** | BNP Paribas S.A., German branch<br>UniCredit Bank Austria AG | **Taiwan** | HSBC Bank (Taiwan) Limited<br>Citibank Taiwan Limited |
| **Pakistan** | Deutsche Bank AG | **Tanzania** | Stanbic Bank Tanzania Limited |
| **Panama** | Citibank N.A., Panama Branch | **Thailand** | The Hongkong and Shanghai Banking Corporation Limited |
| **Peru** | Citibank del Peru S.A. | **Czech Republic** | Citibank Europe plc, organizační složka |
| **Philippines** | Standard Chartered Bank Philippines Branch | **Tunisia** | Union Internationale de Banques |
| **Poland** | Bank Polska Kasa Opieki S.A. | **Turkey** | Deutsche Bank A.S. |
| **Portugal** | Citibank Europe Plc | **Uganda** | Stanbic Bank Uganda Limited |
| **Romania** | Citibank Europe plc Dublin, Romania Branch | **Ukraine** | JSC "Citibank" |
| **Russia** | AO RenCap Bank<br>TBank | **Hungary** | Citibank Europe plc, Hungarian Branch Office |
| **Zambia** | Stanbic Bank Zambia Limited | **Uruguay** | Banco Itaú Uruguay S.A. |
| **Saudi Arabia** | HSBC Saudi Arabia | **United Arab Emirates** | HSBC Bank Middle East Limited (HBME) |
| **Sweden** | Skandinaviska Enskilda Banken AB (Publ) | **United States of America** | The Bank of New York Mellon |
| **Switzerland** | UBS Switzerland AG | **United States of America, Precious Metals** | HSBC Bank, USA, N.A. |
| **Serbia** | UniCredit Bank Serbia JSC Belgrade | **Vietnam** | HSBC Bank (Vietnam) Ltd |
| **Zimbabwe** | Stanbic Bank Zimbabwe Limited | **WAEMU*** | Société Générale Côte d'Ivoire |
| **Singapore** | DBS Bank Ltd<br>Standard Chartered Bank (Singapore) Limited | **Cyprus** | Citibank Europe Plc, Greece Branch |
| **Slovak Republic** | Citibank Europe plc, pobočka zahraničnej banky | | |

*West African Economic and Monetary Union (Benin, Burkina Faso, Ivory Coast, Guinea-Bissau, Mali, Niger, Senegal and Togo)

# TERMS OF INVESTMENT OF THE FUND

## General Terms of Investment

**governing the legal relationship between the investors and ODDO BHF Asset Management GmbH, Düsseldorf (the "Company") with respect to the funds managed by the Company in conformity with the UCITS Directive, applicable solely in conjunction with the Specific Terms of Investment drawn up by the Company for each individual UCITS fund.**

### SECTION 1 Basic information

1. The Company is a UCITS management company and is subject to the regulations of the German Investment Code (Kapitalanlagegesetzbuch – the "Investment Code").

2. The Company invests the money deposited with it in its own name for the common account of the investors in the assets permitted by the Investment Code, in accordance with the principle of risk-spreading, keeping them segregated from its own assets in the form of a UCITS fund. The object of the UCITS fund is limited to making capital investments using the monies invested in it in accordance with a defined investment strategy, such investments being managed on a collective basis; it may not conduct an operating business or undertake the active entrepreneurial management of the assets held.

3. The legal relationship between the Company and the investor is determined by the General Terms of Investment and Specific Terms of Investment of the UCITS fund and by the Investment Code.

### SECTION 2 Depositary

1. The Company appoints a credit institution as Depositary for the UCITS fund; the Depositary acts independently of the Company and in the sole interests of the investors.

2. The tasks and duties of the Depositary are determined by the depositary agreement made with the Company, the Investment Code and the Terms of Investment.

3. The Depositary may delegate custodial tasks to another enterprise (a "sub-custodian") in accordance with section 73 of the Investment Code. Further information can be found in the Prospectus.

4. The Depositary shall be liable to the UCITS fund or the investors for any loss of a financial instrument in custody within the meaning of section 72(1) no. 1 of the Investment Code by the Depositary or by a sub-custodian to whom the custody of financial instruments has been transferred in accordance with section 73(1) of the Investment Code. The Depositary shall not be liable if it can show that the loss is attributable to outside events of which the consequences were unavoidable in spite of all appropriate countermeasures. This does not affect more extensive claims arising under civil law on the basis of contracts or wrongful acts. The Depositary shall also be liable to the UCITS fund or the investors for all other losses they incur as a result of a negligent or wilful failure by the Depositary to fulfil its obligations under the Investment Code. The liability of the Depositary shall not be affected by any transfer of custodial duties pursuant to sub-section 3, sentence 1.

### SECTION 3 Fund management

1. The Company acquires and manages the assets in its own name for the common account of the investors with due knowledge, probity, care and conscientiousness. In performing its tasks, it acts independently of the Depositary and exclusively in the interests of the investors.

2. The Company is entitled to acquire the assets with the money deposited by the investors and to resell those assets and reinvest the proceeds elsewhere; it is further empowered to accomplish all other legal acts proceeding from the management of the assets.

3. The Company may neither grant loans of money nor assume obligations under a pledge or guarantee contract for the common account of the investors; it may not sell assets coming under sections 193, 194 and 196 Investment Code that do not belong to the UCITS fund at the time the transaction is entered into. This does not affect section 197 of the Investment Code.

### SECTION 4 Investment principles

The UCITS fund shall be invested directly or indirectly in accordance with the principle of risk-spreading. The Company shall only acquire assets for the UCITS fund that are expected to produce income and/or capital growth. It shall specify which assets may be acquired for the UCITS fund in the Specific Terms of Investment.

## SECTION 5 Securities

Except insofar as any further limitations are set in the Specific Terms of Investment, the Company may acquire securities for the account of the UCITS fund, subject to section 198 of the Investment Code, provided that

a) they are admitted to an exchange in a Member State of the European Union or another signatory state to the Agreement on the European Economic Area or are admitted to or included in another organised market in one of these states,

b) they are exclusively admitted to trading on an exchange outside the Member States of the EU and other signatory states to the EEA Agreement or are admitted to or included in another organised market outside those states, provided that the Federal Financial Supervisory Authority (Bundesanstalt für Finanzdienstleistungsaufsicht – "BaFin") has approved the choice of that exchange or organised market[6],

c) their admission to trading on an exchange in a Member State of the European Union or another signatory state to the Agreement on the European Economic Area or their admission to or inclusion in an organised market in a Member State of the European Union or another signatory state to the Agreement on the European Economic Area is to be applied for under their terms of issue, provided that the admission or inclusion of said securities takes place within one year of their issue,

d) their admission to trading on an exchange or their admission to or inclusion in an organised market outside the Member States of the European Union and the other signatory states to the Agreement on the European Economic Area is to be applied for under their terms of issue, provided that the choice of that exchange or organised market is approved by BaFin and that the admission or inclusion of the securities takes place within one year of their issue,

e) they are shares to which the UCITS fund is entitled by virtue of a bonus issue,

f) they are acquired through the exercise of subscription rights belonging to the UCITS fund,

g) they are units in closed-end funds that satisfy the criteria in section 193(1) sentence 1 no. 7 of the Investment Code,

h) they are financial instruments that satisfy the criteria in section 193(1) sentence 1 no. 8 of the Investment Code.

Securities may only be acquired in accordance with sentence 1 points a) to d) if the conditions of section 193(1) sentence 2 of the Investment Code are also met. Subscription rights founded on securities acquirable under this section 5 may also be acquired.

## SECTION 6 Money market instruments

1. Except insofar as further limitations are laid down in the Specific Terms of Investment, the Company may acquire for the account of the UCITS fund, subject to section 198 of the Investment Code, instruments that are customarily traded on the money markets as well as interest-bearing securities with a remaining maturity of no more than 397 days at the time of their acquisition for the fund, whose interest rate is regularly adjusted to market terms pursuant to their terms of issue at least once every 397 days or whose risk profile matches the risk profile of such securities (money market instruments).

Money market instruments may only be acquired for the UCITS fund if they

a) are admitted to an exchange in a Member State of the European Union or another signatory state to the Agreement on the European Economic Area, or are admitted to or included in an organised market in such a state,

b) are exclusively admitted to trading on an exchange outside the Member States of the EU and other signatory states to the EEA Agreement or are admitted to or included in another organised market outside those states, provided that BaFin has approved the choice of that exchange or organised market[7],

c) are issued or guaranteed by the European Union, the German Federal Government, a special fund (Sondervermögen) of the German Federal Government, a German Federal State, another Member State or another governmental, regional or local authority or the central bank of an EU Member State, by the European Central Bank or European Investment Bank, by a third country or, in the case of a country that is a federation, a member of the federation, or by an international public institution to which at least one EU Member State belongs,

d) are issued by a company whose securities are traded on the regulated markets referred to in a) and b) above, or

e) are issued or guaranteed by a credit institution subject to prudential supervision pursuant to the criteria laid down in European Union law, or by a credit institution subject to and complying with prudential rules considered by BaFin as equivalent to those laid down in European Union law, or

f) are issued by other issuers meeting the requirements of section 194(1) sentence 1 no. 6 of the Investment Code.

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[6] The list of approved exchanges and other organised markets pursuant to section 193(1) no. 2 and 4 of the Investment Code is published on BaFin's website (http://www.bafin.de).www.bafin.de).

[7] see previous footnote

2. Money market instruments within the meaning of paragraph 1 may only be acquired if they satisfy the requirements of section 194(2) and (3) of the Investment Code.

## SECTION 7 Bank deposits

The Company may hold bank deposits for the account of the UCITS fund with a maturity period of up to 12 months. The deposits, which shall be held in blocked accounts, may be held at a credit institution having its registered office in a Member State of the European Union or another signatory state to the Agreement on the European Economic Area; the deposits may also be held at a credit institution having its registered office in a third country whose prudential rules are considered by BaFin as equivalent to those laid down in European Union law. Unless otherwise provided for in the Specific Terms of Investment, bank deposits may be held in foreign currencies.

## SECTION 8 Fund units

1. Unless otherwise provided for in the Specific Terms of Investment, the Company may acquire units in investment funds coming under Directive 2009/65/EC (UCITS Directive) for the account of the UCITS fund. Units in other German funds or variable-capital investment companies and units in open-ended EU AIFs and foreign open-ended AIFs may be acquired provided that they satisfy the requirements of section 196(1) sentence 2 of the Investment Code.

2. The Company may only acquire units in German funds, German variable-capital investment companies, EU UCITS, open-ended EU AIFs and foreign open-ended AIFs where the terms of investment or articles of association of the investment management company, variable-capital investment company, EU investment fund, EU management company, foreign AIF or foreign AIF management company prevent them from investing more than 10% of their value in units in other German funds, variable-capital investment companies, open-ended EU investment funds or foreign open-ended AIFs.

## SECTION 9 Derivatives

1. Unless otherwise provided for in the Specific Terms of Investment, the Company may employ derivatives as per section 197(1) sentence 1 of the Investment Code and financial instruments with derivative components as per section 197(1) sentence 2 of the Investment Code in the course of its management of the UCITS fund. In order to determine – in line with the nature and scope of the derivatives and financial instruments with derivative components employed, and in accordance with section 197(2) of the Investment Code – the extent to which the market risk limit for the use of derivatives and financial instruments with derivative components has been reached, the Company may use either the simple or the qualified approach as defined in the German Regulation on Risk Management and Risk Measurement in the Use of Derivatives, Securities Loans and Repurchase Agreements in Investment Funds in Accordance with the Investment Code (Derivateverordnung – the "Derivatives Regulation") issued in relation to section 197(3) of the Investment Code; specific details are laid down in the Prospectus.

2. If the Company uses the simple approach, it may usually only use basic forms of derivatives and financial instruments with derivative components or combinations of these derivatives, financial instruments with derivative components and underlying assets permitted under section 197(1) sentence 1 of the Investment Code in the UCITS fund. Complex derivatives with underlying assets permitted under section 197(1) sentence 1 of the Investment Code may only be employed to a negligible degree. The weighted amount of the UCITS fund's market risk exposure as per section 16 of the Derivatives Regulation may not exceed the value of the fund at any time.

Basic forms of derivatives are:

a) Forward or futures contracts on underlying assets as per section 197(1) of the Investment Code, with the exception of fund units as per section 196 of the Investment Code;

b) Options or warrants on underlying assets as per section 197(1) of the Investment Code, with the exception of fund units as per section 196 of the Investment Code, and on forward or futures contracts as per a), where they have the following features:

ba) exercise is possible either throughout the term or at the end of the term and

bb) the option value at the time of exercise exhibits a linear dependency on the positive or negative difference between the strike price and the market price of the underlying asset and is zero if the difference has the opposite sign;

c) interest rate swaps, currency swaps and cross-currency swaps;

d) options on swaps as per c), provided that they exhibit the features described in b) under ba) and bb) (swaptions);

e) credit default swaps based on a single underlying asset (single name credit default swaps).

3. If the Company uses the qualified approach, it may – provided that there is a suitable risk management system – invest in any financial instruments with derivative components or derivatives that are derived from an underlying asset permitted under section 197(1) sentence 1 of the Investment Code.

In this case, the potential market risk exposure attributable to the UCITS fund ("exposure") may not exceed twice the potential market risk exposure for the associated reference asset as per section 9 of the Derivatives Regulation. Alternatively, the amount at risk may not exceed 20% of the value of the UCITS fund at any time.

4. In such transactions, the Company may not under any circumstances deviate from the investment principles and limits laid down in the Terms of Investment or the Prospectus.

5. The Company shall employ derivatives and financial instruments with derivative components for the purposes of hedging or efficient portfolio management or to achieve additional returns if and insofar as it believes this to be in the interests of investors.

6. In accordance with section 6 sentence 3 of the Derivatives Regulation, the Company may switch between the simple and the qualified approach at any time when determining the market risk limit for the use of derivatives and financial instruments with derivative components. Such a switch does not require authorisation from BaFin; however, the Company must promptly notify BaFin of the switch and announce it in the next half-yearly or annual report.

7. The Company shall have regard to the Derivatives Regulation when employing derivatives and financial instruments with derivative components.

## SECTION 10 Other investment instruments

Unless otherwise provided for in the Specific Terms of Investment, the Company may invest up to 10% of the value of the UCITS fund in Other Investment Instruments as per section 198 of the Investment Code.

## SECTION 11 Issuer limits and investment limits

1. In its management activities, the Company shall have regard to the limits and restrictions laid down in the Investment Code, the Derivatives Regulation and the Terms of Investment.

2. Securities and money market instruments issued by the same issuer, including where accepted under repurchase transactions, may be acquired up to a limit of 5% of the value of the UCITS fund; however, up to 10% of the value of the UCITS fund may be invested in such assets if this is provided for in the Specific Terms of Investment and the total value of securities and money market instruments issued by such issuers does not exceed 40% of the value of the UCITS fund. The issuers of securities and money market instruments are also to be taken into account within the limits specified in sentence 1 if the securities and money market instruments issued by them are acquired indirectly via other securities included in the UCITS fund which are linked to their performance.

3. The company may invest in bonds, bonded loans and money market instruments issued or guaranteed by the German Federal Government, a German Federal State, a Member State or regional or local authorities thereof, another signatory state to the Agreement on the European Economic Area, a third country or an international organisation to which at least one EU Member State belongs, up to a limit of 35% of the value of the UCITS fund in each case.

4. The Company may invest up to 25% of the value of the UCITS fund per issuer in

a) covered bonds (Pflandbriefe), municipal bonds and bonds issued by credit institutions domiciled in a Member State of the EU or another signatory state to the EEA Agreement prior to 8 July 2022, provided that the credit institution is subject to specific public-sector prudential supervision by virtue of a statutory requirement protecting the holders of such bonds and the funds obtained from the bond issue are invested in accordance with the statutory requirements throughout the lifetime of the issue in assets that sufficiently cover the ensuing liabilities and rank primarily for the repayments and interest due in the event of the issuer's default.

b) covered bonds within the meaning of Article 3 number 1 of Directive (EU) 2019/2162 of the European Parliament and of the Council of 27 November 2019 on the issue of covered bonds and covered bond public supervision and amending Directives 2009/65/EC and 2014/59/EU (OJ L 328 from 18 December 2019, p. 29), which were issued after 7 July 2022.

If the Company invests more than 5% of the value of the UCITS fund in bonds issued by the same issuer as per sentence 1, the total amount of such bonds may not exceed 80% of the value of the UCITS fund.

5. The limit in paragraph 3 may be exceeded in relation to securities and money market instruments issued by the same issuer in accordance with section 206(2) of the Investment Code where this is provided for in the Specific Terms of Investment and the relevant issuers are named. In such a case, the securities and money market instruments held for account of the UCITS fund must come from at least 6 different issues and no more than 30% of the value of the UCITS fund may be held in a single issue.

6. The Company may invest up to a limit of 20% of the value of the UCITS fund in bank deposits as per section 195 of the Investment Code at the same credit institution.

7. The Company must ensure that a combination of:

a) securities and money market instruments issued by a single institution,

b) deposits with the same institution and

c) attributable amounts for the counterparty risk on transactions entered into with that institution,

does not exceed 20% of the value of the UCITS fund. Sentence 1 applies for the issuers and guarantors referred to in paragraphs 3 and 4 with the proviso that the Company must ensure that a combination of the assets and attributable amounts referred to in sentence 1 does not exceed 35% of the value of the UCITS fund. The individual upper limits continue to apply in both cases.

8. The bonds, bonded loans and money market instruments referred to in paragraphs 3 and 4 shall not be taken into account when applying the 40% limits specified in paragraph 2. Notwithstanding the rule in paragraph 7, the limits referred to in paragraphs 2 to 4 and paragraphs 6 to 7 may not be aggregated.

9. The Company may invest in the units of a single investment fund as per section 196(1) of the Investment Code up to a limit of 20% of the value of the UCITS fund. The Company may invest in the units of investment funds as per section 196(1) sentence 2 of the Investment Code up to a limit of 30% of the value of the UCITS fund. The Company may not acquire for the account of the UCITS fund more than 25% of the units issued by another open-ended German, EU or foreign investment fund that is invested in accordance with the principle of risk-spreading in assets within the meaning of sections 192 to 198 of the Investment Code.

## SECTION 12 Merger

1. Pursuant to sections 181 to 191 of the Investment Code, the Company may:

a) transfer all assets and liabilities of this UCITS fund to another existing UCITS fund, a new UCITS fund to be established by way of the transfer, an EU UCITS or a UCITS variable-capital investment company;

b) absorb all assets and liabilities of another open-ended retail investment fund into this UCITS fund.

2. The merger shall require authorisation by the responsible supervision body. The details of the procedure can be found in sections 182 to 191 of the Investment Code.

3. The UCITS fund may only be merged with a retail investment fund that is not a UCITS if the absorbing or newly established fund remains a UCITS. The merger of an EU UCITS into the UCITS fund may also be carried out in accordance with Article 2(1)(p)(iii) of Directive 2009/65/EC.

## SECTION 13 Securities lending

1. The Company may grant for the account of the UCITS fund a loan of securities, terminable at any time, to a securities borrower for a reasonable fee upon the furnishing of adequate collateral in accordance with section 200(2) of the Investment Code. The sum of market value of the securities to be transferred and the market value of any other securities transferred for account of the UCITS fund to the same borrower, including any other businesses in the borrower's group within the meaning of section 290 of the German Commercial Code (Handelsgesetzbuch), may not exceed 10% of the value of the UCITS fund.

2. If the borrower provides cash collateral for the transferred securities, the cash deposits must be held in blocked accounts as per section 200(2) sentence 3 no. 1 of the Investment Code. Alternatively, the Company may opt to invest this cash in the currency of the original deposit in the following assets:

a) high-quality debt securities issued by the German Federal Government, a German Federal State, the European Union, a Member State of the European Union or regional or local authorities thereof, another signatory state to the Agreement on the European Economic Area or a third country,

b) short-term money market funds in accordance with the Guidelines issued by BaFin on the basis of section 4(2) of the Investment Code or

c) a reverse repurchase transaction with a credit institution that guarantees the return of the accrued balance at any time.

Income from the investment of collateral accrues to the UCITS Fund.

3. The Company may also avail itself of a brokerage and settlement system for securities lending organised by a custodian or central securities depository which deviates from the requirements of section 200 (1) sentence 3 of the Investment Code, if the right to terminate the agreement at any time as per paragraph 1 is not deviated from.

4. Unless otherwise provided for in the Specific Terms of Investment, the Company may also grant securities loans in respect of money market instruments and fund units, insofar as these assets are eligible for the UCITS fund. The rules under paragraphs 1 to 3 shall apply to such transactions accordingly.

## SECTION 14 Repurchase transactions

1. The Company may enter into securities repurchase transactions terminable without notice within the meaning of section 340b(2) of the German Commercial Code for the account of the UCITS fund in exchange for a fee on the basis of standardised framework agreements with credit institutions or financial services institutions.

2. The subject of the repurchase transactions must be securities that are eligible for the UCITS fund under the Terms of Investment.

3. The repurchase transactions may have a term of not more than 12 months.

4. Unless otherwise provided for in the Specific Terms of Investment, the Company may also enter into repurchase transactions in relation to money market instruments and fund units, insofar as these assets are eligible for the UCITS fund. The rules under paragraphs 1 to 3 shall apply to such transactions accordingly.

## SECTION 15 Borrowing

The Company may take out short-term loans of up to 10% of the value of the UCITS fund for the common account of the investors, provided that the loan is subject to normal market conditions and the Depositary consents to the borrowing.

## SECTION 16 Units

1. UCITS fund units are made out to the bearer and are certificated in the form of unit certificates or issued as electronic unit certificates. Electronic unit certificates may be replaced, at any time and without the investor's consent, by certificated units of identical content. Certificated units may be replaced, at any time and without the investor's consent, by a central securities register security of identical content. A certificated or electronic unit certificate may only be replaced by a crypto fund unit of identical content with the express consent of the investor. The unit certificates may be recorded in the same register as a mixed holding consisting partly of a collective registration and partly of securities issued by means of a physical certificate or securities in individual registration in the same register if this is indicated in the register for collective registration; in which case these parts shall be deemed to form a single collective holding.

2. Certificated unit certificates are certificated in the form of a global certificate; the issue of individual certificates is excluded. On purchase of a UCITS fund unit the investor acquires a co-ownership share of the global certificate. Units are transferable, unless otherwise specified in the Specific Terms of Investment.

3. Electronic unit certificates are registered in an electronic securities register. Registration as holder can take the form of

a) collective registration for a central securities depositary or depositary, or

b) individual registration for a natural person and/or legal entity and/or partnership with legal capacity, who/which holds the electronic security as the beneficiary.

An individual registration may be converted into a collective registration at the request of the holder. On purchasing a unit of the UCITS fund in the form of a collective registration, the investor is considered a co-owner by fractions of the registered electronic unit certificate.

4. If electronic unit certificates are registered in a crypto securities register, these are crypto fund units. For crypto fund units, the registration body is the Depositary or a company appointed by it. It is permitted to change the registration body at any time without the investor's consent. The transfer of a crypto fund unit to another electronic securities register requires the consent of all holders recorded in the register or the approval of BaFin.

5. Units may have varying features, particularly in terms of the income distribution policy, the entry charge, the exit charge, the currency of the unit value, the management fee, minimum investment amount, form of issue or a combination of these features ("unit classes"). The details are laid down in the Specific Terms of Investment.

6. There is no right to an individual certificate. If, in the past, physical securities were issued for the UCITS fund which were not held in collective custody at an institution referred to in section 97(1) sentence 2 of the Investment Code by the end of 31 December 2016, said physical securities shall be void with effect from the end of 31 December 2016. Investors' units shall instead be certificated in a global certificate and credited to a special custody account at the Depositary. Any person submitting a void physical security to the Depositary may demand that a corresponding unit be credited to a custody account held by him for his account. Physical securities held in collective custody at an institution referred to in section 97(1) sentence 2 of the Investment Code as of the end of 31 December 2016 may be transferred to a global certificate at any time.

## SECTION 17 Issue and redemption of units, suspension

1. The number of units that can be issued is in principle unlimited. The Company reserves the right to cease the issue of units either temporarily or permanently.

2. Units may be purchased from the Company, the Depositary or through the brokerage of third parties. The Specific Terms of Investment may provide that units may only be purchased and held by certain investors.

3. Unless otherwise provided for in the Specific Terms of Investment or below, investors can request the redemption of their units by the Company. The Company is obliged to redeem the units at the applicable redemption price for the account of the UCITS fund. The redemption agent is the Depositary.

4. The Company reserves the right to suspend the issue and redemption of units in accordance with section 98(2) KAGB in the event of exceptional circumstances in which it appears necessary to do so, having regard to the interests of the investors.

5. The Company will inform the investors of the suspension and the resumption of redemptions by way of an announcement in the Bundesanzeiger (German Federal Gazette) and also in a financial or daily newspaper with a sufficiently wide circulation or in the electronic news media referred to in the Prospectus. Investors must be informed of the suspension and resumption of unit redemptions by means of a durable medium immediately after the announcement in the German Federal Gazette.

## SECTION 18 Spin-off of illiquid investments

The Company may, in the interests of the investors in the UCITS fund, spin off illiquid investments.

## SECTION 19 Liquidity management tools

1. The Company uses at least two of the following liquidity management tools. It determines in the Specific Terms of Investment which liquidity management tools are to be used for the UCITS fund:

a) Restriction on redemptions

The Company may temporarily and partially restrict the right of investors to redeem their units such that they may only redeem a certain portion of their units.

b) Extension of the redemption notice period

The Company may extend the redemption notice period.

c) Redemption fee

The Company may charge a redemption fee within a predetermined range. This fee is paid by investors upon the redemption of units in the UCITS fund, taking into account liquidity costs, and ensures that investors who remain in the UCITS fund are not unfairly disadvantaged.

d) Swing pricing or dual pricing

The Company may use swing pricing or dual pricing. Swing pricing is a predetermined mechanism whereby the net asset value of the UCITS fund's units is adjusted by applying a "swing factor" that takes liquidity costs into account. Dual pricing is a predetermined mechanism whereby the issue and redemption prices for the UCITS fund's units are set by adjusting the net asset value per unit by a factor that reflects liquidity costs.

e) Anti-dilution fee

The Company may charge an anti-dilution fee, payable to the UCITS fund by an investor upon the issue or redemption of units, which compensates the UCITS fund for the liquidity costs incurred as a result of the scale of such a transaction and ensures that other investors are not unfairly disadvantaged.

f) Distributions in kind

The Company may transfer assets held by or on behalf of the UCITS fund to a professional investor in lieu of paying out the redemption price in order to execute the redemption of units.

2. In addition to the tools referred to in paragraph 1, the Company may also use other tools to manage the liquidity of the UCITS fund. The conditions for the use of such tools are set out in the Specific Terms of Investment.

## SECTION 20 Issue and redemption prices

1. Unless otherwise provided for in the Specific Terms of Investment, in order to determine the issue and redemption price of the units, the net asset value (sum of the fair market values of the assets belonging to the UCITS Fund, less borrowings and other

liabilities) is determined and divided by the number of units in issue (the "unit value"). If different unit classes are introduced for the UCITS fund in accordance with section 16(5), the unit value and issue and redemption prices are determined separately for each class.

The assets are valued in accordance with sections 168 and 169 of the Investment Code and the German Investment Accounting and Valuation Regulation (Kapitalanlage-Rechnungslegungs- und -Bewertungsverordnung).

2. The issue price is equal to the unit value of the UCITS fund plus, where applicable, an entry charge as per section 165(2) no. 8 of the Investment Code, which is to be laid down in the Specific Terms of Investment. The redemption price is equal to the unit value of the UCITS fund less, where applicable, an exit charge as per section 165(2) no. 8 of the Investment Code, which is to be laid down in the Specific Terms of Investment. To the extent provided for in the Specific Terms of Investment, additional fees may apply in connection with liquidity management tools.

3. The settlement date for unit subscription and redemption orders shall be no later than the valuation day following the receipt of the unit subscription or redemption order, unless otherwise provided for in the Specific Terms of Investment. If the Company suspends the redemption of units in accordance with section 17(4), the settlement day for these redemption orders shall be the valuation date following the resumption of redemptions.

4. The net asset value, the unit value as well as the issue and redemption prices are calculated Monday to Friday except on New Year's Day, Shrove Monday, Good Friday, Easter Monday, May Day, Ascension Day, Whit Monday, Corpus Christi, German Unity Day, All Saints' Day, Christmas Eve, Christmas Day, Boxing Day and New Year's Eve ("valuation days"). The Specific Terms of Investment may state other days that are not valuation days.

## SECTION 21 Charges

The Specific Terms of Investment set out the expenses and fees payable to the Company, Depositary and third parties that may be charged to the UCITS fund. For fees within the meaning of sentence 1, the Specific Terms of Investment shall also state the payment method, amount and basis of calculation.

## SECTION 22 Accounting

1. The Company shall issue an annual report, including a statement of income and expenditure, in accordance with section 101(1), (2) and (4) of the Investment Code no later than four months after the end of the financial year of the UCITS fund.

2. The Company shall issue a half-yearly report in accordance with section 103 of the Investment Code no later than two months after the midpoint of the financial year.

3. If the right to manage the UCITS fund is transferred during the financial year to another investment management company or the UCITS fund merges during the financial year into another UCITS fund, a UCITS variable-capital investment company or an EU UCITS, the Company shall draw up an interim report as at the transfer date that meets the requirements for an annual report as per paragraph 1.

## SECTION 23 Termination and winding-up of the UCITS fund by the Company

1. The Company may terminate its management of the UCITS fund, to be announced in the German Federal Gazette and also in the annual or half-yearly report. The investors shall be promptly informed via a durable medium that such notice has been given. Upon announcement of termination pursuant to sentence 1, the Company is obliged to wind up the UCITS fund and distribute the proceeds to the investors.

2. Investment limits no longer apply during the winding-up process. The obligation to manage the UCITS fund shall only cease once the Company has wound up the UCITS fund.

3. On the date on which it winds up the UCITS fund, the Company must prepare a liquidation report that complies with the requirements for an annual report as set out in section 22(1).

## SECTION 24 Winding-up of the UCITS fund by the Depositary in cases other than termination by the Company

1. In the event that the Depositary winds up and distributes the UCITS fund whilst safeguarding the interests of the investors in accordance with section 100(2) KAGB, the Depositary shall be entitled to remuneration for its activities in winding-up the UCITS fund and to reimbursement of the expenses necessitated by the winding-up. Investment limits no longer apply during the winding-up process. With BaFin's approval, the Depositary may refrain from winding-up and distribution, and transfer the management of the UCITS fund to another investment management company in accordance with the previous Terms of Investment.

2. If the UCITS fund is wound up by the Depositary, the Depositary must publish a liquidation report annually, and on the date on which the winding-up ends, which conforms to the requirements for an annual report as set out in section 22(1).

## SECTION 25 Change of investment management company and depositary

1. The Company may transfer the right to manage the UCITS fund and dispose over its assets to another investment management company. The transfer requires prior approval from BaFin.

2. The authorised transfer will be announced in the German Federal Gazette and in the annual or half-yearly report of the Fund as well as in the electronic information media designated in this Prospectus. The transfer shall take effect no earlier than three months after its announcement in the German Federal Gazette.

3. The Company may change the Depositary of the UCITS fund. The change requires the approval of BaFin.

## SECTION 26 Amendments to the Terms of Investment

1. The Company may amend the Terms of Investment.

2. Amendments to the Terms of Investment require prior approval from BaFin.

3. All intended amendments shall be announced in the German Federal Gazette and in a financial or daily newspaper with a sufficiently wide circulation or in the electronic news media referred to in the Prospectus. Any public notice as per sentence 1 must refer to the intended amendments and the date they take effect. In the event of amendments to charges within the meaning of section 162(2) no. 11 of the Investment Code that are detrimental to investors or amendments to material investor rights that are detrimental to investors, as well as in the event of amendments to the investment principles of the UCITS fund within the meaning of section 163(3) of the Investment Code, the essential content of the planned amendments to the investment terms and conditions and their background shall be sent to the investors in a comprehensible form by way of a durable data medium together with the announcement as per sentence 1. In the event of amendments to the previous investment principles, the investors must also be informed of their rights in accordance with section 163(3) of the Investment Code.

4. The amendments will take effect no earlier than the day after their announcement in the German Federal Gazette, or no earlier than four weeks after the announcement in the case of amendments to costs or the investment principles. With the approval of BaFin, an earlier date may be specified if an amendment relates to a change in costs and such change is beneficial to the investor.

## SECTION 27 Place of performance

The place of performance is the Company's registered office.

## SECTION 28 Dispute resolution proceedings

The Company undertakes to participate in dispute resolution proceedings before a consumer arbitration body[8]. In the event of disputes, consumers may call upon the Investment Funds Ombudsman operated by the German Investment Funds Association (BVI Bundesverband Investment und Asset Management e.V.) as the competent consumer arbitration body. The Company participates in arbitration proceedings before this arbitration body[9].

Its contact details are as follows: Büro Ombudsstelle des BVI Bundesverband Investment und Asset Management e.V., Unter den Linden 42, 10117 Berlin, www.ombudsstelle-investmentfonds.de.

[8] Section 36(1) no. 1 of the Consumer's Dispute Settlement Act

[9] Section 36(1) no. 2 of the Consumer's Dispute Settlement Act

# Specific Terms of Investment

**governing the legal relationship between the investors and ODDO BHF Asset Management GmbH, Düsseldorf (the "Company") with respect to ODDO BHF German Equities, a fund in conformity with the UCITS Directive managed by the Company, applicable only in conjunction with the General Terms of Investment drawn up by the Company for this Fund.**

## INVESTMENT PRINCIPLES AND INVESTMENT LIMITS

### SECTION 1 Assets

The Company may acquire the following assets for the UCITS Fund:

1. Transferable securities as per section 5 of the General Terms of Investment,

2. Money market instruments as per section 6 of the General Terms of Investment,

3. Bank deposits as per section 7 of the General Terms of Investment.

4. Fund units as per section 8 of the General Terms of Investment,

5. Derivatives as per section 9 of the General Terms of Investment,

6. Other investment instruments as per section 10 of the General Terms of Investment.

### SECTION 2 Investment limits

1. At least 85% of the assets (excluding bank deposits) in the portfolio have – taking into account the weighting of the individual assets – an ESG rating. As part of our sustainable 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.

The following issuers are excluded: issuers who

- manufacture or distribute non-conventional weapons;

- are involved in the production of tobacco;

- are in violation of the United Nations Global Compact (UNGC) principles or the Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises.

Issuers are also excluded if they exceed a specific turnover threshold in the following activities:

- coal mining or coal-fired power generation; or

- the extraction and production of non-conventional oil and gas (shale oil and gas and oil sands).

Other issuers may also be excluded as part of the sustainable investment strategy.

2. At least 51% of the value of the UCITS Fund must be invested in equities of German issuers. Securities held under repurchase contracts are to be included in the total for the purposes of the investment limits as per section 206(1) to (3) of the Investment Code. Taking into account the investment focus pursuant to paragraph 1, no more than 40% of the value of the UCITS Fund may be invested in securities of foreign issuers.

3. The Company may invest a total of up to 49% of the value of the UCITS Fund in money market instruments denominated in euro as per section 6 of the General Terms of Investment. Money market instruments held under repurchase contracts are to be included in the total for the purposes of the investment limits as per section 206(1) to (3) of the Investment Code.

4. Securities and money market instruments issued by the same issuer may be acquired in excess of the 5% limit up to a total of 10% of the value of the UCITS Fund, provided that the total value of securities and money market instruments issued by such issuers does not exceed 40% of the value of the UCITS Fund.

5. The Company may invest a total of up to 49% of the value of the UCITS Fund in bank deposits denominated in euro as per section 7(1) of the General Terms of Investment.

6. The Company may use derivatives in its management of the UCITS Fund. For purposes of hedging, efficient portfolio management and achieving additional returns, the Company may use derivatives if and to the extent that it considers this to be in the interest of investors.

7. The Company may invest a total of up to 10% of the UCITS Fund's value in fund units as per section 8 of the General Terms of Investment:

a) for the UCITS Fund, units may be acquired up to a limit of 10% in UCITS or EU-UCITS which, pursuant to their terms of investment, predominantly invest in equities (equity funds),

b) for the UCITS Fund, units may be acquired up to a limit of 10% in UCITS or EU-UCITS which, pursuant to their terms of investment, predominantly invest in interest-bearing securities (bond funds),

c) for the UCITS Fund, units may be acquired up to a limit of 10% in UCITS or EU-UCITS which meet the criteria of the Guideline establishing fund categories pursuant to section 4(2) of the Investment Code for short-term money market funds or money market funds.

Fund units held under repurchase contracts are to be included in the total for the purposes of the investment limits as per sections 207 and 210(3) of the Investment Code.

8. Subject to the investment limits laid down in paragraphs 1 to 7 above, more than 50 per cent of the UCITS Fund's assets (the amount of the assets is determined by the value of the investment fund's assets without taking liabilities into account) may also be invested in such equity investments (within the meaning of section 2(8) of the Investment Tax Act) which may be acquired for the UCITS Fund pursuant to these Terms of Investment. In the case of target investment funds, pursuant to section 2(6) sentences 2 and 3 of the German Investment Tax Act, the basis is the actual equity participation rates published each valuation day, where available.

### SECTION 3 Investment committee

The Company may take advice from an investment committee when selecting assets to be acquired or disposed of for the UCITS fund.

## UNIT CLASSES

### SECTION 4 Unit classes

1. Different unit classes within the meaning of section 16(5) of the General Terms of Investment may be formed for the UCITS fund which may differ in terms of the income distribution policy, the entry charge, the currency of the unit value including the use of currency hedging transactions, the management fee, the depositary fee, the minimum investment amount, the form of issue or a combination of these features. Unit classes may be issued at any time at the Company's discretion.

2. Existing unit classes shall be listed individually both in the Prospectus and in the annual and semi-annual reports. The features defining each unit class (income distribution policy, entry charge, currency of the unit value, management fee, depositary fee, minimum investment amount, form of issue or combination of these features) shall be described in the Prospectus and in the annual and half-yearly report.

3. It is permitted to enter into currency hedging transactions exclusively in favour of a single currency unit class. For currency unit classes with currency hedging in favour of the currency of this unit class (reference currency), the Company may, regardless of section 9 of the General Terms of Investment, use derivatives on exchange rates or currencies within the meaning of section 197(1) of the Investment Code for the purpose of avoiding losses of unit value due to foreign exchange losses on UCITS Fund assets that are not denominated in the reference currency of the unit class.

4. The unit value shall be calculated separately for each unit class, in the process of which the set-up costs of new unit classes, distribution of income (including any taxes to be paid from the Fund's assets), management fees, depositary fees and the results of currency hedging transactions relating to a particular unit class, including any income equalisation where relevant, shall be exclusively attributed to the unit class in question.

## UNITS, ISSUE PRICE, REDEMPTION PRICE, UNIT REDEMPTIONS, CHARGES

### SECTION 5 Units

1. Investors have a fractional co-ownership interest in the UCITS Fund's assets in proportion to the number of units they hold. Units where the Depositary name is given as Berliner Handels- und Frankfurter Bank remain valid. This is without prejudice to section 16(6) of the General Terms of Investment.

2. The Company is entitled to remove an investor for cause. Cause exists, in particular, if

a) the investor is a U.S. Person (i.e. a natural person resident in the U.S.A. or a partnership or corporation established in accordance with the laws of the U.S.A. or any U.S. state, territory or possession) or a U.S. taxpayer or

b) the name of the investor is on the EU consolidated list of persons, groups and entities subject to financial sanctions.

Upon receipt of the notice of termination, the investor is obliged to return the units received to the Company without delay. The Company is obliged to redeem the units at the applicable redemption price for the account of the UCITS fund.

## SECTION 6 Issue and redemption price, order cut-off time, fees

1. In determining the net asset value for calculating the issue and redemption price, the Company uses partial swing pricing. This means that, notwithstanding section 20(1), sentence 1 of the General Terms of Investment, the modified net asset value per unit must be calculated in addition to the net asset value. To this end, a swing factor is taken into account when units are issued and redeemed. The swing factor shall include the liquidity costs arising on the net excess of unit issue or redemption requests and is expressed as a percentage of the net asset value of the UCITS fund. It is taken into account if the net excess is above a threshold set by the Company.

The issue and redemption price is based on the modified net asset value per unit instead of the net asset value per unit. The Company explains in the Prospectus the procedure by which the modified net asset value per unit is calculated.

2. For each unit class, the entry charge is up to 5% of the unit value. The Company is free to charge a lower entry charge or to refrain from charging an entry charge for one or more unit classes. No exit charge is levied.

2. In variance to section 20(3) of the General Terms of Investment, the settlement date for unit subscription and redemption orders shall be no later than the next-but-one valuation day after the unit subscription or redemption order is received.

3. Orders for the issue and redemption of units received by the Company or Depositary by 2:00 p.m. at the latest ("order cut-off time") on a valuation day will be settled on the basis of the unit value for this valuation day, which is calculated on the next valuation day. Orders that reach the Company or the Depositary after 2:00 p.m. are settled on the basis of the unit value for the following valuation day, which is calculated on the next valuation day but one.

4. A valuation day is each day on which a net asset value is calculated pursuant to section 20(4) of the General Terms of Investment.

## SECTION 7 Charges

The following applies to all fees calculated pro rata:

For calendar days that are valuation days within the meaning of section 20(4) of the General Terms of Investment, the net asset value or unit value determined for the valuation day forms the basis of calculation. For a calendar day that is not a valuation day within the meaning of section 20(4) of the General Terms of Investment, the net asset value or unit value determined for the last preceding valuation day forms the basis of calculation.

1. Fees payable to the Company are as follows:

a) The Company receives an annual fee for the UCITS Fund's management of up to 2% of the average net asset value of the UCITS Fund in the accounting period. The average net asset value is calculated using the individual net asset values applicable to the calendar days in question. It is entitled to charge monthly pro rata advances on this amount. The management fee may be withdrawn from the UCITS Fund at any time. The Company is free to charge a lower management fee for one or more unit classes. The Company shall state the management fee charged in the Prospectus and in the annual and half-yearly reports.

b) Where the Company initiates, arranges and executes securities lending and repurchase transactions for the account of the UCITS Fund, the Company receives a customary fee of up to one third of the gross income from these transactions. Costs arising in connection with the preparation and execution of such transactions, including fees payable to third parties, are borne by the Company.

2. Fees payable to third parties are as follows:

a) The Company pays an annual fee from the UCITS fund for market risk and liquidity risk measurement as per the German Derivatives Regulation (Derivateverordnung) of up to 0.1% of the average net asset value of the UCITS fund in the accounting period. The average net asset value is calculated using the individual net asset values applicable to the calendar days in question. The fee is not covered by the management fee pursuant to paragraph 1a) and is thus additionally charged to the UCITS fund.

b) The Company pays an annual fee from the UCITS fund for the employment of a collateral manager ("collateral manager fee") of up to 0.2% of the average net asset value of the UCITS fund in the accounting period. The average net asset value is calculated using the individual net asset values applicable to the calendar days in question. The Company is entitled to charge monthly pro rata advances on this amount. The Company is free to charge a lower fee or no fee at all. The fee is not covered by the management fee pursuant to paragraph 1a) and is thus additionally charged to the UCITS fund.

3. Depositary

The Depositary receives an annual fee from the UCITS fund for its services of up to 0.1% of the average net asset value of the UCITS fund in the accounting period, subject to a minimum of EUR 5,000 p.a. and taking paragraph 4 into account. The average net asset value is calculated using the individual net asset values applicable to the calendar days in question. It is entitled to charge monthly pro rata advances on this amount. The depositary fee may be withdrawn from the UCITS Fund at any time. The Depositary is free to charge a lower fee for one or more unit classes. The Company shall state the depositary fee charged in the Prospectus and in the annual and half-yearly reports.

4. Annual maximum amount permitted as per paragraphs 1(a), 2, 3 and 5(l)

The total amount withdrawn annually from the UCITS Fund pursuant to paragraphs 1(a), 2 and 3 by way of fees and pursuant to paragraph 5(l) for reimbursement of expenses may be up to 2.49% of the average net asset value of the UCITS Fund in the accounting period. The average net asset value is calculated using the individual net asset values applicable to the calendar days in question.

5. Expenses

In addition to the above fees, the following expenses are borne by the UCITS Fund:

a) normal bank charges for custody accounts and bank accounts, including where relevant normal bank charges for the custody of foreign assets abroad;

b) the costs of printing and distributing the legally prescribed marketing documents intended for investors (annual and half-yearly reports, prospectuses, Key Information Documents);

c) the costs of publicising the annual and half-yearly reports, the issue and redemption prices and, where applicable, any distributions or income reinvestments and the winding-up report;

d) the costs of the audit of the UCITS Fund performed by the UCITS Fund's auditor;

e) the costs of the assertion and enforcement by the Company of legal claims for the account of the UCITS Fund and of defence by the Company against claims made against the Company to the detriment of the UCITS Fund;

f) fees and charges levied by government bodies in relation to the UCITS Fund;

g) the costs of legal and tax advice with regard to the UCITS Fund;

h) costs and any fees that may be incurred in connection with the acquisition and/or use or setting of a benchmark or benchmark index;

i) the costs of appointing proxy voters;

j) costs for the analysis by third parties of the UCITS Fund's investment performance;

k) the costs of creating and using a durable medium provided for by contract or law, except in the case of notices about mergers of investment funds or notices about measures in connection with breaches of investment limits or calculation errors in the determination of unit values;

l) the costs of the provision by third parties of analysis material or services in relation to one or more financial instruments or other assets or in relation to the issuers or potential issuers of financial instruments or in close connection with a particular industry or market, up to an amount of 0.09% p.a. of the average net asset value of the UCITS Fund in the accounting period. The average net asset value is calculated using the individual net asset values applicable to the calendar days in question;

m) costs arising in connection with the acquisition and disposal of assets (transaction costs);

n) the costs of publicising the basis of assessment and the notice that the tax information was determined in accordance with the provisions of German tax law;

o) taxes, in particular VAT, incurred in connection with the expenses mentioned in letters a) to n) above and to be reimbursed by the UCITS fund.

6. Acquisition of investment fund units

The Company must disclose in the annual and half-yearly report the entry charge and exit charge amounts that were charged to the UCITS Fund in the period under review for the subscription and redemption of units within the meaning of section 1(4). For the acquisition of units managed directly or indirectly by the Company itself or another company with which the Company is associated by way of a substantial direct or indirect holding, the Company or the other company may not charge any entry or exit charges for subscription and redemption. The Company must disclose in the annual and half-yearly report the fee that was charged to the UCITS Fund by the Company itself, by another (investment) management company or another company with which the Company is associated by way of a substantial direct or indirect holding for managing the units held in the UCITS Fund.

## TERMS OF INVESTMENT

# INCOME DISTRIBUTION POLICY AND FINANCIAL YEAR

## SECTION 8 Income distribution policy

### Distribution

1. For unit classes that distribute their income, the Company generally distributes all interest, dividends and other income earned for the account of the UCITS Fund during the financial year, minus expenses and taking account of the income equalisation process. Realised gains on disposals may also be distributed, taking account of the income equalisation process. Furthermore, available bank deposits as per section 1(3) may also be distributed out of the UCITS Fund (Addition the UCITS Fund/Capital distribution).

2. Distributable pro rata income as per paragraph 1 may be carried forward for distribution in later financial years, provided that the total income carried forward does not exceed 15% of the value of the UCITS Fund at the end of the financial year. Income from short accounting periods may be carried forward in full.

3. Pro rata income may be partially carried forward, and in exceptional circumstances carried forward in full, for reinvestment in the UCITS Fund in the interests of preserving capital.

4. Distributions are made annually within four months of the end of the financial year.

5. Interim distributions are permitted.

### Reinvestment

For unit classes that reinvest their income, the Company reinvests all interest, dividends and other income earned for the account of the UCITS Fund during the financial year, minus expenses and taking account of the income equalisation process, as well as all gains on disposal for the unit classes in question, allocating the reinvested income proportionately to each unit.

## SECTION 9 Financial year

The financial year of the UCITS Fund begins on 1 October and ends on 30 September of the following year.

## SECTION 10 Redemption notice period and restriction on redemptions

The Company may temporarily restrict the redemption of units on a pro rata basis (restriction on redemptions) if, on a given valuation day, investors' redemption requests amount to at least 15% of the net asset value (threshold). A description concerning the possibility of and conditions for a restriction on redemptions can be found in the Prospectus.

**ODDO BHF Asset Management GmbH**

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40217 Düsseldorf
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Postfach 105354, 40044 Düsseldorf

Tel.: +49 (0)211 23924-01

Frankfurt am Main branch
Gallusanlage 8
60329 Frankfurt am Main
Postal address:
Postfach 110761, 60042 Frankfurt am Main

Tel.: +49 (0)69 92050-0
Fax: +49 (0)69 92050-103

Subscribed and paid-up capital:
EUR 10.3 million

ODDO BHF Asset Management GmbH is 100% owned by ODDO BHF SE

Court of registration: Düsseldorf, HRB 11971




## DEPOSITARY

The Bank of New York Mellon SA/NV,
Asset Servicing, Frankfurt am Main branch
Tower 185, Friedrich-Ebert-Anlage 35-37
60327 Frankfurt am Main

Liable capital:
EUR 3.2 billion

## MANAGEMENT

**Nicolas Chaput**
CEO
President of ODDO BHF Asset Management SAS

**Dr. Stefan Steurer**

**Bastian Hoffmann**

Also Chairman of the Board of Directors of ODDO BHF Asset Management Lux

## SUPERVISORY BOARD

**Werner Taiber**
Chairman

Düsseldorf, Chairman of the Supervisory Board of ODDO BHF SE, Frankfurt am Main

**Noémie Ellezam**

Paris, Chief Marketing and Data Officer of ODDO BHF SCA, Paris

**Christophe Tadié**

Frankfurt am Main, Director of ODDO BHF SE, Frankfurt am Main and of ODDO BHF SCA, Paris

**Dr. Alexander Ilgen**

Frankfurt am Main, Director of ODDO BHF SE, Frankfurt am Main and of ODDO BHF SCA, Paris

**Thomas Seale**

Luxembourg, independent member of the Supervisory Board

**Olivier Marchal**

Suresnes, Chairman of Bain & Company France, Paris and Chairman of the Supervisory Board of ODDO BHF SCA, Paris

**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.

# *Environmental and/or social characteristics*

Product name: ODDO BHF German Equities

Legal Entity Identifier (LEI): 529900ZQYZQ8H2PF7W26

DOES THIS FINANCIAL PRODUCT HAVE A SUSTAINABLE INVESTMENT OBJECTIVE?

| ☐ Yes | ☒ No |
|---|---|
| ☐ It will make a minimum of **sustainable investments with an environmental objective**: N/A<br>☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy<br>☐ in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy<br>☐ It will make a minimum of **sustainable investments with a social objective**: N/A | ☒ 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 20.0% of sustainable investments.<br>☒ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy<br>☒ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy<br>☐ with a social objective<br>☐ It promotes E/S characteristics but **will not make any sustainable investments.** |

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 include 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?

**Sustainability indicators** measure how the sustainable objectives of this financial product are attained.

The Fund promotes: (1) climate change adaptation (i.e. reducing carbon emissions); (2) natural capital (i.e. protecting biodiversity and reducing 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/quality) through a combination of exclusion criteria and an external ESG score from MSCI that reflects consideration of these environmental and social characteristics. ESG criteria are considered using an approach that can be broken down into two stages:

1. 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 gambling and adult entertainment industries are also excluded.

2. stage: ESG rating
The ESG rating of securities to be allocated to the Fund is considered. The basis is the ESG ratings of data provider MSCI ESG 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 ratings for issuers described above, MSCI also assigns ESG ratings for funds.

In the event that an issuer does not have an MSCI ESG rating, there are two possibilities:
- Either the ESG rating assigned by the Company to the relevant security of the issuer is used, or
- if the Company has not assigned an ESG rating to that issuer's securities, the Company can substitute an ESG rating, determined among other things by an average based on the ESG ratings of MSCI according to sector of activity, size of the issuer, and the issuer's place of business. This substitute rating is no longer used if MSCI ESG Research generates its own ESG rating for the issuer concerned or if an ESG rating 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 rating.

The ESG ratings influence the portfolio structure of the Fund, which aims to achieve a better weighted average ESG rating than its investment universe. In the event of a deterioration in the ESG ratings of the securities in which the Fund invests or a change in the ESG rating methodology that affects the average ESG rating of the Fund, the average ESG rating 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 an ESG rating, taking into account the weighting of the individual assets.

A benchmark index has not been defined to assess whether the environmental and/or social characteristics promoted by the financial product have been attained.

## 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 attainment of the characteristics:
- The Fund's average weighted average ESG score, used to assess the attainment of environmental, social and governance characteristics; in particular compared with the investment universe;
- The percentage of sustainable investments, with the minimum being 20%;
- At least 90% of the assets (excluding bank deposits) in the portfolio have an ESG rating, taking into account the weighting of the individual assets.

**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?

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.

## 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 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 gambling and adult entertainment industries are also excluded.

**2. 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 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:** 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.

**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.

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

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

MSCI ESG ratings also take into consideration environmental, social and governance issues if the use of additional PAI data for companies and governments can support the ESG rating. Where data is available for companies, ESG analysis includes: 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), 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 sovereign issuers, 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/sustainability-solutions/esg-ratings

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

The Company ensures that the Fund's sustainable investments are aligned by applying the UN Global Compact (UNGC) exclusion list and the exclusion list for violations of the OECD Guidelines for Multinational Enterprises, as described in the 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 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 and Article 6 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 fund manager takes into account sustainability risks by integrating ESG (environmental and/or social and/or governance) criteria into its investment decision-making process. The fund manager considers principal adverse impacts either via pre-trade exclusions or through the integration of ESG ratings, which reflect sustainability risks based on a number of criteria including data on principal adverse impacts.

Information on the principal adverse impacts on sustainability factors is available in the Annual Report pursuant to Article 11(2) of the SFDR.

☐ No



## WHAT INVESTMENT STRATEGY DOES THIS FINANCIAL PRODUCT FOLLOW?

The objective of the Fund is to participate in the performance of German equities. The Fund invests primarily in German equities. To a limited extent, the fund manager may also invest in shares from other Euro Zone countries. The Fund offers a mix of large and mid-cap companies. The Company pursues a sustainable investment strategy in its management of the Fund. The Fund incorporates financial criteria and environmental, social and good governance (ESG) characteristics. As part of the ESG strategy, the sustainability activities of issuers are analysed and sustainability opportunities and risks integrated into investment decisions; the principal adverse impacts of investment decisions on sustainability factors are also taken into account. The Fund's investment universe consists of the MSCI Germany NR EUR, the EuroStoxx and the EuroStoxx TMI Small.

ESG criteria are considered using an approach that can be broken down into two stages:

1. 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 gambling and adult entertainment industries are also excluded.

2. stage: ESG rating
The ESG rating of securities to be allocated to the Fund is considered. The basis is the ESG ratings of data provider MSCI ESG 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 ratings for issuers described above, MSCI also assigns ESG ratings for funds.

In the event that an issuer does not have an MSCI ESG rating, there are two possibilities:
- Either the ESG rating assigned by the Company to the relevant security of the issuer is used, or
- if the Company has not assigned an ESG rating to that issuer's securities, the Company can substitute an ESG rating, determined among other things by an average based on the ESG ratings of MSCI according to sector of activity, size of the issuer, and the issuer's place of business. This substitute rating is no longer used if MSCI ESG Research generates its own ESG rating for the issuer concerned or if an ESG rating 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 rating.

The ESG ratings influence the portfolio structure of the Fund, which aims to achieve a better weighted average ESG rating than its investment universe. In the event of a deterioration in the ESG ratings of the securities in which the Fund invests or a change in the ESG rating methodology that affects the average ESG rating of the Fund, the average ESG rating 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 an ESG rating, taking into account the weighting of the individual assets.

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).

**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 INVESTMENTS TO ATTAIN EACH OF THE ENVIRONMENTAL OR SOCIAL CHARACTERISTICS PROMOTED BY THIS FINANCIAL PRODUCT?

The binding elements of the investment strategy ensure that investments correspond to the environmental and/or social characteristics promoted. The binding elements are:
- The Fund applies the exclusions described in the Company's exclusion policy. This exclusion policy specifically applies to coal, tobacco, non-conventional weapons and non-conventional oil and gas. Issuers in the gambling and adult entertainment industries are also excluded;
- The Fund's average weighted average ESG score, used to assess the attainment of environmental, social and governance characteristics, in particular compared with the investment universe;
- The percentage of sustainable investments, with the minimum being 20%;
- At least 90% of the assets (excluding bank deposits) in the portfolio have an ESG rating, taking into account the weighting of the individual assets.

**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?

There is no committed minimum rate to reduce the scope of the investments considered prior to implementation of the investment strategy.

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

ODDO BHF Asset Management's Responsible Investment Policy sets out our definition and assessment of what constitutes good corporate governance practices. Good corporate governance practices can be assessed on the basis of a number of criteria, including anti-corruption measures and practices, the remuneration policy for senior executives, shareholder structure, quality of financial communication, and corporate ethics.

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

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

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 financial product 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.

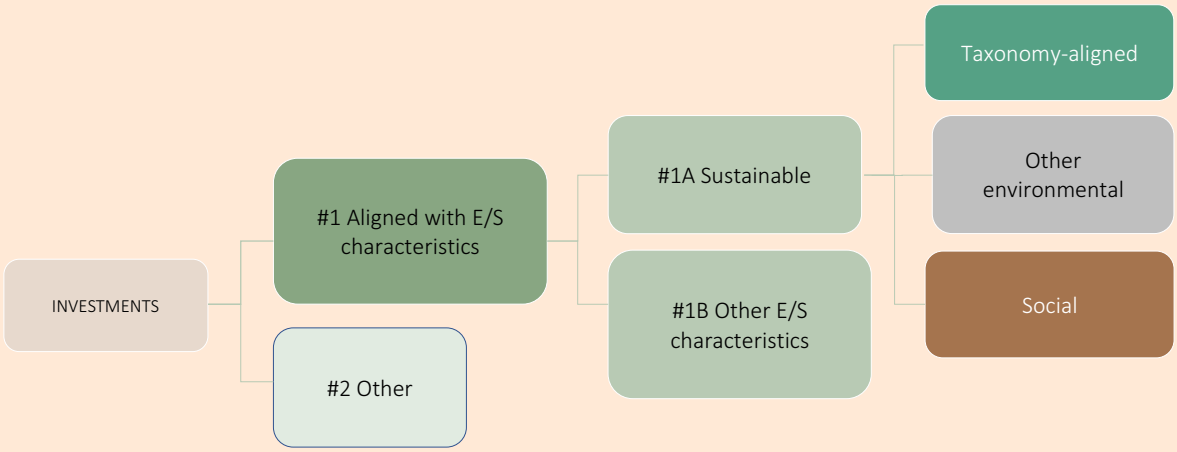
- At least 90% of the assets (excluding bank deposits) in the portfolio have an ESG rating, taking into account the weighting of the individual assets.

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 actively used to improve ESG alignment or reduce ESG risk.

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

Taxonomy-aligned investments include debt and/or equity investments in environmentally sustainable economic activities aligned with the EU Taxonomy. At least 0.5% of the Fund's net asset value is invested in Taxonomy-aligned investments. Data on Taxonomy alignment is provided by an external data provider; it is not certified by an auditor or verified by a third party. Currently, there is no method to determine the share of Taxonomy-aligned investments for government bonds. Therefore, no data are available on this.

### DOES THE FINANCIAL PRODUCT INVEST IN FOSSIL GAS AND/OR NUCLEAR ENERGY RELATED ACTIVITIES THAT COMPLY WITH THE EU TAXONOMY[1]?

☐ Yes

☐ In fossil gas ☐ In nuclear energy

☒ No

The fund manager analyses portfolio positions based on ESG criteria. Investments in nuclear energy and fossil gases are not excluded. A minimum proportion of Taxonomy-aligned activities connected with nuclear energy and fossil gas is not intended for the fund.

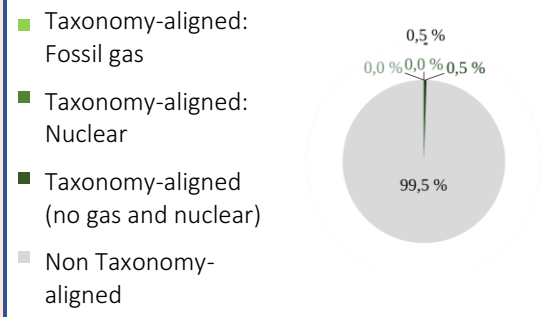
To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy,** the criteria include comprehensive safety and waste management rules.

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

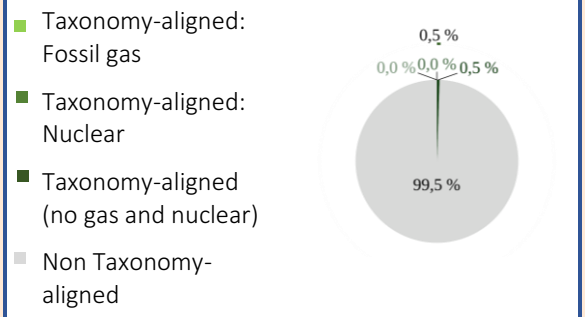
**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

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.

1. Taxonomy-alignment of investments **including sovereign bonds***




2. Taxonomy-alignment of investments **excluding sovereign bonds***




This graph represents 100% of the total investments.

* 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?

There is no minimum share of investments in transitional and enabling activities but the Fund may hold such investments.

[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 note in the left-hand margin. 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 Regu lation (EU) 2022/1214

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?

Sustainable investments are made by the Fund. However, there is no minimum share for sustainable investments with an environmental objective that are not aligned with the EU Taxonomy.

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

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

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

The investments included in "#2 Other" are cash, derivatives, securities, target funds and other investments for which ESG data and ratings are not available. 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 at the assets of a target fund or certificates.

## 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 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.

**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?

N/A

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

N/A

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

N/A

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

N/A

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

**Further product-specific information is available at**: am.oddo-bhf.com

# Important information for investors in France

**The AVDw-EUR unit class is not authorized for public distribution in France.**

Facility in accordance with Article 92 of the EU Directive 2009/65/EC:

ODDO BHF SCA

12, Boulevard de la Madeleine

75440 Paris Cedex 09

E-Mail: service_ordre_opcvm@oddo-bhf.com

ODDO BHF SCA performs the following tasks:

- provide investors with information on how orders can be made and how repurchase and redemption proceeds are paid
- process subscription, repurchase and redemption orders and make other payments to unitholders relating to the units of the UCITS
- facilitate the handling of information and access to procedures and arrangements relating to the investors' exercise of their rights arising from their investment in the UCITS
- make information and documents required pursuant to Chapter IX of Directive 2009/65/EC available to investors
- provide investors with information relevant to the tasks that the facility performs in a durable medium

Information and documentation with regard to the above-mentioned tasks can also be obtained from the Management Company ODDO BHF Asset Management GmbH, Herzogstrasse 15, 40217 Düsseldorf, Germany, or via E-Mail: kundenservice@ oddo-bhf.com.

The Management Company also acts as a contact point for communicating with the competent authorities.

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