

Environmental and/or social characteristics

Product name: ODDO BHF US Large Cap

Legal entity identifier: 969500PU8CLCM4PCIB49

DOES THIS FINANCIAL PRODUCT HAVE A SUSTAINABLE INVESTMENT OBJECTIVE?

●● <input type="checkbox"/> Yes	●● <input checked="" type="checkbox"/> No
<p><input type="checkbox"/> It will make a minimum of sustainable investments with an environmental objective: N/A</p> <ul style="list-style-type: none"> <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 <p><input type="checkbox"/> It will make a minimum of sustainable investments with a social objective: N/A</p>	<p><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</p> <ul style="list-style-type: none"> <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 <p><input type="checkbox"/> It promotes E/S characteristics, but will not make any sustainable investments.</p>

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 starting universe used for the non-financial analysis of the Fund, and more specifically used for comparing ESG scores, is the Fund's benchmark, the S&P500.

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 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. In particular, the Fund's weighted average ESG rating must be above that of the benchmark.

At least 90% of the Fund's net assets have an ESG rating once weightings have been taken into account.

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.

The management team takes into account the weighting of securities held in the portfolio when calculating the portfolio's average ESG rating. If the ESG rating of investments is downgraded or the ESG rating methodology is changed to the detriment of the portfolio's average ESG rating, then the management team will consider unitholders' interests and market conditions when reestablishing the portfolio's lead over its benchmark in terms of average 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. 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:

- The 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 benchmark index.

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.

- 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.

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.

- 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.
- **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 Investment Advisor takes sustainability risks into account by integrating ESG (Environmental and/or Social and/or Governance) criteria into its investment decision-making process. This process also makes it possible to assess the fund manager's ability to identify the adverse sustainability impacts of their business activities. For more information, please refer to the Fund prospectus, which is available on the website: am.oddobhf.com.

No



WHAT INVESTMENT STRATEGY DOES THIS FINANCIAL PRODUCT FOLLOW?

The Fund's stock selection method relies upon a trend-tracking model based on the benchmark index. This model calculates trends and buy/sell signals with reference to a wide array of historical data.

The Fund aims to outperform its benchmark rather than replicate it precisely. The Fund's performance may therefore deviate from it considerably in both positive and negative terms.

The Fund invests at least 70% of its assets in equities included in the S&P 500 NR (Net Return) index.

The Fund may also invest up to 30% of its net assets in equities of issuers headquartered outside of the United States.

The Fund may invest up to 10% of its net assets in equities headquartered outside the OECD (emerging country).

The Fund may invest up to 30% of assets in euro-denominated fixed, variable or revisable rate securities (linked to bond market or money market rates) in order to optimise cash management.

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.

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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. Target funds with an ESG rating at fund level are also considered.

The Fund's maximum exposure to the instruments (equities, debt securities, UCIs and derivatives) is limited to 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).

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, tobacco and non-conventional weapons, in particular.

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

The Fund's weighted average ESG rating must be above that of the benchmark.

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

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 minimum rate.

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.

Good governance practices include sound management structures, employee relations, remuneration of staff and tax compliance.



WHAT IS THE ASSET ALLOCATION PLANNED FOR THIS FINANCIAL PRODUCT?

The net assets of the Fund comprise equities, debt securities and money market instruments, held directly or via UCIs

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 and/or social investments rate. 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. Selected UCIs with an ESG rating at fund level are also taken into account.

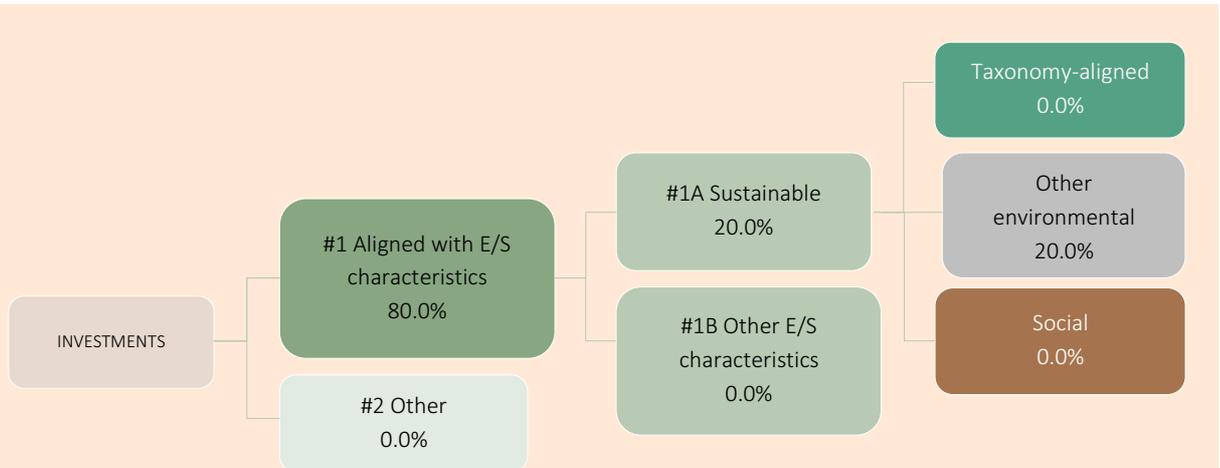
Asset allocation describes the share of investments in specific assets.

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 and exposure purposes.



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

There is no minimum share of 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?

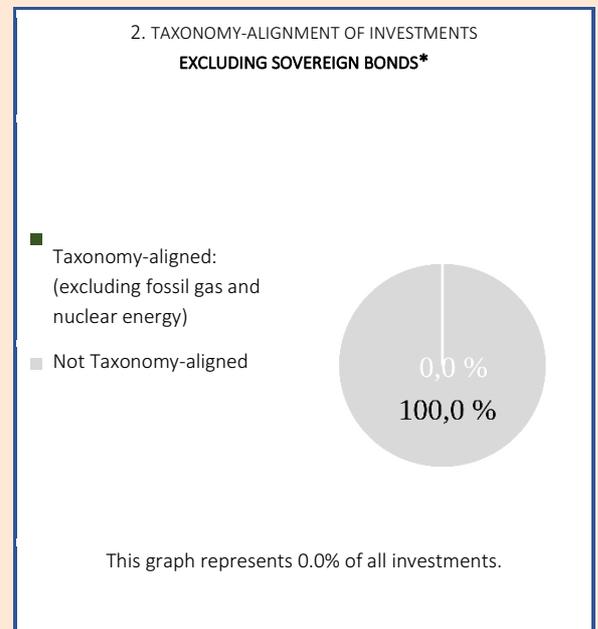
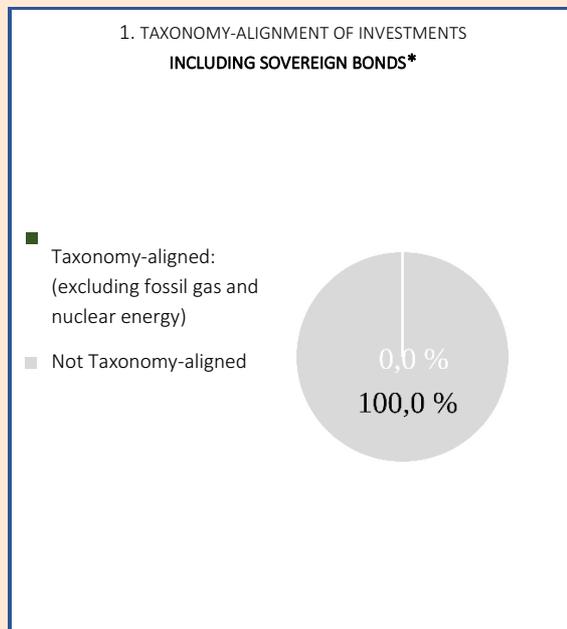
- Yes
- In fossil gas In nuclear
- No

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. A minimum share of EU Taxonomy-aligned activities within the field of fossil gas and/or nuclear energy is not 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 of investments in transitional and enabling activities is 0%.



WHAT IS THE MINIMUM SHARE OF SUSTAINABLE INVESTMENTS WITH AN ENVIRONMENTAL



are sustainable investments with an environmental objective that do not take into account the criteria for

OBJECTIVE THAT ARE NOT ALIGNED WITH THE EU TAXONOMY?

The minimum share of sustainable investments with an environmental objective but that are not aligned with the EU Taxonomy is 20%.



WHAT IS THE MINIMUM SHARE OF SOCIALLY SUSTAINABLE INVESTMENTS?

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

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

Reference benchmarks are indices to measure whether the financial product attains the environmental or social characteristics that they promote.