Statement on Principal Adverse Impacts of Investment Decisions on Sustainability Factors

Financial Market Participant / AIFM: Adventum International Ltd.
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This statement is published in accordance with Article 4(1)(a) of Regulation (EU) 2019/2088 on sustainability-related disclosures in the financial services sector ("SFDR") and the applicable provisions of Commission Delegated Regulation (EU) 2022/1288.

Adventum International Ltd. (the "AIFM") is a financial market participant within the meaning of the SFDR and acts as the alternative investment fund manager of investment funds under its management. For the purposes of the SFDR, the individual funds managed by the AIFM constitute separate financial products and may be subject to different sustainability-related disclosure requirements depending on their classification under the SFDR.

The AIFM considers principal adverse impacts ("PAIs") of investment decisions on sustainability factors in accordance with Article 4(1)(a) of the SFDR. The AIFM manages financial products classified under both Article 6 and Article 8 of the SFDR. The scope, availability and quality of sustainability data differ significantly across these financial products.

In particular, certain assets held through Article 6 financial products were acquired and are managed without commitments to promote environmental or social characteristics or to consider PAIs at product level. Consequently, the availability of the sustainability data required to calculate PAI indicators for these assets is limited, and meaningful and sufficiently reliable data cannot currently be collected for all investments held through the Article 6 financial product.

Accordingly, any aggregation of PAI indicators at the level of the AIFM may be affected by material limitations in data availability and coverage and may not provide a complete or representative picture of the sustainability performance or adverse impacts of all financial products managed by the AIFM. Investors should therefore consider AIFM-level PAI disclosures in light of these limitations and should not interpret the absence of data for certain investments as indicating the absence of adverse impacts.

To ensure transparency and avoid potentially misleading comparisons or conclusions, the AIFM provides product-level PAI information for the financial product~~s~~ that considers principal adverse impacts and for which the relevant sustainability data are collected and monitored. Such product-level disclosures should be read alongside this AIFM-level statement and the sustainability-related disclosures applicable to each financial product.

For the reference period from 1 January 2025 to 31 December 2025, the Adventum Industrial Fund, a sub-fund of Adventum Central Europe NAIF SICAV p.l.c., considered principal adverse impacts of its investment decisions on sustainability factors and prepared a PAI Statement in the format prescribed by Annex I to Commission Delegated Regulation (EU) 2022/1288. The PAI Statement contains the applicable quantitative indicators, explanations of identified adverse impacts, actions taken and planned, policies for identifying and prioritising PAIs, engagement policies, references to international standards and information on historical comparisons.

The Fund-level PAI Statement is published separately and should be consulted for detailed information on the principal adverse impacts of the investment decisions relating to the Adventum Industrial Fund.

The AIFM will continue to review the availability, quality and coverage of sustainability data across the financial products under its management and will update its approach to the consideration and disclosure of principal adverse impacts as appropriate, taking into account developments in data availability, investment strategies and the applicable regulatory framework.