



LEA 02	Discretionary Mandate	Gateway	Reason for Interaction
<p>Individual internal staff engagements</p>			
<p>Collaborative engagements</p>	<p>Collaborative engagements</p>	<p>Collaborative engagements</p>	<p>Collaborative engagements</p>
<p>Service provider engagements</p>	<p>Service provider engagements</p>	<p>Service provider engagements</p>	<p>Service provider engagements</p>

RI TRANSPARENCY REPORT

2020

ODDO BHF Asset Management

About this report

The PRI Reporting Framework is a key step in the journey towards building a common language and industry standard for reporting responsible investment (RI) activities. This RI Transparency Report is one of the key outputs of this Framework. Its primary objective is to enable signatory transparency on RI activities and facilitate dialogue between investors and their clients, beneficiaries and other stakeholders. A copy of this report will be publicly disclosed for all reporting signatories on the [PRI website](#), ensuring accountability of the PRI Initiative and its signatories.

This report is an export of the individual Signatory organisation's response to the PRI during the reporting period specified above. It includes their responses to mandatory indicators, as well as responses to voluntary indicators the signatory has agreed to make public. The information is presented exactly as it was reported. Where an indicator offers a response option that is multiple-choice, all options that were available to the signatory to select are presented in this report. Presenting the information exactly as reported is a result of signatory feedback which suggested the PRI not summarise the information.

PRI disclaimer

This document presents information reported directly by signatories. This information has not been audited by the PRI Secretariat or any other party acting on their behalf. While this information is believed to be reliable, no representations or warranties are made as to the accuracy of the information presented, and no responsibility or liability can be accepted for any error or omission.

Usage restrictions

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OO 01.1	Select the services and funds you offer
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Select the services and funds you offer	% of asset under management (AUM) in ranges
Fund management	<input type="radio"/> 0% <input type="radio"/> <10% <input type="radio"/> 10-50% <input checked="" type="radio"/> >50%
Fund of funds, manager of managers, sub-advised products	<input type="radio"/> 0% <input type="radio"/> <10% <input checked="" type="radio"/> 10-50% <input type="radio"/> >50%
Other	<input checked="" type="radio"/> 0% <input type="radio"/> <10% <input type="radio"/> 10-50% <input type="radio"/> >50%
Total 100%	

OO 01.2	Additional information. [Optional]
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In addition to fund management ODDO BHF Asset Management offers fund administration services as a KVG (Kapitalverwaltungsgesellschaft).

OO 02.1	Select the location of your organisation's headquarters.
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France

OO 02.2	Indicate the number of countries in which you have offices (including your headquarters).
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- 1
- 2-5
- 6-10
- >10

OO 02.3	Indicate the approximate number of staff in your organisation in full-time equivalents (FTE).
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338

OO 03.1	Indicate whether you have subsidiaries within your organisation that are also PRI signatories in their own right.
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- Yes
- No

OO 03.3	Additional information. [Optional]
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Our main shareholder ODDO BHF SCA acquired (at 100%) in July 2015 the German AM company Meriten IM in Düsseldorf (renamed ODDO BHF AM GmbH). ODDO BHF AM GmbH signed PRI in 2011.

At the end of 2018, we have proceeded with the PRI to group our various management entities into a single reporting: ODDO BHF Asser Management.

OO 04.1	Indicate the year end date for your reporting year.
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31/12/2019

OO 04.2	Indicate your total AUM at the end of your reporting year.
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Total AUM
 60,805,235,563 EUR
 67025690040 USD

OO 04.4	Indicate the assets which are subject to an execution and/or advisory approach. Provide this figure based on the end of your reporting year
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Not applicable as we do not have any assets under execution and/or advisory approach

OO 05.1 Provide an approximate percentage breakdown of your AUM at the end of your reporting year using the following asset classes and investment strategies:

	Internally managed (%)	Externally managed (%)
Listed equity	28	0
Fixed income	30	0
Private equity	4	0
Property	0	0
Infrastructure	0	0
Commodities	0	0
Hedge funds	0	0
Fund of hedge funds	0	0
Forestry	0	0
Farmland	0	0
Inclusive finance	0	0
Cash	0	0
Money market instruments	3	0
Other (1), specify	21	0
Other (2), specify	14	0

Internally managed 'Other (1)' description

Balanced portfolios (mix of Equities and bonds)

Internally managed 'Other (2)' description

KVG activity in Germany (administrative functions)

OO 06 **Mandatory** **Descriptive** **General**

OO 06.1 Select how you would like to disclose your asset class mix.

- as percentage breakdown
- as broad ranges

OO 06.3 Indicate whether your organisation has any off-balance sheet assets [Optional].

- Yes
- No

OO 06.5 Indicate whether your organisation uses fiduciary managers.

- Yes, we use a fiduciary manager and our response to OO 5.1 is reflective of their management of our assets.
- No, we do not use fiduciary managers.

OO 07 **Mandatory to Report, Voluntary to Disclose** **Gateway** **General**

Private

OO 09 **Mandatory** **Peering** **General**

OO 09.1 Indicate the breakdown of your organisation's AUM by market.



OO 09.2	Additional information. [Optional]
<p>ODDO BHF AM is a leading European independent asset management firm since 1978. ODDO BHF AM provides specialized investment management solutions to institutional investors and third party distributors. Our clients include pension funds, insurance companies, multi-managers, financial institutions, clerical clients, private banks and IFAs.</p> <p>ODDO BHF SCA (100% shareholder of ODDO BHF AM) is built around a partnership of individuals: 60% ownership for Oddo family, 30% for employees and 10% for other investors as of 31/12/2019. This partnership structure, on which the Group's development model is built, is the pledge of the teams' involvement in the long term.</p>	

OO 10	Mandatory	Gateway	General
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OO 10.1	Select the active ownership activities your organisation implemented in the reporting year.
	Listed equity – engagement
<input checked="" type="checkbox"/> We engage with companies on ESG factors via our staff, collaborations or service providers. <input type="checkbox"/> We do not engage directly and do not require external managers to engage with companies on ESG factors.	
	Listed equity – voting
<input checked="" type="checkbox"/> We cast our (proxy) votes directly or via dedicated voting providers <input type="checkbox"/> We do not cast our (proxy) votes directly and do not require external managers to vote on our behalf	
	Fixed income SSA – engagement
<input checked="" type="checkbox"/> We engage with SSA bond issuers on ESG factors via our staff, collaborations or service providers. <input type="checkbox"/> We do not engage directly and do not require external managers to engage with SSA bond issuers on ESG factors. Please explain why you do not.	
	Fixed income Corporate (financial) – engagement
<input checked="" type="checkbox"/> We engage with companies on ESG factors via our staff, collaborations or service providers. <input type="checkbox"/> We do not engage directly and do not require external managers to engage with companies on ESG factors. Please explain why you do not.	
	Fixed income Corporate (non-financial) – engagement
<input checked="" type="checkbox"/> We engage with companies on ESG factors via our staff, collaborations or service providers. <input type="checkbox"/> We do not engage directly and do not require external managers to engage with companies on ESG factors. Please explain why you do not.	
	Fixed income Corporate (securitised) – engagement
<input type="checkbox"/> We engage with companies on ESG factors via our staff, collaborations or service providers. <input checked="" type="checkbox"/> We do not engage directly and do not require external managers to engage with companies on ESG factors. Please explain why you do not.	
	Please explain why you do not engage directly and do not require external managers to engage with companies on ESG factors.
<p>We started the ESG integration within our Fixed Income asset class in 2018 and we put in place our engagement policy step by step and in relation with the importance of our exposures.</p>	

OO 11	Mandatory	Gateway	General
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OO 11.1	Select the internally managed asset classes in which you addressed ESG incorporation into your investment decisions and/or your active ownership practices (during the reporting year).
	Listed equity
<input checked="" type="checkbox"/> We address ESG incorporation. <input type="checkbox"/> We do not do ESG incorporation.	
	Fixed income - SSA
<input checked="" type="checkbox"/> We address ESG incorporation. <input type="checkbox"/> We do not do ESG incorporation.	
	Fixed income - corporate (financial)
<input checked="" type="checkbox"/> We address ESG incorporation. <input type="checkbox"/> We do not do ESG incorporation.	
	Fixed income - corporate (non-financial)
<input checked="" type="checkbox"/> We address ESG incorporation. <input type="checkbox"/> We do not do ESG incorporation.	
	Fixed income - securitised
<input type="checkbox"/> We address ESG incorporation. <input checked="" type="checkbox"/> We do not do ESG incorporation.	

	Private equity
<input checked="" type="checkbox"/>	We address ESG incorporation.
<input type="checkbox"/>	We do not do ESG incorporation.
	Money market instruments
<input type="checkbox"/>	We address ESG incorporation.
<input checked="" type="checkbox"/>	We do not do ESG incorporation.
	Other (1)
<input checked="" type="checkbox"/>	We address ESG incorporation.
<input type="checkbox"/>	We do not do ESG incorporation.
	Other (2)
<input type="checkbox"/>	We address ESG incorporation.
<input checked="" type="checkbox"/>	We do not do ESG incorporation.
	Other (1) [as defined in OO 05]
	Balanced portfolios (mix of Equities and bonds)
	Other (2) [as defined in OO 05]
	KVG activity in Germany (administrative functions)

OO 12	Mandatory	Gateway	General
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OO 12.1 Below are all applicable modules or sections you may report on. Those which are mandatory to report (asset classes representing 10% or more of your AUM) are already ticked and read-only. Those which are voluntary to report on can be opted into by ticking the box.

	Core modules
<input checked="" type="checkbox"/>	Organisational Overview
<input checked="" type="checkbox"/>	Strategy and Governance
	RI implementation directly or via service providers
	Direct - Listed Equity incorporation
<input checked="" type="checkbox"/>	Listed Equity incorporation
	Direct - Listed Equity active ownership
<input checked="" type="checkbox"/>	Engagements
<input checked="" type="checkbox"/>	(Proxy) voting
	Direct - Fixed Income
<input checked="" type="checkbox"/>	Fixed income - SSA
<input checked="" type="checkbox"/>	Fixed income - Corporate (financial)
<input checked="" type="checkbox"/>	Fixed income - Corporate (non-financial)
	Direct - Other asset classes with dedicated modules
<input checked="" type="checkbox"/>	Private Equity
	Closing module
<input checked="" type="checkbox"/>	Closing module

OO LE 01	Mandatory to Report, Voluntary to Disclose	Gateway	General
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OO LE 01.1 Provide a breakdown of your internally managed listed equities by passive, active - quantitative (quant), active - fundamental and active - other strategies.

2	Passive
22	Active - quantitative (quant)
76	Active - fundamental and active - other

OO LE 02	Mandatory to Report, Voluntary to Disclose	Gateway	General
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Private

OO FI 01	Mandatory to Report, Voluntary to Disclose	Gateway	General
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OO FI 01.1 Provide a breakdown of your internally managed fixed income securities by active and passive strategies

SSA		Passive	0
		Active - quantitative (quant)	0
		Active - fundamental and active - other	100
Corporate (financial)		Passive	0
		Active - quantitative (quant)	0
		Active - fundamental and active - other	100
Corporate (non-financial)		Passive	0
		Active - quantitative (quant)	0
		Active - fundamental and active - other	100
Securitised		Passive	0
		Active - quantitative (quant)	0
		Active - fundamental and active - other	100

OO FI 03 Mandatory Descriptive General

OO FI 03.1 Indicate the approximate (+/- 5%) breakdown of your SSA investments, by developed markets and emerging markets.

SSA		Developed markets	95
		Emerging markets	5

OO FI 03.2 Indicate the approximate (+/- 5%) breakdown of your corporate and securitised investments by investment grade or high-yield securities.

Type	Investment grade (+/- 5%)	High-yield (+/- 5%)	Total internally managed
Corporate (financial)	<input type="radio"/> >50% <input checked="" type="radio"/> 10-50% <input type="radio"/> <10% <input type="radio"/> 0%	<input type="radio"/> >50% <input checked="" type="radio"/> 10-50% <input type="radio"/> <10% <input type="radio"/> 0%	100%

OO PE 01 Mandatory Descriptive General

OO PE 01.1 Provide a breakdown of your organisation's internally managed private equity investments by investment strategy.

Investment strategy	Percentage of your internally managed private equity holdings (in terms of AUM)
Venture capital	<input type="radio"/> >50% <input type="radio"/> 10-50% <input type="radio"/> <10% <input checked="" type="radio"/> 0%

Growth capital	<input type="radio"/> >50% <input type="radio"/> 10-50% <input type="radio"/> <10% <input checked="" type="radio"/> 0%
(Leveraged) buy-out	<input type="radio"/> >50% <input type="radio"/> 10-50% <input type="radio"/> <10% <input checked="" type="radio"/> 0%
Distressed/Turnaround/Special Situations	<input type="radio"/> >50% <input type="radio"/> 10-50% <input type="radio"/> <10% <input checked="" type="radio"/> 0%
Secondaries	<input type="radio"/> >50% <input checked="" type="radio"/> 10-50% <input type="radio"/> <10% <input type="radio"/> 0%
Other investment strategy, specify (1)	<input checked="" type="radio"/> >50% <input type="radio"/> 10-50% <input type="radio"/> <10% <input type="radio"/> 0%
Other investment strategy, specify (2)	<input type="radio"/> >50% <input type="radio"/> 10-50% <input type="radio"/> <10% <input checked="" type="radio"/> 0%
Total 100%	

Other investment strategy, specify (1)
Primary fund of funds

OO PE 01.2 Additional information. [Optional]

ODDO BHF Private Equity offers a multi-strategy focus with proven expertise across all private equity fund of funds strategies: primaries, secondaries and co-investments.

OO PE 02 Mandatory to Report, Voluntary to Disclose Descriptive General

Private

OO Checks Checks

If there are any messages below, please review them before continuing. If there are no messages below, please save this page and continue.

SG 01.1 Indicate if you have an investment policy that covers your responsible investment approach.

✓ Yes

SG 01.2 Indicate the components/types and coverage of your policy.

Policy components/types	Coverage by AUM
<input checked="" type="checkbox"/> Policy setting out your overall approach <input checked="" type="checkbox"/> Formalised guidelines on environmental factors <input checked="" type="checkbox"/> Formalised guidelines on social factors <input checked="" type="checkbox"/> Formalised guidelines on corporate governance factors <input type="checkbox"/> Fiduciary (or equivalent) duties <input checked="" type="checkbox"/> Asset class-specific RI guidelines <input checked="" type="checkbox"/> Sector specific RI guidelines <input checked="" type="checkbox"/> Screening / exclusions policy <input type="checkbox"/> Other, specify (1) <input type="checkbox"/> Other, specify(2)	<input type="radio"/> Applicable policies cover all AUM <input checked="" type="radio"/> Applicable policies cover a majority of AUM <input type="radio"/> Applicable policies cover a minority of AUM

SG 01.3 Indicate if the investment policy covers any of the following

- Your organisation’s definition of ESG and/or responsible investment and it’s relation to investments
- Your investment objectives that take ESG factors/real economy influence into account
- Time horizon of your investment
- Governance structure of organisational ESG responsibilities
- ESG incorporation approaches
- Active ownership approaches
- Reporting
- Climate change
- Understanding and incorporating client / beneficiary sustainability preferences
- Other RI considerations, specify (1)
- Other RI considerations, specify (2)

SG 01.4 Describe your organisation’s investment principles and overall investment strategy, interpretation of fiduciary (or equivalent) duties, and how they consider ESG factors and real economy impact.

In addition to traditional financial analysis, ODDO BHF Asset Management ensures that ESG criteria that are significant for investors are taken into consideration in researching and evaluating issuers, just like traditional financial criteria.

Our in-house ESG research platform, which is available to all investment teams, has allowed us to roll out our ESG integration policy, whose primary goal is to influence the construction of investment portfolios. We thereby address our dual objective of producing the fullest and most holistic possible analysis of long-term risks and opportunities and of offering our clients sustainable financial performance.

SG 01.5 Provide a brief description of the key elements, any variations or exceptions to your investment policy that covers your responsible investment approach. [Optional]

ODDO BHF AM commitment to the integration of ESG criteria is rooted in the long-term focus of its business as the management subsidiary of an independent bank with origins dating back to 1849 and a stable and long-term shareholding structure: 60% for the Oddo family, 30% for employees, 10% for other investors as of 31 December 2019. The Principles for Responsible Investment are consistent with our vision of asset management, which is based on fundamental analysis and a long-term investment horizon, in the aim of better identifying risks and opportunities. During the investment phase, ODDO BHF AM aims gradually to integrate ESG criteria into its analysis and the construction of its portfolios. Upstream and downstream of the investment phase, ODDO BHF AM plays its role as an active investor by voting at shareholder meetings and promoting dialogue/engagement. Based on the recommendations of the PRI, ODDO BHF AM is gradually implementing its ESG integration approach in all asset classes. In descending order of priority for ODDO BHF AM the European equities asset class, the European corporate bond asset class, the sovereign debt asset class, and the Private Equity asset class together totaling above 75% of total undertakings for collective investment in transferable securities managed by the management company as of end-2019. Apart from companies involved in anti-personnel mines (within the scope of the Ottawa Treaty, 1997), cluster munitions (Oslo Convention, 2008) and chemical weapons (Paris Treaty, 1993), ODDO BHF AM has formalized an exclusion policy for both norm-based and sector exclusions in 2019. ODDO BHF AM uses the integrated ESG methodology developed internally, which breaks down into 10 themes: 3 ENVIRONMENTAL themes: Environmental Management Systems (EMS), Environmental Opportunities, Environmental Risks, 4 SOCIAL themes: Regulation, Quality of management/Human Capital, Licence to Operate/Reputation/Controversies, Social Ecosystem (customer satisfaction, supply chain management, innovation, quality of products and services), 3 GOVERNANCE themes: Sustainable Development Strategy, Corporate Governance, Business Ethics.

ODDO BHF AM has opted to prioritise Governance and Human Capital/Management Quality criteria. The 10 themes cover the 10 principles of the United Nations Global Compact which derive from the following instruments: Universal Declaration of Human Rights, International Labour Organization Declaration on Fundamental Principles and Rights at Work, Rio Declaration on Environment and Development, United Nations Convention against Corruption. Sector-specific characteristics: ODDO BHF AM reviews cross-cutting ESG criteria, such as corporate governance and quality of management (including human resources), for all sectors analysed. However, its approach is primarily bottom-up, and ODDO BHF AM seeks to identify long-term ESG investment trends in all sectors (risks and opportunities alike), the specific ESG characteristics of growth models in each sector, and specific ESG criteria and indicators. ODDO BHF AM currently uses the same ESG analysis model for the equity and corporate bond asset classes. Convertible bonds are included within this scope.

ODDO BHF AM is developing a proprietary database that assigns a synthetic ESG rating in the form of a score and a five-level rating, on a "best-in-

universe" basis: Strong opportunity (5), Opportunity (4), Neutral (3), Moderate risk (2), High risk (1). In this absolute best-in-universe approach, issuers with a Strong opportunity (5) rating deliver the best ESG practices, while those with a High risk (1) rating are poor performers in ESG terms. The ESG rating is also combined with an ESG trend (neutral, positive or negative), allowing us to qualify best-effort momentum. At ODDO BHF AM, the global weightings of the 3 pillars E, S, and G remains sector-based. ODDO BHF AM uses the following service providers specialising in ESG analysis: the ESG specialised teams of selected brokers, external extra-financial data providers (Sustainalytics, CDP), raw ESG data increasingly provided by Bloomberg and Facset.

ODDO BHF AM commits to a 3-year ESG roadmap with the objective to extend the ESG integration process to other expertise like Quantitative equity, Credit High Yield, Private Equity and Private Debt.

No

SG 01 CC	Mandatory to Report, Voluntary to Disclose	Descriptive	General
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SG 01.6 CC	Indicate whether your organisation has identified transition and physical climate-related risks and opportunities and factored this into the investment strategies and products, within the organisation's investment time horizon.
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Yes

Describe the identified transition and physical climate-related risks and opportunities and how they have been factored into the investment strategies/products.
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ODDO BHF Group has been a signatory of the Carbon Disclosure Project (CDP) since 2006. ODDO BHF Asset Management is part of this search for continuous progress and now incorporates a qualitative analysis that goes beyond carbon measurement and looks at how its ESG-integrating funds contribute to the achievement of climate objectives (The Paris Agreement main objective is to contain global warming below 2°C by 2100).

As part of the implementation of Article 173 of the Energy Transition and Green Growth Act in France, and more specifically the integration of climate change risks into investment decisions, ODDO BHF Asset Management has built its environmental strategy around three axes : i/ a quantitative measurement of carbon intensity of its main equity funds, ii/ the inclusion of environmental themes in its shareholder dialogue policy with companies, and iii/ a qualitative measurement of its investment strategies' contribution to the transition towards a low carbon economy.

ODDO BHF Asset Management has opted to work on the carbon intensity of its portfolios, i.e. CO2 emissions relative to turnover (while the carbon footprint brings CO2 emissions to market capitalization). This is an indicator less volatile and more reflective of the effectiveness of corporate actions.

To support its commitment to climate change issues, ODDO BHF AM became a signatory of the Climate Action 100+ initiative in March 2018 and joined the Investor Agenda in 2019. By joining the list of signatories, the objective for ODDO BHF AM is to participate in the joint effort of investors to facilitate the dialogue with the 100 companies that are the world's largest emitters of greenhouse gases.

Finally, ODDO BHF AM has developed a specific indicator to measure each company's contribution to the transition towards a low carbon economy. This ETA (Energy Transition Analysis) indicator is composed of two aspects: i/ the positioning of the sector in which the company operates, accounting for 30% and ii/ the score of the company specific environment block assigned by our ESG model, accounting for 70%. The sectoral positioning takes into account the long-term environmental risks and opportunities using ODDO BHF AM's SDG matrix based on the "2030 United Nations Sustainable Development Goals". Within this matrix, ODDO BHF AM identifies five environmental themes: Clean Energies (SDGs 7, 13), Energy Efficiency (SDGs 7, 9, 11), Biodiversity (SDGs 6, 12, 14, 15), Circular Economy (SDGs 11, 12) and Sustainable Mobility (SDGs 9, 11, 13). The second part, the environment block of ODDO BHF AM's ESG analysis model, is divided into two parts: the environmental management system of the company analysed and the analysis of environmental opportunities and risks related to the business activity (products and services). The climate related risks part is analysed by using the CDP data which are now aligned on the TCFD recommendations.

To complete its climate approach, ODDO BHF AM has announced in 2019 the exclusion of coal of all portfolios integrating ESG criteria (23% of total AUM).

No

SG 01.7 CC	Indicate whether the organisation has assessed the likelihood and impact of these climate risks?
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Yes

Describe the associated timescales linked to these risks and opportunities.

In our internal ESG analysis model, environmental risks and opportunities account for 50% of the Environmental block. This risks and opportunities analysis relies on the latest available CDP data taking into account different timescales (short, medium and long-term impact).

As an example, respondent companies are asked to answer: i/ where in the value chain does the risk occur (direct operations, customer, supply chain), ii/ which type of risk (transition or physical) and iii/ on which time horizon (short, medium, long-term).

No

SG 01.8 CC	Indicate whether the organisation publicly supports the TCFD?
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Yes

No

SG 01.9 CC	Indicate whether there is an organisation-wide strategy in place to identify and manage material climate-related risks and opportunities.
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Yes

Describe

Through its decisions to join the "Climate Action 100+" initiative in 2018, the Investor Agenda in 2019, and to formalize the exclusion of coal, the ODDO BHF AM Management Board clearly recognizes climate risks as an important part of its investor responsibility.

No

SG 1.10 CC Indicate the documents and/or communications the organisation uses to publish TCFD disclosures.

- Public PRI Climate Transparency Report
- Annual financial filings
- Regular client reporting
- Member communications
- Other

specify

We published in December 2017 a dedicated white paper regarding our approach to climate change, explaining our analysis methodology partly based on the TCFD recommendations.

- We currently do not publish TCFD disclosures

SG 02 **Mandatory** **Core Assessed** **PRI 6**

SG 02.1 Indicate which of your investment policy documents (if any) are publicly available. Provide a URL and an attachment of the document.

- Policy setting out your overall approach

URL/Attachment

- URL
https://www.am.oddo-bhf.com/france/en/professional_investor/ad/investment_capabilities/1008/sustainable_investments__esg/1016
- Attachment (will be made public)

- Formalised guidelines on environmental factors
- Formalised guidelines on social factors
- Formalised guidelines on corporate governance factors
- Asset class-specific RI guidelines
- Sector specific RI guidelines
- Screening / exclusions policy

URL/Attachment

- URL
https://www.am.oddo-bhf.com/france/en/professional_investor/ad/investment_capabilities/1008/sustainable_investments__esg/1016
- Attachment (will be made public)

- Engagement policy

URL/Attachment

- URL
https://www.am.oddo-bhf.com/france/en/professional_investor/ad/investment_capabilities/1008/sustainable_investments__esg/1016
- Attachment (will be made public)

- (Proxy) voting policy

URL/Attachment

- URL
https://www.am.oddo-bhf.com/france/en/professional_investor/ad/investment_capabilities/1008/sustainable_investments__esg/1016
- Attachment (will be made public)

- We do not publicly disclose our investment policy documents

SG 02.2 Indicate if any of your investment policy components are publicly available. Provide URL and an attachment of the document.

- Your organisation's definition of ESG and/or responsible investment and it's relation to investments

URL/Attachment

- URL
https://www.am.oddo-bhf.com/france/en/professional_investor/ad/investment_capabilities/1008/sustainable_investments__esg/1016
- Attachment

- Your investment objectives that take ESG factors/real economy influence into account
- Time horizon of your investment
- Governance structure of organisational ESG responsibilities

URL/Attachment

- URL

https://www.am.oddo-bhf.com/france/en/professional_investor/ad/investment_capabilities/1008/sustainable_investments__esg/1016

Attachment

ESG incorporation approaches

URL/Attachment

URL

https://www.am.oddo-bhf.com/france/en/professional_investor/ad/investment_capabilities/1008/sustainable_investments__esg/1016

Attachment

Active ownership approaches

URL/Attachment

URL

https://www.am.oddo-bhf.com/france/en/professional_investor/ad/investment_capabilities/1008/sustainable_investments__esg/1016

Attachment

Reporting

URL/Attachment

URL

https://www.am.oddo-bhf.com/france/en/professional_investor/ad/investment_capabilities/1008/sustainable_investments__esg/1016

Attachment

Climate change

URL/Attachment

URL

<https://library.oddo-bhf.com/api/Library/ViewFile?guid=aa910d86-c645-4df7-9708-bd6be2aedd38>

Attachment

Understanding and incorporating client / beneficiary sustainability preferences

We do not publicly disclose any investment policy components

SG 03	Mandatory	Core Assessed	General
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SG 03.1 Indicate if your organisation has a policy on managing potential conflicts of interest in the investment process.

Yes

SG 03.2 Describe your policy on managing potential conflicts of interest in the investment process.

Public reporting at

https://am.oddo-bhf.com/France/en/investisseur_professionnel/Infos_reglementaire

By taking appropriate organisational measures, we have ensured that risk of disadvantages arising for the individual investor from conflicts of interest is reduced to a minimum and have implemented several processes and controls to identify, manage and solve potential conflicts of interest. The effectiveness of such protective mechanisms is subject to monitoring by our Compliance Officer.

The measures put in place are regularly audited by the Compliance Officer and other employees entrusted with controlling activities and will be adjusted, as required.

Should the measures taken by us prove insufficient to prevent the interest of one or more clients from being harmed, the client service manager or the fund manager will notify his/her client about such conflict of interest prior to executing the relevant transaction and will execute or proceed with such transaction solely with the client's express consent.

No

SG 04	Voluntary	Descriptive	General
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Private

SG 05	Mandatory	Gateway/Core Assessed	General
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SG 05.1 Indicate if and how frequently your organisation sets and reviews objectives for its responsible investment activities.

Quarterly or more frequently

Biannually

Annually

Less frequently than annually

Ad-hoc basis

It is not set/reviewed

SG 06	Voluntary	Descriptive	General
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Private

SG 07.1 Indicate the internal and/or external roles used by your organisation, and indicate for each whether they have oversight and/or implementation responsibilities for responsible investment.

Roles

- Board members or trustees
- Internal Roles (triggers other options)

Select from the below internal roles

Chief Executive Officer (CEO), Chief Investment Officer (CIO), Chief Operating Officer (COO), Investment Committee

- Oversight/accountability for responsible investment
- Implementation of responsible investment
- No oversight/accountability or implementation responsibility for responsible investment

Other Chief-level staff or head of department, specify

- Compliance - Risk management -
- Oversight/accountability for responsible investment
 - Implementation of responsible investment
 - No oversight/accountability or implementation responsibility for responsible investment

Portfolio managers

- Oversight/accountability for responsible investment
- Implementation of responsible investment
- No oversight/accountability or implementation responsibility for responsible investment

Investment analysts

- Oversight/accountability for responsible investment
- Implementation of responsible investment
- No oversight/accountability or implementation responsibility for responsible investment

Dedicated responsible investment staff

- Oversight/accountability for responsible investment
- Implementation of responsible investment
- No oversight/accountability or implementation responsibility for responsible investment

- Investor relations
- Other role, specify (1)
- Other role, specify (2)

External managers or service providers

SG 07.2 For the roles for which you have RI oversight/accountability or implementation responsibilities, indicate how you execute these responsibilities.

Our Head of ESG Research, Nicolas Jacob, reports directly to the CIO of the company.

Supported by a dedicated team of 36 analyst, he executes his responsibilities by providing ESG inputs which are used in some specific investment processes and are available for new ESG investment processes (ie Request For Proposal).

SG 07.3 Indicate the number of dedicated responsible investment staff your organisation has.

4

SG 07.4 Additional information. [Optional]

The ESG team includes:

- Nicolas Jacob, Head of ESG Research
- Valentin Pernet, ESG analyst
- Simona Rizzuto, ESG analyst
- Léa Miomandre, ESG analyst

SG 07.5 CC Indicate the roles in the organisation that have oversight, accountability and/or management responsibilities for climate-related issues.

Chief Executive Officer (CEO), Chief Investment Officer (CIO), Chief Risk Officer (CRO), Investment Committee

- Oversight/accountability for climate-related issues
- Assessment and management of climate-related issues
- No responsibility for climate-related issues

Other Chief-level staff or heads of departments	
<input checked="" type="checkbox"/>	Oversight/accountability for climate-related issues
<input checked="" type="checkbox"/>	Assessment and management of climate-related issues
<input type="checkbox"/>	No responsibility for climate-related issues
Portfolio managers	
<input checked="" type="checkbox"/>	Oversight/accountability for climate-related issues
<input type="checkbox"/>	Assessment and management of climate-related issues
<input type="checkbox"/>	No responsibility for climate-related issues
Investment analysts	
<input checked="" type="checkbox"/>	Oversight/accountability for climate-related issues
<input type="checkbox"/>	Assessment and management of climate-related issues
<input type="checkbox"/>	No responsibility for climate-related issues
Dedicated responsible investment staff	
<input checked="" type="checkbox"/>	Oversight/accountability for climate-related issues
<input checked="" type="checkbox"/>	Assessment and management of climate-related issues
<input type="checkbox"/>	No responsibility for climate-related issues

SG 07.7 CC For management-level roles that assess and manage climate-related issues, provide further information on the structure and processes involved.

Through its decisions to join the "Climate Action 100+" and the Investor Agenda initiatives and the implementation of the coal exclusion, the ODDO BHF AM Management Committee clearly recognizes climate risks as an important part of its investor responsibility.

The Head of ESG Research, Nicolas Jacob, is responsible for the implementation of the dedicated climate analysis which is part of the proprietary ESG model. The climate analysis has been publicly presented at the end of 2017 through the publication of a dedicated white paper. Regular upgrades of the climate module take place during the year thanks to the data update coming from the CDP.

All the investment teams (fund managers and analysts) received training about the main climate-related issues and the corresponding KPI put in place.

SG 08	Voluntary	Additional Assessed	General
Private			

SG 09	Mandatory	Core Assessed	PRI 4,5
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SG 09.1 Select the collaborative organisation and/or initiatives of which your organisation is a member or in which it participated during the reporting year, and the role you played.

Principles for Responsible Investment

Your organisation's role in the initiative during the reporting period (see definitions)	
Moderate	
Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]	
In 2019, we kept taking part of the Climate Action 100+ collaborative initiative and joined the Investor Agenda.	
In 2019, ODDO BHF AM also signed the "Women's Empowerment Principles" in order to support the gender parity in companies.	

- Asian Corporate Governance Association
- Australian Council of Superannuation Investors
- AVCA: Sustainability Committee
- France Invest – La Commission ESG
- BVCA – Responsible Investment Advisory Board
- CDP Climate Change

Your organisation's role in the initiative during the reporting period (see definitions)	
Basic	
Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]	
ODDO BHF AM is signatory	

CDP Forests

Your organisation's role in the initiative during the reporting period (see definitions)	
Basic	
Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]	

ODDO BHF AM is signatory

CDP Water

	Your organisation's role in the initiative during the reporting period (see definitions)
Basic	
	Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]
ODDO BHF AM is signatory	

CFA Institute Centre for Financial Market Integrity

Climate Action 100+

	Your organisation's role in the initiative during the reporting period (see definitions)
Moderate	
	Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]
ODDO BHF AM is taking part in 2 engagement processes with european companies.	

Code for Responsible Investment in SA (CRISA)

Council of Institutional Investors (CII)

Eumedion

Extractive Industries Transparency Initiative (EITI)

ESG Research Australia

Invest Europe Responsible Investment Roundtable

Global Investors Governance Network (GIGN)

Global Impact Investing Network (GIIN)

Global Real Estate Sustainability Benchmark (GRESB)

Green Bond Principles

HKVCA: ESG Committee

Institutional Investors Group on Climate Change (IIGCC)

	Your organisation's role in the initiative during the reporting period (see definitions)
Moderate	
	Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]
ODDO BHF AM participates to working groups since 2017.	

Interfaith Center on Corporate Responsibility (ICCR)

International Corporate Governance Network (ICGN)

Investor Group on Climate Change, Australia/New Zealand (IGCC)

International Integrated Reporting Council (IIRC)

Investor Network on Climate Risk (INCR)/CERES

Local Authority Pension Fund Forum

Principles for Financial Action in the 21st Century

Principles for Sustainable Insurance

Regional or National Social Investment Forums (e.g. UKSIF, Eurosif, ASRIA, RIAA), specify

French SIF (FIR) and German SIF (FNG)

	Your organisation's role in the initiative during the reporting period (see definitions)
Advanced	
	Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]
Member of the steering committee and jury of the FIR-PRI Academic Awards, member of the Dialogue & Engagement working group and Impact measurement working group.	

Responsible Finance Principles in Inclusive Finance

Shareholder Association for Research and Education (Share)

United Nations Environmental Program Finance Initiative (UNEP FI)

United Nations Global Compact

Other collaborative organisation/initiative, specify

ESG Commission at AFG (Association Française de la Gestion) and SFAF (Société Française des Analystes Financiers, member of EFFAS)

	Your organisation's role in the initiative during the reporting year (see definitions)
Moderate	

Other collaborative organisation/initiative, specify

WICI - World Intellectual Capital Initiative

Your organisation's role in the initiative during the reporting year (see definitions)
Moderate
Provide a brief commentary on the level of your organisation's involvement in the initiative. [Optional]
Take part and sponsor the WICI Europe conferences in 2015, 2017, and 2019.
<input type="checkbox"/> Other collaborative organisation/initiative, specify
<input type="checkbox"/> Other collaborative organisation/initiative, specify

SG 10	Mandatory	Core Assessed	PRI 4
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SG 10.1	Indicate if your organisation promotes responsible investment, independently of collaborative initiatives.
---------	--

Yes

SG 10.2	Indicate the actions your organisation has taken to promote responsible investment independently of collaborative initiatives. Provide a description of your role in contributing to the objectives of the selected action and the typical frequency of your participation/contribution.
---------	--

Provided or supported education or training programmes (this includes peer to peer RI support) Your education or training may be for clients, investment managers, actuaries, broker/dealers, investment consultants, legal advisers etc.)

Description

Internal trainings + the Head of ESG Research gives courses at the Lyon University

Frequency of contribution

- Quarterly or more frequently
- Biannually
- Annually
- Less frequently than annually
- Ad hoc
- Other

Provided financial support for academic or industry research on responsible investment

Description

ODDO BHF AM is co-founder and sponsor of the FIR-PRI Academic Awards on responsible investment

Frequency of contribution

- Quarterly or more frequently
- Biannually
- Annually
- Less frequently than annually
- Ad hoc
- Other

Provided input and/or collaborated with academia on RI related work

Encouraged better transparency and disclosure of responsible investment practices across the investment industry

Description

ODDO BHF AM is member of different working groups at the AFG (Association Française de la Gestion), SFAF and French SIF

Frequency of contribution

- Quarterly or more frequently
- Biannually
- Annually
- Less frequently than annually
- Ad hoc
- Other

Spoke publicly at events and conferences to promote responsible investment

Description

Speaker at various RI-oriented conferences (GFSI in Switzerland, JPMorgan in Paris, ESG Investing in London...) and in the front of academics and students (HEC Paris, Paris Dauphine).

Frequency of contribution

- Quarterly or more frequently
- Biannually
- Annually

- Less frequently than annually
- Ad hoc
- Other

Wrote and published in-house research papers on responsible investment

Description
ODDO BHF AM commits to publishing at least 2 ESG thematic white papers or position papers annually

Frequency of contribution
<ul style="list-style-type: none"> <input type="radio"/> Quarterly or more frequently <input checked="" type="radio"/> Biannually <input type="radio"/> Annually <input type="radio"/> Less frequently than annually <input type="radio"/> Ad hoc <input type="radio"/> Other

- Encouraged the adoption of the PRI
- Responded to RI related consultations by non-governmental organisations (OECD, FSB etc.)
- Wrote and published articles on responsible investment in the media
- A member of PRI advisory committees/ working groups, specify

Description
The Head of ESG Research is a member of the steering committee for the FIR-PRI Academic Awards (French SIF)

Frequency of contribution
<ul style="list-style-type: none"> <input type="radio"/> Quarterly or more frequently <input checked="" type="radio"/> Biannually <input type="radio"/> Annually <input type="radio"/> Less frequently than annually <input type="radio"/> Ad hoc <input type="radio"/> Other

- On the Board of, or officially advising, other RI organisations (e.g. local SIFs)
- Other, specify

No

SG 11	Voluntary	Additional Assessed	PRI 4,5,6
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Private

SG 12	Mandatory	Core Assessed	PRI 4
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SG 12.1	Indicate whether your organisation uses investment consultants.
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Yes, we use investment consultants

SG 12.4	Indicate whether you use investment consultants for any the following services. Describe the responsible investment components of these services.
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- Custodial services
- Investment policy development
- Strategic asset allocation
- Investment research

Describe how responsible investment is incorporated

Sustainalytics is our external provider of ESG research, and we use some of their inputs in our own internal ESG analysis platform. We use as well data from the CDP to source in our Environmental block in our internal model.

- Other, specify (1)
- Other, specify (2)
- Other, specify (3)
- None of the above

No, we do not use investment consultants.

SG 13	Mandatory	Descriptive	PRI 1
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SG 13.1	Indicate whether the organisation carries out scenario analysis and/or modelling, and if it does, provide a description of the scenario analysis (by asset class, sector, strategic asset allocation, etc.).
---------	--

Yes, in order to assess future ESG factors

Describe

We regularly work and embedded academic contributions in order to keep update our internal model regarding the most material ESG factors aligned with long-term trends (environmental transition, digitalization, urbanisation, consumer behavior ...)

Yes, in order to assess future climate-related risks and opportunities

Describe

In our internal ESG analysis model, environmental risks and opportunities account for 50% of the Environmental block. This risks and opportunities analysis relies on the latest available CDP data taking into account different timescales (short, medium and long-term impact).

No, our organisation does not currently carry out scenario analysis and/or modelling

SG 13.2	Indicate if your organisation considers ESG issues in strategic asset allocation and/or allocation of assets between sectors or geographic markets.
---------	---

We do the following

- Allocation between asset classes
- Determining fixed income duration
- Allocation of assets between geographic markets
- Sector weightings
- Other, specify
- We do not consider ESG issues in strategic asset allocation

SG 13.3	Additional information. [OPTIONAL]
---------	------------------------------------

Given the fact that we work with an absolute "best-in-universe" approach, our internal ESG model highlights more obviously the sectors presenting opportunities. As a consequence and given the fact that our goal is to keep portfolios' ESG rating higher than their benchmarks, our ESG analysis has a direct impact on sector weightings.

SG 13 CC	Mandatory to Report, Voluntary to Disclose	Descriptive	General
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SG 13.4 CC	Describe how your organisation is using scenario analysis to manage climate-related risks and opportunities, including how the analysis has been interpreted, its results, and any future plans.
------------	--

Initial assessment

Describe

In joining the Climate Action 100+ and the Investor Agenda initiatives, ODDO BHF AM recognised that climate change is an integral part of its responsibility as a shareholder on behalf of its clients. As a consequence, we have defined a clear approach around 3 different axes: i/ a quantitative measurement of carbon intensity of the funds integrating ESG criteria into their investment process, ii/ the inclusion of environmental themes in our shareholder dialogue policy with companies, and iii/ a qualitative measurement of our investment strategies' contribution to the transition towards a low carbon economy.

Incorporation into investment analysis

Describe

ODDO BHF AM has developed a specific indicator to measure each company's contribution to the transition towards a low carbon economy. This ETA (Energy Transition Analysis) indicator is composed of two aspects: i/ the positioning of the sector in which the company operates, accounting for 30% and ii/ the score of the company specific environment block assigned by our ESG model, accounting for 70%.

The sectoral positioning takes into account the long-term environmental risks and opportunities using ODDO BHF AM's SDG matrix based on the "2030 United Nations Sustainable Development Goals". Within this matrix, ODDO BHF AM identifies five environmental themes: Clean Energies (SDGs 7, 13), Energy Efficiency (SDGs 7, 9, 11), Biodiversity (SDGs 6, 12, 14, 15), Circular Economy (SDGs 11, 12) and Sustainable Mobility (SDGs 9, 11, 13).

The second part, the environment block of ODDO BHF AM's ESG analysis model, is divided into two parts: the environmental management system of the company analysed and the analysis of environmental opportunities and risks related to the business activity (products and services).

Environmental risks and opportunities account for 50% of the Environmental block. This risks and opportunities analysis relies on the latest available CDP data taking into account different timescales (short, medium and long-term impact), being aligned with the TCFD recommendations.

Beyond identifying environmental impact, the goal is also to highlight potential mid to long-term drivers of value creation or destruction for companies.

By aggregating the ETA scores of the companies held in a portfolio (weighted by the weight of each position), ODDO BHF AM come up with an indicator of the contribution of such an investment portfolio to the transition towards a low carbon economy. This methodology provides ODDO BHF AM with a qualitative approach, helping it to align its portfolios with climate scenarios.

Inform active ownership

Describe

As part of our dialogue and engagement policy, climate-related issues have become an important part of the discussions that we have with companies, during individual dialogue as well as during collaborative engagement actions through the Climate Action 100+ initiative. ODDO BHF AM publishes an annual dialogue & engagement report available on its website.

Other

SG 13.5 CC	Indicate who uses this analysis.
------------	----------------------------------

Board members, trustees, C-level roles, Investment Committee

Portfolio managers

- Dedicated responsible investment staff
- External managers
- Investment consultants/actuaries
- Other

SG 13.6 CC Indicate whether your organisation has evaluated the potential impact of climate-related risks, beyond the investment time horizon, on its investment strategy.

- Yes
- No

Please explain the rationale

Climate-related analysis is a recent practice back to 2017 in our organisation and we intend to proceed step by step in order not to distort our long-term positive financial track-records.

Nevertheless, we start working with public available tools like the PACTA model (Equity and Bond) or IPR Forecast Policy Scenario model (Equity).

SG 13.7 CC Indicate whether a range of climate scenarios is used.

- Analysis based on a 2°C or lower scenario
- Analysis based on an abrupt transition, consistent with the Inevitable Policy Response
- Analysis based on a 4°C or higher scenario
- No, a range is not used

SG 13.8 CC Indicate the climate scenarios your organisation uses.

Provider	Scenario used
IEA	
IRENA	
Greenpeace	
Institute for Sustainable Development	
Bloomberg	
IPCC	<input checked="" type="checkbox"/> Representative Concentration Pathway (RCP) 8.5
IPCC	<input checked="" type="checkbox"/> RPC 6
IPCC	<input checked="" type="checkbox"/> RPC 4.5
IPCC	<input checked="" type="checkbox"/> RPC 2.6
Other	
Other	
Other	

SG 14 Mandatory to Report, Voluntary to Disclose Additional Assessed PRI 1

SG 14.1 Some investment risks and opportunities arise as a result of long term trends. Indicate which of the following are considered.

- Changing demographics
- Climate change
- Resource scarcity
- Technological developments
- Other, specify(1)

other description (1)

Digitalization

- Other, specify(2)

other description (2)

Urbanisation

- None of the above

SG 14.2 Indicate which of the following activities you have undertaken to respond to climate change risk and opportunity

- Established a climate change sensitive or climate change integrated asset allocation strategy
- Targeted low carbon or climate resilient investments
- Phase out your investments in your fossil fuel holdings
- Reduced portfolio exposure to emissions intensive or fossil fuel holdings
- Used emissions data or analysis to inform investment decision making
- Sought climate change integration by companies
- Sought climate supportive policy from governments
- Other, specify
- None of the above

SG 14.3 Indicate which of the following tools the organisation uses to manage climate-related risks and opportunities.

- Scenario analysis
- Disclosures on emissions risks to clients/trustees/management/beneficiaries
- Climate-related targets
- Encouraging internal and/or external portfolio managers to monitor emissions risks
- Emissions-risk monitoring and reporting are formalised into contracts when appointing managers
- Weighted average carbon intensity
- Carbon footprint (scope 1 and 2)
- Portfolio carbon footprint
- Total carbon emissions
- Carbon intensity
- Exposure to carbon-related assets
- Other emissions metrics
- Other, specify

other description

Exposure to carbon solutions / green share

- None of the above

SG 14 CC Voluntary General

SG 14.6 CC Provide further details on the key metric(s) used to assess climate-related risks and opportunities.

Metric Type	Coverage	Purpose	Metric Unit	Metric Methodology
Weighted average carbon intensity	Majority of assets	To compare a portfolio weighted average CO2 intensity with its benchmark	tCO2/M€ revenues	Sum of (%weight x Scope 1 & 2) / Revenues
Carbon footprint (scope 1 and 2)	Majority of assets	To have similar and comparable data for a large universe of companies		
Portfolio carbon footprint				
Carbon intensity	Majority of assets	To calculate carbon intensity at a portfolio level	tCO2/M€ revenues	(%weight x Scope 1 & 2) / Revenues
Exposure to carbon-related assets	Majority of assets	To compare a portfolio's positioning vs. its benchmark	% of portfolio NAV	Data provided by our external provider Sustainalytics

SG 14.8 CC Indicate whether climate-related risks are integrated into overall risk management and explain the risk management processes used for identifying, assessing and managing climate-related risks.

- Processes for climate-related risks are integrated into overall risk management
- Processes for climate-related risks are not integrated into overall risk management

Please describe

Climate-related risks analysis is at this stage to inform and to raise awareness of the portfolio managers. For some dedicated mandate, we are able to take it into consideration to answer specific client requirements.

SG 14.9 CC Indicate whether your organisation, and/or external investment manager or service providers acting on your behalf, undertake active ownership activities to encourage TCFD adoption.

- Yes

Please describe

To support its commitment to climate change issues, ODDO BHF AM became a signatory of the Climate Action 100+ and Investor Agenda. By joining the list of signatories, the objective for ODDO BHF AM is to participate in the joint effort of investors to facilitate the dialogue with the 100 companies

that are the world's largest emitters of greenhouse gases and to encourage them to adopt and apply the TCFD recommendations. We also publicly support the TCFD.

- No, we do not undertake active ownership activities.
- No, we do not undertake active ownership activities to encourage TCFD adoption.

SG 15	Mandatory to Report, Voluntary to Disclose	Descriptive	PRI 1
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SG 15.1 Indicate if your organisation allocates assets to, or manages, funds based on specific environmental and social themed areas.

Yes

SG 15.2 Indicate the percentage of your total AUM invested in environmental and social themed areas.

0.2%

SG 15.3 Specify which thematic area(s) you invest in, indicate the percentage of your AUM in the particular asset class and provide a brief description.

Area

Energy efficiency / Clean technology

Asset class invested

- Listed equity
- Fixed income - SSA
0.2Percentage of AUM (+/-5%) per asset class invested in the area
- Fixed income - Corporate (financial)
0.2Percentage of AUM (+/-5%) per asset class invested in the area
- Fixed income - Corporate (non-financial)
0.2Percentage of AUM (+/-5%) per asset class invested in the area
- Fixed income - Securitised
- Private equity
- Other (1)
- Other (2)

Brief description and measures of investment
--

ODDO BHF AM launched a Green Bond fund in 2019 with a minimum exposure of 75% to green projects. Thge fund size is around €120m.

Renewable energy

Asset class invested

- Listed equity
- Fixed income - SSA
0.2Percentage of AUM (+/-5%) per asset class invested in the area
- Fixed income - Corporate (financial)
0.2Percentage of AUM (+/-5%) per asset class invested in the area
- Fixed income - Corporate (non-financial)
0.2Percentage of AUM (+/-5%) per asset class invested in the area
- Fixed income - Securitised
- Private equity
- Other (1)
- Other (2)

Brief description and measures of investment
--

ODDO BHF AM launched a Green Bond fund in 2019 with a minimum exposure of 75% to green projects. Thge fund size is around €120m.

Green buildings

Asset class invested

- Listed equity
- Fixed income - SSA
0.2Percentage of AUM (+/-5%) per asset class invested in the area
- Fixed income - Corporate (financial)
0.2Percentage of AUM (+/-5%) per asset class invested in the area
- Fixed income - Corporate (non-financial)
0.2Percentage of AUM (+/-5%) per asset class invested in the area

- Fixed income - Securitised
- Private equity
- Other (1)
- Other (2)

Brief description and measures of investment

ODDO BHF AM launched a Green Bond fund in 2019 with a minimum exposure of 75% to green projects. Thge fund size is around €120m.

- Sustainable forestry
- Sustainable agriculture
- Microfinance
- SME financing
- Social enterprise / community investing
- Affordable housing
- Education
- Global health
- Water

Asset class invested

- Listed equity
- Fixed income - SSA
0.2Percentage of AUM (+/-5%) per asset class invested in the area
- Fixed income - Corporate (financial)
0.2Percentage of AUM (+/-5%) per asset class invested in the area
- Fixed income - Corporate (non-financial)
0.2Percentage of AUM (+/-5%) per asset class invested in the area
- Fixed income - Securitised
- Private equity
- Other (1)
- Other (2)

Brief description and measures of investment

ODDO BHF AM launched a Green Bond fund in 2019 with a minimum exposure of 75% to green projects. Thge fund size is around €120m.

- Other area, specify

No

Files: [link](#)

SG 16	Mandatory	Descriptive	General
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SG 16.1 Describe how you address ESG issues for internally managed assets for which a specific PRI asset class module has yet to be developed or for which you are not required to report because your assets are below the minimum threshold.

Asset Class	Describe what processes are in place and the outputs or outcomes achieved
Other (1) [as defined in Organisational Overview module]	Balanced portfolios are composed of both equity and fixed income assets (directly owned or through mutual funds). We apply the same ESG approach than the one we apply for equity and fixed income alone.

SG 18	Voluntary	Descriptive	General
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SG 18.1 Indicate whether any specific features of your approach to responsible investment are particularly innovative.

Yes

SG 18.2 Describe any specific features of your approach to responsible investment that you believe are particularly innovative.

- 1/ ODDO BHF AM developed its own approach to measure the portfolios' alignment to long term climate trajectories in order to anticipate on potential future regulations (ETA score at company and portfolio level)
- 2/ Human Capital/Quality of management methodology is innovative and clearly materiality oriented.
- 3/ Moreover, our corporate governance research does distinguish by a differentiating analysis for each of the 3 following different shareholding structures: non controlled, controlled and family owned companies.
- 4/ Finally, ODDO BHF AM relies on ODDO BHF Corporates & Markets ESG research which has been Approved for its innovations by the Investment Innovation Benchmark (IIB) at the 1st IIB Summit in September 2015 in London (link:http://www.iib.io/static/docs/first_event/camera_ready/Claims_Oddo.pdf).

No

SG 19.1

Indicate whether your organisation typically discloses asset class specific information proactively. Select the frequency of the disclosure to clients/beneficiaries and the public, and provide a URL to the public information.

Listed equity - Incorporation

Do you disclose?

- We do not proactively disclose it to the public and/or clients/beneficiaries
- We disclose to clients/beneficiaries only.
- We disclose it publicly

The information disclosed to clients/beneficiaries is the same

- Yes
- No

Disclosure to public and URL

Disclosure to public and URL

- Broad approach to ESG incorporation
- Detailed explanation of ESG incorporation strategy used

Annually

https://am.oddo-bhf.com/France/en/investisseur_professionnel/Infos_reglementaire
https://www.am.oddo-bhf.com/france/en/professional_investor/ad/investment_capabilities/1008/sustainable_investments__esg/1016

Listed equity - Engagement

Do you disclose?

- We do not disclose to either clients/beneficiaries or the public.
- We disclose to clients/beneficiaries only.
- We disclose to the public

The information disclosed to clients/beneficiaries is the same

- Yes
- No

Disclosure to public and URL

Disclosure to public and URL

- Details on the overall engagement strategy
- Details on the selection of engagement cases and definition of objectives of the selections, priorities and specific goals
- Number of engagements undertaken
- Breakdown of engagements by type/topic
- Breakdown of engagements by region
- An assessment of the current status of the progress achieved and outcomes against defined objectives
- Examples of engagement cases
- Details on eventual escalation strategy taken after the initial dialogue has been unsuccessful (i.e. filing resolutions, issuing a statement, voting against management, divestment etc.)
- Details on whether the provided information has been externally assured
- Outcomes that have been achieved from the engagement
- Other information

Annually

https://am.oddo-bhf.com/France/en/investisseur_professionnel/Infos_reglementaire
https://www.am.oddo-bhf.com/france/en/professional_investor/ad/investment_capabilities/1008/sustainable_investments__esg/1016

Listed equity – (Proxy) Voting

Do you disclose?

- We do not disclose to either clients/beneficiaries or the public.
- We disclose to clients/beneficiaries only.
- We disclose to the public

The information disclosed to clients/beneficiaries is the same
<input checked="" type="radio"/> Yes <input type="radio"/> No

Disclosure to public and URL	
Disclosure to public and URL	
<input type="radio"/> Disclose all voting decisions <input type="radio"/> Disclose some voting decisions <input checked="" type="radio"/> Only disclose abstentions and votes against management	
Annually	
https://am.oddo-bhf.com/France/en/investisseur_professionnel/Infos_reglementaire https://www.am.oddo-bhf.com/france/en/professional_investor/ad/investment_capabilities/1008/sustainable_investments_esg/1016	

Fixed income

Do you disclose?
<input type="radio"/> We do not disclose to either clients/beneficiaries or the public. <input type="radio"/> We disclose to clients/beneficiaries only. <input checked="" type="radio"/> We disclose to the public
The information disclosed to clients/beneficiaries is the same
<input checked="" type="radio"/> Yes <input type="radio"/> No

Disclosure to public and URL	
Disclosure to public and URL	
<input type="radio"/> Broad approach to RI incorporation <input checked="" type="radio"/> Detailed explanation of RI incorporation strategy used	
Annually	
https://am.oddo-bhf.com/France/en/investisseur_professionnel/Infos_reglementaire https://www.am.oddo-bhf.com/france/en/professional_investor/ad/investment_capabilities/1008/sustainable_investments_esg/1016	

Private equity

Do you disclose?
<input type="radio"/> We do not disclose to either clients/beneficiaries or the public. <input type="radio"/> We disclose to clients/beneficiaries only. <input checked="" type="radio"/> We disclose to the public
The information disclosed to clients/beneficiaries is the same
<input checked="" type="radio"/> Yes <input type="radio"/> No

Disclosure to public and URL	
Disclosure to public and URL	
<input checked="" type="checkbox"/> ESG information in relationship to our pre-investment activities <input checked="" type="checkbox"/> ESG information in relationship to our post-investment monitoring and ownership activities <input type="checkbox"/> Information on our portfolio companies' ESG performance <input type="checkbox"/> Other	
Annually	
https://www.am.oddo-bhf.com/france/en/professional_investor/ad/investment_capabilities/1008/private_equity/1050	

If there are any messages below, please review them before continuing. If there are no messages below, please save this page and continue.

LEI 01	Mandatory	Gateway	PRI 1		
LEI 01.1	Indicate which ESG incorporation strategy and/or combination of strategies you apply to your actively managed listed equities; and the breakdown of your actively managed listed equities by strategy or combination of strategies.				
<input checked="" type="checkbox"/> Screening alone (i.e., not combined with any other strategies) <table border="1" style="margin-left: 20px;"> <tr> <td>Percentage of active listed equity to which the strategy is applied – you may estimate +/- 5%</td> <td>20%</td> </tr> </table>				Percentage of active listed equity to which the strategy is applied – you may estimate +/- 5%	20%
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<input type="checkbox"/> Thematic alone (i.e., not combined with any other strategies)					
<input type="checkbox"/> Integration alone (i.e., not combined with any other strategies)					
<input checked="" type="checkbox"/> Screening and integration strategies <table border="1" style="margin-left: 20px;"> <tr> <td>Percentage of active listed equity to which the strategy is applied – you may estimate +/- 5%</td> <td>80%</td> </tr> </table>				Percentage of active listed equity to which the strategy is applied – you may estimate +/- 5%	80%
Percentage of active listed equity to which the strategy is applied – you may estimate +/- 5%	80%				
<input type="checkbox"/> Thematic and integration strategies					
<input type="checkbox"/> Screening and thematic strategies					
<input type="checkbox"/> All three strategies combined					
<input type="checkbox"/> We do not apply incorporation strategies					
LEI 01.3	If assets are managed using a combination of ESG incorporation strategies, briefly describe how these combinations are used. [Optional]				
<p>ODDO BHF AM apply in priority a screening to exclude companies involved in anti-personnel mines (within the scope of the Ottawa Treaty, 1997) and cluster munitions (Oslo Convention, 2008).</p> <p>ESG integration - Most of the funds (mutual funds and mandates) managed with our fundamental investment process now integrate ESG criteria in their investment process. This process is built around 3 systematic steps: i/ exclusion (norm-based and/or sector-based), ii/ ESG rating according to our proprietary ESG model (best-in-universe approach), and iii/ dialogue and engagement in priority with the lowest rated companies.</p>					
LEI 02	Voluntary	Additional Assessed	PRI 1		
Private					
LEI 03	Voluntary	Additional Assessed	PRI 1		
Private					
LEI 04	Mandatory	Descriptive	PRI 1		
LEI 04.1	Indicate and describe the type of screening you apply to your internally managed active listed equities.				
<input checked="" type="checkbox"/> Negative/exclusionary screening <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Product <input checked="" type="checkbox"/> Activity <input checked="" type="checkbox"/> Sector <input type="checkbox"/> Country/geographic region <input checked="" type="checkbox"/> Environmental and social practices and performance <input checked="" type="checkbox"/> Corporate governance <table border="1" style="margin-left: 20px;"> <thead> <tr> <th>Description</th> </tr> </thead> <tbody> <tr> <td>Apart from controversial weapons, ODDO BHF AM now applies a systematic exclusion filter to all equity funds integrating ESG criteria (around 80% of total fundamental equity funds). Exclusion may concern activity (coal-related exposure), sector (alcohol, tobacco ...), or ESG criteria (the lowest ratings on human capital and corporate governance are excluded from the funds that were awarded with the French SRI label).</td> </tr> </tbody> </table>				Description	Apart from controversial weapons, ODDO BHF AM now applies a systematic exclusion filter to all equity funds integrating ESG criteria (around 80% of total fundamental equity funds). Exclusion may concern activity (coal-related exposure), sector (alcohol, tobacco ...), or ESG criteria (the lowest ratings on human capital and corporate governance are excluded from the funds that were awarded with the French SRI label).
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<input checked="" type="checkbox"/> Positive/best-in-class screening <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Product <input checked="" type="checkbox"/> Activity <input checked="" type="checkbox"/> Sector <input type="checkbox"/> Country/geographic region <input checked="" type="checkbox"/> Environmental and social practices and performance <input checked="" type="checkbox"/> Corporate governance <table border="1" style="margin-left: 20px;"> <thead> <tr> <th>Description</th> </tr> </thead> <tbody> <tr> <td>Best-in-Universe and Best effort ESG approach</td> </tr> </tbody> </table>				Description	Best-in-Universe and Best effort ESG approach
Description					
Best-in-Universe and Best effort ESG approach					
<input checked="" type="checkbox"/> Norms-based screening <ul style="list-style-type: none"> <input checked="" type="checkbox"/> UN Global Compact Principles <input type="checkbox"/> The UN Guiding Principles on Business and Human Rights <input checked="" type="checkbox"/> International Labour Organization Conventions <input checked="" type="checkbox"/> United Nations Convention Against Corruption <input type="checkbox"/> OECD Guidelines for Multinational Enterprises <input type="checkbox"/> Other, specify 					

	Description		
	ODDO BHF Asset Management ESG integration methodology covers the 10 principles of the United Nations Global Compact which derive from the Universal Declaration of Human Rights, the International Labour Organization Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development and the United Nations Convention against Corruption.		
LEI 04.2	Describe how you notify clients and/or beneficiaries when changes are made to your screening criteria.		
	ODDO BHF AM uses screening criteria methodologies developed internally. Criteria are reviewed every year, in January. All the methodology is publically available on the website in the Eurosif Transparency Code.		
	The ESG factsheets/reporting for the funds and dedicated mandates under ESG integration strategies is done on a monthly basis.		
LEI 05	Mandatory	Core Assessed	PRI 1
LEI 05.1	Indicate which processes your organisation uses to ensure ESG screening is based on robust analysis.		
	<input checked="" type="checkbox"/> Comprehensive ESG research is undertaken or sourced to determine companies' activities and products. <input type="checkbox"/> Companies are given the opportunity by you or your research provider to review ESG research on them and correct inaccuracies. <input checked="" type="checkbox"/> External research and data used to identify companies to be excluded/included is subject to internal audit by ESG/RI staff, the internal audit function or similar. <input checked="" type="checkbox"/> Third-party ESG ratings are updated regularly to ensure that portfolio holdings comply with fund policies. <input checked="" type="checkbox"/> Trading platforms blocking / restricting flagged securities on the black list. <input type="checkbox"/> A committee, body or similar with representatives independent of the individuals who conduct company research reviews some or all screening decisions. <input checked="" type="checkbox"/> A periodic review of internal research is carried out. <input type="checkbox"/> Review and evaluation of external research providers. <input type="checkbox"/> Other; specify <input type="checkbox"/> None of the above		
LEI 05.2	Indicate the proportion of your actively managed listed equity portfolio that is subject to comprehensive ESG research as part your ESG screening strategy.		
	<input type="radio"/> <10% <input type="radio"/> 10-50% <input checked="" type="radio"/> 51-90% <input type="radio"/> >90%		
LEI 05.3	Indicate how frequently third party ESG ratings are updated for screening purposes.		
	<input checked="" type="radio"/> Quarterly or more frequently <input type="radio"/> Bi-Annually <input type="radio"/> Annually <input type="radio"/> Less frequently than annually		
LEI 05.4	Indicate how frequently you review internal research that builds your ESG screens.		
	<input checked="" type="radio"/> Quarterly or more frequently <input type="radio"/> Bi-Annually <input type="radio"/> Annually <input type="radio"/> Less frequently than annually		
LEI 06	Voluntary	Additional Assessed	PRI 1
	Private		
LEI 08	Mandatory	Core Assessed	PRI 1
LEI 08.1	Indicate the proportion of actively managed listed equity portfolios where E, S and G factors are systematically researched as part of your investment analysis.		
	ESG issues	Proportion impacted by analysis	
	Environmental	Environmental	
		<input type="radio"/> <10% <input type="radio"/> 10-50% <input checked="" type="radio"/> 51-90% <input type="radio"/> >90%	

Social	Social	
	<input type="radio"/> <10% <input type="radio"/> 10-50% <input checked="" type="radio"/> 51-90% <input type="radio"/> >90%	
Corporate Governance	Corporate Governance	
	<input type="radio"/> <10% <input type="radio"/> 10-50% <input checked="" type="radio"/> 51-90% <input type="radio"/> >90%	

LEI 09	Mandatory	Core Assessed	PRI 1
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LEI 09.1 Indicate which processes your organisation uses to ensure ESG integration is based on robust analysis.

- Comprehensive ESG research is undertaken or sourced to determine companies' activities and products
- Companies are given the opportunity by you or your research provider to review ESG research on them and correct inaccuracies
- Third-party ESG ratings are updated regularly
- A periodic review of the internal research is carried out
- Structured, regular ESG specific meetings between responsible investment staff and the fund manager or within the investments team
- ESG risk profile of a portfolio against benchmark
- Analysis of the impact of ESG factors on investment risk and return performance
- Other; specify
- None of the above

LEI 09.2 Indicate the proportion of your actively managed listed equity portfolio that is subject to comprehensive ESG research as part your integration strategy.

- <10%
- 10-50%
- 51-90%
- >90%

LEI 09.3 Indicate how frequently third party ESG ratings that inform your ESG integration strategy are updated.

- Quarterly or more frequently
- Bi-Annually
- Annually
- Less frequently than annually

LEI 09.4 Indicate how frequently you review internal research that builds your ESG integration strategy.

- Quarterly or more frequently
- Bi-Annually
- Annually
- Less frequently than annually

LEI 09.5 Describe how ESG information is held and used by your portfolio managers.

- ESG information is held within centralised databases or tools, and it is accessible by all relevant staff
- ESG information or analysis is a standard section or aspect of all company research notes or industry/sector analysis generated by investment staff
- Systematic records are kept that capture how ESG information and research were incorporated into investment decisions
- Other; specify
- None of the above

LEI 10	Mandatory to Report, Voluntary to Disclose	Core Assessed	PRI 1
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Private

LEI Checks			Checks
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If there are any messages below, please review them before continuing. If there are no messages below, please save this page and continue.

LEA 01.1 Indicate whether your organisation has an active ownership policy (includes engagement and/or voting).

Yes

LEA 01.2 Attach or provide a URL to your active ownership policy.

Attachment provided:

URL provided:

https://www.am.oddo-bhf.com/france/en/professional_investor/ad/investment_capabilities/1008/sustainable_investments__esg/1016

LEA 01.3 Indicate what your active engagement policy covers:

General approach to Active Ownership

- Conflicts of interest
- Alignment with national stewardship code requirements
- Assets/funds covered by active ownership policy
- Expectations and objectives
- Engagement approach

Engagement

- ESG issues
- Prioritisation of engagement
- Methods of engagement
- Transparency of engagement activities
- Due diligence and monitoring process
- Insider information
- Escalation strategies
- Service Provider specific criteria
- Other, (specify)

(Proxy) voting approach

Voting

- ESG issues
- Prioritisation and scope of voting activities
- Methods of voting
- Transparency of voting activities
- Regional voting practice approaches
- Filing or co-filing resolutions
- Company dialogue pre/post-vote
- Decision-making processes
- Securities lending processes
- Other, (specify)

Other

None of the above

No

LEA 01.4 Do you outsource any of your active ownership activities to service providers?

Yes

LEA 01.5 Where active ownership activities are conducted by service providers, indicate whether your active ownership policy covers any of the following:

- Outline of service provider's role in implementing your organisation's active ownership policy
- Description of considerations included in service provider selection and agreements
- Identification of key ESG frameworks which service providers must follow
- Outline of information sharing requirements of service providers
- Description of service provider monitoring processes
- Other, (specify)
- None of the above

No

LEA 01.6	Additional information [optional]
<p>ODDO BHF Asset Management believes that exercising voting rights is an integral part of its responsibility as a shareholder. We regard our profession as investment managers from the point of view of investors and therefore believe that participating in annual general meetings (AGMs) is in the interests of our fund unitholders. Participating in AGMs helps us ensure that entrepreneurs' strategies, risk management and governance are creating value over the long term, which is a source of returns for their shareholders.</p> <p>Moreover, ODDO BHF AM has set up a formal Dialogue & Engagement policy in 2017 which is under responsibility of the quarterly ESG Integration Committee. The Committee is composed of the Head of ESG Research, the CIO, portfolio managers, and the Compliance Officer. The aim is to review the companies with a low ESG rating in which ODDO BHF AM SAS is invested in, and to decide which ones we will engage in the next 3 months. The Committee takes its decisions with the support of informations from the internal ESG platform and from the database of our proxy provider (ISS). A monitoring process is in place and the result of each engagement action is communicated to PM teams.</p> <p>More generally, dialogue & engagement at ODDO BHF AM is easy in practice as portfolio managers meet often top managements of the companies in which they are invested or not.</p>	

LEA 02	Mandatory	Core Assessed	PRI 1,2,3
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LEA 02.1	Indicate the method of engagement, giving reasons for the interaction.
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Type of engagement	Reason for interaction
Individual / Internal staff engagements	<input checked="" type="checkbox"/> To influence corporate practice (or identify the need to influence it) on ESG issues <input checked="" type="checkbox"/> To encourage improved/increased ESG disclosure <input checked="" type="checkbox"/> To gain an understanding of ESG strategy and/or management <input type="checkbox"/> We do not engage via internal staff
Collaborative engagements	<input checked="" type="checkbox"/> To influence corporate practice (or identify the need to influence it) on ESG issues <input checked="" type="checkbox"/> To encourage improved/increased ESG disclosure <input checked="" type="checkbox"/> To gain an understanding of ESG strategy and/or management <input type="checkbox"/> We do not engage via collaborative engagements
Service provider engagements	<input type="checkbox"/> To influence corporate practice (or identify the need to influence it) on ESG issues <input checked="" type="checkbox"/> To encourage improved/increased ESG disclosure <input type="checkbox"/> To gain an understanding of ESG strategy and/or management <input type="checkbox"/> We do not engage via service providers

LEA 02.2	Indicate whether your organisation plays a role in the engagement process that your service provider conducts.
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Yes

LEA 02.3	Indicate the role(s) you play in engagements that your service provider conducts on your behalf.
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- We discuss the topic of the engagement (or ESG issue(s)) of engagement
- We discuss the rationale for the engagement
- We discuss the objectives of the engagement
- We select the companies to be engaged with
- We discuss the frequency/intensity of interactions with companies
- We discuss the next steps for engagement activity
- We participate directly in certain engagements with our service provider
- Other; specify
 Materiality of ESG factors and as a follow-up from a voting decision
- We play no role in engagements that our service provider conducts.

No

LEA 03	Mandatory	Core Assessed	PRI 2
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LEA 03.1	Indicate whether your organisation has a formal process for identifying and prioritising engagements.
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Yes

LEA 03.2	Indicate the criteria used to identify and prioritise engagements for each type of engagement.
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Type of engagement	Criteria used to identify/prioritise engagements

Individual / Internal staff engagements	<table border="1"> <thead> <tr> <th colspan="2" style="background-color: #0070C0; color: white;">Individual / Internal staff engagements</th> </tr> </thead> <tbody> <tr> <td><input type="checkbox"/></td> <td>Geography/market of the companies</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td>Materiality of the ESG factors</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td>Exposure (size of holdings)</td> </tr> <tr> <td><input type="checkbox"/></td> <td>Responses to ESG impacts that have already occurred</td> </tr> <tr> <td><input type="checkbox"/></td> <td>Responses to divestment pressure</td> </tr> <tr> <td><input type="checkbox"/></td> <td>Consultation with clients/beneficiaries</td> </tr> <tr> <td><input type="checkbox"/></td> <td>Consultation with other stakeholders (e.g. NGOs, trade unions, etc.)</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td>Follow-up from a voting decision</td> </tr> <tr> <td><input type="checkbox"/></td> <td>Client request</td> </tr> <tr> <td><input checked="" type="checkbox"/></td> <td>Breaches of international norms</td> </tr> <tr> <td><input type="checkbox"/></td> <td>Other; (specify)</td> </tr> <tr> <td><input type="checkbox"/></td> <td>We do not outline engagement criteria for our individual engagements</td> </tr> </tbody> </table>	Individual / Internal staff engagements		<input type="checkbox"/>	Geography/market of the companies	<input checked="" type="checkbox"/>	Materiality of the ESG factors	<input checked="" type="checkbox"/>	Exposure (size of holdings)	<input type="checkbox"/>	Responses to ESG impacts that have already occurred	<input type="checkbox"/>	Responses to divestment pressure	<input type="checkbox"/>	Consultation with clients/beneficiaries	<input type="checkbox"/>	Consultation with other stakeholders (e.g. NGOs, trade unions, etc.)	<input checked="" type="checkbox"/>	Follow-up from a voting decision	<input type="checkbox"/>	Client request	<input checked="" type="checkbox"/>	Breaches of international norms	<input type="checkbox"/>	Other; (specify)	<input type="checkbox"/>	We do not outline engagement criteria for our individual engagements				
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No

LEA 04	Mandatory	Core Assessed	PRI 2
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LEA 04.1	Indicate whether you define specific objectives for your organisation's engagement activities.
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Individual / Internal staff engagements	<input checked="" type="radio"/> All engagement activities <input type="radio"/> Majority of engagement activities <input type="radio"/> Minority of engagement activities <input type="radio"/> We do not define specific objectives for engagement activities carried out by internal staff
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Collaborative engagements	<input checked="" type="checkbox"/> All engagement activities <input type="checkbox"/> Majority of engagement activities <input type="checkbox"/> Minority of engagement activities <input type="checkbox"/> We do not define specific objectives for engagement activities carried out through collaboration
Service-provider engagements	<input type="checkbox"/> All engagement activities <input type="checkbox"/> Majority of engagement activities <input type="checkbox"/> Minority of engagement activities <input checked="" type="checkbox"/> We do not define specific objectives for engagement activities carried out by our service providers

LEA 05	Mandatory	Core Assessed	PRI 2
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LEA 05.1 Indicate whether you monitor and/or review engagement outcomes.

Individual / Internal staff engagements	<input checked="" type="checkbox"/> Yes, in all cases <input type="checkbox"/> Yes, in a majority of cases <input type="checkbox"/> Yes, in a minority of cases <input type="checkbox"/> We do not monitor, or review engagement outcomes when the engagement is carried out by our internal staff.
Collaborative engagements	<input checked="" type="checkbox"/> Yes, in all cases <input type="checkbox"/> Yes, in a majority of cases <input type="checkbox"/> Yes, in a minority of cases <input type="checkbox"/> We do not monitor, or review engagement outcomes when the engagement is carried out through collaboration.
Service-provider engagements	<input type="checkbox"/> Yes, in all cases <input type="checkbox"/> Yes, in a majority of cases <input type="checkbox"/> Yes, in a minority of cases <input checked="" type="checkbox"/> We do not monitor, or review engagement outcomes when the engagement is carried out by our service providers.

LEA 05.2 Indicate whether you do any of the following to monitor and/or review the progress of engagement activities.

Individual / Internal staff engagements	<input checked="" type="checkbox"/> Define timelines/milestones for your objectives <input type="checkbox"/> Track and/or monitor progress against defined objectives and/or KPIs <input type="checkbox"/> Track and/or monitor the progress of action taken when original objectives are not met <input checked="" type="checkbox"/> Revisit and, if necessary, revise objectives on a continuous basis <input type="checkbox"/> Other; specify
Collaborative engagements	<input type="checkbox"/> Define timelines/milestones for your objectives <input checked="" type="checkbox"/> Track and/or monitor progress against defined objectives and/or KPIs <input type="checkbox"/> Track and/or monitor the progress of action taken when original objectives are not met <input type="checkbox"/> Revisit and, if necessary, revise objectives on a continuous basis <input type="checkbox"/> Other; specify

LEA 06	Mandatory	Additional Assessed	PRI 2,4
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LEA 06.1 Indicate whether your organisation has an escalation strategy when engagements are unsuccessful.

Yes

LEA 06.2 Indicate the escalation strategies used at your organisation following unsuccessful engagements.

- Collaborating with other investors
- Issuing a public statement
- Filing/submitting a shareholder resolution
- Voting against the re-election of the relevant directors
- Voting against the board of directors or the annual financial report
- Submitting nominations for election to the board
- Seeking legal remedy / litigation
- Reducing exposure (size of holdings)
- Divestment
- Other; specify

No

LEA 06.3 Additional information. [Optional]

Our engagement approach is based on identifying and systematically formalising the vectors of progress that are expected. This allows us to assess the results and to follow up on them. Our approach is deemed a success if dialogue with an issuer has led to greater ESG transparency and/or an improvement in its ESG practices within 18 to 24 months. If the engagement is unsuccessful (i.e., if there is no dialogue or if the dialogue that has been carried out is unsatisfactory), the management teams may decide to exclude the issuer from the investment universe or, in the case of an active position, will have to sell it off.

LEA 07 Voluntary Additional Assessed PRI 1,2

LEA 07.1 Indicate whether insights gained from your organisation's engagements are shared with investment decision-makers.

Type of engagement	Insights shared
Individual / Internal staff engagements	<input checked="" type="checkbox"/> Yes, systematically <input type="checkbox"/> Yes, occasionally <input type="checkbox"/> No
Collaborative engagements	<input checked="" type="checkbox"/> Yes, systematically <input type="checkbox"/> Yes, occasionally <input type="checkbox"/> No
Service-provider engagements	<input type="checkbox"/> Yes, systematically <input type="checkbox"/> Yes, occasionally <input checked="" type="checkbox"/> No

LEA 07.2 Indicate the practices used to ensure that information and insights gained through engagements are shared with investment decision-makers.

- Involving investment decision-makers when developing an engagement programme
- Holding investment team meetings and/or presentations
- Using IT platforms/systems that enable data sharing
- Internal process that requires portfolio managers to re-balance holdings based on interaction and outcome levels
- Other; specify
- None

LEA 07.3 Indicate whether insights gained from your organisation's engagements are shared with your clients/beneficiaries.

Type of engagement	Insights shared
Individual/Internal staff engagements	<input type="checkbox"/> Yes, systematically <input checked="" type="checkbox"/> Yes, occasionally <input type="checkbox"/> No
Collaborative engagements	<input type="checkbox"/> Yes, systematically <input checked="" type="checkbox"/> Yes, occasionally <input type="checkbox"/> No
Service-provider engagements	<input type="checkbox"/> Yes, systematically <input type="checkbox"/> Yes, occasionally <input checked="" type="checkbox"/> No

LEA 08 Mandatory Gateway PRI 2

LEA 08.1 Indicate whether you track the number of your engagement activities.

Type of engagement	Tracking engagements
Individual/Internal staff engagements	<input checked="" type="checkbox"/> Yes, we track the number of our engagements in full <input type="checkbox"/> Yes, we partially track the number of our engagements <input type="checkbox"/> We do not track
Collaborative engagements	<input checked="" type="checkbox"/> Yes, we track the number of collaborative engagements in full <input type="checkbox"/> Yes, we partially track the number of our collaborative engagements <input type="checkbox"/> We do not track

Service-provider engagements	<input type="radio"/> Yes, we track the number of service-provider engagements in full <input type="radio"/> Yes, we partially track the number of our service-provider engagements <input checked="" type="radio"/> We do not track
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LEA 09	Mandatory to Report, Voluntary to Disclose	Core Assessed	PRI 2
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Private

LEA 10	Voluntary	Additional Assessed	PRI 2
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Private

LEA 11	Voluntary	Descriptive	PRI 2
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Private

LEA 12	Mandatory	Descriptive	PRI 2
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LEA 12.1	Indicate how you typically make your (proxy) voting decisions.
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Approach

- We use our own research or voting team and make voting decisions without the use of service providers.
- We hire service providers who make voting recommendations and/or provide research that we use to guide our voting decisions.

Based on

- The service-provider voting policy we sign off on
 - Our own voting policy
 - Our clients' requests or policies
 - Other (explain)
- We hire service providers who make voting decisions on our behalf, except in some pre-defined scenarios where we review and make voting decisions.
 - We hire service providers who make voting decisions on our behalf.

LEA 12.2	Provide an overview of how you ensure that your agreed-upon voting policy is adhered to, giving details of your approach when exceptions to the policy are made.
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To analyse resolutions and to determine its votes, ODDO BHF AM currently draws on the services of an external service provider, ISS, which applies ODDO BHF AM's voting principles. A voting committee has been set up to manage any conflicts of interest and requests for exemptions from the voting policy defined by ODDO BHF AM. It is chaired by ODDO BHF AM's head of internal control and compliance and includes ODDO BHF AM's CIO, an internal risk controller from ODDO BHF and a "Corporate" legal specialist from ODDO BHF. Its decisions are communicated for information purposes to ODDO BHF AM's Management Committee. A distinction is made between votes for controlled companies, and other companies with regard to the minimum number of independent directors, the number of term renewals and their duration. For controlled companies, a more specific focus is placed on governance within supervisory boards in order to limit all conflicts of interests and to protect minority shareholders.

LEA 14	Voluntary	Additional Assessed	PRI 2
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Private

LEA 15	Mandatory	Descriptive	PRI 2
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LEA 15.1	Indicate the proportion of votes participated in within the reporting year in which where you or the service providers acting on your behalf raised concerns with companies ahead of voting.
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- 100%
- 99-75%
- 74-50%
- 49-25%
- 24-1%
- Neither we nor our service provider(s) raise concerns with companies ahead of voting

LEA 16	Mandatory	Core Assessed	PRI 2
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LEA 16.1	Indicate the proportion of votes where you, and/or the service provider(s) acting on your behalf, communicated the rationale to companies for abstaining or voting against management recommendations. Indicate this as a percentage out of all eligible votes.
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- 100%
- 99-75%
- 74-50%
- 49-25%
- 24-1%
- We do not communicate the rationale to companies
- Not applicable because we and/or our service providers did not abstain or vote against management recommendations

LEA 17	Mandatory	Core Assessed	PRI 2
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LEA 17.1	For listed equities in which you or your service provider have the mandate to issue (proxy) voting instructions, indicate the percentage of votes cast during the reporting year.		
<input checked="" type="checkbox"/> We do track or collect this information			
	<table border="1"> <tr> <td>Votes cast (to the nearest 1%)</td> </tr> <tr> <td>98%</td> </tr> </table>	Votes cast (to the nearest 1%)	98%
Votes cast (to the nearest 1%)			
98%			
	<table border="1"> <tr> <td>Specify the basis on which this percentage is calculated</td> </tr> <tr> <td> <input type="checkbox"/> Of the total number of ballot items on which you could have issued instructions <input checked="" type="checkbox"/> Of the total number of company meetings at which you could have voted <input type="checkbox"/> Of the total value of your listed equity holdings on which you could have voted </td> </tr> </table>	Specify the basis on which this percentage is calculated	<input type="checkbox"/> Of the total number of ballot items on which you could have issued instructions <input checked="" type="checkbox"/> Of the total number of company meetings at which you could have voted <input type="checkbox"/> Of the total value of your listed equity holdings on which you could have voted
Specify the basis on which this percentage is calculated			
<input type="checkbox"/> Of the total number of ballot items on which you could have issued instructions <input checked="" type="checkbox"/> Of the total number of company meetings at which you could have voted <input type="checkbox"/> Of the total value of your listed equity holdings on which you could have voted			
<input type="checkbox"/> We do not track or collect this information			

LEA 17.2	Explain your reason(s) for not voting on certain holdings
<input type="checkbox"/> Shares were blocked <input type="checkbox"/> Notice, ballots or materials not received on time <input checked="" type="checkbox"/> Missed deadline <input type="checkbox"/> Geographical restrictions (non-home market) <input type="checkbox"/> Cost <input type="checkbox"/> Conflicts of interest <input type="checkbox"/> Holdings deemed too small <input checked="" type="checkbox"/> Administrative impediments (e.g., power of attorney requirements, ineligibility due to participation in share placement) <input type="checkbox"/> Client request <input type="checkbox"/> Other (explain)	

LEA 18	Voluntary	Additional Assessed	PRI 2							
LEA 18.1	Indicate whether you track the voting instructions that you or your service provider on your behalf have issued.									
<input checked="" type="checkbox"/> Yes, we track this information										
LEA 18.2	Of the voting instructions that you and/or third parties on your behalf have issued, indicate the proportion of ballot items that were:									
<table border="1"> <tr> <td>Voting instructions Breakdown as percentage of votes cast</td> </tr> <tr> <td>For (supporting) management recommendations</td> </tr> <tr> <td>79%</td> </tr> <tr> <td>Against (opposing) management recommendations</td> </tr> <tr> <td>21%</td> </tr> <tr> <td>Abstentions</td> </tr> <tr> <td>0%</td> </tr> </table>				Voting instructions Breakdown as percentage of votes cast	For (supporting) management recommendations	79%	Against (opposing) management recommendations	21%	Abstentions	0%
Voting instructions Breakdown as percentage of votes cast										
For (supporting) management recommendations										
79%										
Against (opposing) management recommendations										
21%										
Abstentions										
0%										
<input type="checkbox"/> No, we do not track this information										
LEA 18.3	In cases where your organisation voted against management recommendations, indicate the percentage of companies which you have engaged.									
0										
LEA 18.4	Additional information. [Optional]									
Votes AGAINST were mainly concentrated in three areas: - Financial operations & mergers 29% - Management remuneration 27% - Directors nominations 26%.										

LEA 19	Mandatory	Core Assessed	PRI 2
LEA 19.1	Indicate whether your organisation has a formal escalation strategy following unsuccessful voting.		
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			

LEA 20	Voluntary	Descriptive	PRI 2
Private			

LEA 21	Voluntary	Descriptive	PRI 2
Private			

LEA Checks			Checks
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If there are any messages below, please review them before continuing. If there are no messages below, please save this page and continue.

FI 01.1 Indicate (1) Which ESG incorporation strategy and/or combination of strategies you apply to your actively managed fixed income investments; and (2) The proportion (+/- 5%) of your total actively managed fixed income investments each strategy applies to.

SSA	Screening alone	80
	Thematic alone	0
	Integration alone	0
	Screening + integration strategies	0
	Thematic + integration strategies	0
	Screening + thematic strategies	20
	All three strategies combined	0
	No incorporation strategies applied	0
Corporate (financial)	Screening alone	75
	Thematic alone	0
	Integration alone	0
	Screening + integration strategies	20
	Thematic + integration strategies	5
	Screening + thematic strategies	0
	All three strategies combined	0
	No incorporation strategies applied	0
Corporate (non-financial)	Screening alone	75
	Thematic alone	0
	Integration alone	0
	Screening + integration strategies	20
	Thematic + integration strategies	5
	Screening + thematic strategies	0
	All three strategies combined	0
	No incorporation strategies applied	0

FI 01.2	Describe your reasons for choosing a particular ESG incorporation strategy and how combinations of strategies are used.
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Screening: ODDO BHF AM applies in priority a screening to exclude companies involved in controversial weapons , issuers suffering from the highest level of controversy in relation with the UN Global Compact principles, and sector-based exclusions on a case by case basis . Integration: objective of enhancing the scope and materiality of ESG risks (governance for instance), Identifying ESG factors which could reduce or reinforce the reimbursement capacity of the issuers. Thematic: ODDO BHF AM has launched a green bond strategy in 2019 in order to contribute to the energy transition.

FI 14	Mandatory to Report, Voluntary to Disclose	Core Assessed	PRI 2
<i>Private</i>			
FI 15	Mandatory to Report, Voluntary to Disclose	Additional Assessed	PRI 1,2
<i>Private</i>			
FI 16	Mandatory to Report, Voluntary to Disclose	Additional Assessed	PRI 1,2
<i>Private</i>			
FI 17	Mandatory to Report, Voluntary to Disclose	Additional Assessed	General
<i>Private</i>			
FI 18	Voluntary	Descriptive	PRI 1,2
<i>Private</i>			

PE 02	Mandatory	Core Assessed	PRI 2
PE 02.1	Indicate whether your organisation's investment activities are guided by a responsible investment policy / follow responsible investment guidelines.		
<input checked="" type="checkbox"/> Our investment activities are guided by a responsible investment policy			
PE 02.2	Describe how your organisation outlines expectations on staff and portfolio companies' approach towards ESG issues in investment activities.		
<p>ODDO BHF Private Equity commitment to integrating ESG factors throughout its investment cycle is fully aligned with ODDO BHF AM's history and principles. For Primary funds as well as for Secondary funds, our ESG approach follows three systematic steps: a pre-investment due diligence, a monitoring of progress, and reporting. The ESG charter of our Private Equity expertise is available on our website.</p>			
<input type="checkbox"/> Our investment activities are not guided by a responsible investment policy <input type="checkbox"/> We do not have a responsible investment policy			

PE 03	Mandatory	Core Assessed	PRI 1,4,6
PE 03.1	Indicate if your most recent fund placement documents (private placement memorandums (PPM) or similar) refer to responsible investment.		
<input checked="" type="checkbox"/> Yes			
PE 03.2	Indicate how your most recent fund placement documents (PPM or similar) refer to the following responsible investment:		
<input checked="" type="checkbox"/> Policy and commitment to responsible investment <input checked="" type="checkbox"/> Approach to ESG issues in pre-investment processes <input checked="" type="checkbox"/> Approach to ESG issues in post-investment processes <input checked="" type="checkbox"/> Approach to ESG reporting			
PE 03.3	Describe how your organisation refers to responsible investment in fund placement documents (PPMs or similar). [Optional]		
<p>ODDO BHF Equity investment process for commitments in private equity funds integrates the ESG assessment of (i) its primary partnership managers and their attentiveness to ESG concerns, and (ii) their current investments through the following actions:</p> <ul style="list-style-type: none"> - Review of the manager's ESG policy throughout its fundraising documents and due diligence interviews with the manager's team. If there is not an existing ESG policy, we highlight the importance of ESG, encourage the manager to put in place a formal policy and process when possible; - Review of the manager's annual ESG reports, PRI report, or any relevant ESG related report; - If additional information is required, the submission of an ODDO BHF Private Equity ESG questionnaire to the manager, to understand and address ESG issues; - Negotiation of ESG-related provisions through side letters prior to the commitment of ODDO BHF Private Equity managed fund. <p>ODDO BHF Private Equity Investment Memorandum encompasses the findings and conclusions of the ESG review during the due diligence process.</p>			
<input type="checkbox"/> No <input type="checkbox"/> Not applicable as our organisation does not fundraise			

PE 04	Voluntary	Additional Assessed	PRI 4
Private			

PE 05	Mandatory	Gateway	PRI 1
PE 05.1	During due-diligence indicate if your organisation typically incorporates ESG issues when selecting private equity investments.		
<input checked="" type="checkbox"/> Yes			
PE 05.2	Describe your organisation's approach to incorporating ESG issues in private equity investment selection.		
<p>ODDO BHF Private Equity collects and reviews the ESG policy and reports (if any) of the LPs. Then it commits to send an ESG questionnaire to the partnership managers of its portfolio every year. All the questionnaires filled out by the fund manager provide the relevant data to monitor and review the application of ESG principles across its private equity portfolio.</p> <p>ODDO BHF Private Equity aggregates this data and presents the findings to the ESG Committee which will review and discuss these elements. If there are ESG issues that need to be addressed, the ESG Committee will reach out to the managers to get a clear action plan to fix them.</p> <p>Based on the collected data and the minutes of the ESG Committee, ODDO BHF Private Equity will produce an annual ESG report to its investors.</p>			
<input type="checkbox"/> No			

PE 06	Mandatory	Core Assessed	PRI 1,3
PE 06.1	Indicate what type of ESG information your organisation typically considers during your private equity investment selection process.		
<input checked="" type="checkbox"/> Raw data from target company <input type="checkbox"/> Benchmarks against other companies <input checked="" type="checkbox"/> Sector level data/benchmarks <input type="checkbox"/> Country level data/benchmarks <input checked="" type="checkbox"/> Reporting standards, industry codes and certifications <input type="checkbox"/> International initiatives, declarations or standards <input type="checkbox"/> Engagements with stakeholders (e.g. customers and suppliers) <input checked="" type="checkbox"/> Advice from external resources <input type="checkbox"/> Other, specify			

We do not track this information

PE 06.2 Describe how this information is reported to, considered and documented by the Investment Committee or similar.

ODDO BHF Private Equity aggregates this data and presents the findings to the ESG Committee which will review and discuss these elements. If there are ESG issues that need to be addressed, the ESG Committee will reach out to the managers to get a clear action plan to fix them. Based on the collected data and the minutes of the ESG Committee, ODDO BHF Private Equity will produce an annual ESG report to its investors.

PE 07	Voluntary	Additional Assessed	PRI 1,2
Private			

PE 08	Voluntary	Additional Assessed	PRI 1
Private			

PE 09 Mandatory Gateway/Core Assessed PRI 2

PE 09.1 Indicate whether your organisation incorporates ESG issues in investment monitoring of portfolio companies.

Yes

PE 09.2 Indicate the proportion of portfolio companies where your organisation included ESG performance in investment monitoring during the reporting year.

- >90% of portfolio companies
- 51-90% of portfolio companies
- 10-50% of portfolio companies
- <10% of portfolio companies

PE 09.3 Indicate ESG issues for which your organisation typically sets and monitors targets (KPIs or similar) and provide examples per issue.

- Environmental
- Social
- Governance
- We do not set and/or monitor against targets

No

PE 09.4 Additional information. [Optional]

2019 was the first year of integration of our ESG monitoring. ODDO BHF Private Equity should incorporate KPIs and monitoring next year.

PE 10 Mandatory Core Assessed PRI 2

PE 10.1 Indicate if your organisation tracks the proportion of your portfolio companies that have an ESG/sustainability-related policy (or similar guidelines).

Yes

PE 10.2 Indicate what percentage of your portfolio companies has an ESG/sustainability policy (or similar guidelines).

- >90% of portfolio companies
- 51-90% of portfolio companies
- 10-50% of portfolio companies
- <10% of portfolio companies
- 0% of portfolio companies

No

PE 11	Voluntary	Additional Assessed	PRI 2
Private			

PE 12	Voluntary	Descriptive	PRI 2,3
Private			

PE 13	Voluntary	Additional Assessed	PRI 2
Private			

PE 14	Voluntary	Additional Assessed	PRI 1,2
Private			

PE 15	Mandatory to Report, Voluntary to Disclose	Descriptive	PRI 1,2
Private			

PE 16	Mandatory to Report, Voluntary to Disclose	Descriptive	PRI 6
Private			

CM1 01	Mandatory	Additional Assessed	General
CM1 01.1	Indicate whether the reported information you have provided for your PRI Transparency Report this year has undergone:		
<input type="checkbox"/> Third party assurance over selected responses from this year's PRI Transparency Report <input type="checkbox"/> Third party assurance over data points from other sources that have subsequently been used in your PRI responses this year <input type="checkbox"/> Third party assurance or audit of the correct implementation of RI processes (that have been reported to the PRI this year) <input type="checkbox"/> Internal audit of the correct implementation of RI processes and/or accuracy of RI data (that have been reported to the PRI this year) <input checked="" type="checkbox"/> Internal verification of responses before submission to the PRI (e.g. by the CEO or the board) <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Whole PRI Transparency Report has been internally verified <input type="checkbox"/> Selected data has been internally verified <input type="checkbox"/> Other, specify <input type="checkbox"/> None of the above			
CM1 02	Mandatory	Descriptive	General
CM1 02.1	We undertook third party assurance on last year's PRI Transparency Report		
<input type="radio"/> Whole PRI Transparency Report was assured last year <input type="radio"/> Selected data was assured in last year's PRI Transparency Report <input checked="" type="radio"/> We did not assure last year's PRI Transparency report <input type="radio"/> None of the above, we were in our preparation year and did not report last year.			
CM1 03	Mandatory	Descriptive	General
CM1 03.1	We undertake confidence building measures that are unspecific to the data contained in our PRI Transparency Report:		
<input type="checkbox"/> We adhere to an RI certification or labelling scheme <input type="checkbox"/> We carry out independent/third party assurance over a whole public report (such as a sustainability report) extracts of which are included in this year's PRI Transparency Report <input type="checkbox"/> ESG audit of holdings <input type="checkbox"/> Other, specify <input checked="" type="checkbox"/> None of the above			
CM1 04	Mandatory	Descriptive	General
CM1 04.1	Do you plan to conduct third party assurance of this year's PRI Transparency report?		
<input type="radio"/> Whole PRI Transparency Report will be assured <input type="radio"/> Selected data will be assured <input checked="" type="radio"/> We do not plan to assure this year's PRI Transparency report			
CM1 07	Mandatory	Descriptive	General
CM1 07.1	Indicate who has reviewed/verified internally the whole - or selected data of the - PRI Transparency Report . and if this applies to selected data please specify what data was reviewed		
<input type="checkbox"/> CEO or other Chief-Level staff <input type="checkbox"/> The Board <input type="checkbox"/> Investment Committee <input checked="" type="checkbox"/> Compliance Function <input checked="" type="checkbox"/> RI/ESG Team <input checked="" type="checkbox"/> Investment Teams <input type="checkbox"/> Legal Department <input type="checkbox"/> Other (specify)			