Sustainability-related disclosures

Product name: ODDO BHF Polaris Moderate

Legal Entity Identifier (LEI): 5299003Y5ICM7PDO9D49

SUMMARY

O Fundo promove caractersticas ambientais e/ou sociais. Isso se reflete na construço e ponderaço do portflio com base no processo de classificaço ESG e na consideraço de pesquisas e dados externos. Os pormenores da estratégia de investimento so fornecidos no prospeto do Fundo e, em especial, no anexo «Caractersticas ambientais e/ou sociais» relativo à divulgaço de informaçes pré-contratuais relativas aos produtos financeiros a que se refere o artigo 8., n.s 1, 2 e 2-A, do Regulamento (UE) 2019/2088 e o artigo 6., primeiro pargrafo, do Regulamento (UE) 2020/852. Os principais impactos adversos sobre os fatores de sustentabilidade so tidos em conta nas decises de investimento, nomeadamente através da adeso à poltica de excluso da Sociedade Gestora. O Fundo contribui para a atenuaço das alteraçes climticas e para a adaptaço às mesmas. O cumprimento das diretrizes de investimento ESG é monitorado pelo departamento independente de controle de risco. A metodologia de pesquisa e avaliaço das caractersticas ambientais e sociais do Fundo é baseada no modelo ESG da Gestora. Dependendo da categoria de ativos e da estratégia, este modelo ESG baseia-se total ou parcialmente na metodologia e nos dados do MSCI. A Sociedade Gestora no utiliza estimativas para dados de Taxonomia. Todos os investimentos diretos adquiridos para o Fundo esto sujeitos às excluses mnimas do Fundo, que garantem um nvel mnimo de proteço ambiental ou social.

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 Fund applies general exclusions which are described in the Company's exclusion policy which is available at am.oddo-bhf.com. The exclusion policy specifically applies to coal, tobacco and non-conventional weapons. Issuers in the gambling and adult entertainment industries are also excluded. Direct investment in the securities of countries with an inadequate Freedom House score is 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: Companies classified by MSCI ESG as particularly controversial are considered 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 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 when the use of additional PAI data for companies and governments can support their ESG score. For companies, ESG analysis includes, where data is available, 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 the principles of the UN Global Compact and the 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. However, the fund manager does not set specific objectives or defined control rules for these other PAIs apart from those mentioned in the first paragraph.

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

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

ENVIRONMENTAL OR SOCIAL CHARACTERISTICS OF THE FINANCIAL PRODUCT

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

In its ESG strategy, the Fund refers to the objectives described above, but does not try to select its investments solely on the basis of one or more of these objectives. The ESG strategy's sustainability indicators take account of the contributions to these objectives.

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

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

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

- Implied Temperature Rise (ITR):

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

- SBTi-recognised emission target:

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

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

- Sustainable impact revenue:

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

- EU Taxonomy-aligned revenue:

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

- EU Taxonomy-aligned investment spending:

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

- Percentage of “green” company patents:

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

c) Additional criteria for “sustainable bonds”:

It is our opinion that green, social and sustainable bonds can be considered sustainable investments, provided that the proceeds are used to finance projects that make a positive contribution to an environmental and/or social objective.

INVESTMENT STRATEGY

The objective of investing in ODDO BHF Polaris Moderate is to avoid any major share price setbacks and earn a higher return than a fixed income investment using asset allocation. The fund invests actively in a mixture of bonds, equities, certificates and money market investments. On an aggregated basis, Europe is the predominant focus of the equities and bonds allocation. An active allocation in US and emerging markets securities may also be added at the discretion of the portfolio manager. The target equity quota is between 0 and 40%. The Fund’s fixed income investments are comprised predominantly of government and corporate bonds along with Pfandbriefe. In addition, up to 10% of its assets can be invested in units of investment funds and ETFs. Up to 10% of assets can also be invested in precious metal certificates. The Fund may also be managed using financial futures.

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 any significant negative impacts that its investment decisions may have on sustainability factors. Companies included in the MSCI ACWI Index represent the Fund’s

investment universe for both equities and corporate bonds. The Fund may also invest in companies or issuers from OECD countries with a market capitalisation of at least EUR 100 million or with at least EUR 100 million in bonds issued.

The ESG approach can be broken down into three 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 and non-conventional weapons. Issuers in the gambling and adult entertainment industries are also excluded. Direct investment in the securities of countries with an inadequate Freedom House score is also excluded.

2. stage: ESG score

The ESG score of securities to be included in the Fund is considered. The basis is the ESG scores of data provider MSCI Research. 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 also takes the Fund's carbon intensity into account to the extent that the Fund's carbon intensity must be at least 20% below that of 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 (excluding bank deposits, derivatives, sovereign issuers and quasi-sovereign issuers).

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

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

BREAKDOWN OF INVESTMENTS

At least 80% of the Fund's net asset value is aligned with environmental and/or social characteristics. The fund may also hold up to 20% of its net asset value in "Other", as defined below, which includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments. At least 10% 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 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

DATA SOURCES AND PROCESSING

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

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

RESTRICTIONS ON METHODS AND DATA

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

DUE DILIGENCE

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

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

ENGAGEMENT POLICIES

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

DESIGNATED REFERENCE BENCHMARK

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

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