

## Swing pricing policy

Pursuant to the French and Luxembourg regulation, ODDO BHF Asset Management SAS has chosen to use the swing pricing mechanism, **to protect the interests of holders who invest in a medium-to-long-term perspective.**

**The management company uses the partial swing methodology, with an adjustment coefficient called the swing factor.**

### 1. PERIMETER

To find out whether a fund uses the swing pricing mechanism, please consult the fund's prospectus before subscribing or redeeming.

### 2. GLOSSARY

**Partial swing:** with this method, the fund's NAV is only swung when the net inflow or net outflow on a given day exceeds a certain pre-determined threshold (i.e. the trigger threshold).

**“Swing factor” adjustment coefficient:** the adjustment coefficient (expressed as a percentage) is the amount by which the NAV is adjusted with a view to protecting the fund's existing holders from the dilution effect caused by changes in the fund's liabilities. The swing factor is applied when the trigger threshold is reached.

**Trigger threshold:** this is the net inflow determined by the management company, expressed as a percentage of the net asset value, above which the partial swing Pricing mechanism will apply.

**Bid-Ask spread:** this is the difference between the highest price that a buyer is ready to accept for a security and the lowest price that a seller is ready to accept to sell the same security. The size of the spread mainly depends on the liquidity available on this security.

### 3. CONTEXT

Within a fund, the buying and selling of securities creates transaction costs such as brokerage fees, taxes and liquidity effects.

Liquidity effects occur between the publicly quoted prices of each portfolio position and those recorded by the portfolio manager on purchases or sales of securities corresponding to subscriptions/redemptions. The portfolio manager buys securities on the basis of the Ask price, and sells securities from from the portfolio on the basis of the Bid price.

Investors are consequently exposed to a dilution effect because of purchases and sales of securities.

### 4. SETTING OF THE SWING FACTOR

To calculate the swing factor, the management company takes into account the following elements:

- The bid/ask range (weighted average) which will be calculated on the basis of the last observation at the time of calculation ((source MSCI Liquidity Metrics) for each fund concerned.

However, in case of unusual and extraordinary market circumstances, the spread may be calculated on the day swing pricing is triggered on the basis of the sale prices of portfolio assets or other comparable assets, not only on bid-ask spreads, to protect the interests of fund holders;

- brokerage fees that will be calculated on the basis of the average brokerage fee rates applied at the execution of orders in the form of a basket at purchase and sale.

### 5. FUNCTIONING

When the daily balance of subscriptions-redemptions has a higher absolute value than the pre-defined threshold, the net asset value will be adjusted accordingly. Consequently, the net asset value will be adjusted upwards (and respectively downwards) if the balance (in absolute value) of subscriptions-redemptions exceeds this threshold.

The objective is to limit the impact of these subscriptions and redemptions on the net asset value of fund holders. This mechanism does not generate additional costs for holders but spreads the costs in such a way that fund holders do not pay fees when the fund manager has to make transactions because of subscriptions/redemptions by entering/exiting holders.

## **6. GOVERNANCE**

The management company's risks committee is in charge of validating the trigger threshold and is informed of the swing factor (at least once a year) for each fund in question.

**Investors are informed that the trigger threshold can vary according to the type of fund and can change over time.**

**Investors are also informed that the swing factor can vary according to the type of fund and can change over time.**

To calculate the trigger thresholds, the management company will take the following points into consideration: the asset class and liquidity of securities in which the fund invests, the costs and hence impacts of dilution relative to the markets in which the fund invests, and the size of the fund.

## **7. IMPACTS ON PERFORMANCE AND RISK MEASURES**

Performances and risk indicators are calculated on the basis of the swung NAV. As a result, the application of swing pricing has an impact on the fund's volatility, as well as a temporary impact on its reported performance.

However, in view of the performance fee applicable to the fund, variable management fees are calculated before the swing factor is taken into account.

Indeed, the one-off impact of swing pricing is not linked to the management of the fund.

## **8. DISSEMINATION OF INFORMATION TO HOLDERS**

**In accordance with the regulation and in the framework of the protection of holders' interests and the management of conflicts of interest, the management company may in no case disseminate the swing factor levels and the levels of trigger thresholds.**

## **9. RESPONSIBILITIES**

In the case of a major modification of the provisions set out in this document, an update will be made immediately. It is the responsibility of fund holders to connect periodically to the company's website to obtain information about the most recent applicable provisions.

The management company bears no responsibility for any decision taken or not taken on the basis of information contained in this document, nor for its use by a third party.

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