

Environmental and/or social characteristics

Product name: ODDO BHF Avenir Europe

Legal entity identifier: 969500QGXS5P7LVVRQ45

DOES THIS FINANCIAL PRODUCT HAVE A SUSTAINABLE INVESTMENT OBJECTIVE?

<input checked="" type="radio"/> <input checked="" type="radio"/> <input type="checkbox"/> Yes	<input type="radio"/> <input checked="" type="radio"/> <input checked="" type="checkbox"/> No
<input type="checkbox"/> It will make a minimum of sustainable investments with an environmental objective: N/A <input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy <input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy <input type="checkbox"/> It will make a minimum of sustainable investments with a social objective: N/A	<input checked="" type="checkbox"/> 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 <input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy <input checked="" type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy <input type="checkbox"/> with a social objective <input type="checkbox"/> It promotes E/S characteristics, but will not make any sustainable investments.

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.

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 lay down 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 environmental or social characteristics promoted by the financial product are attained.

The fund's ESG approach aims to promote good general sustainability practices, on the one hand by excluding issuers involved in sectors or with practices that run counter to the main sustainable development objectives, and on the other by favouring those with good practices on their material issues, by taking ESG scores into account.

The management team takes into account non-financial criteria in a significant way, thanks to a selective approach leading to the elimination of at least 20% of this universe.

This selective approach can be broken down into two stages:

First stage: exclusions

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

The Fund may not, therefore, invest in the regulated utilities and telecommunications sectors, alcohol, gambling, oil & gas, or in banks that have not committed to a policy that meets international standards for a fossil fuel phase-out.

Second stage: ESG rating

This ESG rating system influences the structure of the Fund by limiting exposure to companies having lower ESG ratings, to ensure that the Fund's overall ESG credentials remain above a certain level.

The management team uses the ESG ratings supplied by an external data provider, MSCI ESG Research.

The Management Company has two options if an issuer has not been rated by MSCI ESG Research:

- o First, it can use the ESG rating that the Management Company has awarded to securities of the issuer concerned.
- o 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, capitalisation or country. This alternative rating will stop being used if MSCI ESG Research 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 after the weighting of each share is taken into account. Target funds with an ESG rating at fund level are also considered.

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 the attainment of the fund's ESG characteristics and published in its monthly ESG report:

- **ESG coverage** of the portfolio, particularly in view of the commitment that at least 90% of the portfolio's securities should be covered, taking into account the weightings.
- The portfolio's weighted **ESG rating** to assess the attainment of environmental, social and governance characteristics, particularly in relation to that of the reference universe.
- The Fund's **carbon intensity** (weighted average of scope 1 and 2 CO₂ emissions divided by the revenue of each company in which the Fund invests).

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?

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.

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.

- 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.

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 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.

The Fund applies specific exclusions, namely: the regulated utilities and telecommunications sectors, alcohol, gambling, oil & gas and banks that have not committed to a policy that meets international standards for a fossil fuel phase-out.

- **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

HOW WERE THE INDICATORS FOR ADVERSE IMPACTS ON SUSTAINABILITY FACTORS TAKEN INTO ACCOUNT?

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 ESG Research’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 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>

HOW ARE THE SUSTAINABLE INVESTMENTS ALIGNED WITH THE OECD GUIDELINES FOR MULTINATIONAL ENTERPRISES AND THE UN GUIDING PRINCIPLES ON BUSINESS AND HUMAN RIGHTS? DETAILED DESCRIPTION:

The Management Company ensures that the Fund’s sustainable investments are aligned by applying its UN Global Compact exclusion list, as well as its list of exclusions for breaches of the OECD Guidelines for Multinational Enterprises, as indicated in the Management 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 other underlying investments do not take into account EU criteria on 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 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 management company takes sustainability risks into account by integrating ESG (Environmental and/or Social and/or Governance) criteria into its investment decision-making process, as set out in the “Investment Strategy” section. This process also makes it possible to assess the management team’s ability to manage the adverse impacts of their business activities on sustainable development. For more information, please refer to the Fund prospectus, which is available on the Management Company’s website: am.oddo-bhf.com.

☐ No



WHAT INVESTMENT STRATEGY DOES THIS FINANCIAL PRODUCT FOLLOW?

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 good general sustainability practices, on the one hand by excluding issuers involved in sectors or with practices that run counter to the main sustainable development objectives, and on the other by favouring those with good practices on their material issues, by taking ESG scores into account.

First of all, the management team takes into account non-financial criteria in a significant way, thanks to a selective approach leading to the elimination of at least 20% of this universe.

This selective approach can be broken down into two 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.

The Fund also applies specific exclusions. The Fund may not, therefore, invest in the regulated utilities and telecommunications sectors, alcohol, gambling, oil & gas, or in banks that have not committed to a policy that meets international standards for a fossil fuel phase-out.

Second stage: ESG rating

This stage involves taking into account the ESG rating of companies in the investment universe. This rating process once again reduces the Fund's investment universe in order to obtain an eligible universe. The lowest-rated companies are excluded from the investment universe.

The management team uses the ESG ratings supplied by an external data provider, MSCI ESG Research.

The Management Company has two options if an issuer has not been rated by MSCI ESG Research:

- o First, it can use the ESG rating that the Management Company has awarded to securities of the issuer concerned.
- o 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, capitalisation or country. This alternative rating will stop being used if MSCI ESG Research 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 after the weighting of each share is taken into account. Target funds with an ESG rating at fund level are also considered.

WHAT ARE THE BINDING ELEMENTS OF THE INVESTMENT STRATEGY USED TO SELECT THE INVESTMENTS TO ATTAIN EACH OF THE ENVIRONMENTAL OR SOCIAL CHARACTERISTICS PROMOTED BY THIS FINANCIAL PRODUCT?

The binding elements of the investment strategy guarantee that investments are aligned with the stated environmental and/or social characteristics.

The binding elements are as follows:

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

The **investment strategy** guides investment decisions based on factors such as investment objectives and risk tolerance.

in particular. The Fund also applies specific exclusions. The Fund may not, therefore, invest in the regulated utilities and telecommunications sectors, alcohol, gambling, oil & gas, or in banks that have not committed to a policy that meets international standards for a fossil fuel phase-out;
A selectivity approach leading to the elimination of at least 20% of the investment universe;

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?

The management team takes into account non-financial criteria through a selectivity approach leading to the elimination of at least 20% of this universe. The approach described above reduces the scope of investments according to applicable exclusions and on the basis of the ESG analysis carried out on, and ESG ratings assigned to, eligible issuers.

WHAT IS THE POLICY TO ASSESS GOOD GOVERNANCE PRACTICES OF THE INVESTEE COMPANIES?

ODDO BHF Asset Management's Responsible Investment Policy describes our definition and assessment of good governance practices. Good governance practices can be assessed using a number of criteria, such as anti-corruption policies and practices, executive remuneration policies, shareholder structure, quality of financial reporting and business ethics.



WHAT IS THE ASSET ALLOCATION PLANNED FOR THIS FINANCIAL PRODUCT?

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.

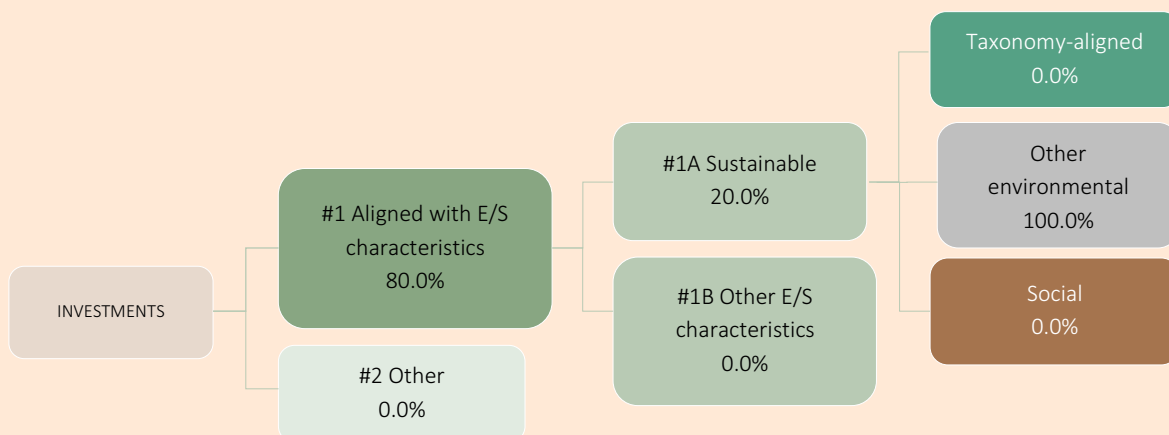
Asset allocation describes the share of investments in specific assets.

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 used to improve ESG alignment or reduce ESG risk. As part of the investment strategy, the Fund is authorised to use derivatives for hedging purposes.



TO WHAT MINIMUM EXTENT ARE SUSTAINABLE INVESTMENTS WITH AN ENVIRONMENTAL OBJECTIVE ALIGNED WITH THE EU TAXONOMY?

DOES THE FINANCIAL PRODUCT INVEST IN FOSSIL GAS AND/OR NUCLEAR ENERGY RELATED ACTIVITIES THAT COMPLY WITH THE EU TAXONOMY?

☐ Yes

☐ In fossil gas

☐ In nuclear

☒ No

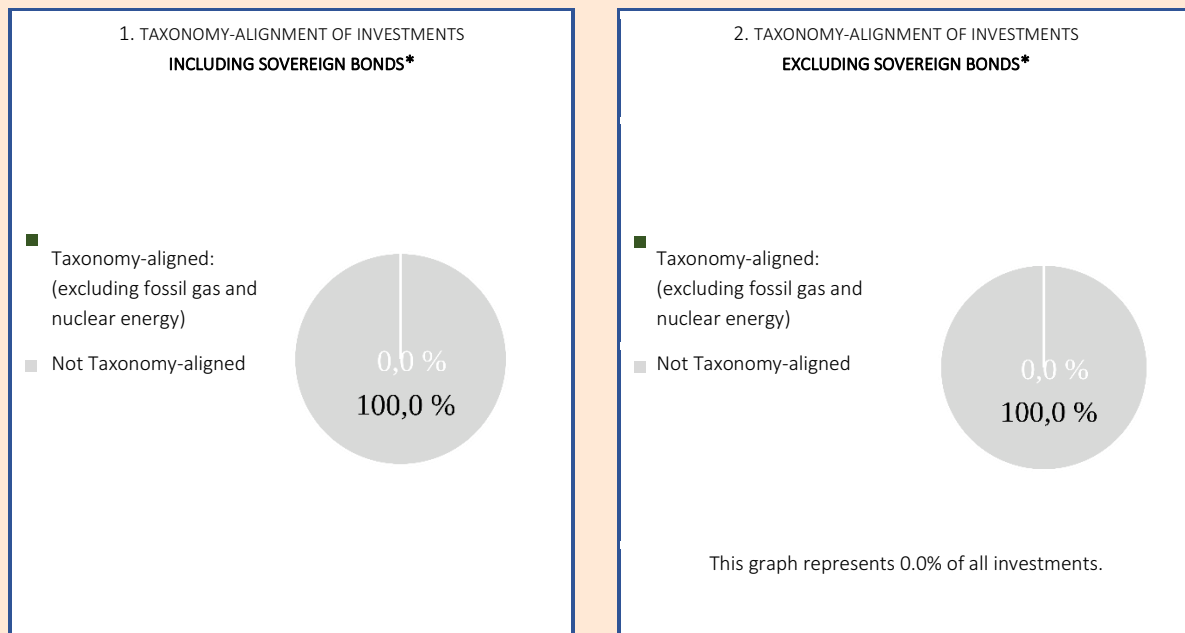
The Fund management team analyses the portfolio's positions on the basis of ESG criteria. The Fund does not rule out investing in nuclear energy and/or fossil gas activities.

No minimum share of EU Taxonomy-aligned activities within the field of fossil gas and/or nuclear energy is planned for the Fund.

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.

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.



*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?

The minimum share is 0%

WHAT IS THE MINIMUM SHARE OF SUSTAINABLE INVESTMENTS WITH AN ENVIRONMENTAL OBJECTIVE THAT ARE NOT ALIGNED WITH THE EU TAXONOMY?

The minimum share is 20%

WHAT IS THE MINIMUM SHARE OF SOCIALLY SUSTAINABLE INVESTMENTS?

There is no minimum share of sustainable investments with an environmental objective, but the Fund may make investments with an environmental objective.

WHAT INVESTMENTS ARE INCLUDED UNDER "#2 OTHER", WHAT IS THEIR PURPOSE AND ARE THERE ANY MINIMUM ENVIRONMENTAL OR SOCIAL SAFEGUARDS?

Investments included under "#2 Other" may be derivatives and other ancillary assets.



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



are sustainable investments with an environmental objective that do not take into account the criteria for environmentally sustainable economic activities under the EU Taxonomy.



Reference benchmarks are indices 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?

Not applicable

HOW IS THE ALIGNMENT OF THE INVESTMENT STRATEGY WITH THE METHODOLOGY OF THE INDEX ENSURED ON A CONTINUOUS BASIS?

Not applicable

HOW DOES THE DESIGNATED INDEX DIFFER FROM A RELEVANT BROAD MARKET INDEX?

Not applicable

WHERE CAN THE METHODOLOGY USED FOR THE CALCULATION OF THE DESIGNATED INDEX BE FOUND?

Not applicable



WHERE CAN I FIND MORE PRODUCT-SPECIFIC INFORMATION ONLINE?

More detailed information on the product is available at: am.oddo-bhf.com