

Impact Principles Disclosure Statement 2024



TRILLIMPACT

DISCLOSURE STATEMENT 2024

This Disclosure Statement affirms that Trill Impact has the policies and procedures in place to manage impact investments in accordance with the Operating Principles for Impact Management (the “Impact Principles”).

The Impact Principles were launched in April 2019, to provide a framework to investors for the design and implementation of their impact management strategy, ensuring that impact considerations are integrated throughout the investment lifecycle. Trill Impact is an independent impact investment advisory firm who signed the Impact Principles in February 2020. The Impact Principles have been embedded into Trill Impact’s strategies from inception. Trill Impact aims to create a measurable, positive impact and contribute to achieving the Sustainable Development Goals, while generating attractive financial returns. This Disclosure Statement affirms that Trill Impact has the policies and procedures in place to manage impact investments in accordance with the Impact Principles.

This Disclosure Statement applies to two of Trill Impact’s three investment strategies: Buyout and Ventures.

Trill Impact’s covered assets under advisory management is EUR 1.3 billion as of 28th of February 2025.

Trill Impact AB 28 February 2025.

PRINCIPLE 1

Define strategic impact objective(s) consistent with the investment strategy

PRINCIPLE

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.

DISCLOSURE STATEMENT

- Trill Impact aspires to make a lasting positive contribution to people, society and the planet. Each investment must actively advance at least one of the UN's seventeen Sustainable Development Goals ("SDGs").
- Each investment must contribute to an environmental and/or social objective and be backed by a credible 'Impact Thesis'. The Impact Thesis specifies Trill Impact's view on how each investment through its inputs, activities, and outputs over time contributes to reductions in SDG gaps, and in applicable cases, specifies its eligibility under the EU Taxonomy Regulation.
- Simultaneously, each investment should follow good governance practices and do no significant harm (DNSH) to any other environmental or social objectives within the meaning of the Sustainable Finance Disclosure Regulation (SFDR).
- Trill Impact seeks to apply guidance as a member of leading sustainability initiatives, such as Swedish and German National Advisory Boards for Impact Investing, GIIN, EDCI and Net Zero Asset Manager Alliance.
- Trill Impact undertakes thematic and sector-level research in targeted markets to inform the investment strategy, and has standardized impact criteria drawing on industry standards, external market experts and academic sources, as well as commercial and financial criteria.
- Trill Impact has developed a methodology for assessing the proportionality of impact to the overall portfolio size by drawing on the Impact Frontier's ABC framework to classify the impact of companies. Trill Impact has developed firm, strategy and transaction-level theories of change linked to its overarching themes of 'Sustainable Planet, Healthy People, and Resilient Society', including processes for compiling supporting research in the investment processes.

PRINCIPLE 2 (1/2)

Manage strategic impact on a portfolio basis

PRINCIPLE

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.

DISCLOSURE STATEMENT

- Trill Impact’s policies and processes to manage impact are applied throughout the entire portfolio and all portfolio companies are expected to comply with Trill Impact’s Impact Investment and Ownership policy, that is reviewed on a regular basis.
- Trill Impact has developed an impact framework (i.e., the IMPACT model) that facilitates the assessment of impact and environmental, social and corporate governance (ESG) aspects throughout the transaction lifecycle and effectively allows for management of impact and ESG aspects across the portfolio.
- As part of the framework, a proprietary Impact Scorecard is used to gauge the estimated performance of each investment opportunity against the Impact Frontiers’ Five Dimensions of Impact – What (is the type of impact), Who (benefits), How Much (do they benefit), Contribution (of the company to this impact), and Risk (of the impact not materializing).
- The Impact Scorecard is complemented with an ESG analysis based on regulatory, sector and geographic guidance.
- Trill Impact’s assessment, conclusions, and recommendations are included in Trill Impact advisory’s Investment Advisory Committee materials, discussion, and recommendation. The Investment Advisory Committee(s) includes Trill Impact advisory’s Impact Partner.
- Trill Impact agrees upon impact and ESG objectives and measurement of related KPIs with management of portfolio companies prior to closing. Required actions are integrated into a value creation impact plan. While impact and material ESG measurements vary across individual investments, certain ESG measurements are aggregated across the entire portfolio. This includes metrics with regards to GHG emissions, diversity, employee engagement and corporate governance.
- Post-closing, Impact and ESG management, measurement, and quarterly reporting are part of the portfolio management process.
- Trill Impact evaluates operations, business activities, and performance against financial, impact and ESG targets through participation in each portfolio company’s Board. Portfolio company reviews are also conducted where impact and ESG progress are assessed and addressed.

PRINCIPLE 2 (2/2)

Manage strategic impact on a portfolio basis

- Trill Impact and portfolio company management remuneration structures are tied via several mechanisms to impact and ESG ambitions. External financing is partially linked to Impact and ESG KPIs and targets tailored to each investment. Further, portfolio company management variable pay is also tied to the achievement of certain impact and ESG KPIs.
- As part of the annual employee review process, Trill Impact conducts anonymized 360-degree feedback, which serves as the foundation for employees' performance evaluations. This feedback mechanism also takes into account an individuals' contribution to leading impact/ESG investing practices.
- Impact performance is measured, monitored, and reported at the strategy and portfolio company level to investors quarterly and annually. The Impact KPIs and the actual performance is also presented in Trill Impact's Annual Impact Review, see for example the 2023 version [here](#).



PRINCIPLE 3 (1/2)

Establish the Manager's contribution to the achievement of impact

PRINCIPLE

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.

DISCLOSURE STATEMENT

- Trill Impact's Investment Advisory Committee documentation includes an assessment to establish a credible, evidence-based impact thesis, using the [Impact Frontier's five dimensions of impact](#) (IMP). As part of this assessment, Trill Impact's contribution to the achievement of impact is defined and documented, in addition to the portfolio company's contribution. Trill Impact's contribution to the achievement of impact can take different forms, including:
 - Provide expertise and know-how via Trill Impact Advisory's impact and investment professionals, of which members sit on the Board of portfolio companies.
 - Pursue active engagement with the Board and Management to discuss the ways in which impact matters in each individual portfolio company and across its products and markets.
 - Develop impact KPIs and targets aligned with management remuneration and financing arrangements.
- Pursue a two-phased approach to impact & ESG value creation, split between "Foundational Practices" (Phase 1) and "Advanced Practices" (Phase 2). Both are defined as part of a value creation impact plan for all portfolio companies contributing to the achievement of set impact and ESG objectives and targets. Plans are drafted in pre-signing meetings and finalized 6-12 months post-investment with management. The progress of value creation initiatives for each portfolio company are tracked quarterly.
 - "Foundational practices" (Phase 1) are focused on setting the baseline and targets for material impact & ESG topics in combination with an implementation of critical improvement measures (identified during the DD).
 - "Advanced Practices" (Phase 2) are tailored interventions for portfolio companies to simultaneously drive commercial and impact value creation in a synergistic manner. The framework is consistent with Trill Impact's existing proprietary adaptation of the IMP dimensions of scale, depth and duration.
- Appoint dedicated impact and ESG responsables at portfolio company level, responsible for overseeing and reporting on the relevant initiatives.
- Provide a portfolio-wide program that brings together employees with responsibility for impact and ESG, that was first launched in 2022 and consists of both educational and practical initiatives related to impact and ESG. The portfolio companies are also provided access to working tools and templates from Trill Impact Advisory.

PRINCIPLE 3 (2/2)

Establish the Manager's contribution to the achievement of impact

- Source industrial and sustainability experts to support portfolio companies in achieving their impact objectives using a variety of support, tools and expertise.
- Ensure adequate documentation and tracking of expected and actual contribution to impact and risks through monitoring of relevant KPIs and periodic surveys.



PRINCIPLE 4

Assess the expected impact of each investment, based on a systematic approach

PRINCIPLE

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.

DISCLOSURE STATEMENT

- Trill Impact uses a systematic approach to assess and quantify each target investment's current and expected impact in the sourcing and due diligence stages based on the [Impact Frontier's ABC classification](#) and Trill Impact's proprietary Impact Scorecard, using the Impact Frontier's five dimensions of impact. The expected status is classified, and activities required to increase the impact and mitigate impact risks are defined. Broader impact & ESG performance is assessed in relation to international best practices as defined by SASB, UN PRI, and other reputable sources including those for specific sectors.
- Pipeline opportunities are screened early on for impact contribution using a simplified version of the proprietary Impact Scorecard. Trill Impact conducts research to identify the most pressing environmental and social challenges in target markets with respect to SDG gaps as well as research on unintended impact risks as part of its due diligence process.
- In addition, Trill Impact has developed an impact heatmap highlighting sustainable investment opportunities to enable proactive sourcing. Proactive sourcing efforts are further complemented by deep dive subsector studies where impact and investment professionals collaborate to identify and target companies that are attractive from both a commercial and impact perspective.
- Transaction level theories of change are developed and where possible, industry accepted catalogues of metrics (companies' IRIS+ impact metrics) are used to identify relevant metrics that contribute to locally/nationally relevant SDG targets. Theories of change, along with impact and ESG KPIs are set with portfolio companies' ex-ante and ongoing quantitative and qualitative monitoring continues throughout the lifecycle of the investment.
- All of the above forms a standard part of Trill Impact's Investment Advisory Committee documentation, discussion, and recommendation.

PRINCIPLE 5

Assess, address, monitor, and manage potential negative impacts of each investment

PRINCIPLE

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.

DISCLOSURE STATEMENT

- Trill Impact is a signatory to the [Principles for Responsible Investment \(PRI\)](#) and believes that environmental, social, and corporate governance (ESG) issues can affect portfolios companies' performance.
- Trill Impact has a systematic approach to assess, address, monitor, and manage potential negative impacts of each investment. An ESG assessment is conducted for all investments during the initial screening and due diligence phase using regulatory guidance and industry frameworks, most notably IFC's Environmental and Social Performance Standards, the IFC EHS Guidelines, relevant ILO conventions, the OECD Guidelines for Multinational Enterprises, and the UN Guiding Principles on Business and Human Rights and various ESG topics under the Sustainable Finance Disclosure Regulation (SFDR).

- The ESG assessment identifies gaps with good industry practice. Key objectives and related KPIs to mitigate potential negative impacts of each investment are defined. These are agreed with portfolio company management prior to closing and integrated with the value creation impact plan.
- The assessment, conclusion, and recommendations form a standard part of the Investment Advisory Committee documentation, discussion, and recommendation.
- Post-closing, ESG and impact measurement, management and reporting is part of the portfolio management process for Trill Impact's Buyout strategy and when relevant, also for Trill Impact's Ventures strategy. Progress towards impact KPIs is reported to investors on a quarterly basis and ESG KPIs on an annual basis. Trill Impact engages directly with management to support and sustain progress, and in the event of underperformance or unexpected risks, for which clear guidelines and escalation methods have been established. The appointed impact and ESG responsible at portfolio company level is engaged in the review process.
- Case studies are documented, evidencing Trill Impact's contribution to impact and ESG improvements in investments, a selection of which can be found in Trill Impact's Annual Impact Review 2023 [here](#).
- Trill Impact is a member of the [Net Zero Asset Managers initiative \(NZAM\)](#), a group of international asset managers, supporting the goal of reaching Net Zero greenhouse gases by 2050 or sooner (in accordance with the 2015 Paris Agreement). Joining this initiative builds on Trill Impact's 2020 commitment to set 5-year science-based greenhouse gas (GHG) emissions reduction targets in all portfolio companies.

PRINCIPLE 6

Monitor the progress of each investment in achieving impact against expectations and respond appropriately

PRINCIPLE

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.

- In 2024, The Impact team at Trill Impact Advisory expanded with the addition of an Impact & ESG Data & Reporting lead, representing a strategic step to further professionalize Impact and ESG reporting.
- Trill Impact monitors portfolio companies' progress in achieving impact and ESG objectives against agreed KPIs and targets, which are set in line with industry accepted catalogues of metrics (e.g., IRIS+ impact metrics). The KPIs are communicated in quarterly and annual reports and portfolio company reviews as part of Trill Impact's Investment Advisory Committee. For selected products, Trill Impact will introduce a third-party annual impact KPI verification.

DISCLOSURE STATEMENT

- Trill Impact collects impact and ESG quantitative and qualitative information from portfolio companies quarterly and annually and reports it to the Board of Directors, the General Partner, and investors. The reported data is in line with regulatory and market requirements such as by the EU Taxonomy and Sustainable Finance Disclosure Regulation (SFDR).
- Since 2023, Trill Impact is leveraging the technological reporting platform Novata to collect impact & ESG performance data from portfolio companies on a continuous basis. A selection of collected KPIs is reported to the ESG Data Convergence Initiative (EDCI).

PRINCIPLE 7

Conduct exits considering the effect on sustained impact

PRINCIPLE

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.

DISCLOSURE STATEMENT

- Trill Impact has not had any exits to the time of this publication (February 2025); however, Trill Impact has implemented a Responsible Exit Approach that is integrated into each step of the investment advisory process, from idea generation to exit. This value created from the Impact and ESG efforts undertaken, and results achieved are documented in each portfolio company with the intention to sustain progress.
- Trill Impact targets investments where impact and commercial aspects are tightly integrated and during the ownership period supports portfolio companies with expertise and capacity building, with the ambition to increase the likelihood of impact continuity after exit.
- Trill Impact's Investment Advisory Committee documentation includes buyer due diligence, timing and other risks and opportunities related to sustaining impact after exit. Trill Impact will measure and report impact outcomes together with contextual data at exit.



PRINCIPLE 8

Review, document, and improve decisions and processes based on the achievement of impact and lessons learned

PRINCIPLE

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.

DISCLOSURE STATEMENT

- Trill Impact regularly assesses and benchmarks against industry best practices, where identified gaps and lessons learned are considered in the continuous development of Trill Impact's investment strategies, processes and decisions. Since 2022, those learnings are manifested in an annual internal peer benchmarking exercise.
- A fund Impact Diagnostics project performed by Bluemark, reviewed Trill Impact's impact strategy, impact governance, impact management and impact reporting practices in comparison to impact investing and ESG industry standards and best practices (report can be found [here](#)). Learnings are incorporated into impact practices.
- Trill Impact has established periodic feedback loops from investors, portfolio companies and other stakeholders to review its impact strategy and each investment's impact performance. More information on stakeholder engagement to be found on page 19 of Trill Impact's Annual Impact Review 2023 [here](#).
- Lessons learned and process improvements are continuously integrated into Trill Impact's IMPACT model at both the strategy and transaction level.
- Trill Impact considers exit due diligence, timing and other risks and opportunities related to sustaining impact after exit. Trill Impact will measure and report impact outcomes together with contextual data at exit.
- Trill Impact continuously engages with partners and peers and is involved in industry bodies and initiatives to seek advice and engage in emerging best practices on impact & ESG management and related investment decision-making, as listed [here](#).

PRINCIPLE 9

Publicly disclose alignment with the Impact Principles and provide regular independent verification of the alignment

PRINCIPLE

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.

DISCLOSURE STATEMENT

- This Disclosure statement re-affirms the alignment of Trill Impact's procedures with the Operating Principles for Impact Management for 2024 and will be updated and published annually.
- The second third-party verification on the alignment of Trill Impact with the Operating Principles for Impact Management is dated October 10, 2023 and is available [here](#). The first third-party verification was completed in 2021. Bluemark (a Tideline company)¹ is the independent verifier for Trill Impact.
- Trill Impact plans to complete and publish a third-party verification again in 2025.

¹BlueMark, 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 implemented a Standard of Conduct requiring their 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 [BlueMark](#)



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February 2025