

# Verifier Statement

## *Independent Verification Report*

Prepared for SPE Capital: March 24, 2025

## Introduction

As a signatory of the Operating Principles for Impact Management (the Impact Principles)<sup>1</sup>, SPE Capital engaged BlueMark to undertake an independent verification of the alignment of SPE Capital's impact management (IM) system with the Impact Principles.<sup>2</sup> SPE Capital's assets under management covered by the Impact Principles (Covered Assets) totals \$429 million<sup>3</sup>, as of December 31<sup>st</sup>, 2024.

## Summary assessment conclusions

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

*Principle 1:* SPE Capital targets sustainable economic growth in Africa through five SDG-aligned impact themes. To further align, the firm should develop a theory of change linked to the fund's impact objectives, providing an evidence-based articulation of the challenges experienced by local stakeholders, how SPE's capital helps to address these challenges, and the impact outcomes sought.

*Principle 2:* SPE Capital leverages an Impact Assessment Tool to assess expected impact and monitor performance along five dimensions, assigning 0-5 points for each dimension. This enables the firm to derive a baseline, target, and actual impact score, allowing portfolio-wide impact aggregation. To further align, SPE Capital should consider developing an impact-linked incentive system.

*Principle 3:* SPE Capital contributes to the impact achievement of its portfolio companies by taking board seats, assisting companies to improve ESG practices, and providing capacity-building support. To further align, the firm should explicitly document its roles and efforts in implementing contribution activities and track the outcomes of actual contributions.

*Principle 4:* SPE Capital uses its proprietary Impact Assessment Tool to conduct a comprehensive assessment of a company's expected impact during the due diligence process, which aligns with the Impact Management Project's Five Dimensions of Impact. To further align, the firm should integrate an impact risk assessment and establish an impact eligibility threshold into the existing processes.

*Principle 5:* SPE Capital leverages an exclusion list, risk categorization, and third-party due diligence to integrate ESG considerations into investment decision-making. The firm's approach to support the mitigation of ESG risks is documented in ESG Impact Action Plans for each portfolio company and are periodically reviewed during the monitoring process.

*Principle 6:* SPE Capital monitors impact performance through regular meetings with portfolio companies and annual data collection using its ESGI KPI tracking tool. The firm reviews self-reported data provided by investees and actively addresses any instances of underperformance with portfolio companies.

*Principle 7:* SPE Capital should formalize a Responsible Exit Framework detailing the actions it will take throughout the investment lifecycle to increase the likelihood that impact will be sustained post-exit.

*Principle 8:* SPE Capital holds quarterly ESGI meetings to discuss key performance trends and review action items. The firm has refined its Impact Assessment Tool over time to incorporate best practices and lessons learned. To further align, the firm could further standardize the impact review process by documenting assessment of progress against key impact objectives, broader impacts (i.e., unintended impacts), explicit learning objectives, and qualitative successes/failures.

<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> The verification of SPE Capital was primarily conducted through BlueMark's Fund Impact Diagnostics (ID) rating assessment process. This verifier statement has been developed for SPE Capital as a supplement to demonstrate alignment with best practices.

<sup>3</sup> Assets under management figure as reflected in email correspondences as of March 2025. BlueMark's assessment did not include verification of the AUM figure.

# Verifier Statement

## *Independent Verification Report*

Prepared for SPE Capital: March 24, 2025

---

### Assessment methodology and scope

SPE Capital 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 March 2025. 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>4</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 SPE Capital staff responsible for defining and implementing the IM system;
3. Testing of selected SPE Capital transactions to check the application of the IM system; and
4. Delivery of detailed assessment findings to SPE Capital, 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 SPE Capital in accordance with the agreement between our firms, to assist SPE Capital in fulfilling Principle 9 of the Operating Principles for Impact Management. We permit SPE Capital to disclose this statement in its entirety online, or to furnish this statement to other interested parties to demonstrate SPE Capital'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 SPE Capital 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>4</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 SPE Capital. BlueMark has relied on the accuracy and completeness of any such information provided by SPE Capital. The assessment results represent BlueMark's professional judgment based on the procedures performed and information obtained from SPE Capital.