



ODDO BHF

*Statement on principal adverse impacts of investment
decisions on sustainability factors*

ARTICLE 4 SFDR
ODDO BHF SE

16TH SEPTEMBER 2026 – VERSION 7

(REPLACES VERSION 6 AS OF 25TH JUNE 2026)

Financial Market Participant: ODDO BHF SE (529900XLAZ15LYK8XK27)

SUMMARY

ODDO BHF SE (LEI: 529900XLAZ15LYK8XK27) considers the principal adverse impacts (PAIs) of its investment decisions on sustainability factors. This statement is the consolidated statement on the principal adverse impacts on sustainability factors of ODDO BHF SE in accordance with Regulation (EU) 2019/2088 (hereinafter also referred to as the “SFDR”).

This statement on principal adverse impacts on sustainability factors covers the reference period from 1 January 2025 to 31 December 2025.

The assessment is based on the mandatory indicators for investments in companies and sovereigns defined Table 1 of Annex I of Delegated Regulation (EU) 2022/1288. Data collection and analysis are carried out using information provided by the external ESG data provider MSCI ESG Research.

During the reporting period, the principal adverse impacts of companies in which investments were made within the scope of the portfolio management mandates were monitored, particularly in the areas of climate change, biodiversity, and social and employee matters. The analysis includes, among other aspects, GHG emissions intensity, exposure to fossil fuels, impacts on biodiversity-sensitive areas, compliance with principles of responsible corporate governance, and exposure to controversial weapons.

To limit negative sustainability impacts, ODDO BHF SE applies various measures. These include, in particular, exclusion criteria relating to controversial weapons, serious violations of the principles of the UN Global Compact, certain activities in the fossil fuel sector, and other sustainability-related restrictions. In addition, sustainability considerations are taken into account as part of ongoing portfolio management and ESG monitoring. The selected additional PAI indicators address the sustainability topics that are particularly relevant to ODDO BHF SE: climate protection, biodiversity, and human rights. We have selected the following indicators

- Companies without initiatives to reduce CO₂ emissions in line with the Paris Climate Agreement
- Companies without strategies to combat deforestation
- Companies without a formalized human rights policy

The development of the PAI indicators is reviewed annually. Changes compared with previous years may be attributable, in particular, to adjustments in portfolio structure, changes in data coverage, and updated company information provided by the external data provider.

It should also be noted that PAIs may be considered as additional criteria in the selection of financial instruments. However, PAIs do not necessarily have to carry greater weight than other factors that may be material to investment decisions.

DESCRIPTION OF THE PRINCIPAL ADVERSE IMPACTS

The figures presented in the table below are rounded to whole numbers or to one decimal place.

The values shown in the “Impact” columns relate to all positions across all of our discretionary portfolio management mandates.

Indicators for investments in investee companies							
Sustainability indicator for principal adverse impacts (PAI)	Metric	Impact 2025	Impact 2024	Impact 2023	Impact 2022	Explanation	Actions taken, planned actions, and targets for the next reference period
CLIMATE INDICATORS AND OTHER ENVIRONMENTAL INDICATORS							
Greenhouse gas emissions	1. GHG-emissions	Scope-1-GHG-emissions	226,264 tCO ₂	217,677 tCO ₂	33,750 tCO ₂	22,485 tCO ₂	Total carbon emissions of portfolio companies – Scope 1 (tCO ₂ e), weighted according to the value of the portfolio's investment in a company and the company's most recently available enterprise value, including cash.
		Scope-2-GHG-emissions	83,543 tCO ₂	76,301 tCO ₂	10,173 tCO ₂	9,477 tCO ₂	Total carbon emissions of portfolio companies – Scope 2 (tCO ₂ e), weighted according to the value of the portfolio's investment in a company and the company's most recently available enterprise value, including cash.
		Scope-3-GHG-emissions	2,886,006 tCO ₂	2,640,129 tCO ₂	362,285 tCO ₂	286,567 tCO ₂	Total estimated Scope 3 emissions (tCO ₂ e) of portfolio companies, weighted by the value of the portfolio's investment in each company and by the company's most recently available enterprise value, including cash.
		Total GHG-emissions	3,266,843 tCO ₂	4,432,164 tCO ₂	402,611 tCO ₂	304,555 tCO ₂	The total annual Scope 1, Scope 2, and estimated Scope 3 greenhouse gas (GHG) emissions associated with the market value of the portfolio. The carbon emissions of the companies are allocated across all outstanding shares and bonds based on the most recently

Indicators for investments in investee companies							
Sustainability indicator for principal adverse impacts (PAI)	Metric	Impact 2025	Impact 2024	Impact 2023	Impact 2022	Explanation	Actions taken, planned actions, and targets for the next reference period
						available enterprise value, including cash.	
2. Carbon Footprint	Carbon Footprint	267 tCO ₂ /MEUR invested	353 tCO ₂ /MEUR invested	301 tCO ₂ /MEUR invested	231 tCO ₂ /MEUR invested	The total annual Scope 1, Scope 2, and estimated Scope 3 greenhouse gas (GHG) emissions per EUR 1 million invested in the portfolio. Corporate emissions are allocated across all outstanding equity and debt instruments based on the most recently available enterprise value, including cash	
3. GHG emissions intensity of investee companies	GHG emissions intensity of investee companies	648 tCO ₂ /MEUR Revenue	595 tCO ₂ /MEUR Revenue	687 tCO ₂ /MEUR Revenue	726 tCO ₂ /MEUR Revenue	The weighted average GHG emissions intensity of the portfolio's investee companies, expressed as Scope 1, Scope 2, and estimated Scope 3 GHG emissions per EUR million of revenue.	Within the scope of our portfolio management under Article 8 of the SFDR, carbon intensity is monitored at both individual security and at portfolio level. The objective is to achieve a lower portfolio carbon intensity than that of the broad market benchmark (MSCI All Country World Index), measured in terms of carbon emissions per unit of revenue.
4. Exposure to companies active in the fossil fuel sector	Share of investments in companies active in the fossil fuel sector	3.3 %	4.4 %	4.7 %	3.3 %	The percentage of the portfolio's market value attributable to issuers engaged in activities related to fossil fuels, including the extraction, processing, storage,	We exclude from our portfolio management mandates investments in companies whose revenue shares from coal

Indicators for investments in investee companies							
Sustainability indicator for principal adverse impacts (PAI)	Metric	Impact 2025	Impact 2024	Impact 2023	Impact 2022	Explanation	Actions taken, planned actions, and targets for the next reference period
						and transportation of petroleum products, natural gas, and thermal and metallurgical coal.	or from the exploration, extraction and use of oil and gas in the Arctic exceed certain thresholds.
5. Share of non-renewable energy consumption and production	Share of the energy consumption and energy production of investee companies from non-renewable energy sources compared with renewable energy sources, expressed as a percentage of total energy sources.	59.3 %	58.6 %	62.2 %	69.5 %	The weighted average of the portfolio issuers' energy consumption and/or energy production from non-renewable sources, expressed as a percentage of the total energy consumed and/or produced.	No actions have been taken, and none are currently planned for the next reference period.
6. Energy consumption intensity by high-impact climate sector	Energy consumption in GWh per EUR million of revenue of investee companies, broken down by high-impact climate sector.	NACE A: 0.2 NACE B: 1.8 NACE C: 0.2 NACE D: 2.1 NACE E: 1.6 NACE F: 0.1 NACE G: 0.3 NACE H: 0.4 NACE L: 0.7	NACE A: 0.5 NACE B: 1.8 NACE C: 0.2 NACE D: 1.7 NACE E: 1.7 NACE F: 0.1 NACE G: 0.1 NACE H: 0.4 NACE L: 0.9	NACE A: 0.5 NACE B: 3.1 NACE C: 0.3 NACE D: 1.4 NACE E: 1.7 NACE F: 0.2 NACE G: 0.2 NACE H: 0.5 NACE L: 1.0	NACE A: 0.5 NACE B: 1.5 NACE C: 0.2 NACE D: 3.0 NACE E: 3.0 NACE F: 0.3 NACE G: 0.2 NACE H: 0.7 NACE L: 1.2	The weighted average energy consumption intensity of the portfolio (GWh per EUR million of revenue) for issuers classified under NACE Codes A, B, C, D, E, F, G, H, and L	

Indicators for investments in investee companies								
Sustainability indicator for principal adverse impacts (PAI)		Metric	Impact 2025	Impact 2024	Impact 2023	Impact 2022	Explanation	Actions taken, planned actions, and targets for the next reference period
Biodiversity	7. Activities negatively affecting biodiversity-sensitive areas	Share of investments in investee companies with sites or operations located in or near biodiversity-sensitive areas, where the activities of those companies negatively affect such areas.	0.1%	11.6%	0.4%	0.0%	The percentage of the portfolio's market value attributable to issuers that, according to their own disclosures, operate in or near biodiversity-sensitive areas and have been involved in controversies with severe or very severe environmental impacts.	We exclude investments in companies involved in severe or very severe controversies relating to biodiversity-sensitive areas from our portfolio management mandates. For indirect investments, we exclude investments where the proportion of severe or very severe controversies exceeds a specified threshold.
Water	8. Emissions to water	Tonnes of emissions to water generated by investee companies per EUR million invested, expressed as a weighted average.	0 t/MEUR invested	0 t/MEUR invested	5.9 t/MEUR invested	26.2 t/MEUR invested	The total annual volume of wastewater discharged into surface waters, measured in tonnes, as a result of industrial or manufacturing activities, per EUR 1 million invested in the portfolio. Companies' emissions to water are allocated across all outstanding equity and debt instruments based on the most recently available enterprise value, including cash	Data availability and coverage are not yet sufficient to define specific measures and targets.
Waste	9. Hazardous waste and radioactive waste ratio	Tonnes of hazardous and radioactive waste generated by investee companies per EUR million invested, expressed as a weighted average.	1.6 t/MEUR invested	0.9 t/MEUR invested	1.0 t/MEUR invested	2.3 t/MEUR invested	The total annual amount of hazardous waste generated, reported in metric tonnes, per EUR 1 million invested in the portfolio. Companies' hazardous waste is allocated across all outstanding equity and debt instruments based	Data availability and coverage are not yet sufficient to define specific measures and targets.

Indicators for investments in investee companies								
Sustainability indicator for principal adverse impacts (PAI)		Metric	Impact 2025	Impact 2024	Impact 2023	Impact 2022	Explanation	Actions taken, planned actions, and targets for the next reference period
							on the most recently available enterprise value, including cash.	
INDICATORS FOR SOCIAL AND EMPLOYEE MATTERS, RESPECT FOR HUMAN RIGHTS, ANTI-CORRUPTION AND ANTI-BRIBERY MATTERS								
Social and employee matters	10. Violations of the UN Global Compact principles and the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises	Share of investments in investee companies that have been involved in violations of the UN Global Compact principles or the OECD Guidelines for Multinational Enterprises.	0.0%	0.0%	0.5%	0.7%	The percentage of the portfolio's market value attributable to issuers involved in very severe controversies related to the company's business activities and/or products.	We exclude from our portfolio management mandates investments in companies involved in severe violations of the principles of the UN Global Compact.
	11. Lack of processes and compliance mechanisms to monitor compliance with the UN Global Compact principles and the OECD Guidelines for Multinational Enterprises	Share of investments in investee companies that have not established policies to monitor compliance with the UN Global Compact principles and the OECD Guidelines for Multinational Enterprises, or grievance-handling mechanisms to address violations of those principles and guidelines.	0.2 %	0.2 %	26.3 %	29.6 %	The percentage of the portfolio's market value invested in issuers that are not signatories to the UN Global Compact.	No actions have been taken, and none are currently planned for the next reference period.
	12. Unadjusted gender pay gap	Average unadjusted gender pay gap at investee companies.	13.5%	14.0%	12.5%	12.9%	The weighted average across the portfolio holdings of the difference between the average gross hourly earnings of male and female	

Indicators for investments in investee companies								
Sustainability indicator for principal adverse impacts (PAI)		Metric	Impact 2025	Impact 2024	Impact 2023	Impact 2022	Explanation	Actions taken, planned actions, and targets for the next reference period
							employees, expressed as a percentage of male gross earnings.	
	13. Board gender diversity	Average ratio of female to male members of the administrative, management and supervisory bodies of investee companies, expressed as a percentage of all members of those bodies.	38.2 %	38.3 %	37.5 %	37.0 %	The weighted average across the portfolio holdings of the ratio of female to male board members.	
	14. Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons).	Share of investments in investee companies involved in the manufacture or sale of controversial weapons.	0.0 %	0.0 %	0.0 %	0.0 %	The percentage of the portfolio's market value invested in issuers active in the controversial weapons sector.	We exclude from our portfolio management mandates investments in companies with exposure to controversial weapons.
Indicators for investments in sovereigns and supranational organisations								
Sustainability indicator for principal adverse impacts (PAI)		Metric	Impact 2025	Impact 2024	Impact 2023	Impact 2022	Explanation	Actions taken, planned actions, and targets for the next reference period
Environmental	15. GHG-intensity	GHG-intensity of investee countries	225 tCO ₂ /MEUR GDP	290 tCO ₂ /MEUR GDP	258 tCO ₂ /MEUR GDP	324 tCO ₂ /MEUR GDP	Weighted average GHG emissions intensity of sovereign issuers in the portfolio, expressed as Scope 1, 2 and 3 emissions per EUR M of GDP.	No actions have been taken, and none are currently planned for the next reference period.

Social	16. Investee countries subject to social violations	Number of investee countries subject to social violations, as referred to in international treaties and conventions, United Nations principles or, where applicable, national law (absolute number and relative number divided by all investee countries).	91	95	40	43	Number of individual sovereign issuers in the portfolio on which the European External Action Service (EEAS) has imposed restrictive measures (sanctions) relating to imports and exports.	
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Indicators applicable to investments in real estate								
Fossil fuels	17. Exposure to fossil fuels through investments in real estate assets.	Share of investments in real estate assets involved in the extraction, storage, transportation or production of fossil fuels.	N/A	N/A	N/A	N/A	No investments were made in real estate.	N/A
Energy efficiency	18. Exposure to energy-inefficient real estate assets.	Share of investments in energy-inefficient real estate assets	N/A	N/A	N/A	N/A	No investments were made in real estate.	N/A
Additional indicators for principal adverse impacts on sustainability factors								
Additional climate and other environment-related indicators								
Sustainability indicator for principal adverse impacts (PAI)		Metric	Impact 2025	Impact 2024	Impact 2023	Impact 2022	Explanation	Actions taken, planned actions, and targets for the next reference period
Indicators for investments in investee companies								
CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS								
Emissions	4. Investments in companies without carbon emission reduction initiatives.	Share of investments in investee companies that do not implement carbon emission reduction initiatives aligned with the Paris Agreement.	34.9%	26%	N/A	N/A	The percentage of the portfolio's market value invested in issuers that, according to the data provider's methodology, do not implement initiatives to reduce CO ₂ emissions.	No actions have been taken, and none are currently planned for the next reference period.

Water, waste and material emissions	15. Deforestation	Share of investments in companies without deforestation policies.	71.7%	70.3%	N/A	N/A	The percentage of the portfolio's market value invested in issuers that, according to the data provider's methodology, have not implemented strategies, policies or measures to prevent or combat deforestation.	
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Additional indicators for social and employee matters, respect for human rights, and anti-corruption and anti-bribery matters

INDICATORS FOR SOCIAL AND EMPLOYEE MATTERS, RESPECT FOR HUMAN RIGHTS, AND ANTI-CORRUPTION AND ANTI-BRIBERY MATTERS

Sustainability indicator for principal adverse impacts (PAI)		Metric	Impact 2025	Impact 2024	Impact 2023	Impact 2022	Explanation	Actions taken, planned actions, and targets for the next reference period
Indicators for investments in investee companies								
Human Rights	9. Lack of a human rights policy	Share of investments in companies without a human rights policy.	1.9%	1.5%	N/A	N/A	The percentage of the portfolio's market value invested in issuers that, according to the external data provider's methodology, have not implemented a formalized human rights policy or publicly documented commitments to respect internationally recognized human rights.	No actions have been taken, and none are currently planned for the next reference period.

DESCRIPTION OF THE POLICIES FOR IDENTIFYING AND PRIORITISING PRINCIPAL ADVERSE IMPACTS ON SUSTAINABILITY FACTORS

ODDO BHF SE has established an appropriate governance structure for defining and continuously monitoring its sustainability strategies. This structure involves all relevant departments, whose findings and comments concerning the sustainability policy may be submitted to the Executive Committees of the respective business divisions and, depending on the extent of their impact on the sustainability policies, ultimately to the Global Management Committee of the ODDO BHF Group.

The strategies for identifying and weighting the principal adverse impacts on sustainability factors were formally approved by the PWM Executive Committee on 18 March 2025.

Adverse sustainability impacts may generally arise in all areas of ESG analysis. As part of our investment process, the economic risks and opportunities associated with an investment are assessed alongside the financial evaluation conducted as part of the individual security analysis for equities, fixed-income securities and other investments. This assessment also takes adverse sustainability impacts into account.

Investment decisions made by ODDO BHF SE as part of its portfolio management activities may have adverse impacts on the environment, including the climate, water and biodiversity, as well as on social and employee matters. They may also have an adverse impact on efforts to combat corruption and bribery.

ODDO BHF SE has been able to review PAIs on a quarterly basis since 30 June 2021.

To manage the identified PAIs, ODDO BHF SE applies various measures and considers all identified PAIs to be equally important. ODDO BHF SE has established corresponding requirements for the investment process applicable to those financial products. The requirements relating to the relevant investment universe and the investment decisions made within it are available to all relevant portfolio managers. These components of the applicable investment process provide a sound basis for sustainability-oriented decisions within the selection process.

The relevant requirements take into account, in particular, data provided by service providers specialising in sustainability analysis. ODDO BHF SE uses data from the third-party provider MSCI ESG Research to consider adverse sustainability impacts in its investment decisions. On this basis, all investments held within the financial products described in the summary can be analysed in terms of their sustainability characteristics across environmental, social and governance matters. To ensure data quality, an appropriate process has been implemented to verify the completeness of the input data.

For individual securities, PAIs are taken into account by applying the following exclusion criteria:

- Sector exclusions: Companies with certain revenue shares in controversial weapons, coal, or the exploration, extraction and use of oil and gas in the Arctic are excluded from investment. The applicable revenue threshold is determined on a sector-specific basis. For most sectors, a revenue share of more than 5% is currently considered relevant. However, different thresholds would sometimes be considered relevant for certain sectors or subsectors. For example, investment in companies generating revenue from certain controversial weapons are excluded entirely, while revenue shares exceeding 5% may be permitted in other sectors.
- Non-compliance with the principles of the United Nations Global Compact: Companies that violate the principles of the United Nations Global Compact are excluded from investment.
- Biodiversity: Companies that, according to their own disclosures, operate in or near biodiversity-sensitive areas and have been involved in controversies with severe or very severe adverse environmental impacts are excluded from investment.

Due to data availability and quality, as well as the thematic alignment with the focus areas of GHG emissions, biodiversity and human rights, ODDO BHF SE has selected the following optional indicators:

- Companies without initiatives to reduce CO₂ emissions in line with the Paris Agreement
- Companies without strategies to combat deforestation
- Companies without a formalised human rights policy

The additional indicators selected are not assigned a higher or lower weighting than the mandatory PAIs.

Adverse sustainability impacts are, in principle and provided that the relevant data are available, also applicable to indirect investments, such as funds and certificates. The above criteria, modified accordingly, apply to indirect investments on a consolidated basis at the level of the respective investment instrument.

Looking ahead, ODDO BHF SE will continuously develop its approach further, while remaining significantly dependent on the availability and quality of the relevant data. With regard to any margins of error, reference is made to the external data provider used, MSCI ESG Research. Since the data provider does not supply margins of error, ODDO BHF SE is also unable to specify them. It should also be noted that ODDO BHF SE has no means of obtaining missing data if they are not provided by MSCI ESG Research or directly by the companies.

Against this background, ODDO BHF SE intends to further improve its internal strategies and measures in order to retain the ability to take greater account of the adverse impacts of investment decisions on sustainability factors on the basis of the data available to it.

Finally, it should be noted that, within the financial products described in the summary, ODDO BHF SE always makes investment decisions in the best interests of its clients. This means that PAIs are considered as additional criteria alongside other decision-relevant factors and, in particular, that PAIs do not necessarily carry greater weight than other decision-relevant factors in every case.

ENGAGEMENT POLICY

In its function as portfolio manager, ODDO BHF SE does not exercise any shareholder rights, and therefore does not pursue an engagement policy.

REFERENCE TO INTERNATIONALE STANDARDS

ODDO BHF SE takes various internationally recognised standards and frameworks into account when assessing the principal adverse impacts on sustainability factors. These include, in particular, the principles of the United Nations Global Compact (UNGC), the United Nations Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises and the objectives of the Paris Agreement.

The methodology used is predominantly based on current sustainability data from the external ESG data provider MSCI ESG Research. The analysis of principal adverse impacts is generally based on reported company data. Where such data are not fully available, modelled or estimated values provided by the data provider are used. The methodology is used to identify and assess adverse impacts that already exist or are currently identifiable. No independent forecast of future adverse sustainability impacts is currently made. Instead, future risks are taken into account indirectly through the ongoing analysis of relevant ESG indicators and controversies.

These standards are taken into account through the analysis of the PAI indicators defined in Annex I to Delegated Regulation (EU) 2022/1288. This includes indicators relating to greenhouse gas emissions, fossil fuels, human rights and good corporate governance.

In the area of climate change, the objectives of the Paris Agreement serve as a reference framework. This includes, among other things, the assessment of greenhouse gas emissions. As part of our portfolio management under Article 8 of the SFDR, CO₂ intensity is monitored at both individual security and portfolio level. The objective is to achieve a lower CO₂ intensity for the portfolio compared with the broad market benchmark (MSCI All Country World Index), measured on the basis of revenue intensity.

In the area of social factors and human rights, the principles of the UN Global Compact, the UN Guiding Principles on Business and Human Rights and the OECD Guidelines are taken into account. This includes, for example, the assessment of violations of international standards and the existence of appropriate human rights-related policies and processes. Companies found to be in violation of the principles of the UN Global Compact are not considered for investment in accordance with the defined exclusion criteria. Existing positions are reviewed as part of the monitoring process and reduced or divested where appropriate.

ODDO BHF SE does not currently use a forward-looking climate scenario, in particular because sufficiently mature methodologies and adequate data are not yet available and no market standard has yet been established in this regard.

HISTORICAL COMPARISON

The development of the PAI indicators is reviewed annually. Changes compared with previous years may be attributable, in particular, to adjustments to the portfolio structure, changes in data coverage and updated company information provided by the external data provider.

For Indicator 10, “Violations of the UN Global Compact principles and the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises”, the reported data demonstrate the effectiveness of the exclusion criterion applied within our portfolio management mandates to companies that violate the UN Global Compact principles. A corresponding effect is evident for Indicator 14, “Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)”. For both indicators, the exposure of our investments amounted to 0% in both the current and the previous reporting period.

With regard to Indicator 1, “GHG emissions”, a significant increase in the reported values was observed between 2023 and 2024. This increase is attributable to improvements in the quality of the data reported by investee companies and does not result from any change in our investment strategy.

Compared with the previous year, the GHG emissions intensity of sovereign issuers held in the portfolio decreased. The number of sovereign issuers subject to restrictive measures imposed by the European External Action Service also declined slightly.

By contrast, the additional indicators relating to investee companies showed an increase in the share of investments in companies without initiatives to reduce CO₂ emissions, without strategies to combat deforestation, and without a formalised human rights policy.

No investments in real estate assets were held during the reporting period. Accordingly, no values are reported for the relevant indicators.

For a comprehensive quantitative historical comparison covering the period from 2022 to 2025, reference is made to the corresponding columns in the table on principal adverse impacts on sustainability factors.

ODDO BHF SE

Handelsregister: HRB 128843 Amtsgericht Frankfurt am Main

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