

**DISCLOSURE STATEMENT**

**Operating Principles for Impact Management**

March 31, 2020

Calvert Impact Capital is a founding Signatory to the Operating Principles for Impact Management (the Principles), a framework adopted by over 90 leading global impact investors to-date. Signatories commit to integrating impact management best practice throughout the entire investment lifecycle, from strategy to deal sourcing to exit or repayment, and ensure that lessons learned are continuously incorporated into portfolio management. While Calvert Impact Capital has always provided [comprehensive impact reporting](#),<sup>1</sup> by adopting these Principles, we committed to publicly disclosing the details of our impact measurement and management (IMM) practices.

**INVESTING FOR IMPACT: OPERATING PRINCIPLES FOR IMPACT MANAGEMENT**



SOURCE: [IMPACTPRINCIPLES.ORG/PRINCIPLES](https://IMPACTPRINCIPLES.ORG/PRINCIPLES)

This Disclosure Statement affirms that Calvert Impact Capital's core business, including our impact management systems, policies and practices, and all loans and investments in domestic and international financial intermediaries, community development organizations, projects, funds, and other social enterprises, is managed in alignment with the Principles. Our total assets under management in alignment with the Principles is \$415.9 million, representing our entire portfolio as of December 31, 2019.

The Principles were designed to **measure integrity** and **increase transparency**. As leaders in the impact investing industry, we welcome widespread adoption of the Principles and look forward to your feedback.



*Jennifer Pryce*  
Jennifer Pryce  
President and CEO

<sup>1</sup> See our annual Impact Report at [calvertimpactcapital.org/impact/report](https://calvertimpactcapital.org/impact/report).

**EXECUTIVE SUMMARY**

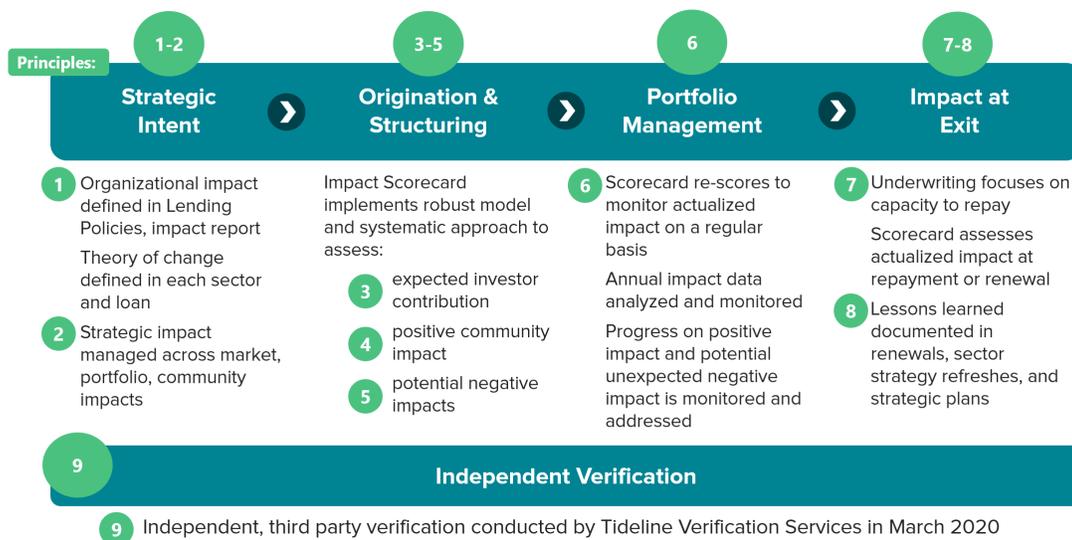
Throughout our 25-year history, we have made loans and investments with the express purpose of generating measurable, positive impact in global communities. Calvert Impact Capital’s adoption of the Principles and the release of this Statement confirm our commitment to managing our portfolio with impact management best practices.

The ninth and final Principle requires Signatories to seek independent verification of their impact management practices. Our independent verification was conducted by Timeline Verification Services and their Verifier Statement can be found at the end of this Disclosure Statement.

This inaugural third-party verification confirmed that:

- Calvert Impact Capital is built to create positive impact, as demonstrated by our strategy, our portfolio, and our policies and procedures;
- Our impact management practices are advanced in understanding our positive Community Impact, as well as our contribution to the market through our Investor Impact and Portfolio Impact (described below);
- We take an active learning approach that identifies best-in-class practices and incorporates these new standards into our work.

Our impact management practices map to the nine Principles as follows:



Please see the following disclosure for detailed information on the alignment of our impact management practices with the Principles.

Details on the actualized impact Calvert Impact Capital has on behalf of its investors can be found in our annual Impact Report: [calvertimpactcapital.org/impact/report](http://calvertimpactcapital.org/impact/report).

**PRINCIPLES 1 & 2: STRATEGIC INTENT**

**Principle 1: Define strategic impact objective(s), consistent with the investment strategy.**

Principles Guidance: 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 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.

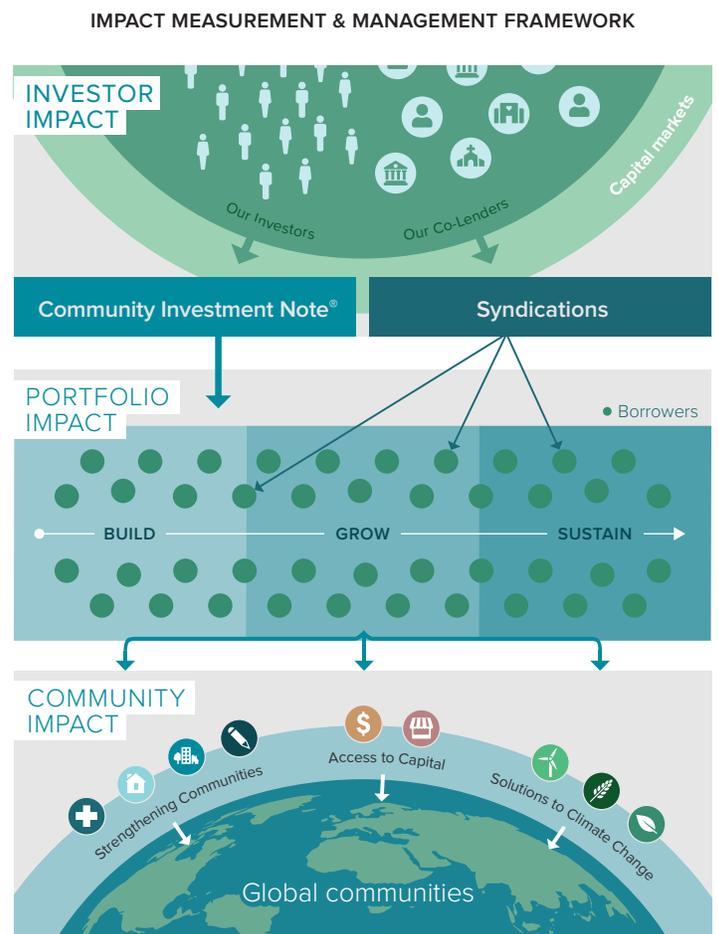
Calvert Impact Capital exists to use capital in innovative and collaborative ways to create an equitable and sustainable world. Our work is focused on connecting investors to organizations that strengthen communities and sustain our planet while providing a financial return.

These strategic impact objectives are defined and codified within our founding Articles of Incorporation, as well as in key corporate documentation such as our Community Investment Note® Prospectus and Lending Policies.

**Our Impact Management Framework:** We manage impact through the investment lifecycle in alignment with our three layers of impact: Investor Impact, Portfolio Impact, and Community Impact.

**Investor Impact** is the impact we have on our individual and institutional investor community through our products and services. Our goal is to provide efficient on-ramps for investors to gain exposure to assets that fit their risk appetite and risk-adjusted return expectations. Through our flagship product, the Community Investment Note®, we enable US-based investors to access a portfolio of more than 100 mission-driven funds and intermediaries that are financing thousands of nonprofits, social enterprises, and communities in-need worldwide. Investor dollars finance efforts to address climate change and improve access to quality affordable housing, healthcare, education, income and wealth building opportunities, and other critical community services.

**Portfolio Impact** is the value our capital brings to our borrowers. Our portfolio strategy is focused on creating more efficient impact markets by providing flexible capital to mission-driven organizations. Our strategy is to Build, Grow, and Sustain our borrowers' operations and impact across sectors so they can connect more effectively to the broader global capital markets.



**Community Impact** is the impact our borrowers have on individuals, businesses, and the planet. Our goal is to affect tangible positive impact on social and environmental challenges through our investments, and help all people live healthy, happy, and productive lives on a more sustainable planet. We have developed a theory of change and impact objectives for each sector in which we lend, which can be found at [calvertimpactcapital.org/portfolio/sectors](https://calvertimpactcapital.org/portfolio/sectors). These theories of change are based on sector and market research and industry impact evidence, and are continuously refined based on insights from our borrowers. We reassess our sector strategies at least every three years in conjunction with our strategic planning cycle. Our most recent Strategic Plan is available on our website at: [calvertimpactcapital.org/about/reports](https://calvertimpactcapital.org/about/reports).



Our work directly contributes to filling the funding gap for 16 out of the 17 global Sustainable Development Goals. Visit [calvertimpactcapital.org/portfolio/sdgs](https://calvertimpactcapital.org/portfolio/sdgs) for more information.



Viewed together, these three dimensions of impact—investor, portfolio, and community—reflect efforts to build a more functioning marketplace between the capital markets and global communities.

## Principle 2: Manage strategic impact on a portfolio basis.

Principles Guidance: 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.

We manage strategic and impact intent and our achieved impact and performance on a portfolio level through monthly, quarterly, and annual portfolio and impact reporting. To assess our Portfolio Impact, we analyze trends in key strategic impact indicators such as growth in borrowers' assets under management (AUM), dollars leveraged in communities, and number and value of loans disbursed by our borrowers. We also assess the additionality, or investor contribution, of each loan we make in comparison to a portfolio benchmark.

Achieved impact is also assessed on a sector level across our nine impact sectors. We collect data on two to five primary impact indicators for each sector from each of our borrowers on an annual basis, which we analyze on a portfolio level to assess trends in impact performance. These primary indicators are chosen based on the impact evidence demonstrating which metrics are most indicative of impact in a particular sector strategy. The data collected for these primary impact indicators is aggregated to determine the overall strategic impact our borrowers are achieving.

We use secondary impact indicators to gather additional data on the five dimensions of impact, as defined by the Impact Management Project (IMP): **What, Who and Where, How Much, Contribution, and Impact Risk**. All impact indicators are aligned with industry standards, including IRIS+,<sup>2</sup> AERIS, the CDFI Fund, or other sector-specific industry standards. When we need to use indicators not captured by IRIS+, we contribute this information to the Global Impact Investing Network (GIIN) with the hope that the indicators can be incorporated into IRIS+ in the future.

We assess, manage, and update our portfolio strategy annually through our enterprise goal setting process and every three years as part of our strategic review process. We examine our strategic impact to ensure we are channeling capital to reach community-facing intermediaries in the most effective way possible.

Contribution to our enterprise goals, both financial and impact, is considered in annual staff performance reviews. Meeting our mission is everyone's responsibility at Calvert Impact Capital, not just the one dedicated impact expert we have on staff.

<sup>2</sup> IRIS+ is the generally accepted system for impact investors to measure, manage, and optimize their impact. IRIS+ provides streamlined, practical, how-to guidance that impact investors need, all in one easy-to-navigate system. It is a free, publicly available resource that is managed by the Global Impact Investing Network (GIIN).

## PRINCIPLES 3-5: ORIGINATION & STRUCTURING

Calvert Impact Capital is a member of the [Impact Frontiers Collaboration](#),<sup>3</sup> a collaborative effort between the Impact Management Project and several other industry-leading impact investing firms to create an industry best practice for examining impact as part of due diligence.<sup>4</sup> Through this effort, we have developed and implemented an internal Impact Scorecard, a proprietary tool we use to systematically assess every transaction at origination and project the expected impact the loan or investment is anticipated to create. The scorecard contains 27 questions and is organized by the IMP's 5 dimensions of impact; it includes assessments of: our investor contribution to impact (Principle 3), the expected impact of a loan (Principle 4), and the potential impact risks of the transaction and how to manage identified risks (Principle 5).

### Outline of the Impact Scorecard



### Principle 3: Establish the Manager's contribution to the achievement of impact.

Principles Guidance: 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.

Our Impact Scorecard systematically assesses the expected financial and non-financial contribution of each loan or investment. The types of contribution assessed are based on best practices where they exist, for example, as outlined by the [Multilateral Development Banks' \(MDBs\) Harmonized Framework for Additionality in Private Sector Operations](#).<sup>5</sup> The six types of contribution assessed in our Scorecard include:

- flexible financing;
- availability of other financing at similar terms;
- resource mobilization (syndications);
- catalyzing additional capital;
- providing a signaling effect;
- providing a demonstration effect; and
- providing advisory and knowledge services.

<sup>3</sup> See [impactmanagementproject.com/about/impact-frontiers](http://impactmanagementproject.com/about/impact-frontiers).

<sup>4</sup> See [pacificcommunityventures.org/2019/07/02/impact-due-diligence-emerging-best-practices](http://pacificcommunityventures.org/2019/07/02/impact-due-diligence-emerging-best-practices).

<sup>5</sup> Available at: [ifc.org/wps/wcm/connect/topics\\_ext\\_content/ifc\\_external\\_corporate\\_site/development+impact/resources/201809-mdb-additionality-framework](http://ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/development+impact/resources/201809-mdb-additionality-framework).

Where there is not a clear best practice, for example in assessing the potential impact of a loan on the overall market, sector, or geography, we have identified and are promoting what we believe to be an emerging best practice. We utilize a robust evidence base, including third-party research, literature reviews, and in-house research, to assess the potential market impact of a loan. After projected market impact and investor contribution are assessed and codified in the Impact Scorecard during the due diligence stage, we include a narrative and analytical analysis in our due diligence memos that are presented to our credit committees for review.

On a portfolio basis, we review the overall contribution our loan portfolio is having on the various markets in which we operate, and report that contribution using case studies in the Portfolio Impact section of our annual impact report.<sup>6</sup>

**Principle 4: Assess the expected impact of each investment, based on a systematic approach.**

Principles Guidance: 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.

Our Impact Scorecard assesses the expected impact of each loan or investment we make (an “ex-ante” assessment), using a systematic approach. The relevant section of the Impact Scorecard for Principle 4 is Community Impact, which includes 17 metrics based on industry best practice,<sup>7</sup> including the IMP's 5 dimensions of impact: **What, Who and Where, How Much, Borrower Contribution, and Impact Risk.**<sup>8</sup> These metrics assess:

- The borrower's strategy;
- The potential for scale in comparison to a benchmark;<sup>9</sup>
- The relative size of the challenge being addressed;
- The borrower's potential to make an impact on that challenge with their solution;
- Indirect impacts of the borrower's strategy;
- Four types of impact risk (evidence, executive, unexpected, and alignment);
- Mitigating factors for impact risk; and
- Internal environmental, social, and governance (ESG) factors.

Internal due diligence memos are produced for each loan or investment and are based directly on findings from the Impact Scorecard. Investment Officers coordinate with our staff impact expert to screen each potential loan through the Impact Scorecard. Material findings and potential impact risks are discussed with our Credit Committee, including thoughts on and approaches for mitigation.

<sup>6</sup> More information is available at: [calvertimpactcapital.org/impact](http://calvertimpactcapital.org/impact).

<sup>7</sup> Required impact metrics are also aligned with industry standards (e.g., AERIS, IRIS+, CDFI Fund).

<sup>8</sup> Investor Contribution is outlined in the previous section of this Disclosure.

<sup>9</sup> Benchmarks for expected scale of outputs are determined by multi-year analyses of existing comparable portfolio data.

## Principle 5: Assess, address, monitor, and manage potential negative impacts of each investment.

Principles Guidance: 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.

As mentioned above, the Impact Scorecard assesses unexpected negative impact risk as well as various ESG risks, such as alignment or mission drift, internal ESG policies, diversity & inclusion policies and practices, and gender diversity of the senior management team and Board of Directors. Material impact and ESG risks are identified in the internal due diligence memos and discussed with our Credit Committee.

As a gender lens investor, Calvert Impact Capital considers gender as a standard part of our investment processes. We do not have a specific policy that sets required minimums for a borrower's gender diversity of staff or clients served, as we have found that being inclusive rather than setting rigid screens ultimately yields greater opportunity for impact. We also assess the gender diversity of borrowers' senior management teams and Boards of Directors on an annual basis.<sup>10</sup> We encourage borrowers, through a variety of methods including setting milestones, to implement or advance their own diversity, inclusion, and local hiring practices and to better understand the impact of gender on their strategy and operations. For example, we provide hands-on advisory and guidance to borrowers to help them advance practices such as collecting gender disaggregated data to better understand the impact of their products or services on women and girls.

In 2018, we published a report on our experience with gender lens investing, [Just Good Investing](#), which provides a quantitative analysis of our portfolio across eleven years, case studies, and guidance to other investors on how to develop a gender lens strategy.

In addition to ESG factors assessed at due diligence, most loan documentation for non-US based borrowers includes requirements that the borrower adhere to the IFC's Performance Standards,<sup>11</sup> which define borrowers' responsibilities for managing their environmental and social risks across eight categories. While not a requirement, many of the underlying microfinance institutions in our portfolio are SMART Campaign certified or endorse the Campaign's principles.<sup>12</sup>

Our Lending and Risk Management Policies mandate quarterly monitoring for each loan to manage material financial and non-financial risks. If and when material risks are identified, we begin more frequent monitoring in coordination with our Risk Management team. We also conduct periodic reviews of each Impact Scorecard, including ESG and impact risks, to re-score a loan when renewed or repaid.

While environmental and social considerations are inherent in everything we do at Calvert Impact Capital, in response to the results of our independent verification, we commit to making that more explicit by incorporating additional ESG and impact risk monitoring into quarterly borrower monitoring reports, specifically identifying ESG risks and mitigation strategies in due diligence and incorporating ESG risk as a discrete category in our Risk Management Policy.

<sup>10</sup> Based on evidence we have published linking positive financial returns with increased gender diversity in governance. Report available at: [calvertimpactcapital.org/insights/gender-report](https://calvertimpactcapital.org/insights/gender-report).

<sup>11</sup> Available at: [ifc.org/performancestandards](https://ifc.org/performancestandards).

<sup>12</sup> The Smart Campaign is a global effort to unite financial leaders around a common goal: to keep clients as the driving force of the industry. The Campaign promotes the Client Protection Principles as standards to help financial service providers practice good ethics and smart business. See [smartcampaign.org](https://smartcampaign.org) for more information.

**PRINCIPLE 6: PORTFOLIO MANAGEMENT****Principle 6: Monitor the progress of each investment in achieving impact against expectations and respond appropriately.**

Principles Guidance: 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.

We monitor the progress of each loan and investment in achieving impact against expectations in three main ways: 1) using the Impact Scorecard (results framework) to re-score the credit and update as new information on impact becomes available; 2) collecting and analyzing annual impact data; and 3) quarterly portfolio reporting and monitoring.

The results of the Impact Scorecard determined at origination are used to measure and monitor realized impact at each stage of the investment management process. This data, in addition to impact data on the primary and secondary impact indicators,<sup>13</sup> is used internally to monitor performance.

Annual impact data collection is required by legal documentation (loan agreements, limited partnership agreements, or a side letter, depending on the structure) and codified in standard fund reporting or annual custom reports. Terms vary across our portfolio of 100+ borrowers, but impact data reporting is generally required by a reporting covenant within 180 days of the borrower's fiscal year end. The data collected annually is reported through a consistent Annual Impact Metrics Report and its results are uploaded into our impact metrics database. This allows us to review results at the credit, sector, and portfolio level in a discrete year or over a longer time period.

For the majority of our borrowers, their impact is almost entirely dependent on their own lending activities. We monitor the progress of our borrowers' portfolios on at least a quarterly basis, as well as their achievement of key impact targets on an annual basis, as mandated by our Lending Policies. Our monthly and quarterly portfolio management processes allow us to monitor when borrower performance does not meet expectations and respond appropriately as needed.

In response to the results of our independent verification, we will consider updating our portfolio management process to more explicitly incorporate a protocol for engaging borrowers in the event that quarterly monitoring indicates impact underperformance, as well as documenting the process of impact data collection and monitoring.

<sup>13</sup> Outlined in the discussion of Principles 2 and 4.

## PRINCIPLES 7 & 8: IMPACT AT "EXIT"

### Principle 7: Conduct exits considering the effect on sustained impact.

Principles Guidance: 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.

As a provider of private debt, our exits are through the repayment of our loans, so we consider our borrower's ability to generate sustained impact at origination, renewal, and/or repayment.

We often renew and increase our financing at maturity if financial and impact performance warrant doing so, in line with our strategy to build capacity and increase a borrower's ability to expand their products and services. When we are lending to a fund, we will often consider financing subsequent funds as managers expand their work and continue to pursue their impact strategy.

When borrowers decide to repay, it is often because our strategy—to help them build, grow, and sustain their operations and impact—has been successful, and they have gained access to traditional capital markets that are more efficient. We codify the actualized impact at repayment, taking into account the effect on sustained impact, in a final repayment scoring using the Impact Scorecard.

In extraordinary circumstances where a borrower may be experiencing a challenge, we will consider sustainability of impact during loan modifications and workouts.

### Principle 8: Review, document, and improve decisions and processes based on the achievement of impact and lessons learned.

Principles Guidance: 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.

We are consistently incorporating lessons learned into our business and strategy to achieve our overarching mission to use capital in innovative and collaborative ways to create a more equitable and sustainable world. Formally, we leverage lessons from the actualized impact of our portfolio in our [annual Impact Report](#)<sup>14</sup> and conduct a comprehensive review of our strategy every three years. During these reviews, we perform industry landscapes, conduct sector strategy and theory of change refreshes, and detail growth plans for each business unit, all of which are documented in our Strategic Plan.

As outlined in previous sections, we collect and assess impact performance data for every borrower at least annually. In addition to assessing the performance of the loan, this data is used in consideration of future strategic investment and individual loan decisions. In the case of a loan renewal or repayment, we review and improve our processes based on lessons learned and the achievement of impact, particularly when the impact falls short of projected targets. These decisions and lessons learned are documented in loan renewal due diligence memos and through the continued implementation of the Impact Scorecard.

<sup>14</sup> Available at: [calvertimpactcapital.org/impact/report](http://calvertimpactcapital.org/impact/report).

**PRINCIPLE 9: INDEPENDENT VERIFICATION**

Principles Guidance: Publicly disclose alignment with the Principles and provide regular independent verification of the alignment.

This Disclosure Statement confirms the alignment of Calvert Impact Capital’s policies, procedures, and practices with the Principles and will be updated annually. The independent verification report on the alignment of Calvert Impact Capital’s practices with the Operating Principles for Impact Management is available at the end of this Disclosure Statement. We plan to conduct an independent verification of our practices every three years, in alignment with our strategic planning process, unless there are significant changes to our practices that warrant a more frequent review.

Information on the current independent verifier is as follows:

- **Name and Address:** Tideline Verification Services, Inc.  
915-2 Battery St.  
San Francisco, CA 94111
- **Qualifications:** 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 impact management (IM) systems with leading asset owners and managers. In 2020, Tideline established a subsidiary with a separate, dedicated team focused on impact management verification. For more information about the organization, qualifications, and services, please visit [tideline.com](https://tideline.com).
- **Most Recent Review:** March 17, 2020

## About Calvert Impact Capital

Calvert Impact Capital makes impact investable. Through our products and services, we raise capital from individual and institutional investors to finance intermediaries and funds that are investing in organizations and communities left out of traditional capital markets. We raise retail and institutional capital through our fixed-income product, the Community Investment Note®, as well as institutional capital through our Syndication services. During our 25-year history, we have mobilized over \$2 billion of investor capital. All investor dollars are channeled to create measurable social and environmental impact in communities in the US and around the world.

To learn more about our impact and impact practice, visit [calvertimpactcapital.org/impact](https://calvertimpactcapital.org/impact).



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## VERIFIER STATEMENT

## Independent Impact Management Verification

Prepared for Calvert Impact Capital (CIC): March 17, 2020

**BACKGROUND**

As a signatory of the Operating Principles for Impact Management (the Principles), CIC is committed to disclosing the degree of alignment of its impact management (IM) system with the Principles.<sup>1</sup> CIC engaged Tideline to undertake the assessment.

**ASSESSMENT METHODOLOGY**

Tideline reviewed CIC's set of IM tools and processes for the purpose of assessing its degree of alignment with the Principles.<sup>2</sup> 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 CIC IM system's degree of alignment with the Principles. As of Dec. 31, 2019, CIC's AUM covered by the Principles totals \$415.9 million. Key takeaways from the assessment are:

**Areas of strength:**

- **Impact objectives:** CIC clearly defines social and environmental impact objectives at the portfolio- and community-levels. CIC collects a robust evidence base to support sector-specific theories of change, which leverage the UN SDG framework and are tied to positive, measurable impact KPIs.
- **Investor contribution:** CIC articulates its expected financial and non-financial contribution per investment, using a systematic, well-documented approach. Contribution is considered in the investment decision-making process.
- **Impact due diligence:** CIC's Impact Scorecard forms the basis for its standardized approach for assessing expected impact for all prospective investments and does so in alignment with the IMP dimensions.
- **Incorporation of lessons learned:** CIC incorporates lessons learned into strategic decisions and investment processes, as seen through both external reports and internal strategy tools / documents.

**Areas for improvement:**

- **ESG performance / risk management:** While CIC assesses a standard set of ESG factors for borrowers, it could consider developing a more comprehensive approach to managing and mitigating ESG risks and underperformance. As CIC develops this approach, there could be an opportunity to draw on industry standards.

**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.

<sup>1</sup> 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."

<sup>2</sup> Tideline's full assessment for CIC states each of the Principles, describes the CIC 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 CIC. Tideline has relied on the accuracy and completeness of any such information provided by CIC. The assessment results represent Tideline's professional judgment based on the procedures performed and information obtained.

VERIFIER STATEMENT

Independent Impact Management Verification

Prepared for Calvert Impact Capital (CIC): March 17, 2020



**DETAILED ASSESSMENT**

Tideline assessed CIC’s IM system on its degree of alignment with the Principles, using the following four ratings: Advanced (limited need for enhancement); High (a few opportunities for enhancement); Moderate (several opportunities for enhancement); and Low (substantial enhancement required).<sup>3</sup>

The chart below summarizes Tideline’s verification of CIC IM system:<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	ADVANCED
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	ADVANCED

<sup>3</sup> The decision to publicly disclose the results of Tideline’s detailed assessment, and the specific ratings assigned to each Principle, is left to the sole discretion of CIC.

<sup>4</sup> Tideline’s full assessment for CIC states each of the Principles, describes the CIC 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 CIC. Tideline has relied on the accuracy and completeness of any such information provided by CIC. The assessment results represent Tideline’s professional judgment based on the procedures performed and information obtained.