



ODDO BHF

INCLUSION OF SUSTAINABILITY RISKS

ARTICLE 3 SFDR

ODDO BHF SE

01.12.2025 – VERSION 8

(REPLACES VERSION 7 AS OF 07.05.2024)

In order to support sustainable investments, Art. 3 SFDR contains the obligation to disclose information on the integration of sustainability risks in investment decision-making processes in course of Portfolio Management and the inclusion of sustainability risks in the performance of investment advisory activities. The approach applied by ODDO BHF SE is explained in more detail below.

1. Sustainability Risks

Environmental conditions, social upheaval and/or poor corporate governance can have a negative impact on the value of our clients' investments and assets in several respects. These risks can have a direct impact on the net assets, financial position and results of operations, and also on the reputation of the investment assets.

Accordingly, Article 2 No. 22 SFDR defines sustainability risks as environmental, social or governance events or conditions, the occurrence of which could have an actual or potential material adverse effect on the value of the investment.

The area of the environment ("environmental") concerns, for example, climate protection, the protection of biodiversity and the protection of water and marine resources. Sustainability risks in this area are divided into physical risks and transition risks.

- Physical risks arise in particular with regard to individual extreme weather events and their consequences (such as periods of heat and drought, flooding, storms, hail, forest fires, avalanches) as well as with regard to long-term changes in climatic and ecological conditions (such as precipitation frequency and amounts, weather instability, sea-level rise, changes in ocean and air currents, acidification of the oceans, increase in average temperatures with regional extremes). These can have direct consequences (such as impairment or destruction of operational/production facilities of individual companies or entire regions) as well as indirect consequences (such as in the form of a breakdown of supply chains, the abandonment of water-intensive business activities or armed conflicts). In addition, those who cause environmental damage or companies that have promoted climate change may be held responsible by the state for the consequences.
- Transition risks exist in particular in connection with the transition to a low-carbon economy: for example, political measures can lead to an increase in the price and/or shortage of fossil fuels (examples: coal phase-out, CO₂ tax) or to high investment costs due to the necessary renovation of buildings and facilities. New technologies can displace known ones (example: electromobility), changed preferences of contractual partners or customers and societal expectations can endanger companies and their business models that do not adapt to such changes in a suitable way or not in time.
- There is also an interdependence between physical risks and transition risks, as a sharp increase in physical risks would require a more abrupt change in the economy, which in turn leads to higher transition risks.

Events, developments or behaviour that can be assigned to the areas of social affairs ("social") and corporate governance ("governance") can also have a negative impact on the assets, financial and earnings situation of a company if the probability of their occurrence is not sufficiently priced into the valuation of the assets or liabilities concerned. Such risks in the area of social affairs result, for example, from non-compliance with recognised labour standards (e.g. child and forced labour) or binding requirements in the area of occupational safety or health protection. In the area of corporate governance, such risks can arise from tax evasion or corruption, among other things. Such risks materialise, for example, in the form of compensation payments or fines, which usually also has an impact on the reputation of the company concerned.

Sustainability risks can impact and/or contribute significantly to traditional risks of an investment (such as industry, issuer or liquidity risk). Various sustainability risks can also occur cumulatively. Sustainability risks may affect entire sectors, industries and/or regions, and may be subject to widely varying manifestations.

2. ODDO BHF SE's approach to incorporating sustainability risks

Since such risks to the assets, financial and earnings situation, and also to the reputation of the investment assets cannot ultimately be completely ruled out, ODDO BHF SE has developed strategies which provide ODDO BHF SE with the possibility to identify and limit sustainability risks.

In order to limit sustainability risks, ODDO BHF SE attempts to identify and, if possible, exclude investments in companies that exhibit an increased risk potential. With specific exclusion criteria, which focus in particular on the business model of a specific investment object, ODDO BHF SE sees itself in a position to also align investment decisions and/or investment recommendations with environmental, social or company-related values. For this purpose, it generally also makes use of data from recognized data providers.

This approach developed by ODDO BHF SE is not used, or at least not to the same extent, for all services subject to this disclosure.

Depending on the specific service provided by ODDO BHF SE, a distinction must be made as follows.

2.1 Approach to incorporate sustainability risks in decentralized portfolio management

ODDO BHF SE currently applies sustainability risks into its decentralized portfolio management by applying the following exclusion criteria at the individual instrument level in its investment decision-making processes in decentralized portfolio management:

- Sector exclusions: companies with certain turnover shares in controversial weapons, gambling, pornography, tobacco, coal or exploration-production and exploitation of oil and gas in the Arctic are excluded from investment. The question of which turnover threshold is decisive in each case is resolved on a sector-specific basis: for most sectors currently a

turnover share of more than 5% is considered to be decisive, but for some sectors respectively sub-sectors of these sectors other thresholds are considered to be decisive in some cases (for example, an investment in companies that generate revenues in the field of certain controversial weapons is completely excluded; for other sectors, turnover shares greater than 5% are also possible).

- Non-compliance with the principles of the United Nation's Global Compact: companies that violate the principles of the United Nation's Global Compact are excluded from investment.
- Biodiversity: exclusion of companies that claim to operate in or near biodiversity-sensitive areas and have been involved in controversies with serious or very serious adverse impacts on the environment.

The sustainability criteria in decentralized portfolio management are, in principle (to the extent that corresponding data are available) also to be applied to indirect investments (e.g. funds, certificates) and thus to pure ETF portfolios. In this context, the above criteria - modified accordingly - apply to indirect investments consolidated at the level of the respective investment instrument.

The corresponding strategies are the responsibility of the business division management, are regularly reviewed and adjusted if required; the details regarding responsibilities are determined by the business division management.

2.2 Approach to incorporate sustainability risks in portfolio management of ODDO BHF TRUST

The portfolio management subsidiary ODDO BHF Trust GmbH was fully merged into the parent company ODDO BHF SE on 2 April 2024. All rights and obligations were transferred to ODDO BHF SE as part of this merger. Operationally, portfolio management will be continued by ODDO BHF TRUST as an independent department of the Bank.

In the course of the performance of ODDO BHF TRUST's portfolio management solutions, all investments are analysed with regard to their environmental, social and corporate governance sustainability. The data being required for this is provided by a recognised external data provider that is specialised in sustainability analyses (currently MSCI ESG Research¹). In respect of individual financial instruments and the respective overall portfolio a specially developed ESG approach is used, which serves to incorporate sustainability risks (at the same time it serves to consider the principal adverse effects of investment decisions on sustainability factors). This approach is essentially based on the following pillars:

- Application of exclusion criteria on single instrument level:
 - Sector exclusions: Companies with certain turnover shares in the areas of controversial weapons, gambling, pornography, tobacco, coal or exploration-production and exploitation of oil and gas in the Arctic are excluded from investment. The question of which turnover threshold is decisive in each case is resolved on a sector-specific basis: for most sectors, a turnover share of more than 5% is currently considered decisive, but for some sectors or subsectors of these sectors, other thresholds are in part considered decisive (for example, an investment in companies that generate turnover in the area of certain controversial weapons is completely excluded; for other sectors, turnover shares greater than 5% are also possible).
 - Non-compliance with principles of the United Nations Global Compact: Companies that violate the principles of the United Nations Global Compact are excluded from investment.
 - Biodiversity: exclusion of companies that claim to operate in or near biodiversity-sensitive areas and have been involved in controversies with serious or very serious adverse environmental impacts.
- Ensure achievement of specific targets at the overall portfolio level:
 - A sustainability rating of at least "A" according to MSCI ESG Research at the level of the overall portfolio is targeted.
 - The minimum share of sustainable investments shall be 4% and the minimum share of environmentally sustainable investments shall be 0.5%.
 - At the level of the individual instruments and the overall portfolio, carbon dioxide emissions (CO₂) are considered. The goal is for the portfolio to have lower CO₂ emissions than the overall market (represented by the MSCI All Country World Index)

The sustainability criteria are, in principle (to the extent that corresponding data are available) also to be applied to indirect investments (e.g. funds, certificates) and thus to pure ETF portfolios. In this context, the above criteria - modified accordingly - apply to indirect investments consolidated at the level of the respective investment instrument.

Within the scope of the **Individual Portfolio Management Solutions for funds** of ODDO BHF TRUST, only the above exclusion criteria apply at individual instrument level. There is no assurance of the achievement of specific targets at the overall portfolio level.

¹ MSCI ESG Research (UK) Limited (LEI 254900RXC6X55NGP8M90, hereinafter: "MSCI ESG Research") is the provider of ESG-related data primarily used by ODDO BHF TRUST.

2.3 Approach to incorporate sustainability risks in the course of investment advice

In course of investment advice, ODDO BHF SE actively takes sustainability risks into account in its investment advisory activities only for clients who have indicated corresponding sustainability preferences to ODDO BHF SE (in the MiFID questionnaire).

Clients of ODDO BHF SE have the possibility to specify which principal adverse impacts on sustainability factors (PAI) should be taken into account. The following categories can be specified:

1. Climate-related categories – PAI 3: GHG emission intensity of the companies in which investments are made
2. Other environment-related categories – PAI 7: activities that adversely impact areas with biodiversity in need of protection
3. Social, labor and human rights categories – PAI 14: involvement in controversial weapons

If clients do not indicate sustainability preferences for the principal adverse impacts on sustainability factors (in the MiFID questionnaire), these will not be taken into account in the investment advice, especially as this is not explicitly requested by clients who have not provided corresponding information.

On the one hand, PAIs are taken into account at an earlier stage when determining the relevant investment advisory universe. For example, financial instruments with an ESG rating worse than “B” from MSCI ESG Research are excluded from a investment advice (the relevant rating score is based precisely on the consideration of PAIs). However, financial instruments for which no MSCI ESG rating is available may still be recommended by ODDO BHF SE as part of its investment advisory services. In addition, PAI can also be taken into account in the context of specific investment advice, for example, by further filtering on the basis of ESG ratings and other mechanisms.

In the case of financial products within the meaning of the SFDR, PAIs are only taken into account for those financial products that (i) are managed by financial market participants subject to the SFDR and (ii) are part of ODDO BHF SE's investment advisory universe.



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

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