Operating Principles for Impact Management

EDFI MC Disclosure Statement – July 2022

The Association of European Development Finance Institutions (EDFI) is a founding signatory to the Operating Principles for Impact Management (the Impact Principles). The Impact Principles provide a reference point against which the impact management systems of funds and institutions may be assessed. They draw on emerging best practices from a range of asset managers, asset owners, asset allocators, and development finance institutions.

EDFI Management Company (EDFI MC) hereby affirms its status as a Signatory to the Operating Principles for Impact Management (the "Impact Principles").

As a subsidiary of EDFI, the EDFI Management Company is sharing this Disclosure Statement as part of its commitment to publicly disclose alignment with the Impact Principles. This Disclosure Statement affirms that EDFI MC's core/client business, including (a) impact management systems; (b) policies and practices; and (c) investment services (including debt, equity, and blended finance instruments) are managed in alignment with the Impact Principles.

This Disclosure Statement serves to fill EDFI MC's obligations pursuant to Principle 9 of the Impact Principles and confirms alignment with the nine Principles. The total Covered Assets in alignment with the Impact Principles is US$ 107.57mln as of December 31 2021[1].

EDFI MC total assets under management in alignment with the Impact Principles is EUR 106.3. million, representing our entire portfolio as of December 2021. Based on commitments as of December 2021, this is allocated 33% to equity, 20% to junior debt, 33% to senior debt, 14% to quasi-equity, and 1% to other types of instruments.

More information about the Impact Principles can be found at https://www.impactprinciples.org/

Principle 1 - Define strategic impact objective(s), consistent with the investment strategy: The Manager shall define strategic impact objectives for the portfolio or fund to achieve positive and measurable social or environmental effects, which are aligned with the Sustainable Development Goals (SDGs), or other widely accepted goals. The impact intent does not need to be shared by the investee. The Manager shall seek to ensure that the impact objectives and investment strategy are consistent; that there is a credible basis

[1] Based on an exchange rate per 04/07/2022 of 1.01 EUR to USD.

for achieving the impact objectives through the investment strategy; and that the scale and/or intensity of the intended portfolio impact is proportionate to the size of the investment portfolio.

- EDFI Management Company is a specialised asset management company with a public mission to support market development in low- and middle-income countries and to contribute to the Sustainable Development Goals. It manages delegated funding from the EU blending instruments and co-financing facilities to deliver development finance solutions that enable European Development Finance Institutions (DFIs) and private sector investors to increase the scale and impact of their work by investing more and in higher risk opportunities than would otherwise be possible.

- EDFI MC was established in 2016 as an EDFI initiative, on behalf of 15 European Development Finance Institutions (DFIs). Since 2021, European DFIs have taken a further step to reinforce their involvement in the ownership and governance of EDFI Management Company, which is now owned directly by nine European DFIs and the EDFI Association in equal shares.

- With support from the European Commission, EDFI MC partners extensively with European DFIs that seek to go further than they can go today. EDFI MC focuses on business models, technologies and geographies where European DFI members have not been able to operate at the desired scale given their resources and investment criteria. It accepts higher transaction costs and greater risks to enable other investors to deploy capital that they could not have invested otherwise. Typically, EDFI MC seeks risks that are higher than EDFI members can accept with their own capital. This includes equity stakes in early-stage companies, first-loss guarantees and flexible financing structures, local-currency lending, and investments in markets with limited liquidity.

- EDFI MC formulates strategies to define areas of focus and deployment of resources to address development and environmental challenges. These strategies can focus on specific themes and reflect the needs to specific countries and regions. EDFI MC has mandates for three facilities operating in alignment with the Impact Principles.

The Disclosure Statement applies to the following assets or business lines (the ‘Covered Assets):

1. **The Electrification Financing Initiative (EDFI ElectriFI)** is an EU-funded impact facility that invests in companies to accelerate access to electricity and modern energy services. It was established in 2015 through a delegation agreement between the European Commission and FMO, which subsequently sub-delegated the execution of the facility to EDFI MC in 2016.

   The facility is funded by the European Union, Power Africa, Sweden and Italy. Total size of the ElectriFI facility is 280 million euros earmarked as follows:

   a) **Global window**: A budget of EUR 126 million made available for all emerging markets, including additional support from Power Africa (USD 10 million targeted at Sub-Saharan Africa), Italy (EUR 5 million) and Sweden (EUR 5 million).

   b) **Country windows**: Developed in partnership with EU Delegations and host governments, ElectriFI Country Windows offer offering dedicated funding for selected countries.
   The first set of Country Windows (launched in 2018) was allocated to Zambia (EUR 31m), Nigeria (EUR 30m), Côte d'Ivoire (EUR 10m), Benin (EUR 5m) and Pacific (EUR 8m). The second set of Country Windows (contracted at the end of 2020) will deploy specific funding for Kenya (EUR 24.7m), Burundi (EUR 9.3m), Eswatini (EUR 5m) and Uganda (EUR 5m).

2. **The Agriculture Financing Initiative (EDFI AgriFI)** is an EU-funded impact facility that leverages sustainable investment in agriculture value chains that rely on smallholder farmers and agri-business medium, small, and micro enterprises to increase production yields and incomes. EDFI AgriFI targets existing private sector enterprises working with smallholder farmers on financially, environmentally, and socially sustainable projects with potential to scale. It was established in 2018 through a delegation agreement between the European Commission and FMO, which subsequently sub-delegated the execution of the facility to EDFI MC.

   The facility is funded by the European Union. Total size of the AgriFI facility is 120 million euros earmarked as follows:

   a) **Global window:** A budget of EUR 30m to provide medium- to long-term financing for private sector enterprises active in the agri-food value chain across the OECD DAC list.

   b) Country windows: developed in partnership with EU Delegations and host governments, AgriFI Country Windows offer offering dedicated funding for selected countries.

i) The AgriFI-Ghana Country Window of EUR 10m is part of a holistic strategy by the Government of Ghana and the EU to support the modernisation of Ghanaian agri-food systems in the five northern regions and beyond with an overall focus on seven high potential crops.

ii) The AgriFI-Tanzania Country Window of EUR 12m is highly tailored by the EU Delegation based on recommendations from the government to focus on value nationally important value chains such as tea, coffee, and horticulture.

iii) The AgriFI-Sri Lanka Window of EUR 8m is part of a larger EU action to support the agriculture sector and will provide access to finance for agri-food businesses with a focus on organic agriculture and the development of the cold chain and food processing, thereby contributing to the reduction of food waste and post-harvest losses.

iv) The AgriFI-ACP Regional Window of EUR 50m aims to provide long-term financing to exemplary projects in the member countries of the Organisation of African, Caribbean and Pacific States (OACPS), with an emphasis on women and youth, to participate fully in the transformation and modernisation of the agricultural sector and contribute to the preparedness of the sector to the impacts of climate change.

3. **The Transferability and Convertibility Facility** is an EU-funded facility to help develop new renewable energy power capacity without delay in developing countries facing significant foreign currency reserve constraints. It was established in 2017 through a sub-delegation agreement between the European Commission and Proparco, which subsequently sub-delegated the execution of the facility to EDFI MC in 2019.[2]

Throughout the investment decision-making process, the delivery of development impact is a key factor in EDFI MC's project selection and design criteria. Strategic impact objectives are incorporated in key decision-making processes including the design and development of new facilities and investment decisions and monitoring. This includes developing investment strategies that are linked to targeted impacts, committing to expected levels of impact, and producing and reviewing ex-ante estimates of impact as part of the investment committee process.

[2] T&C is currently in the establishment phase and is not included in the covered assets for this disclosure statement.

Principle 2 – Manage strategic impact on a portfolio basis: The Manager shall have a process to manage impact achievement on a portfolio basis. The objective of the process is to establish and monitor impact performance for the whole portfolio, while recognizing that impact may vary across individual investments in the portfolio. As part of the process, the Manager shall consider aligning staff incentive systems with the achievement of impact, as well as with financial performance.

- **EDFI MC establishes impact indicators as part of the design, development, and approval of each new facility[3].** We consult with DFI members, EU policy makers, and external experts to develop a theory of change for how new financial products can mobilize additional capital and support the SDGs. The selection of indicators is a key element of articulating the purpose of each facility.

- **Following the selection of facility-level indicators, EDFI MC establishes targets for a subset of the indicators.** For example, we expect to make investments in companies that allow over 11 million people to benefit from electricity production. For our current facilities – EDFI ElectriFI, EDFI AgriFI, and T&C – these targets have been submitted and approved as part of the EU approval process and our included in our contractual requirements.

  Incorporating indicators and targets which speak to value add and impact into the data collection process for each portfolio company will ensure that EDFI MC can monitor the Impact performance and, over time, and will be in a position to assess the impact that EDFI MC investment and strategic added-value and impact interventions have had on each portfolio company and its respective stakeholders and at EDFI MC portfolio level.

- **EDFI MC establishes indicators and measure progress based on the standards through the EDFI harmonisation initiative whenever possible.** The EDFI Harmonisation Initiative was launched in May 2019 to deepen cooperation on responsible financing requirements and impact measurement. It includes common definitions and methods to measure impact on SDGs, with a focus on key impacts to which private sector enterprises contribute, including gender equality, job creation, reduced inequality, and fighting climate change.

- **EDFI MC does not include impact performance or financial performance targets in staff incentive systems. However, this is something EDFI MC is considering to adopt and implement in the future.**

[3] A full list of indicators for EDFI ElectriFI and EDFI AgriFI facility can be found in Annex I.

Principle 3 – Establish the Manager's contribution to the achievement of impact: The Manager shall seek to establish and document a credible narrative on its contribution to the achievement of impact for each investment. Contributions can be made through one or more financial and/or non-financial channels. The narrative should be stated in clear terms and supported, as much as possible, by evidence.

EDFI MC must establish additionality as threshold condition for investment. In practice this means that without investment by EDFI MC, the private enterprise would not undertake the investment, or it would not do so on the same scale, at the same time, in the same location or to the same standard. An investment by EDFI MC should not crowd out the private sector or replace other private financing whilst mobilisation of additional resources (from development and/or commercial banks) is also a requirement. As a result, EDFI MC is confident that it contributes directly to impact by enabling private companies to produce goods and services that create a meaningful difference in the lives of people who are currently underserved and contribute to society challenges, such as a climate change.

EDFI MC applies the EDFI harmonised approach on additionality as provided for in the DFI Working Group on Blended Concessional Finance for Private Sector Projects[4]. DFIs are now collaborating to develop common approaches to implementing this harmonised approach.

For direct investments, EDFI MC applies an Additionality Impact Scorecard as a tool to evidence additionality. The scorecard considers financial additionality, operational and sector additionality, leverage and mobilisation, and market distortion mitigation.

Our policy for establishing contribution is determined on a per facility basis. As we currently invest in early-stage companies in EDFI ElectriFI and EDFI AgriFI, we assume 100% attribution for our investments, with the exception of financial intermediaries where a pro rata attribution approach is applied.

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[4] See the summary report from the DFI Working Group on Blended Concessional Finance for Private Sector Projects, issued October 2017.

Principle 4 – Assess the expected impact of each investment, based on a systematic approach: For each investment the Manager shall assess, in advance and, where possible, quantify the concrete, positive impact potential deriving from the investment. The assessment should use a suitable results measurement framework that aims to answer these fundamental questions: (1) What is the intended impact? (2) Who experiences the intended impact? (3) How significant is the intended impact? The Manager shall also seek to assess the likelihood of achieving the investment's expected impact. In assessing the likelihood, the Manager shall identify the significant risk factors that could result in the impact varying from ex-ante expectations. In assessing the impact potential, the Manager shall seek evidence to assess the relative size of the challenge addressed within the targeted geographical context. The Manager shall also consider opportunities to increase the impact of the investment. Where possible and relevant for the Manager's strategic intent, the Manager may also consider indirect and systemic impacts. Indicators shall, to the extent possible, be aligned with industry standards and follow best practice.

EDFI MC measures impact based on facility-specific indicators. The process for impact measurement through indicators includes collecting baseline data and estimates of future expected impact for all investments at the start of an investment, based on client information and validated by investment officers. EDFI MC is in the process of adjusting its due diligence and monitoring impact tools to align the assessment and impact narrative of each investment to the IMP five dimensions of impact.

EDFI MC relies on data provided by clients for most indicators. Once an investment is active, EDFI MC uses a client data collection approach agreed in the investment contract, which stipulates the type of impact data, frequency and data source that the client is expected to provide during the active stage of an investment. For EDFI ElectriFI, data is collected from the client every six months by the ElectriFI monitoring team. For EDFI AgriFI, data is collected every 12 months by the AgriFI investment officer.
In addition to monitoring impact, investment teams identify opportunities to optimise development impact. Specifically, investments are reviewed against environmental and social (E&S) standards and opportunities for improvements are identified and detailed in action plans.

EDFI MC participates in further harmonisation of impact measurement, indicators and reporting an important focus area. It works with the European Development Finance Institutions (EDFIs) to harmonise the econometric modelling of impact on (direct and indirect) jobs, climate finance, and gender, by using the Joint Impact Model (JIM) to report in job and GHG emissions. In addition, EDFI MC engages in various platforms that discuss impact measurement and harmonisation, such as HIPSO and the IRIS+ metric system of GIIN through the EDFI Association.

Principle 5 – Assess, address, monitor, and manage potential negative impacts of each investment: For each investment the Manager shall seek, as part of a systematic and documented process, to identify and avoid, and if avoidance is not possible, mitigate and manage Environmental, Social and Governance (ESG) risks. Where appropriate, the Manager shall engage with the investee to seek its commitment to take action to address potential gaps in current investee systems, processes, and standards, using an approach aligned with good international industry practice. As part of portfolio management, the Manager shall monitor investees' ESG risk and performance, and where appropriate, engage with the investee to address gaps and unexpected events.

EDFI MC incorporates environmental and social (E&S) standards in its investment decision making and seeks to protect people and the environment which may be potentially impacted by its portfolio companies' operations. Best efforts will be used to ensure that all EDFI MC investees comply with the relevant host country legislation and actively work towards reaching compliance with the relevant internationally recognized environmental and social guidelines and standards. This includes:

- IFC Performance Standards/ World Bank Group Environmental Health and Safety Guidelines/ Equator Principles
- The World Bank Group Environmental, Health and Safety Guidelines
- UN Guiding Principles on Business and Human Right
- ILO Declaration on Fundamental Principles and Rights at Work
- EDFI Principles for Responsible Financing
- The 2X Challenge: Financing for Women
- SMART Campaign Client Protection Principles
- GOGLA Consumer Protection Code

These principles and guidelines are part of the EDFI harmonised environmental and social framework and EDFI MC will apply primarily the IFC Environmental and Social Performance Standards and the associated World Bank Group Environmental Health and Safety Guidelines when investing.

All transactions under EDFI MC portfolio are screened against the EDFI Exclusion List and categorised as per the EDFI harmonised E&S framework according to the inherent E&S risk of the sector, business activity and project size and characteristics.

EDFI MC shall not invest into any portfolio company that, in its reasonable opinion, cannot be expected to meet the minimum E&S requirements set out in the above standards over the life of the investment.

All Portfolio Investees include legal language that the company will comply with all E&S Requirements including a corrective E&S action plan with specified timelines.

We publicly disclose selected relevant information about our investments and financing after contracting. In addition, for our EDFI AgriFI and EDFI ElectriFI facilities, we disclose information about our investments prior to contracting, explicitly inviting comments from the stakeholder community.

Principle 6 – Monitor the progress of each investment in achieving impact against expectations and respond appropriately: The Manager shall use the results framework (referenced in Principle 4) to monitor progress toward the achievement of positive impacts in comparison to the expected impact for each investment. Progress shall be monitored using a predefined process for sharing performance data with the investee. To the best extent possible, this shall outline how often data will be collected; the method for data collection; data sources; responsibilities for data collection; and how, and to whom, data will be reported. When monitoring indicates that the investment is no longer expected to achieve its intended impacts, the Manager shall seek to pursue appropriate action. The Manager shall also seek to use the results framework to capture investment outcomes.

For direct investments, EDFI MC monitors measurable development impact that contributes to market development and improves people's lives in the world's poorest countries. EDFI MC has established appropriate monitoring, evaluation and results measurement arrangements for supervising progress and achievements and for recommending possible improvements, involving all partners (contributors, financiers, beneficiaries as well as industry and civil society representatives). Direct impact data of individual investments are collected and monitored by investment teams through impact cards at contracting (baseline) and as part of the monitoring reviews every 12 months for EDFI AgriFI and every 6 months for EDFI ElectriFI.

Impact data collected from Portfolio Investees on a regular basis is collated into an operational Impact and ESG reports highlighting E&S performance of that investment. This information is shared with investment and portfolio management teams, EDFI MC partners and committees as relevant and act as a check for how impact performance compares to the baseline established during due diligence.
The operational Impact and Environmental and Social Performance report are viewed as an internal document that will be used to alert EDFI MC to key issues across the portfolio that may require attention or further interrogation; as well as those areas where positive

impact or outcomes are being achieved - which could also warrant further resources or focus.

In addition, EDFI MC will estimate certain indicators based on client data when monitoring the information is not part of the clients ongoing business operations. For example, EDFI MC will estimate the tons of greenhouse gases avoided through its investments using established methodologies and based on inputs provided by our clients and the JIM for portfolio based GHG emissions and jobs creation valuations.

Principle 7 – Conduct exits considering the effect on sustained impact: When conducting an exit, the Manager shall, in good faith and consistent with its fiduciary concerns, consider the effect which the timing, structure, and process of its exit will have on the sustainability of the impact.

EDFI MC considers the effect of maintaining development impact when making exit decisions in its private equity operations. This may affect timing, structure, and choice to whom to sell. Most debt, guarantee and blended finance investments are self-liquidating without exit decisions.

EDFI MC is in the process of formulating its exit policy for equity investments. When EDFI MC realises an exit, EDFI MC will ensure such exit is responding to following criteria qualifying the exit as a responsible exit:

- EDFI MC will timely inform relevant stakeholders of its intention to exit
- EDFI MC will sale its holdings to willing buyers compliant with EDFI MC's KYC policy.
- EDFI MC will ensure it understands the buyer's intentions and its commitment to the mission of the company and the role such new shareholder could be playing in the company.
- If applicable, EDFI MC shall ensure that the buyer is supportive of the content of the existing shareholders' agreement and thus consciously subscribes to a deed of adherence.
- EDFI MC will provide all necessary information to the other existing shareholders as detailed in the shareholders' agreement, to allow them to consider executing their right of first refusal / first offer.
- In case several exit options occur at the same time, EDFI MC shall take into account a mix of price and non-price characteristics and typically pursue, a two-step process. First, buyers are screened for suitability (including mission); second, a final selection is made on most attractive terms & conditions.

Principle 8 – Review, document, and improve decisions and processes based on the achievement of impact and lessons learned: The Manager shall review and document the impact performance of each investment, compare the expected and actual impact, and other positive and negative impacts, and use these findings to improve operational and strategic investment decisions, as well as management processes.

EDFI MC has developed a monitoring framework that stipulates the role of management in reviewing and documenting the impact performance of each investment to inform operational strategy and policy. EDFI MC produces annual mandatory monitoring reports on all its investment projects. These monitoring reports are embedded in the client credit review process. The aggregate results are reported annually to the Management Board and disclosed to the public.

As a young company, EDFI MC is continuing to strengthen its operations and improve its performance. As it grows, it will undertake evaluations of its operations, policies, and strategies. These evaluations fill knowledge gaps related to assessment of project performance and / or meet demands of external stakeholders for performance evaluation (e.g., donors providing concessional funding).

Principle 9 – Publicly disclose alignment with the Impact Principles and provide regular independent verification of the alignment: The Manager shall publicly disclose, on an annual basis, the alignment of its impact management systems with the Impact Principles and, at regular intervals, arrange for independent verification of this alignment. The conclusions of this verification report shall also be publicly disclosed. These disclosures are subject to fiduciary and regulatory concerns.

EDFI MC has completed an independent verification of its alignment with the Operating Principles for Impact Management by BlueMark, LLC. (See Annex II for the Verifier Statement.) Since its founding in 2014, BlueMark has become a recognized leader in impact measurement and management, focused on the design and verification of IM systems with leading asset owners and managers. In 2020, BlueMark established a subsidiary with a separate, dedicated team focused on impact management verification. As the company is rapidly growing, EDFI MC anticipates updating the disclosure statement and conducting another independent verification in 2023.

Annex 1: Development Impact Indicators for EDFI MC Facilities

ELECTRIFI INDICATORS

Indicators	Source
1. Number of proposals/applications processed by the Delegatee	Calculated by EDFI MC
2. Number of Operations supported	Calculated by EDFI MC
3. Equity and senior debt leveraged by the Action	Calculated by EDFI MC
4. Number of beneficiaries with new access/improved (reliable) access to grid/non-grid electricity and energy services	Estimated by EDFI MC based on client reporting
5. Number of new clients at the utilities	Client data
6. Installed capacity (MW)	Client data
7. Increased annual energy output produced from renewable energy sources (MWh/year)	Client data
8. GHG emissions saved (CO2 or CO2-eq; ktons CO_2eq)	Estimated by EDFI MC based on client reporting
9. Number of direct jobs created during the project construction and installation phases and during the operation phase and (to the extent possible) as a result of the increased access to energy in general (indirect and induced) and in particular for women	Client data
10. Number of new enterprises created	NA
11. Number and type of energy efficiency activities in portfolio and impact per investment (energy savings as result of energy efficiency measures in kWh).	Client data

AGRIFI INDICATORS

OUTPUT INDICATORS	UNIT	DEFINITION	COMMENTS
Number of finance proposals processed	#		
Equity and senior debt leveraged	€		
Number of units served among relevant target group	#	Number of outstanding loans/ at the end of their fiscal year and annual number of new loans/investments disbursed/made during the year.	Number of active EDFI-AgriFI investments
Amount of outstanding loans	€	Amount of outstanding loans/investments at the end	Amount of outstanding EDFI-AgriFI investments

to relevant target group		of their fiscal year and annual volume of new loans/investments disbursed/made during the year.	
Total number of beneficiaries	#	Estimated number of people with improved access to services (financial services, social and economic infrastructure, etc.).	Agreed that EDFI-AgriFI reports on a common-sense basis: #smallholder farmers served.
Agricultural production	Tons/yr	For the main productions impacted by the project, measured yearly	Report on an annual basis.
Area under cultivation	Ha/yr	For the main productions impacted by the project, measured yearly	Report on an annual basis.
Due diligence report of projects that affect land and property rights	Yes/No	Based on the guidelines developed by the Agence Française de Développement (AFD) or similar guidelines, in line with the Voluntary Guidelines on the Responsible Governance of Tenure of Land, Fisheries and Forests in the Context of National Food Security (VGGT)	Where relevant
OUTCOME INDICATORS	**UNIT**	**DEFINITION**	**COMMENTS**
Repayment rate	%	Percent of investments fully repaid / not in arrears.	
Additional added value created	€ (constant value) per yr	For the main productions impacted by the project, measured yearly	Extracted from the accounts of investee. Value Added is the sum of salaries (and social security contributions), taxes (net of subsidies), financial charges and Operating Profit.
Added value going to farmers	% (constant value) per yr	For the main productions impacted by the project, measured yearly	Sum of added value of investee and participating farmers. As a proxy the farm gate price as a % of the company's produce price may be used (= % of final price received by farmers).
Net direct employment creation: fixed-term/permanent	#/year	Total number of new direct fixed-term/permanent employees, sex-disaggregated, per year.	

Net direct employment creation: seasonal	#/year	Total number of new direct seasonal employees, sex-disaggregated, per year.	
Minimum Dietary Diversity Score*	Score	Minimum number of food groups consumed by an individual over a reference period. Ref.: FAO Manual Minimum Dietary Diversity in Women (in preparation).	Agreed that EDFI-AGRIFI does not report on indicator 6.9 on an annual basis. However, EDFI-AGRIFI will include this indicator if relevant for operations of significant size, whereby data will be available twice in the lifetime (baseline, endline)

Annex II: Verifier Statement

TIDELINE

VERIFIER STATEMENT

Independent Impact Management Verification

Prepared for EDFI MC: July 8, 2020

EDFI

BACKGROUND

As a signatory of the Operating Principles for Impact Management (the Principles), the European Development Finance Institutions Management Company (EDFI MC) is committed to disclosing the degree of alignment of its impact management (IM) system with the Principles.[1] EDFI MC engaged Tideline to undertake the assessment.

ASSESSMENT METHODOLOGY

Tideline reviewed EDFI MC's set of IM tools and processes for the purpose of assessing its degree of alignment with the Principles.[2] To do so, Tideline used a proprietary rubric informed by:

1. The text of each Principle and associated implementation guidance;
2. Tideline's proprietary process assessment criteria, which are mapped to each Principle; and
3. Tideline's retained knowledge of the state of IM practices

SUMMARY ASSESSMENT

Tideline conducted an assessment to verify the EDFI MC IM system's degree of alignment with the Principles. As of June 2020, EDFI MC's AUM covered by the Principles total EUR 244 million. Key takeaways from the assessment are:

- **Areas of strength:** EDFI MC has developed positive, measurable impact objectives aligned with the UN SDGs (Principle 1). The company has a thorough process, aligned with the IFC Performance Standards, to identify, categorize, monitor, and manage ESG risks, including in due diligence and ongoing monitoring (Principle 5). EDFI MC sets a baseline expected positive impact for each investment, using impact indicators, and compares actual impact to expectations on an ongoing basis (Principle 6).

- **Areas for improvement:** Tideline identified opportunities for further alignment, including integrating additional impact considerations (e.g., significance of the intended impact, risks that could result in impact variance) into EDFI MC's due diligence process (Principle 4), further standardizing and documenting the company's impact at exit processes, drawing on EDFI MC's approach in private equity (Principle 7), and establishing a protocol to extract lessons learned from the review of each investment's impact performance (Principle 8).

ABOUT TIDELINE

Tideline Advisors, LLC is a certified women-owned advisory firm in impact investing. Since its founding in 2014, Tideline has become a recognized leader in impact measurement and management, focused on the design and verification of IM systems with leading asset owners and managers. In 2020, Tideline established a subsidiary with a separate, dedicated team focused on impact management verification.

Tideline has offices in New York, NY and San Francisco, CA and is headquartered at 915 Battery St, San Francisco, CA 94111, USA.

[1] Principle 9 states that signatories shall "publicly disclose alignment with the Principles and provide regular independent verification of the alignment: The Manager shall publicly disclose, on an annual basis, the alignment of its impact management systems with the Principles and, at regular intervals, arrange for independent verification of this alignment. The conclusions of this verification report shall also be publicly disclosed. These disclosures are subject to fiduciary and regulatory concerns."

[2] Tideline's full assessment for EDFI MC states each of the Principles, describes the EDFI MC IM processes covered by the Principles, and identifies areas where further alignment is appropriate and feasible. The scope of Tideline's assessment procedures does not include the verification of the resulting impacts achieved. Tideline's assessment is based on its analyses of publicly available information and information in reports and other material provided by EDFI MC. Tideline has relied on the accuracy and completeness of any such information provided by EDFI MC. The assessment results represent Tideline's professional judgment based on the procedures performed and information obtained.

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The EDFI Management Company (EDFI MC) was established in 2016 on behalf of 15 European Development Finance Institutions (DFIs). Since 2021, EDFI MC is owned by nine EU pillar assessed DFIs and the EDFI Association in equal shares. EDFI MC delivers innovative development finance solutions that enable European DFIs, development banks and private sector investors to increase the scale and impact of their work. The company focuses on business models, technologies, and geographies where other investors have not been able to operate at the desired scale given their resources and investment criteria.