

Compliance Declaration in accordance with Art. 4 SFDR

1. REGULATORY CONTEXT

In accordance with the EU regulation 2019/2018 of 27 November 2019 (“SFDR”) and more particularly article 4 SFDR, the management company ODDO BHF Asset Management Lux, publishes on its website how the Company considers the principal adverse impacts of investment decisions on sustainability factors and its strategy for due diligence in relation to these impacts.

2. COMPLIANCE DECLARATION

This statement applies to the management of funds and discretionary mandates by the Company. It does not apply in cases where the Company has outsourced the portfolio management function to, or is advised by, an external third party.

The Company takes into account the principal adverse impacts of investment decisions on sustainability factors for the products addressing sustainability risks by integrating ESG criteria (Environment and/or Social and/or Governance) into their investment decision making process. The due diligence policy is based on the respective exclusion policies across the funds integrating ESG criteria, the MSCI ESG model that evaluates the sustainability profile of issuers, the dialogue and engagement policy and our monthly sustainability reporting integrating key sustainability KPIs.

Our monthly sustainability reporting is a key tool to track continuously the adverse sustainability indicators. It includes the following KPIs for the funds integrating ESG criteria:

- Greenhouse gas emissions (GHG)
- GHG intensity of investee companies and the fund
- Exposure of the fund to companies active in the fossil fuel sector
- An energy transition indicator (ETA) developed internally and based on our internal model rating
- Female executives
- UN Global Compact Signatory
- Implementation of Human rights policy

The funds not integrating ESG criteria do not take into account principle adverse impacts of investment decisions as it has not been decided to assess, monitor and report them in the investment strategy. However, the Company has implemented mitigating factors applying to all ODDO BHF Asset Management branded mutual funds and implying a consistent integration of principal adverse impacts of investment decisions (see our Coal and United Nations Global

Compact exclusion policies). Please refer to the respective fund literature for further information.

A brief summary of our engagement policies in accordance with Article 3g of Directive 2007/36/EC is available on our website. ODDO BHF Asset Management is also signatory of responsible business codes and internationally recognized standards: United Nations Principles for Responsible Investment and the CDP.

As we follow a progressive integration of ESG and principal adverse impacts across our asset classes, we may or may not extend their consideration in the future if we deem them relevant for the investment strategy of our products.

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