Sustainability-related disclosures

Product name: ODDO BHF Avenir Europe

LEI code: 969500QGXS5P7LVVRQ45

SUMMARY

The Fund promotes environmental and/or social characteristics. This is reflected in portfolio construction and weighting based on the ESG rating process and the consideration of external research and data. Details of the investment strategy are provided in the Fund's Prospectus and in particular in the "Environmental and/or social characteristics" Annex on pre-contractual disclosures for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852. Principal adverse impacts on sustainability factors are taken into account in investment decisions, particularly by adherence to the Management Company's exclusion policy. The Fund contributes to climate change mitigation and adaptation. Compliance with the ESG investment guidelines is monitored by the independent risk control department. The research and assessment methodology for the environmental and social characteristics of the Fund is based on the Management Company's ESG model. Depending on the asset category and strategy, this ESG model is based wholly or partly on the methodology and data of MSCI. The Management Company does not use estimates for Taxonomy data. All direct investments purchased for the Fund are subject to the Fund's minimum exclusions, which guarantee a minimum level of environmental or social protection.

NO SUSTAINABLE INVESTMENT OBJECTIVE

This financial product promotes environmental or social characteristics.

The following approach is taken to comply with Article 2 (17) of Regulation (EU) 2019/2088 on sustainability-related disclosures in the financial services sector (SFDR).

• Sectors excluded from investments: The Management Company's exclusion policy is applied to eliminate sectors that have significant adverse impacts on sustainability objectives. The Fund applies the common framework of our Exclusion Policy, which is available online: am.oddo-bhf.com.

• Controversies: After the ESG team has double-checked, companies that are the most controversial according to our MSCI ESG data will not be considered sustainable.

• Consideration of the principal adverse impacts: In order to ensure no significant harm to the sustainability objectives, the Management Company sets (pre-trade) testing rules for selected significantly harmful activities: exposure to controversial weapons (PAI 14, zero tolerance) and serious violations of the principles of the UN Global Compact and OECD Guidelines for Multinational Enterprises (PAI 10, zero tolerance).

• Dialogue and engagement: our dialogue and engagement approach helps identify significant risks and gives us a voice to encourage changes and improvements

Regulation (EU) 2020/852 establishes certain areas of concern that may have an adverse impact ("PAI").

The Management Company applies pre-trade rules to the following PAIs:

exposure to controversial weapons (PAI 14 and zero tolerance),

serious violations of the principles of the UN Global Compact and OECD Guidelines for Multinational Enterprises (PAI 10 and zero tolerance).

MSCI Solutions (Deutschland) GmbH's ESG ratings incorporate environmental, social and governance themes. Other PAI data on companies and sovereign states may be collected to support the ESG rating. For companies, assuming the data is available and the subject is material, the ESG analysis includes total greenhouse gas emissions (PAI 1), carbon footprint (PAI 2), greenhouse gas intensity of investee companies (PAI 3), activities negatively affecting biodiversity-sensitive areas (PAI 7), hazardous waste and radioactive waste ratio (PAI 9), violations of United Nations Global Compact principles and the OECD Guidelines for Multinational Enterprises (PAI 10), 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). In particular, for sovereign issuers, it may also include greenhouse gas intensity (PAI 15).

However, the management company does not set specific targets or monitoring rules for these other PAIs, with the exception of those mentioned in the first paragraph.

More information on MSCI ESG ratings: https://www.msci.com/en/esg-ratings

However, taking MSCI Solutions (Deutschland) GmbH ratings into account does not result in any specific constraints other than the coverage rate mentioned previously.

The Fund also takes into account PAI 1, 2 and 3 relating to greenhouse gases, in line with its carbon intensity target as detailed above.

The Management Company ensures that the Fund's sustainable investments comply with the UN Global Compact (UNGC) exclusion list, as described in greater detail in the Management Company's exclusion policy. Proven breaches of the OECD Guidelines for Multinational Enterprises and/or the UN Guiding Principles on Business and Human Rights are also grounds for exclusion.

ENVIRONMENTAL OR SOCIAL CHARACTERISTICS OF THE FINANCIAL PRODUCT

The Fund promotes climate change mitigation and adaptation through sustainable investments within the meaning of the EU Taxonomy and sustainable investments within the meaning of Article 2 (17) of the SFDR.

The Fund does not seek to select its investments solely on the basis of one or more of these objectives. Contributions to these objectives are taken into account by the sustainability indicators used in the ESG strategy.

As such, the Fund seeks to take advantage of both aspects of a company's contribution: its positive social and/or environmental contribution arising from 1) the revenue generated by the company's products and/or services or 2) its contribution to the environmental and/or social objective arising more broadly from its operations where these are aligned with the environmental and/or social objectives.

To be eligible as a Sustainable Investment, a company must meet at least one of the criteria detailed below:

a) Criteria based on the company's activities:

- Implied Temperature Rise (ITR):

The activities of companies where climate target initiatives are aimed at keeping the temperature increase at or below 2°C, in line with the Paris Agreement trajectory of 2°C or less, are considered to contribute to an environmental objective and, as such, qualify as a sustainable investment. To assess temperature alignment, we use MSCI's ITR data.

- Emissions targets approved by the SBTi (Science Based Targets Initiative):

Greenhouse gas emissions are one of the factors used to measure an environmental objective. Our approach to measuring sustainable investments also includes companies whose GHG emissions reduction targets have been approved by the SBTi.

b) Criteria based on the company's sustainable solutions revenues:

- Economic activity contributing to the achievement of specific environmental or social objectives.

We assess how an economic activity contributes to the achievement of specific environmental or social objectives. To do this, we use the sustainable solutions revenues calculated by MSCI. Sustainable solutions revenues range from 0 to 100% and represent a specific proportion of a company's overall income.

- EU Taxonomy-aligned income:

The EU taxonomy is designed to identify economic activities that meet environmental objectives. For each company, we will base taxonomy alignment on the percentage of income generated by activities that are aligned with the taxonomy.

- Capital expenditure aligned with the EU taxonomy:

For each company, we will base taxonomy alignment on the percentage of investment expenditure resulting from activities that are aligned with the taxonomy.

- "Green percentage" of a company patent:

This indicator enables us to identify companies that generate revenues and hold patents on emission reduction technologies and practices that contribute to an environmental objective.

c) Additional criteria: Sustainability bonds:

We consider that green, social and sustainability bonds can be considered sustainable investments if their proceeds are used to finance projects that make a positive contribution to an environmental and/or social objective.

INVESTMENT STRATEGY

The investment strategy aims to actively manage a portfolio of Euro Zone small and mid caps, without any allocation restrictions, whether geographic or as otherwise specified in the prospectus.

Between 75% and 100% of the Fund's net assets will be invested in equities of issuers headquartered in either:

the European Economic Area (EEA);

a European country that is also a member of the OECD (but not the EEA).

By way of exception, up to a maximum of 20%, the Fund may invest in equities of issuers headquartered in the OECD, but outside the EEA and/or a European country.

Cumulatively, these equities of issuers must meet one of the following criteria when first added to the portfolio:

belong to the MSCI Smid Cap Europe index;

be outside the MSCI Smid Cap Europe index, but have a market capitalisation of between EUR 500 million and EUR 10 billion;

additionally, up to a maximum of 10%, the Fund may invest in equities outside the MSCI Smid Cap Europe Index and with a market capitalisation of less than EUR 500 million.

The investment process relies on an active management strategy based on stock-picking within the investment universe. The manager invests in companies from the investment universe that enjoy a real competitive advantage in a market with strong entry barriers, and that are highly profitable, thereby enabling them to finance their own long-term development. These characteristics are identified during the analysis conducted by the fund managers, who choose them on a discretionary basis.

The investment process comprises four stages:

First stage: The manager filters the universe based on economic and financial performance indicators.

The manager favours companies in a position to generate, over the course of a cycle, a greater Return on Capital Employed than the industry average and a positive free cash flow.

Second stage: Fundamental analysis, company visits.

The fundamental analysis of stocks aims to verify that the fundamental elements underlying the financial profitability of a company will be preserved and even improved or regained in years to come.

Company visits: the manager will endeavour to validate the suitability and coherence of the company strategy, any foreseeable changes in the company's industry and the stock's sensitivity to the macroeconomic environment or any other theme that may affect the company's fundamentals.

Third stage: Valuation.

Companies are valued using two methods: peers (P/E, yield, EV/sales, EV/EBITDA, etc.) and discounted cashflows (DCF) based on two scenarios: one optimistic, the other pessimistic. These valuations determine the buy and sell thresholds.

Fourth stage: Portfolio development.

Weightings are defined in absolute terms and not in direct relation to a benchmark index.

At the end of this strictly bottom-up process, the manager compares the portfolio's sector allocation to that of the benchmark index. The manager ensures that the portfolio's thematic and sector diversification is sufficient to avoid too great a tracking error versus the benchmark index, while complying with the aforementioned sectoral and ESG exclusions.

The Fund's maximum exposure to the markets (equities, debt securities, funds and derivatives) may not exceed 100% of net assets, it being understood that the maximum exposure is the sum of the net exposures to each of the markets (equity, fixed income, money) to which the Fund is exposed (the sum of long and hedging positions).

The Fund's ESG approach aims to promote sound management of carbon emissions:

By excluding issuers involved in high-carbon sectors such as coal and unconventional oil and gas, as set out in the management company's Exclusion Policy; And, at the same time, by ensuring that the Fund's average carbon intensity is 20% lower than that of its benchmark.

The Fund's ESG approach can be broken down into three stages:

First stage: Exclusions

The Fund applies the common exclusion framework detailed in the Management Company's Exclusion Policy, which is available at am.oddo-bhf.com. This framework covers coal, tobacco and non-conventional weapons, in particular.

Second stage: ESG rating

This stage involves taking into account the ESG rating of the securities.

The management team uses the ESG ratings supplied by an external data provider, MSCI Solutions (Deutschland) GmbH. MSCI uses a methodology that assigns issuers a rating relative to their sector, ranging from 0 (worst in the sector) to 10 (best in the sector), based on their ability to manage relevant sustainability risks and opportunities in light of their activities. Specifically, the environmental and social characteristics outlined above are analysed by MSCI: (1) climate transition (carbon emissions, vulnerability to climate change, opportunities in clean technologies and renewable energy), (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, workforce management, community relations, data privacy and security, product safety and quality). MSCI also provides an ESG rating for funds, in addition to those for issuers described above.

The Management Company has two options if an issuer has not been rated by MSCI Solutions (Deutschland) GmbH:

- First, it can use the ESG rating that the Management Company has awarded to securities of the issuer concerned.

- Second, if the Management Company has not awarded an ESG rating to securities of the issuer concerned, then it can create an alternative ESG rating based, amongst other things, on MSCI's average rating for the relevant industry, market capitalisation or country. This alternative rating will stop being used if MSCI Solutions (Deutschland) GmbH creates its own ESG rating for the issuer concerned, or if the Management Company awards its own ESG rating.

The Management Company may also adjust an ESG rating supplied by MSCI. The ESG team would make this adjustment and may go as far as replacing the MSCI rating with a new internal ESG rating.

At least 90% of the issuers in the portfolio are subject to an ESG rating once the weighting of each security has been taken into account. This enables the Fund to be aware of the main sustainability opportunities and risks facing the majority of its assets under management.

Third stage: carbon intensity

The Management Company also takes into account the Fund's carbon intensity, which must be 20% lower than that of its benchmark.

Furthermore, at least 90% of the securities that make up the Fund's net asset have a carbon intensity estimate, after the weightings of each security have been taken into account and excluding cash, derivatives, sovereign and quasi-sovereign debt.

INVESTMENT PROPORTIONS

At least 80% of net assets must be aligned with environmental and social characteristics. The Fund may hold up to 20% of its net assets in the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The Fund has a minimum 20% of sustainable investments.

However, the Fund may hold investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

The Fund does not have a minimum Taxonomy alignment, nor does it have a minimum requirement for other environmental and/or social investments. However, the Fund may hold investments that present these characteristics.

At least 90% of the issuers in the portfolio are subject to an ESG rating after the weighting of each share is taken into account.

MONITORING OF ENVIRONMENTAL OR SOCIAL CHARACTERISTICS

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

METHODS

The research and assessment methodology for the environmental and social characteristics of the Fund is based on the Management Company's ESG model. Depending on the asset category and strategy, this ESG model is based wholly or partly on the methodology and data of MSCI. Further information is available at: https://am.oddo-bhf.com/

DATA SOURCES AND PROCESSING

The Management Company uses various data sources in its ESG model for analysing and assessing environmental or social characteristics. This data comes from external sources such as MSCI, CDP, Carbon4 Finance (data on biodiversity) and Bloomberg, and is supplemented by internal research. Taxonomy data is obtained from Refinitiv. The Management Company does not use estimates for Taxonomy data.

The data is subject to internal quality control measures. The Management Company ensures the quality and consistency of the data by organising regular meetings with data suppliers in order to correct any errors, recommend potential improvements, and provide feedback from meetings with investors and companies. Data is processed by importing it into the Management Company's IT systems.

LIMITATIONS TO METHODOLOGIES AND DATA

All rights relating to the data and reports provided by data suppliers are held by these data suppliers and/or their content providers. These data suppliers, their affiliated companies and content providers cannot be held liable in the event of any errors, omissions or interruptions in this data and these reports, with regards to their exhaustiveness, accuracy or up-to-date nature. Copying or redistributing this data/these reports is prohibited without the express written agreement of these data suppliers. The Investment Manager is in regular contact with these data suppliers to ensure the quality and reliability of the data used. The Management Company does not use estimates for Taxonomy data. After internal checking, the Investment Manager thus has a range of external data sources available, which the Management Company considers generally reliable.

DUE DILIGENCE

Due diligence processes are subject to fundamental analysis by the Fund's Investment Manager. Internal ESG ratings are also used. ESG investment limits are monitored by the independent Investment Controlling department.

All direct investments purchased for the Fund are subject to the Fund's minimum exclusions, which guarantee a minimum level of environmental or social protection. However, individual financial instruments are not subject to controls (no controls on the investments of target funds or certificates).

ENGAGEMENT POLICIES

The Management Company's engagement policy is available at: am.oddo-bhf.com

DESIGNATED BENCHMARK

The benchmark is not intended to be aligned with the environmental and/or social characteristics promoted by the Fund.

Dated 25 November 2026 (updated following a change in ESG investment strategy)