

ODDO BHF Asset Management GmbH

Düsseldorf

Important notice regarding the UCITS Fund

ODDO BHF Polaris Moderate CR-EUR (ISIN: DE000A2JJ1W5)
ODDO BHF Polaris Moderate DRW-EUR (ISIN: DE000A0D95Q0)
ODDO BHF Polaris Moderate CI-EUR (ISIN: DE000A2JJ1S3)
ODDO BHF Polaris Moderate GC-EUR (ISIN: DE000A2JJ1T1)
ODDO BHF Polaris Moderate CN-EUR (ISIN: DE000A2JJ1V7)
ODDO BHF Polaris Moderate CNW-EUR (ISIN: DE000A1XDYL9)
ODDO BHF Polaris Moderate DI-EUR (ISIN: DE000A2P5QA0)
ODDO BHF Polaris Moderate DIW-EUR (ISIN: DE000A2P5QB8)
ODDO BHF Polaris Moderate CIW-EUR (ISIN: DE000A2P5QC6)
ODDO BHF Polaris Moderate CN-CHF (ISIN: DE000A2P5QD4)

Amendment to the Specific Terms of Investment

With the approval of the German Federal Financial Supervisory Authority (BaFin) dated 21 January 2021, the Specific Terms of Investment of the aforementioned UCITS Fund will be amended as follows with effect from **10 March 2021**:

- A new subsection 8 concerning units of feeder funds has been added to section 2 (Investment limits).
- The benchmark for the performance-related remuneration has been changed from “EONIA OIS” to “€STR plus 8.5 basis points” in section 7 (Costs).
- Brexit-related changes concerning Great Britain and Northern Ireland have been made in the appendix.

The amendments to the Specific Terms of Investment will enter into force on **10 March 2021**.

The full text of section 2 (Investment limits), section 7 (Costs) and the appendix to the Specific Terms of Investment is provided below.

Section 2 Investment limits

1. The Company may invest a total of up to 100% of the UCITS Fund's value in transferable securities as per section 5 of the General Terms of Investment. 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.
2. The Company may invest a total of up to 100% of the value of the UCITS Fund in money market instruments 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.
3. 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.
4. Notwithstanding paragraph 3, the Company may invest more than 35% of the value of the UCITS Fund in transferable securities and money market instruments of the issuers listed in the Annex. This is without prejudice to section 11(5) sentence 2 of the General Terms of Investment.
5. The Company may invest a total of up to 100% of the value of the UCITS Fund in bank deposits 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) which, pursuant to their terms of investment, predominantly invest in equities (equity funds),

- b) which, pursuant to their terms of investment, predominantly invest in interest-bearing securities (bond funds),
- c) 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. Units of feeder funds as per section 1(19) number 11 of the Investment Code are not acquired for the UCITS Fund.

Section 7 Charges

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 1.5% of the average value of the UCITS Fund in the accounting period based on the net asset value as determined each valuation day. It is entitled to charge monthly pro rata advances on this amount. The management fee may be taken 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) Performance-related remuneration

ba) Definition of the performance-related remuneration

For the UCITS Fund's management, in addition to the remuneration referred to in paragraph 1a), the Company may receive a performance-related remuneration per unit issued of up to 10% of the amount by which the performance of the units exceeds at the end of an accounting period earnings from a money market investment used as a benchmark during this accounting period by 200 basis points (hurdle rate), but no higher than 5% of the average net asset value of the UCITS Fund during the accounting period, which is calculated using the values at the end of each month. If the unit value at the beginning of the accounting period is lower than the highest unit value that the UCITS Fund reached at the end of the five previous accounting periods (hereinafter "high water mark"), the high water mark is used to calculate unit performance as per sentence 1 instead of the unit value at the beginning of the accounting period. If the UCITS Fund has existed for fewer than five previous accounting periods, all of the previous accounting periods will be taken into account when calculating the remuneration entitlement.

The costs charged to the UCITS Fund may not be deducted from the benchmark performance before the comparison.

The "€STR plus 8.5 basis points"¹ is set as the benchmark.

bb) Definition of the accounting period

The accounting period begins on 1 January and ends on 31 December of each calendar year.

bc) Calculation of unit performance

Unit performance will be calculated according to the BVI method².

bd) Provisions

Based on the outcome of a daily comparison, any performance-related remuneration incurred is set aside within the UCITS Fund per unit issued or a previous booked provision is written back accordingly. Written back provisions revert to the UCITS Fund. A performance-related remuneration can only be withdrawn if corresponding provisions have already been built up.

c) Where the Company initiates, arranges and executes securities lending and repurchase transactions for account of the UCITS Fund, the Company receives a customary market 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:

¹ The €STR is the euro short-term interest rate issued by the European Central Bank based on transactions conducted and settled on the previous business day, as reported by banks in the eurozone in accordance with money market statistical reporting. €STR + 8.5 basis points is the economic equivalent of the discontinued EONIA benchmark.

² An explanation of the BVI method is published on the website of BVI Bundesverband Investment und Asset Management e.V. (www.bvi.de)

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 no more than 0.1% of the average value of the UCITS Fund in the accounting period based on the net asset value as determined each valuation day.

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 value of the UCITS Fund in the accounting period based on the net asset value as determined each valuation day. 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.

3. The Depositary receives an annual fee from the UCITS Fund for its services of up to 0.1% of the average value of the UCITS Fund in the accounting period based on the net asset value as determined each valuation day, subject to a minimum of EUR 9,800 p.a. 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% of the average value of the UCITS Fund in the accounting period based on the net asset value as determined each valuation day.

5. 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 the investors (annual and half-yearly reports, prospectuses, Key Investor Information);

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, 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 0.05% p.a. of the average value of the UCITS Fund in the accounting period based on the net asset value as determined each valuation day;

m) taxes incurred in connection with the fees payable to the Company, the Depositary and third parties, in connection with the above expenses and in connection with management and custody.

6. Transaction costs

In addition to the fees and expenses above, costs arising in connection with the acquisition and disposal of assets are charged to the UCITS Fund.

7. 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.

A n n e x

In accordance with section 208 of the Investment Code, more than 35% of the value of the UCITS Fund may be invested in transferable securities and money market instruments of the following issuers, provided that the Terms of Investment allow this and specify the issuers concerned.

- **Federal Republic of Germany**

- **The German federal states:**

- Baden-Württemberg
- Bavaria
- Berlin
- Brandenburg
- Bremen
- Hamburg
- Hessen
- Mecklenburg-West Pomerania
- Lower Saxony
- North Rhine-Westphalia
- Rhineland-Palatinate
- Saarland
- Saxony
- Saxony-Anhalt
- Schleswig-Holstein
- Thuringia

- **European Union**

- **As EU Member States:**

- Belgium
- Bulgaria
- Denmark
- Estonia
- Finland
- France
- Greece
- Republic of Ireland
- Italy
- Croatia
- Latvia
- Lithuania
- Luxembourg
- Malta
- Netherlands
- Austria
- Poland
- Portugal
- Republic of Cyprus
- Romania
- Sweden
- Slovakia
- Slovenia
- Spain
- Czech Republic
- Hungary

- **As signatory states to the Agreement on the European Economic Area:**

- Iceland
- Liechtenstein
- Norway

- **As member states of the Organisation for Economic Co-Operation and Development (excluding EEA states):**
 - Australia
 - Chile
 - Israel
 - Japan
 - Canada
 - Mexico
 - New Zealand
 - Switzerland
 - South Korea
 - Turkey
 - United States of America
 - United Kingdom of Great Britain and Northern Ireland

- **As an international organisation to which at least one EU Member State belongs:**
 - EURATOM

Düsseldorf, February 2021

**ODDO BHF Asset Management GmbH
Management**