

Principal Adverse Impact Statement

In accordance with Article 4(1)(b) and 4(2) of Regulation (EU) 2019/2088

BlueOrchard Asset Management (Luxembourg) SA (“the Firm”), does not take into account the principal adverse impacts on sustainability factors, as the information provided by underlying investee companies regarding these factors is deemed insufficient. By making private investments in frontier and emerging markets, certain funds under management lack sufficient data coverage across the PAI indicators to publish the BlueOrchard’s consolidated PAI statement. The Firm is aiming to increase data coverage by engaging with investee companies and by working with external data providers such as the Joint Impact Model to obtain relevant proxy data. While the Firm does not consider principal adverse impacts on sustainability factors at entity level for the purposes of Article 4 SFDR, certain funds may disclose sustainability-related information at product level, based on available data and in accordance with the applicable SFDR product disclosure requirements. Such product-level disclosures do not constitute consideration of principal adverse impacts at entity level. This statement covers the reference period from 1 January 2025 to 31 December 2025.

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