Disclosure Statement

Operating Principles for Impact Management

April 17, 2025

FinDev Canada 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.

This disclosure statement affirms that FinDev Canada's investments are managed in alignment with the Impact Principles. Total assets under management are **US$ 1,105 million*** as of December 31, 2024.

Lori Kerr, Chief Executive Officer

Stéphanie Émond, Chief Impact Officer

* Total assets under management refers to the value of outstanding financing and equity transactions for both their funded as well as committed yet unfunded amounts.

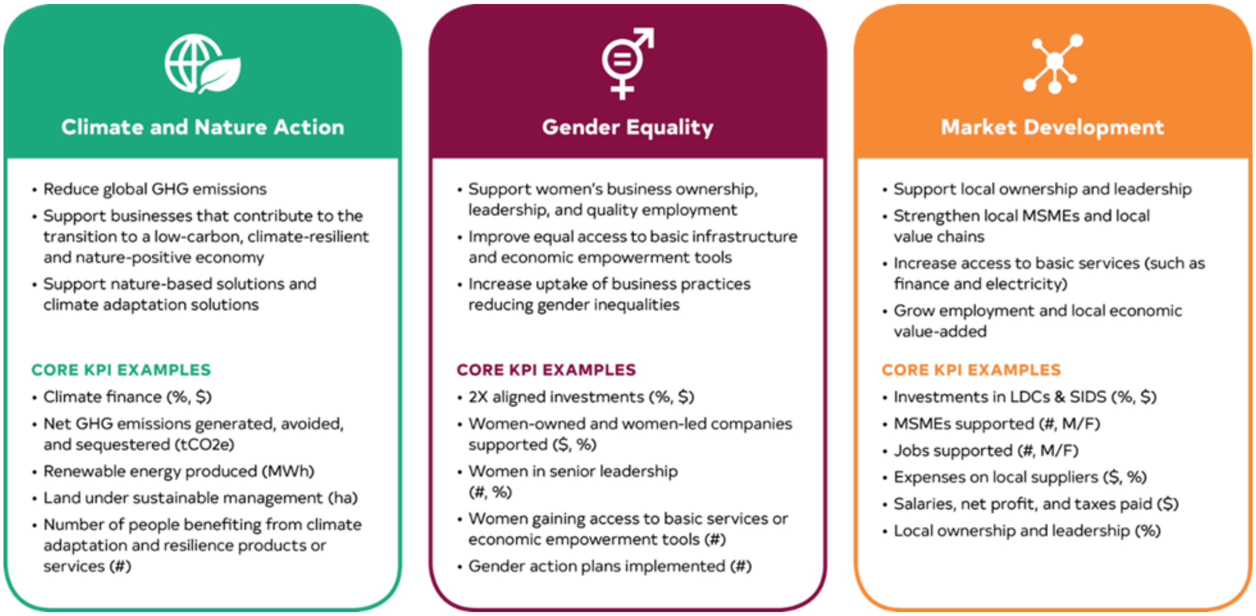
PRINCIPLE 1

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 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.

- FinDev Canada is Canada's bilateral development finance institution (DFI), established in 2018. We support development through the private sector by providing financing, investment, and blended finance solutions, as well as technical assistance and knowledge, to contribute to sustainable and inclusive growth in emerging markets and developing economies in alignment with the United Nations Sustainable Development Goals (SDGs) and Paris Agreement commitments. FinDev Canada has a geographic focus on Latin America, the Caribbean, the Indo-Pacific and Sub-Saharan Africa.
- Our Development Impact Policy (Impact Policy) sets out our strategic impact objectives in support of our corporate strategy, along with our intent to advance the development impact of FinDev Canada's financing and investments.
- The Impact Policy is an integral part of the overarching policy framework of the corporation and is complemented by our Gender Equality Policy, Climate Change Policy, and Environmental & Social Risk Policy. It is operationalized through our Approach to Development Impact ("Impact Approach"), a document that details our key development impact objectives, as well as our strategic intent and approach for making impactful investments.
- Having a dual mandate to achieve both development impact and financial sustainability, we are guided by three impact goals: (1) climate and nature action, (2) gender equality and (3) market development. Each of the three is underpinned by a set of key performance indicators (KPIs) (Figure 1).

FIGURE 1: FINDEV CANADA'S DEVELOPMENT IMPACT GOALS



- We align our development impact goals with the challenges prevailing in emerging markets and developing economies in the regions we serve and the SDGs.
- At the portfolio level, we define development impact targets. These are translated into annual targets based on a share of transactions that meet specific impact criteria *(for more details, please refer to Principle 2)*.
- Environmental, Social, Climate and Business Integrity risks are evaluated alongside the positive development impact outcomes *(for more details, please refer to Principle 5)*.

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.

- Our [Approach to Development Impact](#) guides our investment decisions and results reporting, supported by procedures to integrate impact considerations throughout the investment lifecycle. Figure 2 illustrates **how development impact is integrated at each stage of the investment process**.

FIGURE 2: FINDEV CANADA'S DEVELOPMENT IMPACT MANAGEMENT PROCESS

1. Pre-Screening	2. Due Diligence	3. Monitoring	4. Reporting	5. Exit
• Checking impact eligibility and fit • Estimating performance potential on development impact goals	• Quantifying expected impact • Agreeing on impact actions, KPIs and projections	• Tracking client level impact • Performing internal/ external impact assessments	• Publishing aggregated impact results of portfolio	• Assessing overall impact performance and sustainability beyond exit

- At the pre-screening stage, we assess the potential development impact of an investment opportunity against all three development impact goals. The assessment is based on the investment's alignment to our impact goals and the impact need(s) in the respective sector/country. At due diligence, we dive deeper to review how a prospective investment has the potential to **contribute towards our impact goals** (*for more details, please refer to Principle* 4). Later, at the asset monitoring stage, we track clients' actual performance against initial estimates, as well as aggregate data to better understand our portfolio's overall performance.
- For each investment we build **results matrices** to capture the anticipated change in specific impact outputs and outcomes. These results matrices are then updated with actual results during the monitoring phase. This allows us to validate the achievement of our clients' impact objectives using an evidence-based approach.
- At the portfolio level, we set **targets** based on the volume of investments that meet development impact criteria, specifically transactions that advance Gender Equality (2X Criteria[1]) and Climate Action (Climate Finance[2]), or that have exposure in Least Developed Countries (LDCs) and Small Islands and Developing States (SIDS). These targets are part of the **performance-based compensation program** for all employees. An internal impact dashboard enables the team to track portfolio results in real time.

[1] The 2X Challenge is a global DFI-led initiative that aims to mobilize substantial capital towards women's economic empowerment. To qualify under it, investments need to meet specific criteria, which has emerged as the standard criteria for gender-lens investing. See: https://www.2xchallenge.org/2xcriteria

[2] As per the MDB/IDFC Common Principles for Climate Change Mitigation & Adaptation Finance Tracking.

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.

- FinDev Canada aspires to offer both financial and non-financial value to our clients, based on the premise that, as a DFI supporting development through the private sector, we should contribute beyond what is available in the market without crowding out the private sector.
- The additionality of each investment —financial and non-financial — is assessed at pre-screening and during due diligence and described in internal investment recommendation memos. We developed an **Additionality Framework** that establishes criteria for the determination of additionality.
- For **financial additionality**, we describe to what extent FinDev Canada's investment helps provide:
  - improved availability of financing that is not offered by the private sector or at least not in sufficient quantities, and
  - improved terms and conditions suitable to clients' needs and not offered otherwise by the private sector.
- For **non-financial additionality**, we describe to what extent we help clients:
  - enhance their knowledge and skills,
  - improve working conditions for their employees and/or across their supply chain,
  - empower women they employ and/or in their customer base/portfolio/supply chain,
  - transition to a low-carbon economy and be resilient to climate change, and
  - raise their ESG management capacity to mitigate risks of negative ESG impacts.
- Through our Technical Assistance (TA) Facility, we aim to enable our clients to advance development impact outcomes, mitigate risks, and strengthen business performance. In particular, we support our clients advance their practices and performance on gender equality, climate and nature action, ESG and climate risk management, and selected business functions.
- To help identify and prioritize capacity building opportunities in the first two areas, we developed TA menus that outline strategic thematic interventions. The Gender Action TA Menu includes interventions aligned with the 2X Criteria, and the Climate Action TA Menu includes interventions in mitigation, adaptation, and strives to support clients integrate recommendations from the Taskforce on Climate-Related Financial Disclosures (TCFD).

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.

- A **development impact tool** helps us estimate the expected development impact for each of our transactions and to assess expected impact within our portfolio and across investment typologies. A governance framework guides the tool's maintenance and its periodic updates.
- At the pre-screening stage, using both quantitative and qualitative data, each opportunity is assessed based on **the development impact dimensions of a country's development needs and a transaction's alignment with our impact goals**. To assess the development need dimension, the tool incorporates a variety of economic and social indicators, such as the Economic Complexity Index[3], the Social Institutions and Gender Index[4] and the Global Adaptation Index[5]. To assess a transaction's impact alignment to our goals, at this early stage, we use readily available information of the company's business model, practices and reach.
- At due diligence, we build on the initial assessment by introducing **additional quantitative and qualitative data**. This includes a review of a company's expected economic performance and an estimation of the transactions' positive impact on the investment's area of influence (e.g. country or region).
- We undertake a **baseline assessment of gender equality in client operations**, to identify opportunities to strengthen gender outcomes as part of our engagement with the client. To do this, we leverage existing gender mainstreaming and assessment tools, such as the 2X Criteria and the Women's Empowerment Principles Gender Gap Analysis Tool[6], which are both widely used in the development finance sector and accessible to all private sector entities.
- We **assess climate change risks and opportunities** associated with every transaction. For climate change risks, we apply an approach developed with the Adaptation & Resilience Investors Collaborative and aligned with the TCFD recommendations. For climate change opportunities, we assess the climate change mitigation and adaptation potential of clients.
- In our analysis, we **distinguish between a company's current and future performance**. This allows us to assess where a client may be today versus their expected future state – based on projected activities and/or additional impact commitments – and to evaluate the degree of stretch to achieve these improved outcomes

[3] The economic complexity index is a measure of the productive capabilities of economic systems developed by Hidalgo and Haussman (2009).

[4] The Social Institution and Gender Index (SIGI) measures discriminatory social institutions in key areas that affect women's and girls' lives.
[5]The Global Adaptation Index measures a country's vulnerability to climate change and its readiness to adapt

[6] The Women's Empowerment Principles Gender Gap Analysis Tool (WEPs Tool) is a business-driven tool designed to help companies from around the world assess gender equality performance across the workplace, marketplace, and community. See https://weps-gapanalysis.org

and the associated risks of not achieving them. We recognize that some clients will be stronger on certain development impact areas than others; some will be further ahead on their development impact journeys while others might be just starting theirs.

- When the degree of stretch is high, or when there is clear room to support the company in expanding its current practices to deepen potential development impact, together with them and often alongside other DFIs, we **develop action plans with time-bound targets**. Wherever reasonable, we draw on our Technical Assistance Facility to support our clients in achieving these targets.
- Detailed development impact assessments, supported by action plans and targets where relevant, alongside ESG related concerns and other risks, are presented in the investment recommendation memos. The anticipated development impacts of a transaction are captured in a **theory of change**, summarizing how it contributes to FinDev Canada's impact goals and the SDGs. A results matrix is developed, outlining the key performance indicators that will be tracked. The results matrices form the basis for performing our annual impact reviews at the monitoring stage and to facilitate the evaluation of a transaction's overall impact performance.
- We also consider significant **risk factors that could disrupt potential development impact** through our environmental and social risk and business integrity review processes (*for more details, please refer to Impact Principle 5*).
- To ensure **alignment with generally accepted industry standards**, FinDev Canada's impact measurement approach draws on reporting standards such as the Harmonized Indicators for Private Sector Operations (HIPSO), the 2X Criteria and the Global Impact Investing Network (GIIN)'s Impact Reporting and Investment Standards Plus (IRIS+). We also encourage and participate in the harmonization of impact measurement approaches including the Joint Impact Model[7] and the Joint Impact Indicators[8].

[7] See https://www.jointimpactmodel.org/

[8] See https://indicators.ifipartnership.org/indicators/joint-impact-indicators-jii/

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.

- FinDev Canada is committed to applying rigorous ESG risk assessment and monitoring approaches throughout the lifecycle of our engagement with clients. During initial screening, we review the client's activities against our List of Excluded Activities, which prohibits investment in particularly high-risk sectors and contexts. **Initial environmental and social (E&S) and business integrity (BI) risk assessments, which consider inherent client, sector or market-specific risks, are also conducted** at the pre-screening stage.
- At due diligence, our E&S team reviews a **client's human rights and E&S performance** to identify potential risks and/or areas for improvement, a process based on our E&S Risk Policy. The policy draws on the IFC Performance Standards on Environmental and Social Sustainability[9], the most widely used set of E&S standards in the development finance sector, as well as its Interpretation Note on Financial Intermediaries[10] and its Environmental, Health and Safety Guidelines[11], where appropriate. Additional benchmarks may be applicable depending on a transaction's risk profile, sector, or operating context, for example the Center for Financial Inclusion's Principles of Client Protection[12], or commodity-specific certifications[13] when cited as a major component of a client's E&S risk management approach. In addition, given the cross-cutting nature of gender equality, we also consider **risk factors that could disrupt potential development impact** through our E&S review process, including **gender related risks** such as gender-based violence and harassment for workers, communities, and clients.
- Also at due diligence, our BI team reviews **the risk management systems a client has in place to manage exposure to internal BI risks** related to governance, corruption, fraud, money laundering and terrorist financing and sanctions exposure. The team considers the client's operating environment, business model, capacity and governance mechanisms, as well as the likelihood of risks occurring, their impacts (including on positive development impacts or environment and social performance), and may propose areas for improvement. Reviews are guided by international reference frameworks on the development and maintenance of effective BI risk management systems, the evolving financial crime regulatory landscape and expectations related to business ethics, transparency and accountability.

---

[9] See https://www.ifc.org/en/insights-reports/2012/ifc-performance-standards

[10] See https://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/sustainability-at-ifc/publications/publications_policy_interpretationnote-fi

[11] See https://www.ifc.org/en/insights-reports/2000/general-environmental-health-and-safety-guidelines

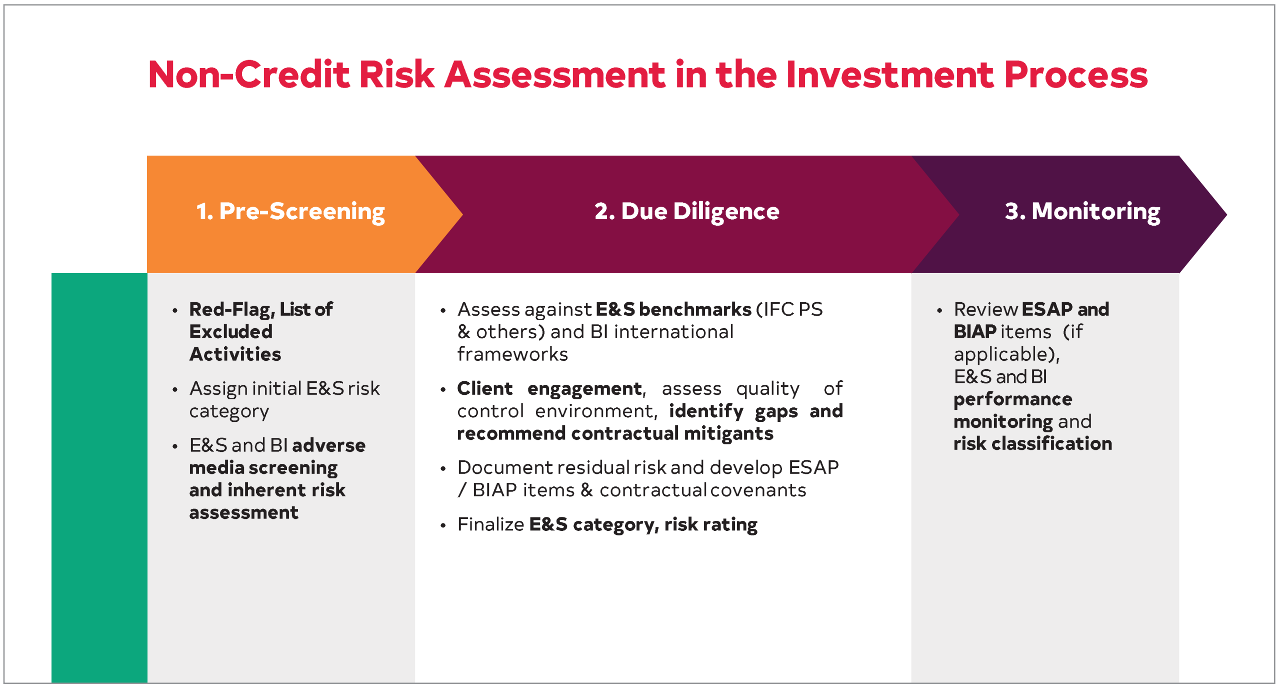
[12] See https://www.centerforfinancialinclusion.org/research/consumer-protection

[13] For example, Forest Stewardship Council's Forest Management Standard or Fair Trade.

- ESG assessment is embedded into our investment cycle, just like development impact — from pre-screening to due diligence, approval, monitoring and reporting (see fig. 4). Given that our clients and countries of investment may face different ESG challenges and capacity constraints, we recognize that **compliance needs to be progressive and based on reasonable timelines**, for example through the use of action plans and/or technical assistance to ensure ESG gaps are addressed appropriately.

- Once an investment is made, we continue to monitor its ESG performance and evaluate potential risks on an annual basis (or more frequently, if required), in accordance with transactional documentation requirements, including ESG performance reporting, ESG incident reporting and the delivery of required action plan items, as applicable. **FinDev Canada applies a dynamic risk classification approach** to facilitate regular assessments on ESG risks, throughout the transaction lifecycle.

FIGURE 4: ESG DUE DILIGENCE & MONITORING IN THE INVESTMENT CYCLE



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.

- Starting at due diligence, FinDev Canada will discuss and draft with a client **development impact and ESG reporting requirements and, where appropriate, support it with an action plan** which outlines expected annual activities and future milestones. Once the investment is approved, these commitments are written into a final contract with the client[14].

- Our monitoring activities integrate development impact and ESG considerations. The Impact, E&S, and BI teams collect and analyze relevant client data using monitoring reports and data collection systems. This information helps monitor an investment's progress against expectations and track performance, typically on an annual basis or more frequently if needed. During the monitoring phase, our development impact tool and results matrices are updated annually to reflect a transaction's progress towards development objectives and to quantify any deviations from expectations. We engage with clients as members of their Impact and ESG Committees and/or through one-on-one calls as appropriate.

- In the event that a client's performance is not aligned with impact or ESG expectations and/or contractual obligations, our approach is to engage with the client to understand the situation. We take a client centric approach, where they lead on a **remedial action plan**. We are committed to supporting our clients in achieving better outcomes while acknowledging that the journey to development impact is rarely straight and requires cooperation and adaptation to reach meaningful goals. In the event where underperformance is observed over a more extended period of time, we may add a client to an internal watchlist, prompting more formal tracking of performance and potentially other actions.

[14] Clients are required to submit regular impact and ESG reports in addition to notification requirements related to material ESG incidents impacting the environment, workers and local communities or related to governance.

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.

- FinDev Canada is committed to an impact-driven approach throughout the investment cycle with our clients — from pre-screening to exit. We believe that a sustainable exit starts at due diligence when a client's impact potential is assessed and development impact and ESG targets are set. In other words, the foundation of the exit process is already embedded throughout the investment process and will be further developed as our portfolio matures and more deals start exiting the portfolio.

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.

- We are building our transaction management system which will enable us to streamline and integrate reporting across Investments, Impact, E&S, BI and other areas of our operations. As an intermediate step, we developed an impact data solution with live dashboards that we currently use to review clients' performance, both at individual and portfolio levels. We update this information regularly and use it to inform our internal discussions, including those with the executive management and the Board.

- FinDev Canada's Transparency and Disclosure Policy demonstrates our commitment to transparent disclosure of investment activities, including requirements to publish a comprehensive summary of Anticipated Development Impacts and E&S due diligence processes and findings, within 90 days of signing for all investments[15]. In addition, we have made available on our website an overview of our portfolio, which provides additional information on our investments and contributions to our development impact goals.

- Furthermore, we report FinDev Canada's generated, avoided, and sequestered GHG emissions in alignment with the attribution approach from the PCAF Standard[16]. This is included in FinDev Canada's annual Climate-related disclosure, which summarizes how the TCFD recommendations are implemented across FinDev Canada.

- We also publish an annual impact report, which provides a comprehensive overview of our achievements and lessons learned in relation to our development impact goals.

---

[15] See website for transaction disclosures https://www.findevcanada.ca/en/what-guides-us/transparency-policy-and-approach

[16] See https://www.findevcanada.ca/en/what-we-do/climate-change-approach

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 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.

- This annual Disclosure Statement affirms FinDev Canada's alignment with the Impact Principles.
- In 2024, BlueMark, a leading provider of impact verification services in the impact investing market, performed an independent verification to assess the extent to which FinDev Canada's impact management system's tools and processes are aligned with the Impact Principles. Recommendations were provided to strengthen FinDev Canada's alignment with the highest standards of the Impact Principles. The results of the assessment have been published on our website[17].
- FinDev Canada remains committed to repeat the independent verification in 2027.

[17] See FinDev Canada-BlueMark_Verifier statement_Detailed assessment_2024