Periodic disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

Product name:
ODDO BHF Polaris Moderate

Legal entity identifier (LEI):
5299003Y5ICM7PDO9D49

Environmental and/or social characteristics

Did this financial product have a sustainable investment objective?

☐ **Yes**	☒ **No**
☐ It made **sustainable investments with an environmental objective**: __% ☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy ☐ in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy ☐ It made **sustainable investments with a social objective**: __%	☒ It **promoted Environmental/Social (E/S) characteristics** and while it did not have as its objective a sustainable investment, it had a proportion of 34.50% of sustainable investments ☒ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy ☒ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy ☐ with a social objective ☐ It promoted E/S characteristics, but **did not make any sustainable investments**

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

To what extent were the environmental and/or social characteristics promoted by this financial product met?

Sustainability indicators measure how the environmental or social characteristics promoted by the financial product are attained.

The Fund met its environmental and social characteristics during the reporting period through the following measures:

- Effective implementation of the ODDO BHF Asset Management exclusion policy (coal, UNGC, oil and gas from unconventional sources, controversial weapons, tobacco, destruction of biodiversity, development, production and use of (conventional and unconventional) oil and gas in the Arctic) and the Fund-specific exclusions
- Implementation of our voting policy in the event that the Fund exercises its voting rights
- Implementation of dialogue and engagement activities in line with our engagement policy
- Consideration of adverse impacts of investment decisions in accordance with Article 4 of the Disclosure Regulation
- Implementation of our approach to review the significant harm of sustainable investments

How did the sustainability indicators perform?

	30/12/2022		29/12/2023	
	Fund	**Percentage of securities analysed (%)**	**Fund**	**Percentage of securities analysed (%)**
MSCI ESG Rating (CCC to AAA)*	AAA	91.8	AA	96.6
MSCI ESG Quality Score (/10)	8.8	91.5	7.4	96.6
Weighted average E ranking (/10)	7.6	91.5	7.5	96.6
Weighted average S ranking (/10)	5.6	90.8	5.7	96.6
Weighted average G ranking (/10)	6.3	91.8	6.1	96.6
Weighted average CO2 intensity (tCO2/EUR million turnover)	43.1	73.4	53.5	95.8
Sustainable investments (%)	29.5	85.6	34.5	92.9
Taxonomy-aligned investments (%)	0.0	95.0	2.4	10.9
Use of fossil fuels (%)**	1.8	75.2	2.8	4.7
Use of CO2-free solutions ("green percentage") (%)***	23.2	75.2	27.2	27.7

* CCC is the lowest rating and AAA is the highest rating
** Sum of the weighting of the companies in the portfolio whose turnover is derived in part from the use of fossil fuels
*** Sum of the weighting of the companies in the portfolio whose turnover is derived in part from the use of CO2-free solutions (renewable energy, sustainable mobility etc.)

… and compared to previous periods?

The information can be found in the table above.

What were the objectives of the sustainable investments that the financial product partially made and how did the sustainable investment contribute to such objectives?

The investment objectives pursued by the Fund's sustainable investments were as follows:

1. During the reporting period, sustainable investments were pursued with the aim of making EU Taxonomy-aligned investments with an environmental objective pursuant to Article 9.

2. Environment: Contribution to environmental impacts as defined by MSCI ESG Research through "sustainable impacts" in relation to the environmental objectives. This includes impacts on the following categories: alternative energy, energy efficiency, environmentally friendly construction, sustainable water supply, preventing and combating environmental pollution, sustainable agriculture.

In the absence of concrete regulatory requirements on calculating sustainable investments pursuant to Article 2(17) of the Disclosure Regulation, we have defined the following calculation approach, which is subject to the inherent uncertainties. We use the MSCI "Sustainable Impact Revenue" metric to assess the suitability of a company for sustainable investment. If revenue of 5% or more is achieved in sustainable business sectors, we consider the overall weighting of the company in the portfolio to be sustainable, but only if the company is not on our DNSH list.

Principal adverse impacts are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

How did the sustainable investments that the financial product partially made not cause significant harm to any environmental or social sustainable investment objective?

The significant harm to the Fund's sustainable investment objectives was controlled via a four-stage process:

1. Companies that have been the subject of significant controversy in relation to environmental, social or governance factors are not considered to be sustainable under any circumstances;
2. Companies that fall under the ODDO BHF Asset Management exclusion policy (coal, UNGC, oil and gas from unconventional sources, controversial weapons, tobacco, destruction of biodiversity, development, production and use of (conventional and unconventional) oil and gas in the Arctic) are not considered to be sustainable under any circumstances and must not become investee companies;
3. Companies with exposure to banned weapons and/or that breach the UN Global Compact principles are not considered to be sustainable and must not become investee companies;

The company's controlling teams are responsible for controlling significant harm.

How were the indicators for adverse impacts on sustainability factors taken into account?

Consideration of the principal adverse impacts is based on a negative screening for three principal adverse impacts [hereinafter: PAI] (7,10 and 14) ("biodiversity", "violations of the UN Global Compact principles and Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises" and "exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)" and on ESG ratings, dialogue, engagement and voting policy (where voting rights are exercised for the Fund) for the remaining PAIs.

Were sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:

The management company ensures that the Fund's sustainable investments correspond to the United Nations Global Compact (UNGC) exclusion list, as outlined in the exclusion policy of the management company.

The capital management company ensures that the Fund's sustainable investments correspond to the United Nations Global Compact (UNGC) exclusion list.
Due to inadequate data quality, the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights are not currently taken into consideration directly. However, individual aspects from these Guidelines and Guiding Principles are taken into consideration indirectly (via MSCI ESG Research ESG ratings).

The EU Taxonomy sets out a "do no significant harm" principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific Union criteria.

The "do no significant harm" principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.

How did this financial product consider principal adverse impacts on sustainability factors?

The principal adverse impacts on sustainability factors are taken into consideration in the Fund by means of exclusions, in connection with pre- and post-trade controls, and on the basis of ESG ratings, dialogue, engagement and, where applicable, voting policy.
Consideration of the principal adverse impacts is based on a negative screening for three PAI (7, 10 and 14) ("biodiversity", "violations of the UN Global Compact principles and Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises" and "exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)" and on ESG ratings, dialogue, engagement and voting policy (where voting rights are exercised for the Fund) for the remaining PAIs.

What were the top investments of this financial product?

The list includes the investments constituting **the greatest proportion of investments** of the financial product during the reference period which is: 01/01/2023–31/12/2023

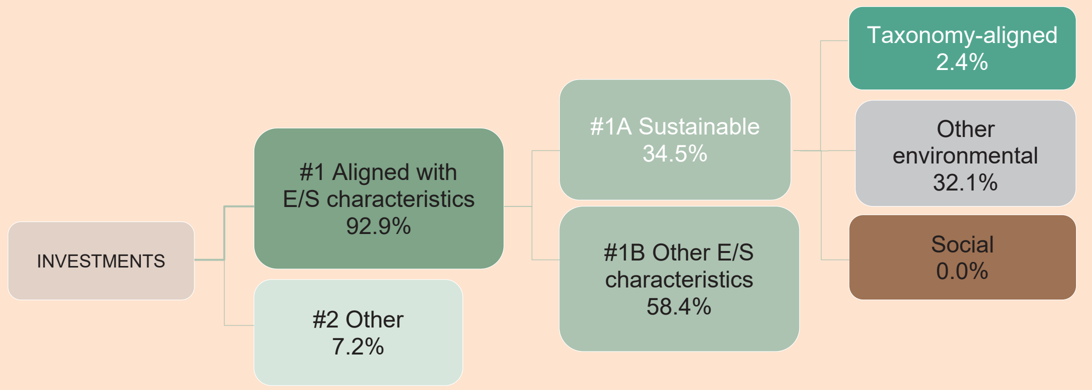
Largest investments	Sector	% Assets*	Country
Xetra-Gold	Equity — Cash	3.6%	Germany
Dpam L- Bonds Emk Sustainable-Fund	-	2.6%	Luxembourg
Bundesrepub. Deutschland 1.75% 02/2024	Bonds — Treasuries	1.9%	Germany
Oddo BHF Euro Credit Short Duration Cp-Eur	-	1.8%	Luxembourg
Ses Sa Eusa5 12/2049	Bonds — Communication	1.5%	Luxembourg
European Investment Bank 4.50% 10/2025	Bonds — Supranational	1.4%	Supranational
Norwegian Government 3.00% 03/2024	Bonds — Treasuries	1.3%	Norway
Finnish Government 0.00% 09/2030	Bonds — Treasuries	1.2%	Finland
Bank of Montreal 0.25% 01/2024	Bonds — Mortgage-backed securities	1.1%	Canada
Roche Holding AG-Genusschein	Equity — Health care	1.1%	Switzerland
Government of Finland 2.75% 04/2038	Bonds — Treasuries	1.0%	Finland
Government Of Austria 4.15% 03/2037	Bonds — Treasuries	0.9%	Austria
Siemens AG-Reg	Equity — Industrial company	0.9%	Germany
Alphabet Inc-Cl C	Equity — Communication services	0.9%	United States of America
Government of Germany 1% 05/2038	Bonds — Treasuries	0.9%	Germany

* Calculation method based on the average of four holdings in the Fund's financial year.

What was the proportion of sustainability-related investments?

- ***What was the asset allocation?***

Asset allocation describes the share of investments in specific assets.



#1 Aligned with E/S characteristics includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

#2 Other includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The category **#1 Aligned with E/S characteristics** covers:

- The sub-category **#1A Sustainable** covers environmentally and socially sustainable investments.
- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

The other investments consist of 1.8% cash instruments, 0.1% derivatives and 5.3% instruments without an ESG rating.

In which economic sectors were the investments made?

The investments were made in the following sectors:

Sectors*	Assets as at 31/12/2023
Equity — Industrial company	6.3%
Equity — Information technology	5.1%
Equity — Financial sector	3.9%
Equity — Health care	3.4%
Equity — Consumer cyclicals	2.9%
Equity — Consumer goods	2.7%
Equity — Energy	1.4%
Equity — Communication services	1.0%
Bonds — Banking	9.9%
Bonds — Communication	8.5%
Bonds — Mortgage-backed securities	6.2%
Bonds — Treasuries	5.7%
Bonds — Consumer cyclicals	4.0%
Bonds — Sovereign bonds	3.8%
Bonds — Consumer non-cyclicals	3.2%
Bonds — Technology	3.0%
Bonds — Utilities	2.4%
Bonds — Supranational	2.2%
Bonds — Transport	2.1%
Bonds — Government guarantee	2.0%
Bonds — Capital goods	2.0%

Bonds — Power	1.7%
Bonds — Local authorities	1.5%
Bonds — Commodities industry	1.4%
Bonds — Natural gas	1.3%
Bonds — Energy	0.8%
Bonds — Public sector loans	0.7%
Bonds — Insurance	0.5%
Bonds — Finance other	0.3%
Bonds — Financial company	0.3%
Bonds — Real estate	0.2%
Bonds — State sponsored	0.2%
Fund	4.5%
Xetra-Gold	2.9%
Cash	1.7%
Currency future	0.1%

The weighting of investments in companies, income from exploration, mining, production, manufacturing, processing, storage, refining or distribution, including transport, storage and trading of fossil fuels, is 2.8%.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable energy or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

To what extent were the sustainable investments with an environmental objective aligned with the EU Taxonomy?

Did the financial product invest in fossil gas and/or nuclear energy related activities complying with the EU Taxonomy[1]?

☒ Yes:

☒ In fossil gas ☒ In nuclear energy

☐ No

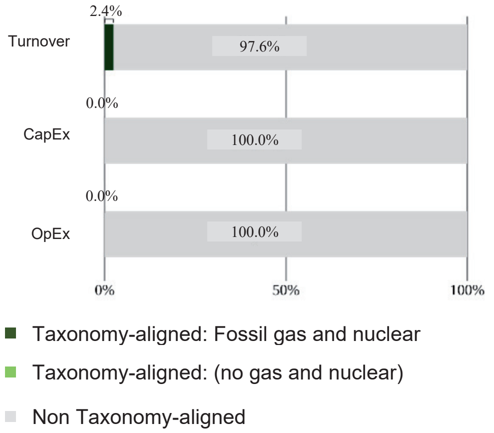
The graphs below show in green the percentage of investments that were aligned with the EU Taxonomy. As there is no appropriate methodology to determine the taxonomy-alignment of sovereign bonds*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.

[1] Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

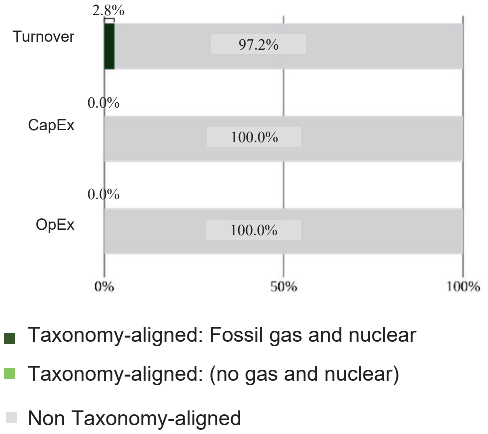
Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies.
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

1. Taxonomy-alignment of investments **including sovereign bonds***



2. Taxonomy-alignment of investments **excluding sovereign bonds***



This graph represents 86.59% of the total investments.

** For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures.*

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

What was the share of investments made in transitional and enabling activities?

The share of investments made in transitional and enabling activities is 0%.

How did the percentage of investments that were aligned with the EU Taxonomy compare with previous reference periods?

The information can be found in the "How did the sustainability indicators perform?" table on page 2.

are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under Regulation (EU) 2020/852.

What was the share of sustainable investments with an environmental objective not aligned with the EU Taxonomy?

The share of sustainable investments with an environmental objective not aligned to the EU Taxonomy was 32.1%.

These investments were made because they invest in activities that, although not aligned with the Taxonomy, are compatible with the Taxonomy.

These activities include: low-carbon energy, energy efficiency, green real estate, sustainable use of water, sustainable agriculture, prevention and control of environmental pollution. However, some companies do not yet provide Taxonomy-aligned data or are themselves not subject to the EU Taxonomy. Despite this, the turnover of these companies is oriented towards green activities provided they adhere to our "do no significant harm" approach (DNSH).

What was the share of socially sustainable investments?

The Fund has no socially sustainable investments.

What investments were included under "other", what was their purpose and were there any minimum environmental or social safeguards?

Investments included under "#2 Other" related to liquidity, commodities and securities without an ESG rating:

Commodities: Commodities include, in particular, precious metals (e.g. gold), base metals (e.g. copper), energy (e.g. oil) and agricultural commodities (e.g. wheat). The company invests principally in gold in the form of Xetra-Gold certificates. Gold is held to hedge against inflation and to increase diversification in the portfolios. Xetra-Gold is a security that can be traded as an equity. Xetra-Gold represents the value of the commodity gold economically and in this way allows investors to participate in the development of the price of gold. No minimum social or environmental safeguards were taken into account.
Securities without an ESG rating: Some securities could not be covered by our current provider of sustainability data. Before the company invests in securities without a sustainability rating, it carries out sustainability due diligence (minimum safeguard check). The company cannot, however, guarantee that the security meets its sustainability criteria and exclusions.

What actions have been taken to meet the environmental and/or social characteristics during the reference period?

The manager has put in place an active ownership strategy:

1. Exercising of voting rights during annual general meetings, if the Fund is within the perimeter of the manager's voting policy
2. Dialogue with investee companies or potential investee companies
3. Engagement with companies in accordance with the manager's engagement policy
4. Application of the ODDO BHF Asset Management exclusion policy and the Fund-specific exclusions
5. Consideration of the principal adverse impacts in accordance with the manager's PAI policy

How did this financial product perform compared to the reference benchmark?

- ***How does the reference benchmark differ from a broad market index?***

The Fund has the 100% MSCI ACWI Net Total Return EUR Index as its benchmark. The Fund's reference index is a broad market index. The Fund's ESG strategy is not based on the index.

Reference benchmarks are indexes used to measure whether financial products attain the environmental or social characteristics that they promote.

- ***How did this financial product perform with regard to the sustainability indicators to determine the alignment of the reference benchmark with the environmental or social characteristics promoted?***

The reference index(es) is/are not tailored to the environmental or social characteristics promoted by the financial product. The environmental and social characteristics are covered by the Fund's ESG investment strategy.

- ***How did this financial product perform compared with the reference benchmark?***

The Fund is not based on any reference index.

- ***How did this financial product perform compared with the broad market index?***

The Fund is not based on any reference index.