

## **CONSIDERATION OF ADVERSE IMPACTS ON SUSTAINABILITY FACTORS**

**Privium Fund Management B.V. ("Privium")**

**LEI: 2138005PY32IR4JLY153**

August 2023 – Augustus 2024

Art 4 SFDR- Regulation (EU) 2019/2088 (the "Regulation")

### **Introduction**

The SFDR Regulation (the Regulation) prescribes that Privium Fund Management B.V. (Privium) informs investors regarding the level at which it considers the Principal Adverse Impacts (PAI) on sustainability factors, as defined in the Regulation, when making investment decisions.

### **No consideration of the adverse impacts on sustainability factors at the level of the fund manager**

Privium does not consider the Principal Adverse Impacts of its investment decisions on sustainability factors for all the financial instruments it manages and does not intend to do so. As such, Privium cannot consider the PAI on an aggregated level for the whole company.

The Funds will not consider the PAI when making investment decisions if this does not align with their target or investment strategy.

### **Consideration of the adverse impacts on sustainability factors at the level of the Fund**

For Funds classified as article 8 or 9, Privium will consider the PAI. For Funds that are classified differently, Privium may do so if it fits the Fund's targets and strategy.

Where a Fund managed by Privium considers the PAI, it will produce its own PAI reporting covering only the assets held by this Fund and publish the above as required under the regulation.