

# Verifier Statement

## *Independent Verification Report*

*Prepared for Invest in Visions: October 7<sup>th</sup>, 2024*

---

## Introduction

As a signatory of the Operating Principles for Impact Management (the Impact Principles)<sup>1</sup>, Invest in Visions engaged BlueMark to undertake an independent verification of the alignment of Invest in Visions’ impact management (IM) system with the Impact Principles. Invest in Visions’ assets under management covered by the Impact Principles (Covered Assets) totals \$873.68 million EUR<sup>2</sup>, for the period ending 02/2024.

## Summary assessment conclusions

BlueMark has independently verified Invest in Vision’s extent of alignment with the Impact Principles. Key takeaways from BlueMark’s assessment are as follows:

*Principle 1:* Invest in Visions has developed an impact strategy focused on promoting financial inclusion and sustainable development in emerging markets through investments in MFIs.

*Principle 2:* Invest in Visions has developed a framework that allows for impact performance comparison across the portfolio and has tied its staff incentive systems to the achievement of impact.

*Principle 3:* Invest in Visions has defined its primary contributions to its investees to be chiefly, 1) allocating capital to MFIs with a social mission, 2) engaging in dialogue with MFIs on impact objectives, and 3) providing loans in local currencies to mitigate currency risk, and it assesses its contribution for each investment. To further align, the firm should build out an evidence base of its investor contributions.

*Principle 4:* Invest in Vision has developed a comprehensive impact due diligence process, which utilizes an eligibility memo, preliminary DD template, Alinus score, and a social dashboard.

*Principle 5:* Invest in Visions has developed an ESG Risk Management framework, leveraging ALINUS, MFI Factsheets, and an ESG Scoring Tool. To further align, Invest in Visions should develop an approach to engage with investees to improve ESG performance and codify processes for engaging with investees in cases of ESG underperformance.

*Principle 6:* Invest in Visions collects impact and financial data from all MFIs quarterly via a standard MFI Factsheet. To further align, the firm should set targets for key impact KPIs with investees and compare progress towards these targets.

*Principle 7:* Invest in Visions has documented its approach to sustainability of impact at and beyond exit in its Impact and Sustainability strategy document. To further align, the firm should develop an “exit/maturity” memo to standardize documenting impact. The firm should also develop a framework for how it steers for the sustainability of impact throughout the investment lifecycle.

*Principle 8:* Invest in Visions reviews impact performance through the quarterly IN Komitee meetings. To further align, the firm should ensure it has protocols in place to ensure lessons learned are systematically used to inform internal system and process changes. The firm should also ensure it captures positive and negative unexpected impacts in its review process.

<sup>1</sup> Principle 9 states that signatories “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.”

<sup>2</sup> Assets under management figure as reflected in Invest in Visions OPIM disclosure statement as of 29/02/2024. BlueMark’s assessment did not include verification of the AUM figure.

# Verifier Statement

## Independent Verification Report

Prepared for Invest in Visions: October 7<sup>th</sup>, 2024

### Detailed assessment conclusions

The chart below summarizes findings from BlueMark’s verification of Invest in Visions’ extent of alignment to the Impact Principles, using the following four ratings:<sup>3</sup>

- Advanced (Limited need for enhancement);
- High (A few opportunities for enhancement);
- Moderate (Several opportunities for enhancement); and
- Low (Substantial enhancement required).<sup>4</sup>

Principle	Alignment
1. Define strategic impact objective(s), consistent with the investment strategy	ADVANCED
2. Manage strategic impact on a portfolio basis	ADVANCED
3. Establish the Manager's contribution to the achievement of impact	HIGH
4. Assess the expected impact of each investment, based on a systematic approach	ADVANCED
5. Assess, address, monitor, and manage potential negative impacts of each investment	HIGH
6. Monitor the progress of each investment in achieving impact against expectations and respond appropriately	HIGH
7. Conduct exits considering the effect on sustained impact	MODERATE
8. Review, document, and improve decisions and processes based on the achievement of impact and lessons learned	HIGH

<sup>3</sup> The scope of BlueMark’s assessment procedures does not include the verification of the resulting impacts achieved. BlueMark’s assessment is based on its analyses of publicly available information and information in reports and other material provided by Invest in Visions. BlueMark has relied on the accuracy and completeness of any such information provided by Invest in Visions. The assessment results represent BlueMark’s professional judgment based on the procedures performed and information obtained from Invest in Visions.

<sup>4</sup> The decision to publicly disclose the results of BlueMark’s detailed assessment, and the specific ratings assigned to each Principle, is left to the sole discretion of Invest in Visions.

# Verifier Statement

## *Independent Verification Report*

*Prepared for Invest in Visions: October 7<sup>th</sup>, 2024*

---

### Assessment methodology and scope

Invest in Visions provided BlueMark with the relevant supporting documentation for the policies, processes, and tools related to the IM system applicable to the Covered Assets. The scope of BlueMark’s work was limited to processes in place related to the Covered Assets as of October 2024. BlueMark’s assessment of the IM system included an evaluation of both the system itself and supporting documentation, as well as the consistency of the draft disclosure statement with the IM system. BlueMark believes that the evidence obtained in the scope of its assessment is sufficient and appropriate to provide a basis for our conclusions.<sup>5</sup>

BlueMark’s full assessment methodology, based on its professional judgment, consisted of:

1. Assessment of the IM system in relation to the Impact Principles, using BlueMark’s proprietary rubric, and examining processes and policies against the following criteria:
  - *Compliance* of the IM system with a threshold level of practice;
  - *Quality* of the IM system’s design in terms of its consistency and robustness; and
  - *Depth* of sub-components of the system, focused on completeness
2. Interviews with Invest in Visions staff responsible for defining and implementing the IM system;
3. Testing of selected Invest in Visions transactions to check the application of the IM system; and
4. Delivery of detailed assessment findings to Invest in Visions, outlining areas of strong alignment and recommended improvement, as well as BlueMark’s proprietary benchmark ratings on the extent of alignment to each of the Impact Principles.

### Permissions

This statement, including our conclusions, has been prepared solely for Invest in Visions in accordance with the agreement between our firms, to assist Invest in Visions in fulfilling Principle 9 of the Operating Principles for Impact Management. We permit Invest in Visions to disclose this statement in its entirety online, or to furnish this statement to other interested parties to demonstrate Invest in Visions’ alignment with the Operating Principles for Impact Management. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than Invest in Visions for our work or this statement except where terms are expressly agreed between us in writing.

### About BlueMark

BlueMark, a Delaware-registered public benefit company, is a leading provider of impact verification services in the impact investing market. BlueMark was founded with a mission to “strengthen trust in impact investing” and to help bring more accountability to the impact investment process. BlueMark has conducted this verification with an independent and unconflicted team experienced in relevant impact measurement and management issues. BlueMark has implemented a Standard of Conduct requiring our employees to adhere to the highest standards of professional integrity, ethics, and objectivity in their conduct of business activities.

BlueMark has office locations in London, UK; New York, NY; and Portland, OR; and is headquartered at 154 W 14th St, 2nd Floor, New York, NY 10011. Its outside investors include S&P Global, Temasek Trust Capital, Blue Haven Initiative, Gunung Capital, Tsao Family Office, Ford Foundation and Radicle Impact. For more information, please visit [www.bluemark.co](http://www.bluemark.co).

---

<sup>5</sup> The scope of BlueMark’s assessment procedures does not include the verification of the resulting impacts achieved. BlueMark’s assessment is based on its analyses of publicly available information and information in reports and other material provided by Invest in Visions. BlueMark has relied on the accuracy and completeness of any such information provided by Invest in Visions. The assessment results represent BlueMark’s professional judgment based on the procedures performed and information obtained from Invest in Visions.