

STATEMENT ON PRINCIPAL ADVERSE IMPACTS OF INVESTMENT DECISIONS ON SUSTAINABILITY FACTORS



Financial market participant – European Finance Opportunities S.C.A.(SICAV-SIF) – Prime Alternative Finance Sub-Fund, ("The Fund" or "PRALTF")

EUROPEAN UNION SUSTAINABLE FINANCE DISCLOSURES REGULATION

(REGULATION (EU) NO.2019/2088) ("SFDR")

Summary

No consideration of sustainability adverse impacts

In accordance with Article 4 sub 1 (b) of the SFDR, Prestige Capital Management Limited ("the AIFM" or "PCM") does not consider Principal Adverse Impacts ("PAI") of investment decisions on sustainability factors as set forth in Article 4 sub 1 (a) of the SFDR. Therefore, it does not make the disclosures as described in Article 4 sub 1 (a) of the SFDR, however PAI may be taken into account at individual Fund level as further disclosed in the governing documents of the relevant Fund and SFDR pre-contractual and website disclosures, when applicable.

The reasons for not publishing such a disclosure are twofold.

- As a primary consideration, the AIFM currently only manages one Alternative Investment Fund registered under Article 8 of SFDR, European Finance Opportunities S.C.A. (SICAV-SIF) Prime Alternative Finance (PRALTF). The disclosure and the administrative burden of considering PAI at AIFM level would not be proportionate considering the assets under management (AuM) of PRALTF relative to the aggregate AuM at the AIFM level. Further, PAI are taken into consideration at the Fund level and both the Fund offering documentation, SFDR pre-contractual and website disclosures contain written statements to that effect.
- Secondly, with due consideration to the overall range of Funds managed, the AIFM considers
 that it would not have sufficient access to relevant and consistent data on the basis of which it
 would be able to accurately report on PAI of investment decisions on sustainability factors within
 the meaning of Article 4 of the SFDR. Regarding PRALTF specifically, the AIFM also considers
 that PAIs are mitigated by the very nature of the investment strategy of PRALTF which is
 targeting only renewable energy projects.