

CONSIDERATION OF ADVERSE IMPACTS ON SUSTAINABILITY FACTORS

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

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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 managed by Privium do not consider the PAI when making investment decisions unless this is part of their investment strategy.

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

Funds classified as article 8 or 9, consider the PAI if they aim to make sustainable investments

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