## **Appendix XII:**

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

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

environmental objective might be

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investments with an

## Sustainable investment objective

Product name: ODDO BHF Artificial Intelligence
The ODDO BHF Artificial Intelligence ("Sub-Fund") is a sub-fund of SICAV ODDO BHF.
Legal entity identifier (LEI-CODE): 549300JBBFN3XZYK2J67

#### DOES THIS FINANCIAL PRODUCT HAVE A SUSTAINABLE INVESTMENT OBJECTIVE ●● ⊠ Yes ● □ No ☑ It will make a minimum of **sustainable** ☐ It promotes Environmental/Social (E/S) investments with an environmental characteristics and while it does not have objective: 90 % as its objective a sustainable investment, it will have a minimum proportion of N/A of ☑ in economic activities that qualify as sustainable investments environmentally sustainable under the **EU Taxonomy** ☐ with an environmental objective in economic activities that qualify as ☑ in economic activities that do not qualify environmentally sustainable under the as environmentally sustainable under the **EU Taxonomy EU Taxonomy** ☐ with an environmental objective in ☐ It will make a minimum of **sustainable** economic activities that do not qualify as investments with a social objective: N/A environmentally sustainable under the **EU Taxonomy** ☐ with a social objective ☐ It promotes E/S characteristics, but **will not** make any sustainable investments



# WHAT IS THE SUSTAINABLE INVESTMENT OBJECTIVE OF THE FINANCIAL PRODUCT?

The Sub-Fund seeks capital growth by investing into global listed equities with exposure to the global mega trend "artificial intelligence" via a selection of related sub themes. The Sub-Fund has sustainable investment as its objective, within the meaning of Article 9 paragraph 3 of the SFDR. The Sub-Fund's sustainable investment objective is to contribute to carbon-reduction and to seize opportunities arising from the transition to a low-carbon economy to achieve the long-term objectives of the Paris Agreement dated 12th December 2015 to limit global warming. The Sub-Fund will achieve carbon emissions 30% lower than the benchmark's, the MSCI World NR, as measured by carbon intensity (tCO2/ mUSD revenue; aggregated at portfolio level including scope 1, scope 2 and scope 3).

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

#### WHAT SUSTAINABILITY INDICATORS ARE USED TO MEASURE THE ATTAINMENT OF THE SUSTAINABLE INVESTMENT OBJECTIVE OF THIS FINANCIAL PRODUCT?

The sustainable investment objective is assessed by the CO2 emissions linked to the portfolio investments of the Sub-Fund as measured by carbon intensity (tCO2/ mUSD revenue; aggregated at portfolio level including scope 1, scope 2 and scope 3).

HOW DO SUSTAINABLE INVESTMENTS NOT CAUSE SIGNIFICANT HARM TO ANY ENVIRONMENTAL OR SOCIAL SUSTAINABLE INVESTMENT OBJECTIVE?

The following approach is defined to respect the Article 2 (17) of the SFDR Regulation:

- 1. Rating exclusions: companies that are not followed by the management team's internal model and with an MSCI ESG Rating of CCC and B if the MSCI ESG sub-rating is below 3 for one of the environmental, social or governance categories are systematically excluded from the ESG Investment Universe:
- 2. Sector and norm-based exclusions: Based on information from the external ESG data provider (i.e. MSCI), and in particular MSCI Business Involvement Screening, the Sub-Fund will not be able to invest in the tobacco, unconventional weapons (chemical weapons, anti-personnel mines and cluster bombs, blinding laser weapons, incendiary weapons and non-detectable fragments weapons, Nuclear weapons manufactured by a company incorporated in a country that does not form part of the Nuclear Non-Proliferation Treaty (NPT)), gambling, unconventional oil and gas (shale oil, shale gas, oil sands, and tar sands), conventional weapons, GMO, coal mining, coal-fired power generation, coal development projects or infrastructure and production of adult entertainment. The Sub-Fund will also not be able to invest in energy (oil, gas and coal), materials, real estate, air freight & logistics and airlines, based on information from Bloomberg. Moreover, the exclusion policy is applied to exclude the sectors that have the most material negative impacts on sustainability objectives. This exclusion policy overlaps with or is additional to the Sub-Fund's specific exclusions.

This initial ESG filter is quarterly reviewed according to the MSCI ESG Research. In the event that the Sub-Fund was invested in a company that is excluded from the investment universe, the Sub-Fund will proceed to a total disinvestment within 12 months of its exclusion.

- 3. Principal adverse impact consideration: The Management Company defines controlling rules (pretrade) for some significantly harming activities selected: exposure to controversial weapons (PAI 14 and 0 % tolerance), exposure to companies active in the fossil fuel sector (PAI 4 and 0 % tolerance), activities negatively affecting biodiversity-sensitive areas (PAI 7 and 0 % tolerance) and serious violations of UN Global Compact principles and Organization for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises (PAI 10 and 0 % tolerance).
- 4. Strong controversies according to MSCI: companies having sustainable investments according to MSCI ESG Research, but with strong controversies will be excluded from the sustainable investment computation, The MSCI Controversies Score provides an assessment of controversial events and their severity on a scores range between zero (very severe) to 10 (no recent incidents).
- 5. Dialogue, engagement and voting: our dialogue, engagement and voting policies support the objective of avoiding significant harm by identifying the most important risks and have our voice heard to generate change and improvement.

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, anticorruption and antibribery matters.

# HOW HAVE THE INDICATORS FOR ADVERSE IMPACTS ON SUSTAINABILITY FACTORS BEEN TAKEN INTO ACCOUNT?

The EU Taxonomy Regulation (EU) 2020/852 defines certain areas of concern which can cause principle adverse impact ("PAI"). The Management Company applies pre-trade rules on three PAI: exposure to controversial weapons (PAI 14 and 0 % tolerance), GHG intensity per million of sales for scope 1 and 2 emissions (PAI 3 and limit of 399 million tons (Mt) of CO2eq./million of revenue if the investment does not have its climate strategy certified by the Science Based Targets initiative (SBTi) meaning a commitment or a strategy well below 2 degrees), exposure to companies active in the fossil fuel sector (PAI 4 and 0 % tolerance), activities negatively affecting biodiversity-sensitive areas (PAI 7 and 0 % tolerance), and serious violations of UN Global Compact principles and Organization for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises (PAI 10 and 0 % tolerance).

Furthermore, MSCI ESG Ratings integrate environmental, social and governance themes where the collection of other core PAI data for corporates and sovereigns may support their ESG rating. The ESG analysis includes for corporates, when the data is available, the monitoring of greenhouse gas emissions (PAI 1), the lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises (PAI 11), and board gender diversity (PAI 13). It also includes for sovereign issuers greenhouse gas intensity per capita (PAI 15 normally based normally on gross domestic product and not on capita) and investee countries subject to social violations (PAI 16).

Nevertheless, the Management Company does not fix specific objectives or defined controlling rules on these other core PAI except the ones mentioned in the first paragraph.

More information on MSCI ESG Ratings: https://www.msci.com/zh/esg-ratings

- HOW ARE THE SUSTAINABLE INVESTMENTS ALIGNED WITH THE OECD GUIDELINES FOR MULTINATIONAL ENTERPRISES AND THE UN GUIDING PRINCIPLES ON BUSINESS AND HUMAN RIGHTS?

The Management Company ensures that the sustainable investments of the Sub-Fund are aligned by applying its United Nations Global Compact (UNGC) exclusion list as detailed in the Management Company's exclusion policy.



# DOES THIS FINANCIAL PRODUCT CONSIDER PRINCIPAL ADVERSE IMPACTS ON SUSTAINABILITY FACTORS?

⊠ Yes, the Management Company takes sustainability risks into account by integrating ESG (Environmental, Social and Governance) criteria into its investment decision-making process, as set out above. This process also makes it possible to assess the management team's ability to manage the adverse sustainability impacts of their business activities. Exposure to controversial weapons (PAI 14), GHG intensity per million of sales for scope 1 and 2 emissions (PAI 3 and limit of 399 million tons (Mt) of CO2eq./million of revenue if the investment does not have its climate strategy certified by the Science Based Targets initiative (SBTi) meaning a commitment or a strategy well below 2 degrees), to companies active in the fossil fuel sector (PAI 4), activities negatively affecting biodiversity-sensitive areas (PAI 7), and serious violations of UN Global Compact principles and Organization for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises (PAI 10) is not tolerated and any such issuers are excluded from the portfolio.

□ No

#### WHAT INVESTMENT STRATEGY DOES THIS FINANCIAL PRODUCT FOLLOW?

The Sub-Fund seeks capital growth by investing into global listed equities with exposure to the global mega trend "artificial intelligence" via a selection of related sub themes. The Sub-Fund has sustainable investment as its objective, within the meaning of Article 9 paragraph 3 of the SFDR. The Sub-Fund's sustainable investment objective is to contribute to carbon-reduction and to seize opportunities arising from the transition to a low-carbon economy to achieve the long-term objectives of the Paris Agreement dated 12th December 2015\* to limit global warming.

I) Based on the investment universe resulting from the big data analysis, an ESG (Environment, Social and Governance) analysis is then conducted on the resulting issuers, which form the "ESG Investment Universe". Thanks to a selectivity approach covering a large majority of the securities in the ESG Investment Universe, at least 20% of the ESG Investment Universe is eliminated. This selectivity approach is carried out in two stages, and then completed by carbon emissions reduction considerations:

#### First stage: sector exclusion

Based on information from the external ESG data provider (i.e. MSCI), and in particular MSCI Business Involvement Screening, the Sub-Fund will not be able to invest in the tobacco, unconventional weapons (chemical weapons, anti-personnel mines and cluster bombs, blinding laser weapons, incendiary weapons and non-detectable fragments weapons, Nuclear weapons manufactured by a company incorporated in a country that does not form part of the Nuclear Non-Proliferation Treaty (NPT)), gambling, unconventional oil and gas (shale oil, shale gas, oil sands, and tar sands), conventional weapons, GMO, coal mining, coal-fired power generation, coal development projects or infrastructure and production of adult entertainment. The Sub-Fund will also not be able to invest in energy (oil, gas and coal), materials, real estate, air freight & logistics and airlines, based on information from Bloomberg.

Moreover, companies that significantly violate the requirements of the UN Global Compact, will be excluded. Details relating to the Management Company's Exclusion Policy and the European SRI Transparency Code containing further details on ESG integration and exclusion thresholds can be found at "am.oddo-bhf.com".

#### Second stage: ESG rating

This stage consists in considering ESG rating to a large majority of companies in the ESG Investment Universe, whether the rating comes from the management team's internal rating or from the management team's external provider of extra-financial data.

The ESG filter of the management team's external provider of extra-financial data is based on the MSCI ESG Rating that evaluates the exposure of companies to ESG related risks and opportunities on a scale of CCC (worst rating) to AAA (best rating). It is based on the sub-ratings on a scale of 0 (worst) to 10 (best) for the environment, social and governance areas.

The combination of external and internal rating processes further reduces the Sub-Fund's ESG Investment Universe to determine its eligible universe:

The investment strategy guides investment decisions based on factors such as investment objectives and risk tolerance.

- 1. companies that are not followed by the management team's internal model and with an MSCI ESG Rating of CCC and B if the MSCI ESG sub-rating is below 3 for one of the environmental, social or governance categories are systematically excluded from the ESG Investment Universe;
- 2. companies that are subject to "very severe" controversy and/or are in violation of the principles of the United Nations Global Compact are excluded as well.

When a company held in the portfolio is downgraded and no longer respects one of these constraints, the management team has three months to disinvest.

The weighted average ESG rating of the portfolio shall be above of the ESG Investment Universe's. At least 90% of the net assets of the Sub-Fund are subject to an ESG rating and carbon footprint analysis.

II)The selectivity approach is completed by carbon-emission reduction considerations. The Sub-Fund takes into account carbon related data to achieve the long-term objectives of the Paris Agreement to limit global warming. In order to do so, the Sub-Fund will invest in companies reducing their carbon footprint by monitoring in dynamic their progress in emissions reduction in absolute on scope 1 (direct emissions from owned or controlled sources), scope 2 (indirect emissions linked to energy consumption to produce goods and services) and scope 3 (all other indirect emissions that occur in a company's value chain), using third-party provider MSCI. Further information on the methodology and ESG score, as well as ESG reporting for the Sub-Fund, is available at am.oddo-bhf.com.

The management team will consider issuers that show commitment towards climate change and/or showing potential to transition to a low-carbon economy based on several recognized market framework:

companies with carbon reduction strategy certified by SBTi (Science Based Target Initiative), revenues alignment with the EU Taxonomy, and improving green share of companies' activities.

Finally, the Sub-Fund will achieve carbon emissions 30% lower than the benchmark's, the MSCI World NR, as measured by carbon intensity (tCO2/ mUSD revenue; aggregated at portfolio level including scope 1, scope 2 and scope 3).

A minimum of 90 % of the net assets of the Sub-Fund is subject to extra-financial analysis, with the support of an external ESG research provider.

### WHAT ARE THE BINDING ELEMENTS OF THE INVESTMENT STRATEGY USED TO SELECT THE INVESTMENTS TO ATTAIN THE SUSTAINABLE INVESTMENT OBJECTIVE?

Based on information from the external ESG data provider (i.e. MSCI), and in particular MSCI Business Involvement Screening, the Sub-Fund will not be able to invest in the tobacco, unconventional weapons (chemical weapons, anti-personnel mines and cluster bombs, blinding laser weapons, incendiary weapons and non-detectable fragments weapons, Nuclear weapons manufactured by a company incorporated in a country that does not form part of the Nuclear Non-Proliferation Treaty (NPT)), gambling, unconventional oil and gas (shale oil, shale gas, oil sands, and tar sands), conventional weapons, GMO, coal mining, coal-fired power generation, coal development projects

or infrastructure and production of adult entertainment. The Sub-Fund will also not be able to invest in energy (oil, gas and coal), materials, real estate, air freight & logistics and airlines, based on information from Bloomberg.

Moreover, companies that significantly violate the requirements of the UN Global Compact, will be excluded. Details relating to the Management Company's Exclusion Policy and the European SRI Transparency Code containing further details on ESG integration and exclusion thresholds can be found at "am.oddo-bhf.com".

## Good governance

practices include sound management structures, employee relations, renumeration of staff and tax compliance.

## WHAT IS THE POLICY TO ASSESS GOOD GOVERNANCE PRACTICES OF THE INVESTEE COMPANIES?

The ODDO BHF Global Responsible Investment Policy details our definition and assessment of good governance and requires that good governance practices rely on the quality of the management team, the sustainable development strategy, minority shareholders' rights, the anti-corruption processes and trackrecord, as well as other criteria. A good indicator for the degree of alignment of companies' strategies with sustainable aspects is their positioning regarding the UN Global Compact. By committing to the ten principles on human rights, labor, environment, and anticorruption, the company sends a positive signal of strong ambitions towards a long-term oriented financial ecosystem. The Fund Management also verifies whether companies have implemented a policy on sustainability or have defined related objectives. If it is the case, it is further analyzed what means are put in place to achieve them, where the responsibility is held and if there is an alignment with the remuneration of the top management.



# WHAT IS THE ASSET ALLOCATION AND THE MINIMUM SHARE OF SUSTAINABLE INVESTMENTS?

There will be a minimum of 90 % Sustainable Investments (as further described in the investment strategy followed by the Sub-Fund set out under section "WHAT INVESTMENT STRATEGY DOES THIS FINANCIAL PRODUCT FOLLOW? of this annex) with an environmental objective, of which a minimum of 0.5 % will be Taxonomy-aligned.

## Asset allocation

describes the share of investments in specific assets

Taxonomy-aligned activities are expressed as a share of:

#### -turnover

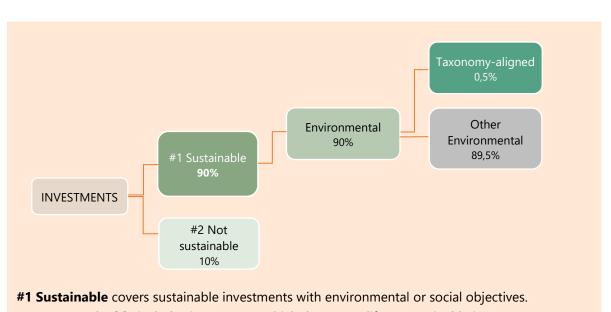
reflecting the share of revenue from green activities of investee companies.

#### -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.



#2 Not sustainable includes investments which do not qualify as sustainable investments.

HOW DOES THE USE OF DERIVATIVES ATTAIN THE SUSTAINABLE INVESTMENT OBJECTIVE?

Derivatives are not actively used to enhance ESG alignment or decrease ESG risk. As part of the investment strategy, the Sub-Fund is allowed to enter into derivatives for investment and hedging purposes. Derivatives used for investment purposes have a sustainable investment as their underlying assets and therefore, contribute to the achievement of the environmental objective.

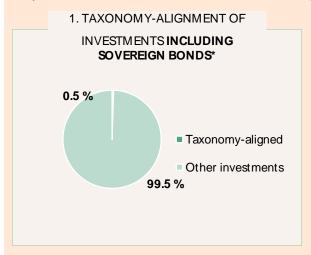
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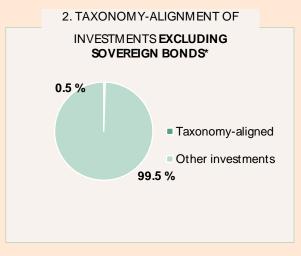
# TO WHAT MINIMUM EXTENT ARE SUSTAINABLE INVESTMENTS WITH AN ENVIRONMENTAL OBJECTIVE ALIGNED WITH THE EU TAXONOMY?

The two graphs below show in green the minimum percentage of investments that are 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.



# 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.





\* For the purpose of these graphs, "sovereign bonds" consist of all sovereign exposures

# WHAT IS THE MINIMUM SHARE OF INVESTMENTS IN TRANSITIONAL AND ENABLING ACTIVITIES?

The minimum percentage is 0%.



WHAT IS THE MINIMUM SHARE OF SUSTAINABLE INVESTMENTS WITH AN ENVIRONMENTAL OBJECTIVE THAT ARE NOT ALIGNED WITH THE EU

#### TAXONOMY?

There is a minimum of 89.5 % of sustainable investments with an environmental objective, which are not aligned with the EU Taxonomy.



WHAT IS THE MINIMUM SHARE OF SUSTAINABLE INVESTMENTS WITH A SOCIAL OBJECTIVE?

The minimum percentage of sustainable investments with a social objective is 0%, but the Sub-Fund may have investments with a social objective.





## WHAT INVESTMENTS ARE INCLUDED UNDER "#2 NOT SUSTAINABLE", WHAT IS THEIR PURPOSE AND ARE THERE ANY MINIMUM ENVIRONMENTAL OR SOCIAL SAFEGUARDS?

The investments included under "#2 Other" are derivatives and other ancillary assets like money market instruments with no minimum environmental or social safeguards applied. The impact of these assets is considered as neutral to the sustainable investment objective the Sub-Fund. Derivatives used for investment purposes have a sustainable investment as their underlying assets and therefore, contribute to the achievement of the environmental objective.



#### IS A SPECIFIC INDEX DESIGNATED AS A REFERENCE BENCHMARK TO MEET THE SUSTAINABLE INVESTMENT OBJECTIVE?

The Sub-Fund references the MSCI World NR Index as its benchmark\*\*. The Benchmark is a broad market index which do not consider in its composition or calculation methodology the ESG characteristics of the Sub-Fund.

Reference benchmarks are indexes to measure whether the financial product attains the

HOW DOES THE REFERENCE BENCHMARK TAKE INTO ACCOUNT SUSTAINABILITY FACTORS IN A WAY THAT IS CONTINUOUSLY ALIGNED WITH THE SUSTAINABLE **INVESTMENT OBJECTIVE?** 

The benchmark is not aligned with the environmental or social characteristics promoted by the financial product. The environmental and social characteristics are covered by the ESG investment strategy of the Sub-Fund.

HOW IS THE ALIGNMENT OF THE INVESTMENT STRATEGY WITH THE METHODOLOGY OF THE INDEX ENSURED ON A CONTINUOUS BASIS?

The benchmark and their constituents are not reviewed for ESG compliance by the benchmark administrator. ESG risks for issuers and their efforts to promote ESG objectives are incorporated into the Sub-Fund.

- HOW DOES THE DESIGNATED INDEX DIFFER FROM A RELEVANT BROAD MARKET INDEX?
  - The Sub-Fund's benchmark is a broad market index. The Sub-Fund's ESG strategy does not rely on the index.
- WHERE CAN THE METHOLOGY USED FOR THE CALCULATION OF THE DESIGNATED INDEX BE FOUND?

A description of the method for calculating the index can be found at "msci.com/index-solutions".



#### WHERE CAN I FIND MORE PRODUCT SPECIFIC INFORMATION ONLINE?

More product-specific information can be found on the website: am.oddo-bhf.com

\*https://treaties.un.org/doc/Treaties/2016/02/20160215%2006-03%20PM/Ch\_XXVII-7-d.pdf

<sup>\*\*</sup> MSCI World NR Index is a registered trademark of MSCI Limited.