THE ISLAMIC CORPORATION FOR THE DEVELOPMENT OF THE PRIVATE SECTOR (ICD)

DISCLOSURE STATEMENT 2022
Operating Principles for Impact Management

The Islamic Corporation for the Development of the Private Sector (ICD) 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. They draw on emerging best practices from a range of asset managers, asset owners, asset allocators, and development finance institutions.

This Disclosure Statement affirms that ICD's core business, including: (a) impact management systems; (b) policies and practices; and (c) investment services (including financing, equity, and funds) are managed in alignment with the Impact Principles and in compliance with Shariah Principles. The total assets of ICD under management in alignment with the Impact Principles is USD 2,119 million as of December 31st, 2022.

For and on behalf of

The Islamic Corporation for the Development of the Private Sector

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For Eng. Hani Salem Sonbol

Acting Chief Executive Officer

Date: July 31, 2023

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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.

- As the private sector arm of the Islamic Development Bank (IsDB) Group operating in 55 member countries, the ICD plays an increasingly important role in building enabling environments for the private sector in both middle-income and the remaining low-income countries. The ICD emphasizes inclusive growth that leads to an expansion of opportunities that are accompanied by measures to ensure that the poor and disadvantaged are able to access these opportunities and are not left behind.

- ICD's mission is to complement the role played by the IsDB through the development and promotion of the private sector as a vehicle for economic growth and prosperity. ICD actively seeks to identify opportunities that could function as engines of growth and nurture these opportunities through a range of financial products and services.

- In line with its mandate and expertise, ICD aims to fulfil two purposes:
  - Support the private sector development in member countries including small, medium and large private enterprises via direct and indirect provision of financial products and services.
  - Strengthen the Islamic finance ecosystem within member countries as enabling environment for private sector growth including unconstrained access to suitable financial products and services, availability of required infrastructure and an enabling regulatory environment.

- ICD is a unique DFI, as it offers exclusively Shariah-compatible financing for private sector in its member countries. Moreover, the promotion of Islamic finance and the deepening of Islamic financial intermediation objectives add to ICD's uniqueness.

- In doing so, ICD focuses on a broad definition of development effectiveness. It takes into special account the United Nations (UN) Sustainable Development Goals (SDGs). ICD applies a holistic approach in the sense that it tries to capture all impacted SDGs; directly & indirectly and intended & unintended.

- At the same time, ICD has developed its own SDGs Theory of Change (ToC), which is a specific oriented approach, as summarized below:
  - ICD considers three of the SDGs as particularly important and directly and indirectly targets these through its investments:
    - **SDG 7:** "Affordable and clean energy", **SDG 8:** "Decent Work and Economic Growth" and **SDG 9**: "Industry, Innovation and Infrastructure"
  - Moreover, ICD aims at improving the enabling environment for economic growth and facilitating interaction between key stakeholders by emphasizing two additional SDGs:
    - **SDG 13**: "Climate Action" and **SDG 17**: "Partnership for the Goals".
  - Through its actions, ICD aims to achieve indirect impact on five further SDGs through its investments and engagement:
    - **SDG 1**: "No Poverty", **SDG 2:** "Zero Hunger", **SDG 3:** "Good Health and Well-Being", **SDG 4**: "Quality Education" and **SDG 5**: "Gender Equality".

- In line with the defined impact objectives, ICD has established the following investment strategies with the aim of generating identifiable, positive and measurable social and environmental benefits and outcomes:
    - Provide capital-efficient products - Line of Finance and Term Finance;
    - Focus on key investment sectors: Financial, Energy, Industrial, Healthcare and Agribusiness;
    - Achieve SDGs by ensuring they are mainstreamed into the operations of investee companies;
    - Increase development impact by supporting new jobs, reaching Small to Medium Enterprises (SMEs) and providing people with access to Islamic finance; and
    - Introduce new products and further build up global private sector platform.

- **Development Targets:2023-2025**

Targets	2023	2024	2025	total
New Jobs	24,136	33,812	38,860	**96,808**
Reach to SMEs	4,169	5,840	6,712	**16,721**
Access to Islamic Finance	43,884	61,476	70,654	**176,014**

- ICD performs ex-ante assessment exercise to estimate the intended impact of each of its interventions and portfolio considering the size of its planned investment.

Principle 2: Manage strategic impact on a portfolio basis.

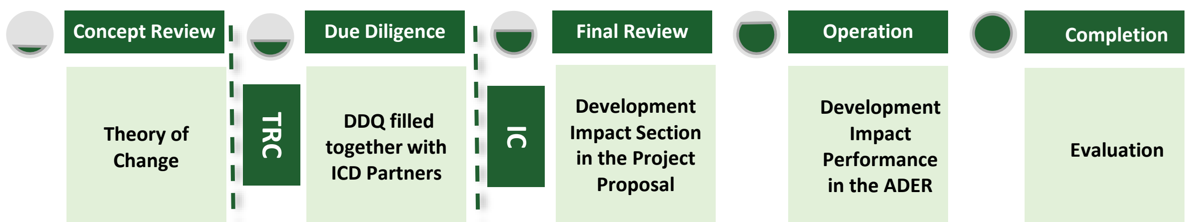
The Manager shall have a process to manage impact achievement on a portfolio basis. The objective of the process is to establish and monitor impact performance for the whole portfolio, while recognizing that impact may vary across individual investments in the portfolio. As part of the process, the Manager shall consider aligning staff incentive systems with the achievement of impact, as well as with financial performance.

- ICD is at its core a development financial institution seeking to strengthen the private sector in its member countries. As such, it formulated “ICD’s SDGs ToC” on a strategic level, which serves as a reference point for all investment and engagement activities to achieve impact across a defined set of SDGs. At the operational level, ICD will continue to define targets, measure contributions to the SDGs in focus, and ensure investment decisions are made based on development effectiveness considerations.

- ICD does this by ensuring continuous application and implementation of dedicated development effectiveness assessment tools and processes in its investment analysis and decision making and applying a holistic view on an investment’s i) strategic alignment to ICD’s mandate, ii) contribution to SDGs as well as iii) additionality or contribution of ICD’s intervention (financial or non-financial). Furthermore, ICD will continue its efforts in measurement of development impact across existing activities via structured data collection to derive insights for further enhancement and guidance for its business operations.

- ICD has developed the Development Indicators Monitoring System (DIMS) to track, assess and report the impact or outcome of its interventions. The impact performances are measured at three levels: individual intervention, portfolio, and geography. The impacts are assessed on an annual basis at portfolio level and for selected interventions. These outcomes are measured on five (5) performance dimensions, and they are: Financial Success, Promotion of Islamic Finance, Economic Benefits, Environmental and Social Effects and Private Sector Development, which are largely based on the Evaluation Cooperation Group (ECG) Good Practice Standards (GPS) for Evaluation of Private Sector Operations. The DIMS involves the following 5-steps embedded in every stage of the ICD’s project cycle:

1. The DIMS starts during the Concept Review by agreeing on the ToC, which identifies the development results *(inputs, outputs, outcomes, and impacts*) and the causal relationships between them. This is presented to the Technical Review Committee (TRC) for clearance.
2. During the Due Diligence and appraisal stage, the Business Officer (BO) selects the relevant indicators, based on the logic outlined and establishes with the client the baseline and the target of each indicator to allow measuring changes down the road. The Due Diligence may involve the M&E team.
3. During the Final Review, the BO develops with the support of the M&E team, the Project Proposal development impact section, which along with the Due Diligence Development Impact Questionnaire (DDQ) will be used to develop the Development Effectiveness Note (DEN).
4. During the implementation phase of an operation, the BO undertakes an annual project supervision report for active projects to monitor the development results (indicators status) and draw relevant lessons learned.
5. Upon completion of the project, the M&E team undertakes an expanded supervision exercise and report on the findings and generate lessons learned. The M&E team can also undertake Real-Time Evaluation for recent projects upon management request.



- Business Departments (BDs) as well as Development Effectiveness Office (DEO) work with the objective of contributing towards the development mandate of ICD within the framework of Board approved business /operational plan and KPI targets. Annual performance targets are usually cascaded to respective professionals to ensure achievement of set goals and development impacts within the framework of the ICD's 3-year strategy.

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

- The goal of ICD's Development Effectiveness Policy is to improve the development impact of ICD via (i) the maximization of ICD's contribution to enhancing the factors and conditions that enable member countries to achieve their development goals (ii) the continuous enhancement of ICD internal operations which can be achieved through increasing staff awareness and knowledge. The goal is achieved through continuous improvement of ICD's operations in terms of design, implementation and results.

- Moreover, part of the continuous enhancement and updates was for the Development Effectiveness Department (DED) to transform into the "Development Effectiveness Office – (DEO)". The DEO will become a leaner more focused Office, tasked with providing guidance on all matters related to Development Effectiveness (DE). The DEO reports directly to the CEO.

- ICD's strategic goal is to be the key enabler of private sector development in its member countries, and this is supported by five key pillars. In alignment with ICD's Articles of Agreement (AoA) and Investment Guidelines, these five key pillars place the "additionality" of the investment in full focus. Central to ICD strategy is to serve the private sector within its member countries through financial institutions within its network that act as "channels", thereby helping to mobilize additional private sector resources and thus multiplying the development impact.

- The five pillars are:
  - Assist, alone or in connection with other sources of finance, in the financing of the establishment, expansion and modernization of private enterprises;
  - Facilitate their access to private and public capital, domestic and foreign, including access to capital markets;
  - Stimulate the development of investment opportunities conducive to the flow of private capital;
  - Contribute to the development and diversification of financial products;
  - Provide technical assistance to private projects.

- For each intervention, growth potential and ability to achieve positive development impact are assessed to determine their suitability for investment. The assessment is done at each stage of the project cycle including Concept Review, Due Diligence, Final Review, Portfolio Management and Closing. y. These are detailed as below:

  a. Concept Review – The Theory of Change

  The ToC is a powerful tool to make each step in the logic of a program explicit, from activities to outputs to outcomes and to impacts. This clarifies what the project will be doing and what changes are expected as a result. This can improve Management, Communication and Results Management.

  Project Officers estimate development impact by initiating the ToC of the project, and thereafter discuss it with the Monitoring and Evaluation (M&E) team. Once the ToC is fixed, the M&E team helps the Project Officer in filling out the DDQ.

  b. Due Diligence

  After preparation of DDQ, Project Officers gathers sufficient information from that questionnaire to design the Logframe of the project comprising the ToC, the development indicators baselines and targets, and the key assumptions.

  A baseline means the value of the indicator before ICD's involvement and establishes a foundation to measure future change. With baseline data, current progress can be measured against the situation that prevailed before ICD intervention. The target means the expected results to be achieved by the completion of the project or within 3-5 years.

  c. Final Review

  After completion of the due diligence process, the Project Officer gathers sufficient information to complete the Development Impact Section. It comprises the following: (i) the project relevance (ii) the narrative of the ToC, (iii) ICD Additionality, (iv) the lessons learned from previous interventions, and (v) the Logframe.

  i. **Project relevance** details out the consistency of the project with ICD Strategy and the country development strategy.

  ii. **Theory of Change** provides the detailed results of the due diligence exercise.

iii. **ICD Additionality** describes ICD's Special Role, and its added unique value, financial as well as non-financial, to the project.

iv. L**essons learned** are drawn from similar interventions to prepare the project design and implementation strategy such that ICD's limited resources are spent wisely.

These lessons are taken out from: (i) the Expanded Project Supervision Reports ("**XPSR**") conducted by the M&E team during evaluation exercises for mature projects, (ii) the Project Supervision Reports (PSR) prepared by the Business Units as part of their Annual Business Reviews for active projects, and (iii) GEOD's evaluation reports.

v. **Logframe or "Logical Framework"** is a matrix that serves to translate the ToC into action.

d. Portfolio Management

Following signing of transaction documents and disbursement, the Project Officer undertakes an annual review of each operation in collaboration with the M&E team to assess the progress of the development indicators defined at the appraisal stage of the relevant transaction. The findings will be the basis for developing the following reports:

- Project Supervision Reports to be prepared by the Portfolio Management Division;
- Annual Development Effectiveness Report (ADER) to be prepared and coordinated by the M&E team;
- Country Briefs to be prepared by the M&E team; and
- Sector Briefs to be prepared by the M&E team.

e. Closing

For projects which have reached maturity, (i.e., have had enough time to have an impact on the ground), the M&E team prepares an XPSR. The objective of the XPSR is to assess the contribution of the project to the ICD's mandate, its impact on ICD's financial performance, and the ICD's work quality in executing the operation. The XPSR findings enable the management and the Project Officers to learn from past operations, identify needs for systematic improvements in new operations, and improve selection of new interventions.

- ICD assesses and determines the impact outcome of its investments on an annual basis at portfolio level and for selected interventions. The portfolio level assessment is reported through ADER, and interventional level investments are reported through PSR and XPSR.

- In case of exit from ICD's equity/fund investments, the BDs conducts the exit analysis to evaluate the actual realization of the relevant investment development outcomes vis-à-vis the impact objectives and exit strategies approved at the time of investment.

- In addition to its financial activities, ICD also provides non-financial advisory and technical support to its clients. Such non-financial channels have proven their ability in contributing to the achievement of ICD overall developmental mandate. The beneficiaries of these interventions have over the years acquired the needed knowledge to develop and improve their development impact systems to be also contributors to the achievements of the SDGs.

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.

- SDGs analysis is included and taken into account in the quality at entry assessment process of ICD's investments. It starts with the project concept approval where the ToC of the project is linked to SDGs. Then, a DDQ including SDGs related questions is submitted to the client to help prepare the full project proposal. Finally, a Development Effectiveness Note (DEN) is prepared and taken into account by the Investment Committee in its decision making. The DEN covers rationale behind ICD's involvement in the project, development challenges, development objectives, contribution/alignment to SDGs, country and ICD priorities, development benefits of the project and ICD Additionality (Financial and Non-Financial).

- ICD has also introduced a customized Assessment System to assess its potential proposals in terms of development effectiveness which is a requirement for ICD to distribute limited resources in the most sustainable and efficient manner. This Assessment System is being upgraded after first initial piloting and is planned to be relaunched accordingly. The objectives of the Assessment System are to:
  - estimate the development impact of investment projects and advisory service proposals submitted for approval;
  - identify projects that maximize ICD's Development Impact at appraisal;
  - provide evidence for effectiveness and accountability;
  - assign ratings of project expected performance/development outcomes based on how well the project is contributing to ICD's goals;
  - promote and support clients/partners engagement towards achieving targeted development impact and the desired financial return.

- It does so by assessing the proposal against five outcome categories (i) Strategic alignment with ICD's mandate, (ii) Fragility index of the country, (iii) Development effects and contribution to the SDGs, (vi) Financial performance and (v) ICD's Additionality.

- The Assessment System comprises Impact categories with indicators that capture the key elements of the ToC:
  - First, strategic alignment with a focus on the fragility of the country and the project's alignment with beneficiary country's priorities;
  - Second, additionality to assess the unique contribution of ICD beyond what is available in the market;
  - Third, project outcomes using the DFIs' Harmonized Indicators for Private Sector Operations (HIPSO);
  - Fourth, SDGs contribution to identify at least one SDG indicator.

- The Overall Development Outcome rating of the project in this case will be a synthesis of the project's performance in all the five outcome categories mentioned above.

- Regular project supervisions are undertaken by ICD with PSR & XPSR being produced, which include details of significant risk factors that could result in the impact varying from the ex-ante expectations. If any intervention is yielding higher than intended impact, ICD management further explores investment opportunities to increase the impact of the intervention considering the impact objectives and investment strategy including exit strategy of ICD.

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.

- As a part of the due diligence process, ICD procures assessment of the potential environmental, social and governance risks of the projects it finances or invests in (using reputable advisors/consultants as necessary) which comes with proposed mitigation measures/plans to address any identified risk. Project Companies financed by ICD or equity investee companies usually lead this process having regard to ICD's requirements and the outcome of this assessment exercise is a key consideration in ensuring effective decision making on Investments/Financing Proposals in ICD.

- Moreover, the XPSR is used to also monitor the potential/actual operational risks that may arise as a result of investee operations.

- ICD also nominates senior and experienced staff to the boards of investee companies to help them strengthen the ESG standards.

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.

- The Development Effectiveness approach of the ICD measures/ assesses the development impact of a private venture on the society or the economy as a whole. The performance dimensions are largely based on the Evaluation Cooperation Group (ECG) Good Practice Standards (GPS) for Evaluation of Private Sector Operations. The impact of the project on various stakeholders is assessed by examining project performance in five key areas: Financial Success, Promotion of Islamic Finance, Economic Benefits, Environmental, Social, Health & Safety (SHS) Effects, and Private Sector Development.

a. Financial Success

This performance dimension measures the intervention's actual and/or projected financial results on the client partner and the sub-interventions from the point of view of shareholders and financiers of these partners. The intervention effects on this group of stakeholders are measured by metrics targeting the intervention’s return on investment such as Return on Invested Capital (ROIC) compared to the Weighted Average Cost of Capital (WACC), the Financial Rate of Return (FRR), or other relevant financial success metrics as applicable.

b. Promoting Financial Inclusion and Access to Islamic Finance

ICD aims at playing a catalytic role in promoting financial inclusion through facilitating access and strengthening the performance of Islamic financial institution and enhancing conditions conducive to the mobilization of financial resources for private enterprises in ICD member countries. This objective shall be measured in terms of improvements in the condition, size, or efficiency of the financial sector and the improvements in the business environment as a whole, which is brought about as a result of the intervention(s) of ICD. Improving access to Islamic finance and increasing the depth and breadth of Islamic financial intermediation affects all those who are interested in Shariah compliant financing.

c. Economic Benefits

This performance dimension accounts for the intervention's effects on the economy as a whole and tries to gauge the intervention's effects on economic growth and improvement of people's living standards. Intervention effects on stakeholders such as government, customers, employees, and suppliers, is taken into consideration. Government benefits are measured mainly from the perspective of taxes, license fees, royalties, levies, duties and other payments that are made to government (directly or indirectly) as a result of the intervention. A satisfactory intervention generally has annual Economic Return on Invested Capital (EROIC) that is higher than the Weighted Average Cost of Capital (WACC) or other relevant economic benefits metrics as applicable; this metric takes into consideration the benefits and costs to the society other than the financial return accruing to investors.

d. Environmental and Social Impact

ICD is committed to carrying out its operations in an environmentally and socially responsible manner. Negative environmental externalities carry a cost that impacts future generations and thus go against the basic principles of sustainable development. As such, it is one of the major objectives of ICD's interventions to fund projects or catalyze investments in projects with sound environmental and social impact practices.

e. Private Sector Development

This performance dimension measures the extent to which the intervention contributed to private sector development in the member countries via the effect it has on a group of stakeholders, which includes producers of complementary products, competitors, and new entrants to the sector/ industry. Changes in the legal and regulatory framework intended to promote private sector growth, demonstration effects that includes best practice in corporate governance, linkages to SMEs, technology or knowledge transfer, and increased competition are all examples of private sector development outcomes that ICD is targeting.
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The Overall Development Outcome rating of each intervention in this case will be a synthesis of the intervention's performance in all the five areas highlighted in paragraphs (a-e) above.

- In ICD, the ex-post analysis is two-fold: (i) the annual survey to track all active investments and advisory projects, (ii) the ex-post evaluation for matured projects.

- The annual development effectiveness survey covers all HIPSO development indicators. The survey was customized to include the SDGs. This survey is the principal source of evidence of the ADER.

- The M&E function under the DEO conducts a number of evaluation missions to mature projects where a more in-depth data is collected and analyzed. The evaluation approach follows the MDBs' Evaluation Cooperation Group Good Practice Standards for Private Sector Operations.

- ICD has developed an in-house SDG Development Indicator Monitoring System (DIMS) to ensure a continuous collection and flow of data that enables ICD management to consistently manage, collect and report on the development impact of its projects. The model drawn from the SDG indicators and HIPSO metrics allows the user to generate real time automated dashboards based on the observed impact against the customized reporting formats. In short, the model provides a real-time snapshot of how the project is performing regarding achieving SDGs and the project's stated objectives and enables taking appropriate strategic decisions.

- Moreover, to help complement the DIMS, ICD has developed a customized Project Assessment Grading System (PAGS) to assess its potential proposals in terms of development effectiveness which is a requirement for ICD to distribute its resources in a most sustainable and efficient manner. PAGS is a robust in-house customized tool which will help guide ICD to assess its interventions not only from a risk perspective, but also from a development perspective.

- PAGS objectives include:

  - estimate the development impact of interventions submitted for approval;
  - identify interventions that maximize ICD's Development Impact at appraisal;
  - provide evidence for effectiveness and accountability;
  - assign ratings/scoring of expected performance based on how well the intervention aims to contribute to ICD's goals;
  - promote and support clients/partners engagement towards development impact alongside financial return.

- In the event of impact underperformance or other negative effects, ICD either opt to update the impact targets or explore the exit as per the approved exit strategy.

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.

- As the timing of the exit could have profound impact on the overall development results of the ICD, the appropriate internal body examines proposals for exiting from investments and make recommendations on the most optimal strategy for the eventual realization of each investment in coordination with the Development Effectiveness Office. Examination of the exit proposals includes evaluation of actual development impacts achieved to ensure the same are in line with the exit strategy. The exit strategy includes financial stability of the investee company at the end of investment period so that it can independently sustain the SDG goals targeted by ICD.

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.

- ICD conducts surveys along with the portfolio companies to collect data and compare the expected vis-à-vis actual impacts of an investment.

- Any lessons learned from the above analysis are used to modify the portfolio composition with the objective to achieve the impact objectives at the portfolio level.

- ICD constantly aligns itself with other leading DFIs through different shared investments and co-financing interventions. This allows ICD and its partner investee companies to subscribe to the latest best practices regarding development impacts. ICD also redefines its investment strategy if the potential investments show positive signs of yielding greater development impact and the same is in line with ICD risk and strategy framework.

- The overall aim is to improve the decision-making process to allow for greater leverage and better usage of ICD resources towards its development mandate as prescribed by the Board.

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 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.

- This Disclosure Statement shall serve to re-affirm the alignment of ICD's procedures with the Impact Principles and will be updated annually considering the requirement of this Principle.

- This Disclosure Statement shall be independently verified to ensure the alignment of ICD's impact policies with the Impact Principles.

- The independent assurance report on the alignment of ICD with the Operating Principles for Impact Management for the last year is available at **https://icd-ps.org/en/publications**

- Most Recent Review: July 2021
- Next Planned Review: July 2024