

# *Sustainability-related disclosures*

**Product name:** ODDO BHF Exklusiv: Global Equity Stars

**Legal Entity Identifier (LEI):** 529900U253BKGZOLXA63

## SUMMARY

Le fonds favorise les caractéristiques environnementales et/ou sociales. Cela se traduit par la construction et la pondération du portefeuille sur la base du processus de notation ESG, de la prise en compte de recherches et de données externes. Les détails de la stratégie d'investissement sont exposés dans le prospectus de vente du fonds et en particulier dans l'annexe « Caractéristiques environnementales et/ou sociales », qui divulgue les informations précontractuelles pour un produit financier tel que visé à l'article 8 (1), (2) et (2a) du règlement (UE) 2019/2088 et à l'article 6 (1) du règlement (UE) 2020/852. Les impacts négatifs importants sur les facteurs de durabilité sont pris en compte dans les décisions d'investissement, notamment en adhérant à la politique d'exclusion de l'entreprise. Le fonds promeut l'atténuation et l'adaptation au changement climatique. Le respect des lignes directrices en matière d'investissement liées à l'ESG est contrôlé par l'unité indépendante de contrôle des risques. La méthodologie d'analyse et d'évaluation des caractéristiques environnementales ou sociales du fonds est basée sur le modèle ESG de l'entreprise. En fonction de la classe d'actifs et de la stratégie, ce modèle ESG est basé entièrement ou seulement partiellement sur la méthodologie ou les données de MSCI. La société n'utilise aucune estimation des données de la taxonomie. Tous les investissements directs achetés pour le fonds sont soumis aux exclusions minimales du fonds, qui garantissent un niveau minimum de protection environnementale ou sociale.

## NO SUSTAINABLE INVESTMENT OBJECTIVE

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

The following approach is defined to be consistent with Article 2(17) of Regulation (EU) 2019/2088 on sustainability-related disclosure requirements in the financial services sector (“SFDR”).

**1. Sector and standard-related exclusions:** The sub-fund applies general exclusions which are described in the Company's exclusion policy which is available at [am.oddo-bhf.com](http://am.oddo-bhf.com). This exclusion policy specifically applies to coal, tobacco and non-conventional weapons. Issuers in the gambling and adult entertainment industries are also excluded.

**2. Consideration of the principal adverse impacts:** In order to ensure no significant harm to sustainability objectives, the fund manager sets (pre-trade) control rules for certain selected activities that do significant harm: Exposure to controversial weapons (PAI 14 and 0% tolerance) and serious violations of the principles of the UN Global Compact and the Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises (PAI 10 and 0% tolerance).

**3. Controversies:** The most controversial companies according to MSCI ESG research are classified as unsustainable.

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

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

The fund manager applies the pre-trade rules to two PAIs:

- Exposure to controversial weapons (PAI 14 and 0% tolerance) and
- Serious violations of UN Global Compact principles and Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises (PAI 10 and 0% tolerance).

MSCI ESG scores also incorporate environmental, social and governance issues if the use of additional PAI data for companies and governments can support their ESG score. Where the data is available for companies, ESG analysis includes: monitoring of GHG emissions (PAI 1), carbon footprint (PAI 2), GHG intensity of investee companies (PAI 3), activities negatively affecting biodiversity sensitive areas (PAI 7), the hazardous waste and radioactive waste ratio (PAI 9), violations of UN Global Compact principles and Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises (PAI 10), the lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises (PAI 11), the unadjusted gender pay gap (PAI 12), and board gender diversity (PAI 13). However, the Management Company does not set specific objectives or defined control rules for these other PAIs apart from the PAIs mentioned in the first paragraph.

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

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

## ENVIRONMENTAL OR SOCIAL CHARACTERISTICS OF THE FINANCIAL PRODUCT

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

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

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

a) criteria "based on the company's operations":

- Implied Temperature Rise (ITR):

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

- SBTi-recognised emission target:

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

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

- Sustainable impact revenue:

Commercial activities are analysed to determine how they contribute to the achievement of certain environmental or social objectives. In this context, the MSCI indicator “Sustainable Impact Revenue” is used. The indicator goes from 0 to 100%, representing the percentage of the company’s total revenue.

- EU Taxonomy-aligned revenue:

The EU Taxonomy is for identifying economic activities that pursue environmental or social objectives. For the time being, however, only two of the six environmental objectives set out are fully covered. The reported revenue from taxonomy-aligned activities for the company in question is used to determine Taxonomy-alignment.

- EU Taxonomy-aligned investment spending:

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

- Percentage of “green” company patents:

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

## INVESTMENT STRATEGY

The equity exposure of ODDO BHF Exklusiv: Global Equity Stars is always above 90%. It invests in a broad range of issuers from across the world, which may be denominated in currencies other than the euro.

The equities investment universe of the sub-fund is the MSCI All Countries World Index (Net Return, EUR). The sub-fund may invest to a limited extent (up to 10% of sub-fund assets) in equities that are not included in the investment universe.

The fund manager incorporates sustainability risks into its investment process by taking into account both the ESG (environmental, social and governance) characteristics of its investment decisions and the principal adverse impacts that its investment decisions may have on sustainability factors. The sub-fund’s investments are therefore subject to ESG restrictions. The Management Company observes the United Nations Principles for Responsible Investment (UN PRI) with respect to environmental, social, and governance issues, and also applies them in its commitments by e.g. exercising voting rights, actively exercising shareholder and creditor rights and engaging in dialogue with issuers.

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

### 1. stage: Exclusions

The sub-fund applies general exclusions which are described in the Management Company's exclusion policy which is available at [am.oddo-bhf.com](http://am.oddo-bhf.com). This exclusion policy specifically applies to coal, tobacco and non-conventional weapons. Issuers in the gambling and adult entertainment industries are also excluded.

### 2. stage: ESG score

The ESG score of securities to be included in the sub-fund is considered. The basis is the ESG scores of data provider MSCI Research. At least 90% of the issuers in the portfolio have an ESG score, taking into account the weighting of the individual securities.

### 3. stage: Carbon intensity

The fund manager takes significant account of non-financial criteria; the sub-fund's carbon intensity must be at least 20% below the carbon intensity calculated for the investment universe. Data on carbon intensity is available for at least 90% of the issuers in the portfolio, taking into account the weighting of individual securities.

Additional ESG assessments conducted by in-house research or by third parties may also be used.

At least 0.5% of the sub-fund's net asset value is invested in Taxonomy-aligned activities. The sub-fund is required to invest a minimum of 20% of its assets in sustainable investments.

## BREAKDOWN OF INVESTMENTS

At least 80% of the sub-fund's net asset value is aligned with environmental and/or social characteristics. The sub-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 sub-fund's net asset value is invested in sustainable investments. The sub-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 sub-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 issuers in the portfolio have an ESG score, taking into account the weighting of the individual securities.

## MONITORING OF ENVIRONMENTAL OR SOCIAL CHARACTERISTICS

The Company's risk management team is responsible for the internal control of the Fund's investment guidelines. These include the environmental and/or social characteristics of the Fund. The fund managers regularly monitor the environmental or social characteristics of the Fund.

### METHODS

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

### DATA SOURCES AND PROCESSING

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

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

### RESTRICTIONS ON METHODS AND DATA

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

### DUE DILIGENCE

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

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

### ENGAGEMENT POLICIES

The Company's engagement policies are available at: [am.oddo-bhf.com](http://am.oddo-bhf.com)

### DESIGNATED REFERENCE BENCHMARK

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

As at 16 April 2026 (updated following a change in the ESG investment strategy)