

Verifier Statement

Independent Verification Report

Prepared for BlueEarth: November 23, 2020

Introduction

As a signatory of the Operating Principles for Impact Management (the Impact Principles)¹, Blue Earth Capital AG (BlueEarth) engaged BlueMark to undertake an independent verification of the alignment of BlueEarth's impact management (IM) system with the Impact Principles. As of November 23, 2020, BlueEarth's assets under management covered by the Impact Principles (Covered Assets) totaled \$373 million.²

Summary assessment conclusions

BlueMark has independently verified BlueEarth's extent of alignment with the Impact Principles. Key takeaways from BlueMark's assessment are as follows:

Principle 1: BlueEarth has clear impact objectives, mapped to the UN Sustainable Development Goals (SDGs) and tied to positive and measurable impact metrics, and the firm constructs logic models that link the expected impact of its investments to specific SDG targets.

Principle 2: The firm integrates impact throughout the investment process, including in impact screening, due diligence, and monitoring, and aligns staff incentive systems with the achievement of impact through management incentives and its annual performance review process.

Principle 3: BlueEarth documents its expected investor contribution for each investment, including financial and non-financial contributions, in the impact assessment process. The firm has compiled evidence supporting its contribution narrative, including case studies, though it could compile additional evidence.

Principle 4: BlueEarth has established a thorough process to assess and quantify the expected impact of each investment, incorporating the Impact Management Project's (IMP) five dimensions of impact and impact metrics aligned with industry standards, among other impact considerations.

Principle 5: The firm has a documented approach to identify, avoid, and mitigate Environmental, Social, and Governance (ESG) risks in the due diligence process, though it could further standardize its approach to monitoring and engaging on ESG risks and performance on an ongoing basis.

Principle 6: BlueEarth has a predefined process in place to collect impact data from investees on a quarterly basis, including the comparison of expected and actual impact performance, though the firm could further clarify its approach to engaging with investees on impact underperformance and capturing impact outcomes.

Principle 7: BlueEarth has established a standardized process to consider the sustainability of impact at exit, including a structured assessment of impact at exit considerations and consideration by the investment committee.

Principle 8: The firm has a clear process in place to review and document the impact performance of each investment, on a quarterly basis, though it could further incorporate the comparison of actual and expected impact performance and the review of unintended positive and negative impacts.

¹ Principle 9 states that signatories "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 Assets under management figure as reflected in BlueEarth's reports and other material as of 11/23/2020. BlueMark's assessment did not include verification of the AUM figure.

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Detailed assessment conclusions

The chart below summarizes findings from BlueMark’s verification of BlueEarth’s extent of alignment to the Impact Principles, using the following four ratings:³

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

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	MODERATE
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	ADVANCED
8. Review, document, and improve decisions and processes based on the achievement of impact and lessons learned	HIGH

³ 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 BlueEarth. BlueMark has relied on the accuracy and completeness of any such information provided by BlueEarth. The assessment results represent BlueMark’s professional judgment based on the procedures performed and information obtained from BlueEarth.

⁴ 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 BlueEarth.

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Assessment methodology and scope

BlueEarth 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 November 23, 2020. BlueMark believes that the evidence obtained in the scope of its assessment is sufficient and appropriate to provide a basis for our conclusions.⁵

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 BlueEarth staff responsible for defining and implementing the IM system;
3. Testing of selected BlueEarth transactions to check the application of the IM system; and
4. Delivery of detailed assessment findings to BlueEarth, 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 BlueEarth in accordance with the agreement between our firms, to assist BlueEarth in fulfilling Principle 9 of the Operating Principles for Impact Management. We permit BlueEarth to disclose this statement in its entirety online, or to furnish this statement to other interested parties to demonstrate BlueEarth’s 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 BlueEarth for our work or this statement except where terms are expressly agreed between us in writing.

About BlueMark

BlueMark, a Tideline 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 is a wholly owned subsidiary of Tideline Advisors, LLC, 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, working with leading asset owners and managers to design and implement impact management systems.

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; Portland, OR; and San Francisco, CA and is headquartered at 915 Battery St, San Francisco, CA 94111, USA. For more information, please visit www.bluemarktideline.com.

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