PRODUCT NAME: ODDO BHF Immobilier

LEGAL ENTITY IDENTIFIER: 969500ZRYSGP8T7AYC79

Environmental and/or social characteristics

DOES THIS FINANCIAL PRODUCT HAVE A SUSTAINABLE INVESTMENT OBJECTIVE?

●● ☐ Yes	●● ☒ No
☐ It will make a minimum of **sustainable investments with an environmental objective**: N/A ☐ 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 will make a minimum of **sustainable investments with a social objective**: N/A	☒ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 30% 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 promotes E/S characteristics, but **will not make any sustainable investments**

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.

WHAT ENVIRONMENTAL AND/OR SOCIAL CHARACTERISTICS ARE PROMOTED BY THIS FINANCIAL PRODUCT?

The Fund promotes environmental and/or social characteristics that are reflected in the construction and weighting of the Management Company's internal rating system.

This model combines a best-in-universe approach that favours companies with the highest scores irrespective of sector, and a best-effort approach by developing a system of shareholder dialogue. Specific attention is paid to the analysis of human capital and corporate governance.

This internal ESG analysis results in an internal scoring system on a scale of 1 (worst) to 5 (best): High ESG Opportunity (5), ESG Opportunity (4), ESG Neutral (3), Moderate ESG Risk (2) and High ESG Risk (1).

There is a risk that the model for internal ESG scoring may not fully meet the purposes for which it has been developed.

WHAT SUSTAINABILITY INDICATORS ARE USED TO MEASURE THE ATTAINMENT OF EACH OF THE ENVIRONMENTAL OR SOCIAL CHARACTERISTICS PROMOTED BY THIS FINANCIAL PRODUCT?

The Management Company's ESG model uses all of the characteristics and indicators mentioned in the paragraph above, and the monthly ESG report currently shows indicators that demonstrate their attainment as follows:

- The portfolio's weighted internal ESG rating to measure the overall attainment of environmental, social and governance characteristics.
- The weighted internal rating to assess the quality of corporate governance;
- The weighted internal rating to assess the quality of management;
- The Fund's carbon intensity (total scope 1 and 2 CO_2 emissions divided by total revenue of the companies in which the Fund invests).
- The brown share of the Fund's investments (exposure to fossil fuel industries according to MSCI ESG research).
- The green share of the Fund's investments (exposure to green solutions according to MSCI ESG research).

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

WHAT ARE THE OBJECTIVES OF THE SUSTAINABLE INVESTMENTS THAT THE FINANCIAL PRODUCT PARTIALLY INTENDS TO MAKE AND HOW DOES THE SUSTAINABLE INVESTMENT CONTRIBUTE TO SUCH OBJECTIVES?

The Fund's sustainable investment objective is **environmental**: contribution to the environmental impact as defined by MSCI ESG research, and its "sustainability impact" field in relation to environmental objectives. It covers the impacts on the following categories: alternative energy, energy efficiency, eco-construction, sustainable water, pollution prevention and control, sustainable farming.

HOW DO THE SUSTAINABLE INVESTMENTS THAT THE FINANCIAL PRODUCT PARTIALLY INTENDS TO MAKE NOT CAUSE SIGNIFICANT HARM TO ANY ENVIRONMENTAL OR SOCIAL SUSTAINABLE INVESTMENT OBJECTIVE?

The following approach is taken to comply with Article 2(17) of the SFDR.

- **Sectors excluded from investments:** The Management Company's exclusion policy is applied to eliminate sectors that have the most significant adverse impacts on sustainability objectives. The Fund excludes companies that do not respect the UN Global Compact, and applies sectoral exclusions to coal mining, coal-based power generation, armaments, tobacco and nuclear energy. The Fund cannot therefore invest in these sectors above the thresholds defined in the Management Company's exclusion policy.

- **Controversies:** After the ESG has double-checked, companies that are the most controversial according to our MSCI ESG data will not be considered sustainable.

- **Consideration of the principal adverse impacts**: Doing no significant harm to the sustainability objectives, the Management Company sets (pre-trade) testing rules for selected significantly harmful activities: exposure to controversial weapons (zero tolerance), activities negatively affecting biodiversity sensitive areas (zero tolerance) and serious violations of the principles of the UN Global Compact and OECD Guidelines for Multinational Enterprises (zero tolerance).

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 lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

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

Regulation (EU) 2020/852 establishes certain areas of concern that may have an adverse impact (“PAI”).

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.

The Management Company applies pre-trade rules to three PAIs:

- exposure to controversial weapons (PAI 14 and zero tolerance),
- activities negatively affecting biodiversity sensitive areas (PAI 7 and zero tolerance)
- serious violations of the principles of the UN Global Compact and OECD Guidelines for Multinational Enterprises (PAI 10 and zero tolerance).

The Management Company also considers other PAIs in its ESG analysis for companies when the information is available, but without strict testing rules. PAI data is collected to determine the Management Company’s final ESG rating.

ESG analysis covers monitoring of greenhouse gas emissions (PAI 1), exposure to fossil fuels (PAI 4), the share of non-renewable energy consumption and production (PAI 5), energy consumption intensity per high impact climate sector (PAI 6), lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises (PAI 11), the unadjusted gender pay gap (PAI 12) and board gender diversity (PAI 13). The Management Company also considers two other PAIs: deforestation policy (PAI 15) and lack of human rights policy (PAI 9).

If the Fund has sovereign investments, the manager’s ESG model includes the two main PAIs in the ESG analysis: greenhouse gas intensity (PAI 15) and investee countries subject to social violations (PAI 16).

More detailed information on the Management Company’s consideration of PAIs is available at www.am.oddo-bhf.com

HOW ARE THE 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 are aligned by applying its UN Global Compact (UNGC) exclusion list, as indicated in the Management Company’s exclusion policy.

The EU Taxonomy sets out a “do not significant harm” principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU 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.

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

☒ Yes, in accordance with the provisions of Article 8 of Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector

(SFDR), the Management Company takes sustainability risks into account by integrating ESG (Environmental and/or Social and/or Governance) criteria into its investment decision-making process, as set out in the "Investment Strategy" section. This process also makes it possible to assess the management team's ability to manage the adverse impacts of their business activities on sustainable development. For more information, please refer to the Fund prospectus, which is available on the Management Company's website: am.oddo-bhf.com.

☐ No

WHAT INVESTMENT STRATEGY DOES THIS FINANCIAL PRODUCT FOLLOW?

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

A minimum of 75% of the Fund's net assets is invested in real estate and property stocks or stocks related to real estate issued in the Euro Zone.

Stocks are selected through a structured, selective investment process designed by the management team specialising in real estate stocks. This process is the result of an approach involving choosing "specialist players" while giving priority to fundamental analysis of securities, including on a multiple market basis:

✓ through geographical analysis based on the various real estate markets
✓ through sector analysis: offices (high-end; mid-range; large-scale; modern; business park), retail premises (city centre shops; shops at ground-floor level of large buildings and shopping malls; regional; small complexes; shopping arcades), residential and industrial premises and logistics platforms; hotel properties and retirement homes. As a result, this investment universe may be expanded to include real estate developers and companies providing services linked to real estate or real estate leasing or companies in the motorway concessions and car park sector.

This process is based on a two-step approach: company valuation and identification of momentum and catalysts, after which each stock is assigned a rating.

The investment process in detail:

Assessment criteria:

- Comparison of price-to-cash-flow ratios after tax
- Net adjusted assets
- Discounted cash flow

Research into momentum and catalysts:

- Earnings and NAV
- Dividends
- Business momentum
- Corporate activities
- Predicted vacancy rates

The portfolio is constructed according to the results of stock rankings described in the investment process below; it is then implemented in relation to the benchmark index as follows:

Note 1: significantly overweight position (holding >5%)
Note 2: overweight
Note 3: neutral (in line with the index)
Note 4: underweight
Note 5: excluded from portfolio

The management team takes into account environmental, social and governance (ESG) criteria in its investment decisions but they are not the dominant factor. The investment decisions taken may therefore not be consistent with ESG criteria.

As part of the security selection process, a non-financial analysis to integrate ESG criteria is carried out in two successive stages:

First stage: strict exclusions are applied to companies that do not respect the UN Global Compact, and sectoral exclusions are implemented for coal mining, coal-based power generation, armaments, tobacco and nuclear energy. The Fund cannot therefore invest in these sectors above the thresholds defined in the Management Company's exclusion policy.

Second stage: issuers are awarded an ESG score using an internal model based on the ESG research of the external data provider MSCI. This model combines a best-in-universe approach that favours companies with the highest scores irrespective of sector, and a best-effort approach by developing a system of shareholder dialogue. Specific attention is paid to the analysis of human capital and corporate governance.

This internal ESG analysis results in an internal scoring system on a scale of 1 (worst) to 5 (best): High ESG Opportunity (5), ESG Opportunity (4), ESG Neutral (3), Moderate ESG Risk (2) and High ESG Risk (1).

There is a risk that the model for internal ESG scoring may not fully meet the purposes for which it has been developed.

The average portfolio score will therefore be equal to or higher than that of the benchmark on the basis of this internal scoring system. The management team takes into account the weighting of securities held in the portfolio when calculating the portfolio average. At least 90% of the Fund's net assets are given an internal ESG score.

The Fund's maximum exposure to the instruments (equities, debt securities, funds and derivatives) may not exceed 100% of net assets, it being understood that the maximum exposure is the sum of the net exposures to each of the markets (equity, fixed income, money) to which the Fund is exposed (the sum of long and hedging positions).

The portfolio's maximum exposure to the different asset classes (equities, debt securities, UCIs and derivatives) may not exceed 100% of net assets, it being understood that the maximum exposure is the sum of the net exposures to each of the markets (equity, fixed income, money) to which the Fund is exposed (the sum of long and hedging positions).

WHAT ARE THE BINDING ELEMENTS OF THE INVESTMENT STRATEGY USED TO SELECT THE INVESTMENTS TO ATTAIN EACH OF THE ENVIRONMENTAL OR SOCIAL CHARACTERISTICS PROMOTED BY THIS FINANCIAL PRODUCT?

The investment strategy applies strict exclusions to companies that do not respect the UN Global Compact, and sectoral exclusions are implemented for coal mining, coal-based power generation, armaments, tobacco and nuclear energy. The Fund cannot therefore invest in these sectors above the thresholds defined in the Management Company's exclusion policy.

The average portfolio score will also be equal to or higher than that of the benchmark on the basis of this internal scoring system.

WHAT IS THE COMMITTED MINIMUM RATE TO REDUCE THE SCOPE OF THE INVESTMENTS CONSIDERED PRIOR TO THE APPLICATION OF THAT INVESTMENT STRATEGY?

The fund management team does not have any committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy.

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

ODDO BHF's Responsible Investment Policy describes our definition and assessment of good governance practices.

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.

WHAT IS THE ASSET ALLOCATION PLANNED FOR THIS FINANCIAL PRODUCT?

Between 75% and 100% of the Fund's assets shall be exposed to shares issued by companies with their registered office located in the Euro Zone.

25% of the Fund's net assets may be exposed:

- to shares of companies headquartered in non-Euro Zone countries, and
- to the currencies of countries which are not part of the Euro Zone in connection with investments in the securities of companies headquartered outside the Euro Zone.

Emerging countries are not permitted.

- Equities in the real estate sector or connected with real estate: a minimum of 80% of the assets.
- Stocks with all sizes of capitalisation, but with 95% of the equities portfolio invested in mid and large caps (at least EUR 150 million).

Up to 20% of the Fund shall be invested in fixed income markets.

Up to 10% of the Fund may be invested in the units or shares of investment funds.

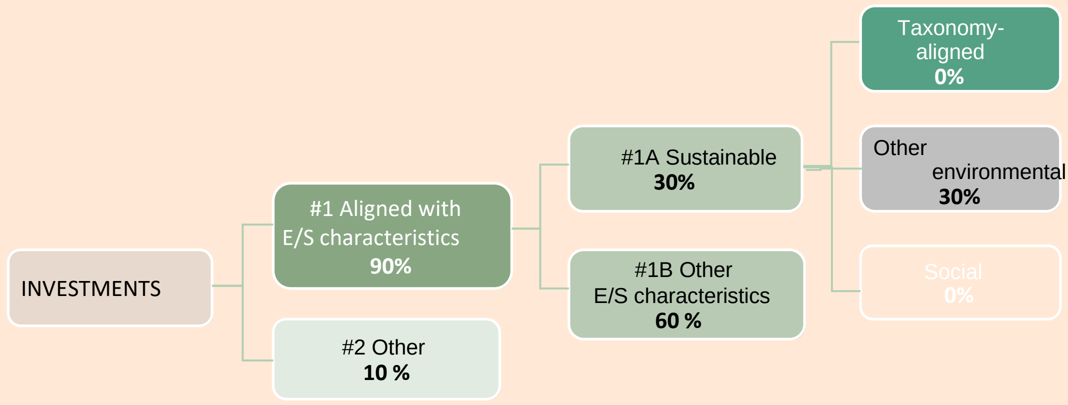
The Fund may invest in financial futures or options traded on French or foreign regulated, organised or over-the-counter markets for the purposes of hedging and generating exposure to equity risk and hedging currency risk. In this regard, the manager may take positions in futures, options, forward exchange contracts and currency swaps. Instruments shall be held without seeking overexposure, up to the limit of 100% of the Fund's net assets.

The Fund may invest up to 5% of its assets in warrants, subscription certificates traded on regulated markets and convertible bonds in order to expose the portfolio to equity risk, without seeking overexposure up to 100% of the Fund's net assets.

To manage cash, invest collateral received and optimise income, the Fund may agree temporary sales or purchases of securities under market conditions, all within the limits of 25% of the Fund's net assets for reverse repurchase agreements and 50% for repurchase agreements and securities lending transactions.

HOW DOES THE USE OF DERIVATIVES ATTAIN THE ENVIRONMENTAL OR SOCIAL CHARACTERISTICS PROMOTED BY THE FINANCIAL PRODUCT?

The symbol represents sustainable investments with an environmental objective that do not take into account the criteria for environmentally sustainable economic activities under the EU Taxonomy.



#1 **#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 **#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 sustainable investments with environmental or social objectives;

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

HOW DOES THE USE OF DERIVATIVES ATTAIN THE ENVIRONMENTAL OR SOCIAL CHARACTERISTICS PROMOTED BY THE FINANCIAL PRODUCT?

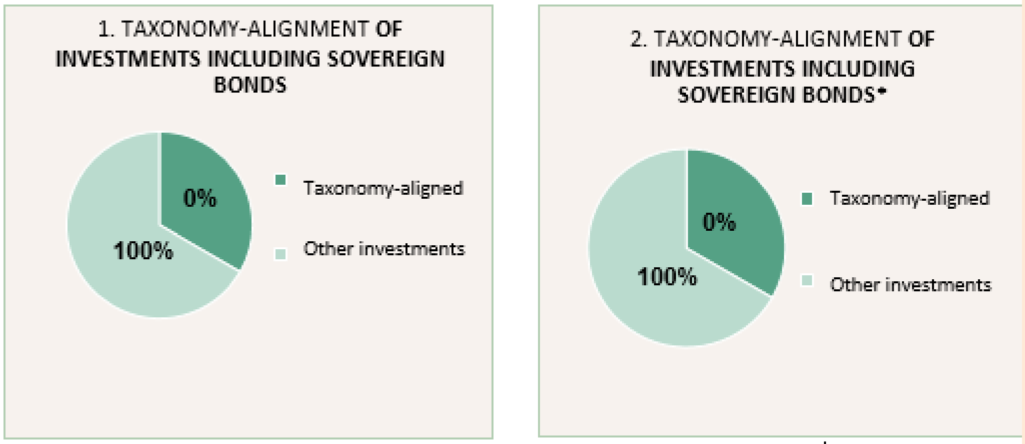
Derivatives are not used to improve ESG alignment or reduce ESG risk. As part of the investment strategy, the Fund is authorised to use derivatives for hedging and exposure purposes.

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

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.

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.



*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 percentage is not yet known.

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

There is no minimum share of sustainable investments with an environmental objective, but the Fund may make investments with an environmental objective.

WHAT IS THE MINIMUM SHARE OF SOCIALLY SUSTAINABLE INVESTMENTS?

There is no minimum share of sustainable investments with a social objective, but the Fund may make investments with a social objective.

WHAT INVESTMENTS ARE INCLUDED UNDER "#2 OTHER", WHAT IS THEIR PURPOSE AND ARE THERE ANY MINIMUM ENVIRONMENTAL OR SOCIAL SAFEGUARDS?

Investments included under "#2 Other" are derivatives and other ancillary assets.

IS A SPECIFIC INDEX DESIGNATED AS A REFERENCE BENCHMARK TO DETERMINE WHETHER THIS FINANCIAL PRODUCT IS ALIGNED WITH THE ENVIRONMENTAL AND/OR SOCIAL CHARACTERISTICS THAT IT PROMOTES?

Reference benchmarks are indices to measure whether the financial product attains the environmental or social characteristics that they promote.

The Fund's benchmark index is the MSCI EMU IMI Core RE 10/40 Index, net dividends reinvested. The above index is a broad market index that does not necessarily reflect, in its composition or method of calculation, the ESG characteristics promoted by the Fund.

HOW IS THE REFERENCE BENCHMARK CONTINUOUSLY ALIGNED WITH EACH OF THE ENVIRONMENTAL OR SOCIAL CHARACTERISTICS PROMOTED BY THE FINANCIAL PRODUCT?

The benchmark is not aligned with the environmental or social characteristics promoted by the financial product. Environmental and social characteristics are covered only by the Fund's ESG investment strategy.

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

The benchmark administrator does not check ESG compliance of the index or its components. Issuers' ESG risks and their efforts to promote ESG objectives are factored into the Fund through the Fund's investment strategy.

HOW DOES THE DESIGNATED INDEX DIFFER FROM A RELEVANT BROAD MARKET INDEX?

The Fund's benchmark index is a broad market index. The Fund's ESG strategy does not depend on this index.

WHERE CAN I FIND MORE PRODUCT SPECIFIC INFORMATION ONLINE?

Additional information on the application of ESG criteria by the Management Company shall be available in the Fund's annual report and on the Management Company's website: www.am.oddo-bhf.com.