



ODDO BHF

*REMUNERATION POLICY IN CONNECTION WITH THE
CONSIDERATION OF SUSTAINABILITY RISKS*

ODDO BHF SE

20.11.2025 – VERSION 6

(REPLACES VERSION 5 AS OF 07.05.2025)

ODDO BHF SE's remuneration system is already designed to support ODDO BHF SE's sustainable strategy due to the regulatory requirements for banks' remuneration systems (including Section 4 of the German Remuneration Regulation for Financial Institutions (InstitutsVergV), which stipulates that the remuneration strategy and remuneration systems must be geared towards achieving the objectives set out in the business and risk strategies, and remuneration parameters must be aligned with the strategies and support the achievement of the strategic objectives) in such a way that it supports ODDO BHF SE's sustainable strategy.

As part of its remuneration policy, which is reviewed annually, ODDO BHF SE ensures that employee performance is not remunerated or evaluated in a manner that conflicts with the obligation to act in the best interests of its clients. The remuneration system is designed in such a way that there are no incentives to take disproportionately high risks. When granting variable remuneration components, any negative performance contributions are reviewed for individual employees in accordance with Section 5 (2) of the German Remuneration Regulation for Financial Institutions (InstitutsVergV) and taken into account when determining remuneration. Thus, the remuneration policy also creates incentives for governance-compliant behavior, while non-governance-compliant behavior leads to a reduction in the respective variable remuneration components.

ODDO BHF SE continuously develops its remuneration policy in accordance with the relevant regulatory requirements. This is done in particular as part of the annual adequacy review, which also includes checking and verifying whether the remuneration system is gender-neutral, so that there is no gender-based pay discrimination for the same or equivalent work.



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Commercial register: HRB 128843 Local Court of Frankfurt am Main

Authorized and supervised by: German Federal Financial Supervisory Authority (Bundesanstalt für Finanzdienstleistungsaufsicht, "BaFin") and the European Central Bank

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