EVENLODE FOUNDATION
EMPOWERING COMMUNITIES

OPIM Disclosure

February 2025

Evenlode Impact Ltd hereby affirms its status as a Signatory to the Operating Principles for Impact Management.

This Disclosure Statement applies to the assets owned within Evenlode Impact Ltd and governed by the Evenlode Foundation, wholly funded from the profits of Evenlode Investment Management Ltd.

The total Covered Assets in alignment with the Impact Principles is c. US$10,000,000 as of 28 February 2025.

Evenlode Impact Ltd is a special purpose vehicle that owns shares of between c.1% and 10% in startup businesses based in the UK, without geographic or sector restriction, made typically in their pre-seed and seed stage except where follow-on occurs later.

The information contained in this Disclosure Statement has not been verified or endorsed by the Global Impact Investing Network ("the GIIN") or the Secretariat or Advisory Board. All statements and/or opinions expressed in these materials are solely the responsibility of the person or entity providing such materials and do not reflect the opinion of the GIIN. The GIIN shall not be responsible for any loss, claim or liability that the person or entity publishing this Disclosure Statement or its investors, Affiliates (as defined below), advisers, employees or agents, or any other third party, may suffer or incur in relation to this Disclosure Statement or the impact investing principles to which it relates. For purposes hereof, "Affiliate" shall mean any individual, entity or other enterprise Fund or organization controlling, controlled by, or under common control with the Signatory.

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

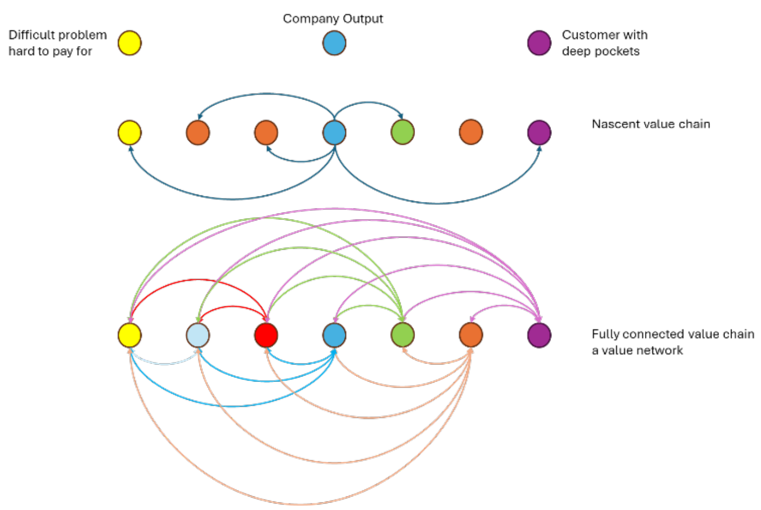
The Manager shall define strategic impact objectives for the portfolio or fund to achieve positive and measurable social or environmental effects, which are aligned with the Sustainable Development Goals (SDGs), or other widely accepted goals. The impact intent does not need to be shared by the investee. 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.

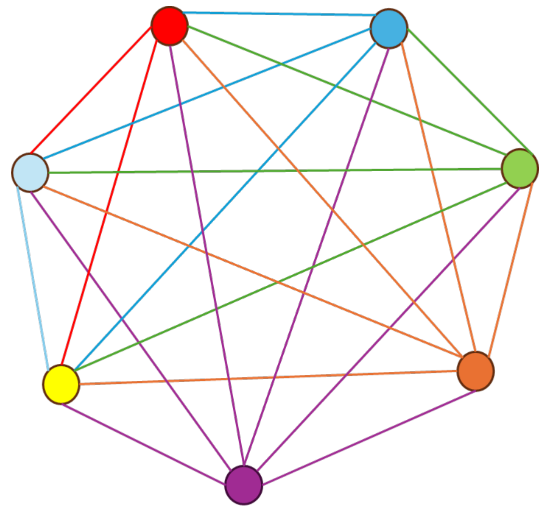
Evenlode Impact has appointed Evenlode Investment Management Ltd (EIML) as the investment manager of its impact portfolio. Evenlode Foundation invests to build a diversified impact portfolio of start-up companies. To develop a diversified portfolio but retain strategic impact we look for alignment between each opportunity and one or more of the 169 underlying targets of the UN Sustainable Development Goals, the Planetary Boundaries, or other emerging globally agreed frameworks.

We assign these at company level, with careful detailing of what/who pairs (see Principle 4), and will in time aggregate them at a portfolio level. To focus we (a) identify themes of interest (b) check they are underserved and (c) work with a specific but non-sector theory of change informed by sector expertise. We identify themes that are underserved in the capital markets, their sub-sectors, or as assessed by qualitative factors such as misunderstanding in society or industry culture. For instance, it is possible to identify the ocean as a generally misunderstood and underserved ecosystem, from the work of Jacques Cousteau to the alignment reported by a market leader in impact verification for their clients (SDG 14 LIFE BELOW WATER being second least served by their measure). As a result, the ocean became a research subject for our team in 2024 (during which the main focus was the built environment) and has now become the main focus in 2025.

Identifying themes allows us to maintain synergies whilst diversifying the impact portfolio. Our team nonetheless maintain an open mind and allow serendipity to play her part. To illustrate, here is a cut-out from the impact analysis for one of our med-tech investees.

SDG				Change in Outcome (Impact, include counterfactual)
3.d	early warnings in population health	Explicit	Direct	eye as canary in the mine, large base buildup, biomarker strategy, unavailable at scale without Siloton
3.c	developing health ecosystems	Implied	Direct	early diagnosis is what GPs are calling for to help the NHS, cheaper diagnosis helps in US, insurers are the people that can pay for the system if the tools are in place
3.8	universal health	Explicit	Indirect	cheaper and more accessible, remote communities (astronauts and Aboriginal People)
1.5	resilience of the poor	Implicit	Indirect	
4.1	ed I & II	Implied	Indirect	
4.2	early years	Implied	Indirect	





The diagram shows the concept of the whole value chain business model creating a strong network that establishes robust impact.

Our theory of change is that change is more likely to occur and be robust when it is created by a business model that encompasses a whole value chain, and that chain is transformed into a network as illustrated in the diagram above.

Our underlying belief is that a technology does not stand alone. Stable adaptation comes from a whole value chain. The whole value chain approach considers the enabling technology as one element or node and then considers the other components of the chain as nodes requiring more or less new connection. Advocacy by the investee may be required to bring in some additional elements, for instance through market education, and some elements may need invention. Investee advocacy thus creates nearest and next nearest neighbour connections, revealing a network where there was previously a chain. This is how we identify companies with potential to make robust systems level change.

This value network is not identified with the ecosystem, rather it is a subset involved in the business of the investee company. The purpose is to connect at one end of the chain a difficult to achieve and difficult to pay for outcome, and at the other end of the chain the customer with deep pockets and an intrinsic and commercial motivation to pay for that outcome. We prefer companies where measurable commercial Key Performance Indicators (KPIs) are also impact KPIs, where those impact KPIs arise from our approach to Principle 4.

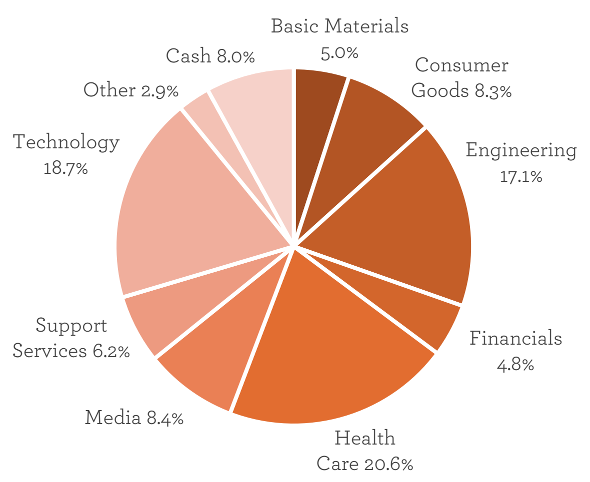
Our strategic impact objective is to invest for long-term, system-level positive impact, for the benefit of our society and our world. Our investment strategy is to:

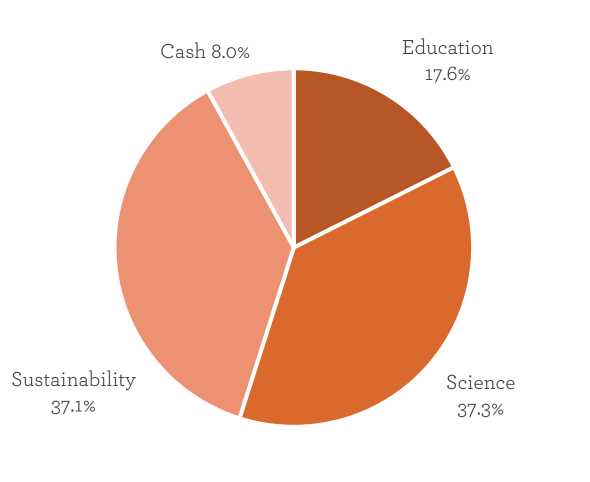
a. Craft an impact portfolio that has a high likelihood of becoming self-supporting.
b. Allocate our capital where it is of highest added value.
c. Allocate our capital where our investor impact is greatest.
d. Allocate our capital to whole value chain business models.

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 impact portfolio. As part of the process, the Manager shall consider aligning staff incentive systems with the achievement of impact, as well as with financial performance.

We manage strategic impact on a portfolio basis by monitoring sector allocation and philanthropic theme, an example of our distribution is displayed below. This allows us to drive decision making, as a more diverse sector allocation supports a more robust portfolio and more persistent overall impact.





Further, we consider general impact metrics, that can be directly aggregated, and specific impact metrics that can be combined when related to a normative level. We drive investment decisions in this way. We also drive portfolio level interventions in this way, looking for synergies across the impact portfolio that support strategic impact. As our monitoring evolves, we will continue to build our capability to aggregate impact achievement to drive portfolio decision making.

The Evenlode Foundation is a philanthropic effort of Evenlode Investment Management Ltd (EIML) and EIML is employee-owned. The capital originates from the profits of our business and thus with our partners, and therefore we believe that the employee ownership structure, alongside the combined investment and impact thesis, means that staff incentives are aligned with the achievement of impact. As best practices emerge, we may consider a more direct incentivisation where that is appropriate.

3. Establish the managers 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.

We contribute to the achievement of impact financially, and with direct and indirect assistance.

Direct Assistance includes activities that are immediate such as chairing Board Remuneration Committees, technical advice on operational or product matters and feedback on communications and investor materials.

Indirect Assistance includes activities where the effect of the contribution can be delayed and/or isn't as easily measured. Examples include introductions to members of our wider network for specialist advice and talent, hosting impact portfolio and industry community events, and informal mentoring.

We track and monitor our contribution systematically in the normal course of business. For instance, notes of board meetings will contain actions, the follow ups to the actions, and the associated precision interventions. We assess these areas currently by actively soliciting feedback. Anecdotally that feedback has been overwhelmingly positive. As best practices emerge, we will adopt them where practical. This year we are adding an objective method of assessment by building out an internal CRM system that will collate the data that we use and track during our activities which are not currently in an aggregate, searchable form. In time we expect to be able to use this data to more systematically track and monitor our contribution and therefore assess and make strategic decisions about our contribution.

In an effort to promote standardisation, we have included a list of investor contribution categories sourced from benchmark providers, and whether we contribute to them, below:

1 Technical assistance or capacity-building	√
2 Helping with operational standards	√
3 Active engagement (board participation)	√
4 Creating trusted partnerships/networks	√
5 Assisting with resource mobilisation/fundraising	√
6 Improving the cost of capital	
7 Specific financial structuring	√
8 Innovative finance instruments	

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: What is the intended impact? Who experiences the intended impact? How significant is the intended impact? The Manager shall also seek to assess the likelihood of achieving the investment's expected impact. In assessing the likelihood, the Manager shall identify the significant risk factors that could result in the impact varying from ex-ante expectations. In assessing the impact potential, the Manager shall seek evidence to assess the relative size of the challenge addressed within the targeted geographical context. The Manager shall also consider opportunities to increase the impact of the investment. Where possible and relevant for the Manager's strategic intent, the Manager may also consider indirect and systemic impacts. Indicators shall, to the extent possible, be aligned with industry standards and follow best practice.

Our systematic approach is based on the Impact Management Project's 5 Dimensions and the ABCs of impact (Act to avoid harm, Benefit stakeholders, Contribute to solutions). As we make investments in early-stage companies, we find that most of our companies are contributing solutions. Our "What?" is driven by a search for aligned impact and investment thesis, our "Who?" is focused on the people and organisations across the value chain.

We do not require a formal process of impact assessment from the investee companies. Although we will have a vision of their potential impact our impact investment thesis must be their intention. Otherwise, we would consider that we were inadvertently investing in what we imagine, rather than what they intend to do. Over time we expect their system of KPIs for managing their business will evolve to encompass the outcomes and impact that they intended to create from inception.

What?	Thesis	Simple explanation of the impact investment thesis in terms of our theory of change.
	Implied/Explicit	Binary flag.
	Direct/Indirect	Binary flag.
	Change	Single measurable.
Who?	Characteristic	Who is affected?
	Consumer/Intermediary	Descriptor, location on value chain.
How much?	Number	How many people are affected?
	Depth	How deeply are they affected?
	Duration	How long are the affected for?
	ABC	Do business activities act to prevent harm? Benefit stakeholders? Contribute to solutions?
Contribution?	Enterprise %?	How much of the problem does their solution solve?
	Counterfactual	What would happen anyway if this company were not present?
	Others required?	Are there other players on whom they depend?
	Investor?	What can we do to assist?
Risks?	Pivot	What commercial factors might cause the business to pivot away from the impactful business activities?
	Disruption	What external factors might prevent the impact?
	Execution	What about the team might prevent them from succeeding?
	Negatives	What are the potential negative consequences?

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.

Our companies are at the forefront of efforts to change behaviour in business management, and are very aware of the environmental, social and governance (ESG) related risks and opportunities. When we assess their impact during initial due diligence, we consider the potential negative consequences, and we can share specific examples where we assessed the potential negative impacts as great enough to prevent our investment.

A significant contribution to this assessment is our 3-level intentionality policy, discussed further under Principle 7, that assists us in finding companies genuinely committed to behaviour change that generally avoids ESG risk. We have not yet invested in a business where the unintended consequences we imagine are related to anything other than the standard challenges of business efficiency and Scope 1 & 2. To avoid unintended negative impacts growing significantly without our knowledge we maintain close relationships across our impact portfolio where possible.

At the earliest stage our companies may not be large enough to formally manage such matters as their three Scopes. We encourage our companies to evolve their internal systems and policies as they mature. In line with our statement on Principle 6 we will review this stance in 2025 and then annually thereafter.

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

The Manager shall use the results framework to monitor progress toward the achievement of positive impacts in comparison to the expected impact for each investment. Progress shall be monitored using a predefined process for sharing performance data with the investee. To the best extent possible, this shall outline how often data will be collected; the method for data collection; data sources; responsibilities for data collection; and how, and to whom, data will be reported. When monitoring indicates that the investment is no longer expected to achieve its intended impacts, the Manager shall seek to pursue appropriate action. The Manager shall also seek to use the results framework to capture investment outcomes.

We group our impact portfolio companies into engaged, active, and passive monitoring. Engaged monitoring involves regular touchpoints such as board meetings as NED or Observer, and Board sub-team meetings for governance, strategy or team dynamics. The monitoring in this case is extensive and deep, our understanding of the business and its impact is nuanced. Active monitoring involves regular touch-points such as monthly or quarterly calls, and involves an extensive but not a deep understanding. Passive monitoring involves receiving the investee's investor updates by email, monitoring LinkedIn output, and receiving Companies House alert emails. All the data from these interactions is available and recorded in the normal course of business, but in future as mentioned for Principle 3 we aim to aggregate and manage it via CRM tools and deliver it into a dashboard to assist decision making.

Expected impact achievement, actual impact achievement, and our response to the difference.

In 2025 we will begin a programme of regular data collection from investee companies, and will assess annually for each company, identifying KPIs that can be monitored more continuously without extra work for the investee. We often actively engage with customers as part of our due diligence, and at the close of 2024 experimented with active engagement with customers post investment. We expect this to become a more regular activity. As our impact practice matures, we will be able to adopt best practices.

The table below summarises what we already do, and in brackets what we aspire to over the coming year.

Frequency	Method	Sources	Responsibility	Format	Reporting
Annual	Interview	Customer	Team	Annual report	Partners
Annual	Survey	Customer	Team		Partners
Monthly	Read	Investee email	Investee		Partners

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.

Our focus on long term system level impact leads us to investments with an intrinsically high likelihood of sustaining impact through an exit. This high probability arises from three sources:

First, our hypothesis is that our whole value chain business model approach leads to a value network with a high level of connectedness that stabilises it, even in the absence of the company that established it.

Second, during due diligence we look for three levels of intentionality: personal motivation, business model, and governance. We prefer that all three levels are achieved, but at least the first two and there are clear plans to achieve all three levels during the early stages of our investment. In the interests of sharing best practice, we have case studies available for discussion where we have rejected opportunities for insufficient intention.

Third, we prefer the company to have come to their intention and whole value chain business model organically. We disfavour additions and adjustments made solely to achieve investment but are open minded where the narrative is well established, and adjustments have an organic pathway.

That the exit we achieved in 2023 will sustain and even enhance the impact beyond the exit we believe is confirmed by the close alignment of the business of the acquirer to our core impact and investment thesis for the company.

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 demonstrably reflective, having developed our three levels of intentionality in reviewing due diligence decisions after rejection of one opportunity, and in doing our due diligence on another.

As specified for Principle 6 over the course of 2025 we will review and document the impact performance of each investment and set up monitoring requests where those are commensurate with the size of our investment or available through established reporting.

We plan a more systematic approach to continuous improvement subsequent to this review across 2025/2026, with a regular set of agenda points appearing in specific meetings to drive continuous improvement.

Task	Frequency	Responsibility
Review impact performance	Quarterly	Evenlode Impact Board
Findings improve process	Bimonthly	Evenlode Investment team (IMA)
Findings improve strategy	Quarterly	Foundation Committee
Unintended consequences revealed	Ongoing, and bimonthly	Investee company, Evenlode Investment team (IMA)
Unintended consequence mitigation improves processes	Responsive	Evenlode Investment team (IMA)

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 affirms the alignment of Evenlode Impact's procedures with the Impact Principles and will be updated annually. The Evenlode Impact Operating Principles of Impact Management Disclosure Statement is submitted to the Impact Principles for public disclosure and publicly disclosed on the Evenlode Foundation's website.

Independent verification will be undertaken every 3 years. The findings of verifications will be disclosed publicly via the Operating Principles of Impact Management and Evenlode Foundation's website. Neither Evenlode Impact Ltd nor EIML are subject to fiduciary or regulatory concerns because of this work as Evenlode Impact Ltd is not engaged in regulated activity. The activities carried out on its behalf by employees of Evenlode Investment Management Ltd for Evenlode Impact are also not regulated activities. The first independent verification is expected to be completed in 2026.