Introduction

As a signatory of the Operating Principles for Impact Management (the Impact Principles), Bintang Capital Partners engaged BlueMark to undertake an independent verification of the alignment of Bintang Capital Partners’ impact management (IM) system with the Impact Principles. Bintang Capital Partners’ assets under management covered by the Impact Principles (Covered Assets) totals $32 million, for the period ending September 30, 2023.

Summary assessment conclusions

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

Principle 1: Bintang Capital Partners has identified seven social and environmental impact themes to guide its investment strategy. To further align, firm should develop a fund-level Theory of Change, supported by an evidence base.

Principle 2: Bintang Capital Partners has developed a framework for assessing and managing impact across the investment lifecycle, which includes using the B Impact Assessment (BIA) to provide a common view of portfolio-level impact. To further align, the firm should consistently assess partner companies against the BIA and explore ways to link impact performance to staff incentive systems.

Principle 3: Bintang Capital Partners identifies opportunities to contribute to the impact of each investment and documents these in value-creation plans. To further align, the firm should monitor its investor contribution activities to validate the effectiveness of its approach.

Principle 4: Bintang Capital Partners has a structured approach to evaluate prospective partner companies ex-ante. To further align, the firm should incorporate an assessment of the Impact Management Project (IMP)’s Five Dimensions.

Principle 5: Bintang Capital Partners assesses the ESG risks of each partner company ex-ante using an approach aligned to the BIA. The firm monitors ESG risks ex-post and has a process to address underperformance.

Principle 6: Bintang Capital Partners has developed a process for monitoring and managing the impact performance of its partner companies. To further align, the firm should set investment-specific impact targets and track these over time.

Principle 7: Bintang Capital Partners has developed a Responsible Exit policy, detailing its planned approach impact at exit. To further align, the firm should develop a responsible exit template to support the implementation of the policy.

Principle 8: Bintang Capital Partners regularly reviews the impact of partner companies and reports fund-level performance on a quarterly basis. To further align, the firm should develop a protocol for utilizing the insights from its review process to enhance operational and strategic decision-making and identify any positive or negative unintended impacts that may arise over time.

1 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.”

2 Assets under management figure as reflected in Bintang Capital Partners’ disclosure statement 10/01/2023. BlueMark’s assessment did not include verification of the AUM figure.
Verifier Statement
Independent Verification Report

Prepared for Bintang Capital Partners: 11 October 2023

Assessment methodology and scope
Bintang Capital Partners 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 September, 2023. 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.3

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 Bintang Capital Partners staff responsible for defining and implementing the IM system;
3. Testing of selected Bintang Capital Partners transactions to check the application of the IM system; and
4. Delivery of detailed assessment findings to Bintang Capital Partners, 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 Bintang Capital Partners in accordance with the agreement between our firms, to assist Bintang Capital Partners in fulfilling Principle 9 of the Operating Principles for Impact Management. We permit Bintang Capital Partners to disclose this statement in its entirety online, or to furnish this statement to other interested parties to demonstrate Bintang Capital Partners’ 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 Bintang Capital Partners for our work or this statement except where terms are expressly agreed between us in writing.

About BlueMark
BlueMark, a Tideline 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 is a wholly owned subsidiary of Tideline Advisors, LLC, a certified women-owned advisory firm in impact investing. Since its founding in 2014, Tideline has become a recognized leader in impact measurement and management, working with leading asset owners and managers to design and implement impact management systems.

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.

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3 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 Bintang Capital Partners. BlueMark has relied on the accuracy and completeness of any such information provided by Bintang Capital Partners. The assessment results represent BlueMark’s professional judgment based on the procedures performed and information obtained from Bintang Capital Partners.
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BlueMark has office locations in London, UK; New York, NY; Portland, OR; and San Francisco, CA and is headquartered at 915 Battery St, San Francisco, CA 94111, USA. For more information, please visit www.bluemarktideline.com.