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 Europe Equity Trend

Legal Entity Identifier (LEI): 529900IUS5S32WQ63L11

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 ☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy ☐ in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy ☐ 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. ☒ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy ☒ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy ☐ with a social objective ☐ 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 the data provider MSCI Solutions (Deutschland) GmbH ("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 alcohol, gambling and adult entertainment industries are 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 from MSCI. 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 ESG scores for issuers described above, MSCI also assigns ESG scores for funds.

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

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

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 portfolio's average weighted ESG score to assess the overall performance 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 – taking into account the weighting of the individual assets – an ESG score.

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 alcohol, gambling and adult entertainment industries are also excluded.

2. Controversies: Companies classified by MSCI as particularly controversial – where applicable, following confirmation by the ESG team based on a second review – are considered unsustainable.

3. 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 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).

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) 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).

ESG scores from MSCI also take environmental, social and governance issues into account when the use of additional PAI data for companies and sovereign issuers can support their ESG score. Where 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). For issuers in the public sector, 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/sustainabilitysolutions/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 scores, which reflect sustainability risks based on a number of criteria including data on principal adverse impacts.

Information on 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 Fund invests in European equities. Equities are rated using a trend-following model and on the basis of ESG research. This model uses extensive historical data to analyse trends and send buy and sell signals. The portfolio composition process involves optimising ESG and risk management by applying various constraints in terms of ESG valuation, beta, sector/country concentration, tracking error and turnover rate of the final portfolio. As part of our 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.

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 alcohol, gambling and adult entertainment industries are 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 from MSCI. 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 ESG scores for issuers described above, MSCI also assigns ESG scores for funds.

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

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

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'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 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 alcohol, gambling and adult entertainment industries are also excluded;
- The percentage of sustainable investments, with the minimum being 20%;
- At least 90% of the assets (excluding bank deposits) in the portfolio have – taking into account the weighting of the individual assets – an ESG score.

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 Fund 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.

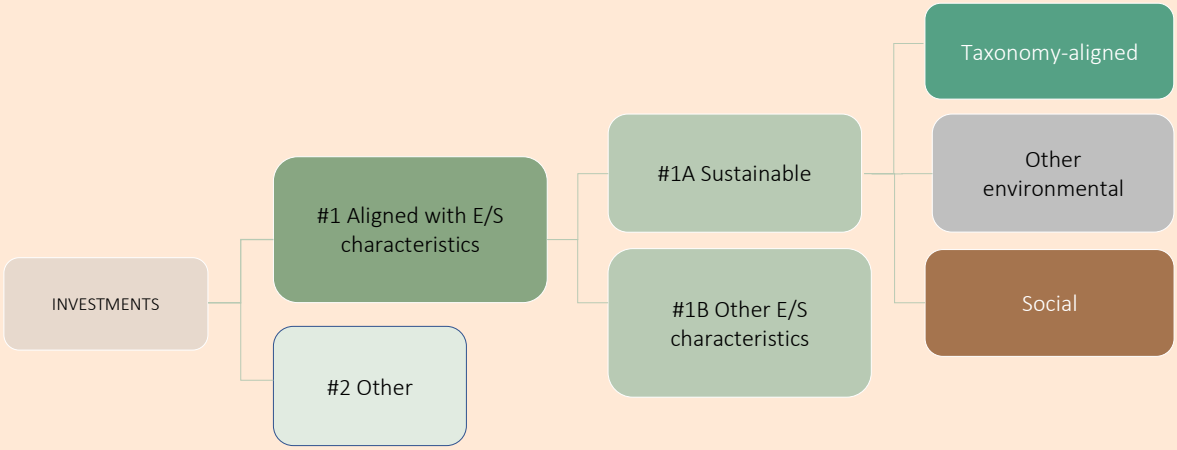
At least 90% of the assets (excluding bank deposits) in the portfolio have – taking into account the weighting of the individual assets – an ESG score.

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

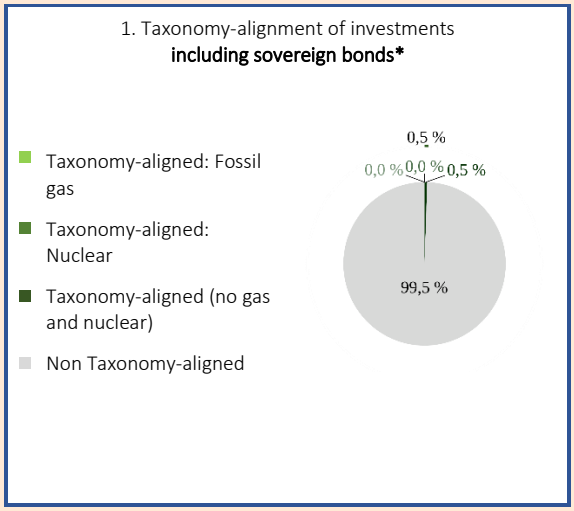
The fund manager analyses portfolio positions based on ESG criteria. Investments in nuclear energy and fossil gases are not excluded. A minimum proportion of Taxonomy-aligned activities connected with nuclear energy or fossil gas is not intended for the Fund.

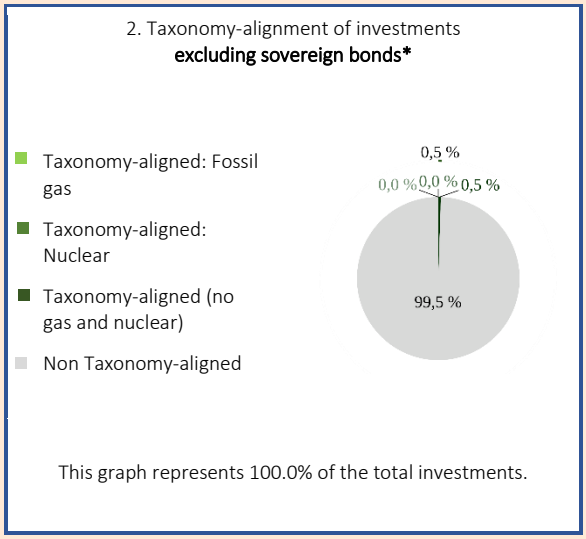
To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy,** the criteria include comprehensive safety and waste management rules.

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.





* 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.

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.

[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 Regulation (EU) 2022/1214

WHAT 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 derivatives, cash, securities, target funds and other investments for which ESG data and scores 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