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Monitoring, Reporting and Verification (MRV) Framework

SAIL INVESTMENTS

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MRV FRAMEWORK

Purpose, scope, and audience

Purpose. SAIL's Monitoring, Reporting, and Verification (MRV) Framework documents how we monitor, report, and verify implementation of sustainability commitments and the resulting indicators across our portfolio. This document explains our calculation and consolidation rules at a level suitable for stakeholder scrutiny, without disclosing confidential parameters or proprietary methodologies.

Scope. The scope of MRV is set per deal by SVCP obligations written into the loan covenants and prescribed in the customized MRV Protocol linked to each SVCP. MRV covers, within that covenant-defined scope, Outputs implementation of commitments and safeguards and Outcomes measured change in environmental, social, climate, and nature performance. Portfolio roll-up produces public KPIs for impact reporting and regulatory compliance.

Audience. Investors and lenders, portfolio companies, regulators, and civil society organizations.

Relationship to Sustainability Value Creation Plans (SVCP). MRV translates each investee's SVCP milestones into measurable outputs and outcomes, and aggregates indicators into fund-level KPIs. The SVCP defines what is "in scope" for MRV for each transaction.

MRV architecture and logic model

The framework operates through a structured three-tier system: transaction-level data points collected annually from investees flow into sustainability indicators that measure specific environmental, social, and governance outcomes, which then aggregate into fund-level Key Performance Indicators (KPIs) for portfolio-wide impact demonstration. This architecture ensures both granular tracking and strategic-level reporting suitable for diverse stakeholder needs.

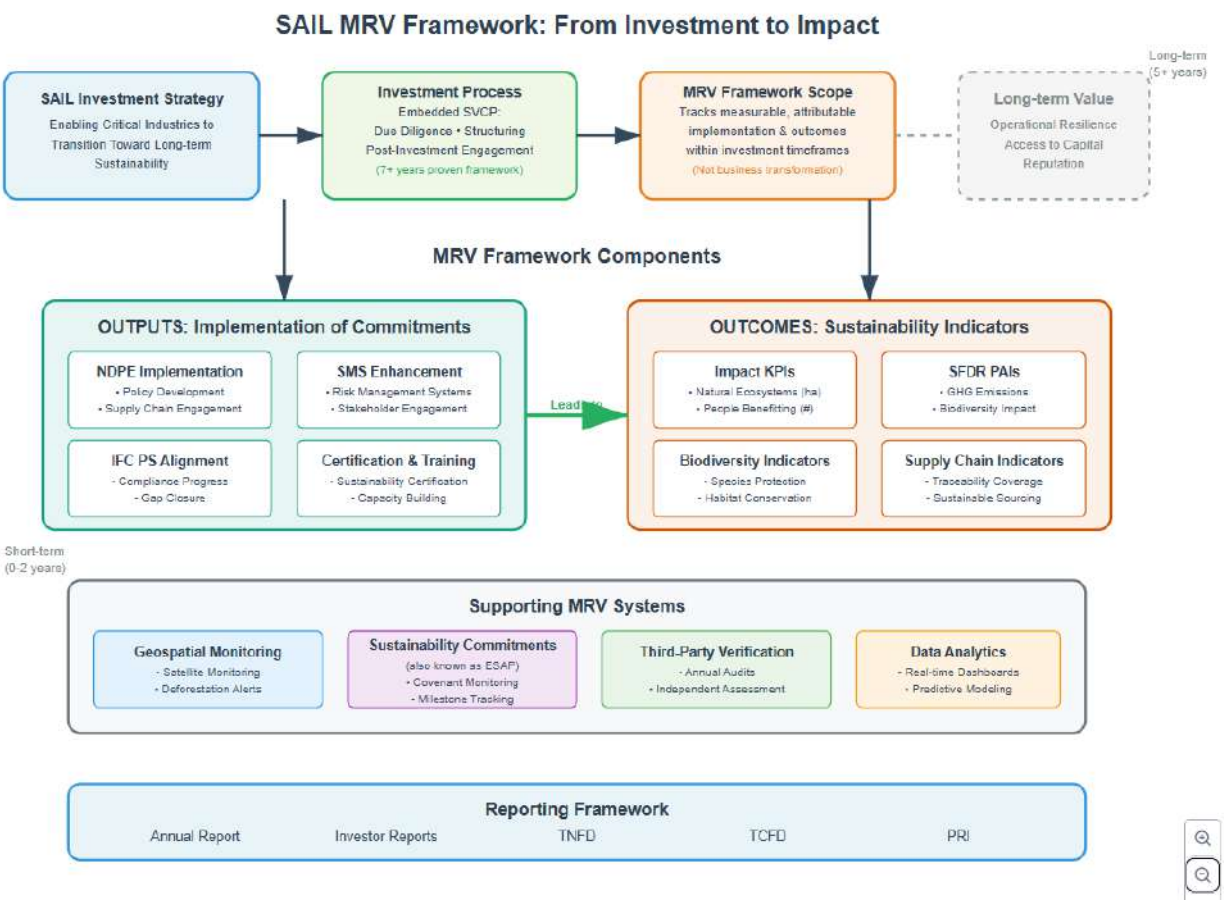


Figure 1. SAIL MRV Framework: From Investment to Impact. The diagram shows Outputs, Outcomes, aggregation to KPIs, supported by geospatial monitoring, commitments tracking, independent verification, and data analytics. Long-term value sits outside annual MRV.

Three-Tier Structure

Outputs: Implementation tracking of sustainability commitments

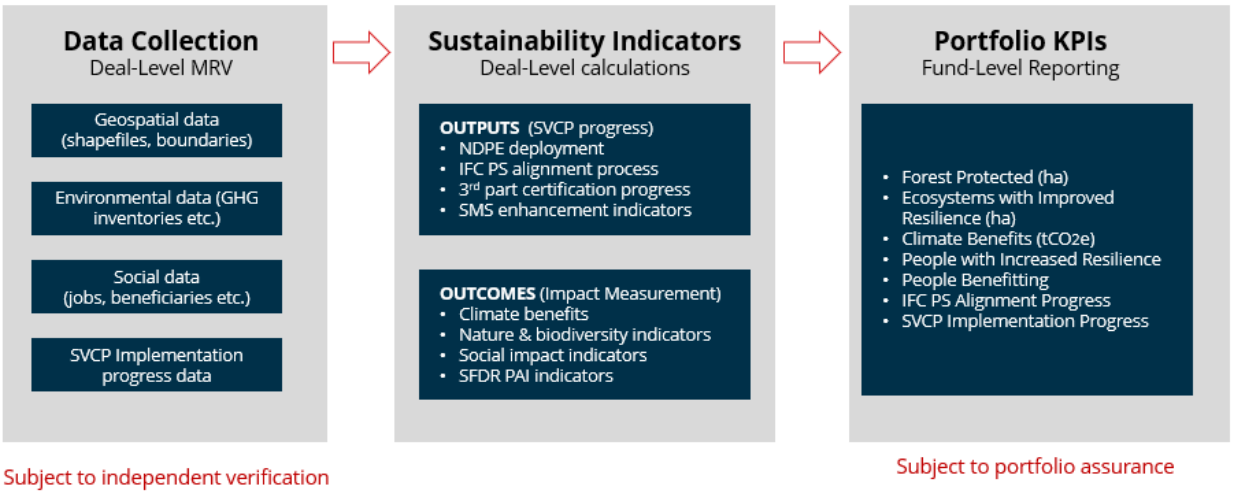
- No Deforestation, Peat, Exploitation (NDPE) policy deployment
- Sustainability Management System (SMS) enhancements
- IFC Performance Standards alignment progress
- Third-party certification milestones

Outcomes: Measured sustainability performance within investment timeframes

- SFDR Principal Adverse Impact (PAI) indicators
- Climate benefits (emissions reductions, sequestration)
- Nature conservation and restoration metrics
- Social impact and beneficiary indicators
- Traceability and supply chain improvements

KPIs: Portfolio-level aggregated metrics for public reporting (see Section 5-7 for more detailed explanation of what the KPIs entail).

- Forest Protected (hectares)
- Ecosystems with Improved Resilience (hectares)
- Climate Benefits (tCO_2e)
- People with Increased Resilience
- People Benefitting



What MRV does not include

Screening and risk diagnostics for nature are outside MRV. Before investing, we assess nature-related dependencies, impacts, risks, and opportunities using a TNFD-aligned LEAP approach, supported by standardized proxies and indicators. These screening tools inform the SVCP scope and milestones for each deal, but most of them are not monitored after investment, so they are not part of MRV. However, when the SVCP and legal covenants bring defined parts of the supply chain into scope for implementation, for example forest-protection obligations for active suppliers, the results from those suppliers become MRV inputs and are attributed in line with the customized MRV Protocol.

Examples of pre-investment screening inputs not covered by MRV:

- TNFD-aligned LEAP assessments
- IBAT STAR species threat scores
- Critical Habitat mapping
- Generic supply-shed buffer analyses
- Ecosystem risk diagnostics

Screening results help set the SVCP. Only when a screening finding is converted into a measurable SVCP milestone does it enter MRV as an output or outcome.

Long-horizon value creation effects requiring extended observation and multi-factor attribution (e.g., operational resilience, market premium access) are tracked separately and excluded from annual MRV consolidation.

1 GOVERNANCE, ROLES, QA OR QC, VERIFICATION AND ASSURANCE

Key responsibilities

- **Investees**: Provide annual data and evidence, maintain documentation, host verification visits
- **Deal Teams**: Embed MRV requirements in legal documentation, monitor covenant compliance, manage corrective actions
- **Sustainability Team**: Own methodologies, conduct quality assurance, consolidate indicators, prepare disclosures
- **Independent Verification**: Risk-based annual verification with periodic comprehensive re-verification.
- **Assurance** (SFDR disclosures = single source of truth): SAIL obtains independent limited assurance over the SFDR disclosures, covering scope/boundaries, method consistency with the MRV, fair presentation (incl. restatements), and data controls. The assured SFDR dataset is the authoritative source for all other reports (Annual Report KPIs, lender reporting, website); any corrections are made in SFDR first and then propagated.

Quality Control Framework

This framework standardizes what data we accept, how we check it, and how corrections are closed. It creates clear data lineage from deal-level submissions to the assured SFDR content used in disclosures, ensuring consistency and traceability across reports:

- Structured guidance for data collection and evidence standards
- Internal review of all submissions with discrepancy flagging
- Return-for-correction loops ensuring data quality
- Versioned change logs and access-controlled data repositories
- ISAE-aligned portfolio assurance processes

Data hierarchy, boundaries, and evidence

Primary evidence sources

MRV uses evidence within each investee's financed boundary as defined by SVCP obligations and the customized MRV Protocol:

- **Geospatial data**: investee-provided shapefiles or GeoJSON for boundaries, land classes, restoration areas, and production zones.
- **Operational data**: Greenhouse gas inventories, activity data, operational metrics from investee systems.
- **Supply Chain Data:** Where covenants require sustainability actions by suppliers, aggregated datasets excluding supplier identities, with independent verification of aggregation accuracy and non-re-identification

Proxy use and data hierarchy

- **Primary:** Investee-reported audited data (preferred)

- **Secondary:** Joint Impact Model proxies where investees not yet reporting (disclosed and replaced prospectively)
- **Tertiary:** Conservative sector benchmarks and removal-factor tables (maintained in confidential guidance).

Boundary definition

- **Financed Boundary:** Results within the boundary defined by SVCP obligations and the customized MRV Protocol count toward MRV attribution
- **Deal Scope:** SVCP obligations and customized MRV Protocol define which indicators are measured
- **No Buffer Aggregation:** Generic supply-shed buffers remain outside MRV unless specific supplier areas and obligations are brought into scope through binding SVCP commitments

2 NATURE-RELATED CALCULATIONS AND INDICATORS

How the shapefile basis works

Each investee submits polygons that define where financing is. We validate schema and projection, fix topology where needed, harmonize class names so natural forest, plantations, restoration types, set-asides, and production areas are comparable, reproject to an equal-area CRS, resolve overlaps so a hectare is never counted twice, and run year-on-year change detection to identify additions, reductions, class switches, and reversals.

Geospatial Processing Method

Each investee submits boundary and land-classification files. Our process includes:

- Schema validation and projection standardization
- Topology correction and class name harmonization
- Equal-area reprojection and overlap resolution (ensuring no double-counting)
- Year-on-year change detection for additions, reductions, and reversals

How we define nature indicators in MRV scope

Indicators are counted only within the **financed scope** set by the SVCP and listed in the deal's MRV Protocol. For each deal-year, the investee submits boundary and land-class files for Asset/Concession areas and, where covenants extend to suppliers, for in-scope active supplier areas.

Within this scope, **Asset/Concession hectares** are the land under the investee's legal management (concession, estate, lease, or freehold), reported by class at **reporting year-end**. This establishes the geometry of accountability for all nature results and provides denominators for ratios such as the share of the asset under protection. **Cultivated hectares** are the production fields at year-end inside Asset/Concession polygons. They serve as the cap for practice adoption: by design, the area under improved management can never exceed cultivated area.

Improved-management hectares measure adoption of eligible regenerative or good-agricultural practices during the reporting year. We compute the **union** of all practice polygons intersected with the cultivated layer and report the area of that union (not the sum of individual practices), enforcing the control that improved-management area is less than or equal to cultivated area. This indicator feeds **Ecosystems with Improved Resilience.**

Where covenants require forest protection by suppliers, we include **Supplier-attributed hectares**. These are farms or estates of **active suppliers** brought into scope by the SVCP and named in the MRV Protocol. Supplier areas are processed with the same geospatial QA as assets. The investee provides **aggregated, non-identifying** datasets; an independent verifier confirms correct aggregation, traceability to source records, non-re-identification, and that **Management for Protection** is active for the areas counted.Screening diagnostics such as STAR scores, Critical Habitat and KBA proximity flags, or generic supply-shed buffers remain outside MRV unless and until they are converted into covenanted, in-scope polygons with evidence requirements. Those diagnostics live in the separate **Nature Framework** and inform SVCP design.

Portfolio-Level Nature KPIs

- **Forest Protected (ha):** Natural forest plus eligible restoration hectares at year-end, additive across deals after cross-deal overlap checks
- **Ecosystems with Improved Resilience (ha):** Natural Ecosystems Protected and restored plus regenerative systems and agricultural ecosystems restored from degraded state

How we count "Forest Protected"

Forest Protected is a managed and mapped status. A hectare is counted only when (i) it lies within the financed scope and meets the **Forest Definition & Eligibility** rules (natural forest or eligible forest restoration; forest plantations excluded) and (ii) Management for Protection is verified as active during the reporting year. The KPI is taken as the year-end area of eligible classes under verified management. Because we interpret land cover and class status annually, any loss during the year is already reflected in the year-end classification; we therefore do not apply a separate "deduction" line. Where helpful, the change table can disclose gross additions and losses, but the KPI itself is the net year-end figure.

Before any portfolio roll-up, we perform cross-deal overlap checks (including multi-buyer supplier polygons). Only after those checks do we aggregate Forest Protected and other additive indicators to portfolio totals.

How we count "Ecosystems with Improved Resilience"

Ecosystems with Improved Resilience is a managed and mapped outcome. A hectare is counted only when (i) it lies within the financed scope and falls into one of the eligible components: (a) Forest Protected (as defined in 5.5), (b) eligible non-forest natural ecosystems under verified Management for Protection/Restoration, or (c) cultivated land under verified regenerative practices in the reporting year, and (ii) the relevant management evidence is verified as active.

For the regenerative component, we take the union of eligible practice areas on cultivated land and enforce the control improved-management area ≤ cultivated area. The KPI is the year-end area of these components after overlap resolution so each hectare is counted once. Because land cover and class status are interpreted annually, within-year losses or switches are already reflected; no separate "deduction" line is applied. Where helpful, the change table may show gross additions and losses, but the KPI itself is the net year-end figure.

Before any portfolio roll-up, we perform cross-deal overlap checks (including multi-buyer supplier polygons); only then do we aggregate Ecosystems with Improved Resilience and other additive indicators to portfolio totals.

3 CLIMATE-RELATED CALCULATIONS AND INDICATORS

Data hierarchy

Land-based components use the same shapefile truth set and annual change analysis described above. Operational GHGs use investee GHG inventories and activity data within the financed boundary. Where investees do not yet report, we estimate with Joint Impact Model proxies and disclose that fact. When investees start reporting, audited figures replace proxies prospectively. Material restatements are labeled and explained.

Emissions reductions

Where relevant, reductions are calculated as the improvement in emissions intensity against an accepted sector benchmark multiplied by production volumes inside the financed boundary during the reporting year. Benchmarks and production records come from investee documentation and recognized references. Reductions are attributed to the investee only.

How we calculate carbon sequestration

This MRV reports annual biological sequestration from forests and restoration as a flux in tonnes of CO_2 equivalent per year. It is not a carbon-crediting method and it is not standard corporate GHG accounting of Scopes 1–3. Instead, it follows the UNFCCC national-inventory approach for land use (IPCC AFOLU): eligible hectares multiplied by a conservative Removal Factor that reflects local forest conditions and restoration type.

The metric is an indirect estimate, not a direct measurement. It infers CO_2 removals from area and ecological condition using literature-based factors. The population of hectares can change across years because active suppliers can enter or exit the covenant scope. The polygon universe is therefore a moving target. Results represent the financed scope at the reporting date, not a fixed cohort through time.

How we calculate carbon stock

This MRV discloses carbon stock in forests as a level in tonnes of CO_2 equivalent, shown as a quality attribute of protection and restoration. It is not a carbon-crediting figure and it is not part of corporate Scopes 1–3 accounting. We use a land-sector, inventory-aligned approach, estimating per-hectare biomass carbon from literature and national references, then converting to CO_2. Publicly reported stock includes above-ground and below-ground biomass using conservative factors set ex-ante in the MRV Protocol; additional pools, for example dead wood, litter, or soil organic carbon, are included only where robust local data exist and are clearly noted.

The metric is an indirect estimate, not a direct measurement. It infers CO_2 stored from mapped area and condition class using literature-based factors. The set of hectares can change across years because active suppliers may enter or exit the covenant scope, so the polygon universe is a moving target. Reported stock represents the financed scope at the reporting date, not a fixed cohort through time

How Removal Factors are built

For each deal, Removal Factors are established ex-ante in the MRV Protocol and applied ex-post each year. They are derived from IPCC parameters: above-ground biomass growth, the root-to-shoot ratio R, and carbon fraction, converted from tonnes of carbon to CO_2 using 44/12. Where possible, higher-tier, location-specific values are used; factors are differentiated by restoration condition such as active vs passive regeneration, and pristine undisturbed forest is treated as equilibrium (≈ 0 tCO_2e/ha/yr).

Why this is not standard corporate GHG accounting

Corporate inventories total organizational emissions by scope and typically do not estimate biogenic CO_2 removals from forest condition change via IPCC land-sector factors. Our sequestration method is inventory-aligned for land use and is used for impact/KPI disclosure, not for offsetting or issuance of credits. It keeps stock and flux separate: carbon stock in protected forest is disclosed as a quality attribute and is not added to annual sequestration.

Rebound and deductions

Changes in practice can increase non-CO_2 emissions for example methane or nitrous oxide. We estimate these using recognized methods consistent with the hierarchy investee inventories where available, Joint Impact Model proxies where not. If annual rebound exceeds the public materiality threshold, it is deducted from Climate Benefits and corrective actions are recorded in the SVCP.

Climate outcome and portfolio KPI

For each deal-year we finalize emissions reductions, carbon sequestration, and material rebound. **Climate Benefits = emissions reductions + sequestration − material rebound.** We round sensibly, attach an assurance tag, archive the evidence log, and sum across deals after cross-deal overlap checks. Any supply-shed or sector-level context is disclosed in the Nature Framework, not counted in MRV.

Scope of use and limitations

These climate results feed into the assured SFDR disclosures that anchor our public reporting. They also inform TCFD risk and exposure and support TNFD where land use drives nature–climate dependencies and impacts. Where applicable, they provide evidence for EU Taxonomy "do no significant harm" tests and Minimum Safeguards, and they underpin impact reporting aligned with OPIM/IRIS+. They are not a carbon-crediting method and are not used to issue offsets; nor are they a substitute for organizational Scope 1–3 accounting and therefore are not eligible for SBTi (including FLAG) without a separate SBTi-compliant inventory. Investee Scope 1–3 inventories remain the reference for corporate GHG reporting; our land-sector results are impact metrics reported alongside, not in place of, those inventories.

4 SOCIAL-RELATED CALCULATIONS AND INDICATORS

Data hierarchy and boundaries

Social results rely on investee records and independent audits inside the financed boundary as defined by the SVCP and the customized MRV Protocol. Supply-chain screening is handled outside MRV unless brought into scope through binding programmatic agreements in the SVCP.

Deal-level operational indicators in MRV

Jobs supported headcount at year end and average FTEs during the year, gender split of workforce and management, training hours and coverage, fatalities and other agreed H&S counts, grievance cases received and resolved within timeframe, community engagement sessions and documented outcomes, land tenure regularization events completed where these are SVCP milestones. These are counted using standard definitions and evidence sources set in the investee's MRV Protocol.

KPI-linked social outcomes

- **People with Increased Resilience.** Conservative count of people with a stable, ongoing benefit that improves livelihood resilience, derived from a fixed subset of people-related OPIs agreed in the investee's MRV Protocol. Uniqueness is controlled at deal level. Additive across deals.

- **People Benefitting.** Annual beneficiaries from services or inclusion actions linked to financed activities. Not necessarily unique persons. Additive across deals, presented with gender disaggregation where possible.

5 ALIGNMENT WITH FRAMEWORKS AND STANDARDS

SAIL's MRV Framework is designed to meet multiple regulatory requirements and align with leading industry standards. Rather than creating a proprietary approach, we build on established frameworks to ensure consistency, comparability, and regulatory compliance across our portfolio reporting.

Our approach recognizes that different stakeholders require different types of information - investors need SFDR compliance, regulators require standardized disclosures, and impact investors seek evidence of additionality and outcomes. By aligning with multiple frameworks simultaneously, we can serve these diverse needs efficiently while maintaining data quality and avoiding duplication of effort.

Framework Alignment

- **Operating Principles for Impact Management (OPIM)**: Systematic approach to impact measurement and management
- **SFDR Principal Adverse Impact (PAI)** indicators: Mandatory EU sustainability disclosures
- **TCFD** climate metrics where material: Financial risk-focused climate reporting
- **TNFD** nature screening: Nature-related financial risk assessment (informs SVCP, results enter MRV when committed)
- **IFC Performance Standards**: Environmental and social risk management (milestones tracked as outputs)
- **EU Taxonomy** DNSH and Minimum Safeguards: Economic activity sustainability criteria (evidenced at deal level)

Key SFDR PAI Indicators Covered

Our methodology addresses the most relevant SFDR Principal Adverse Impact indicators for our investment approach:

- GHG Emissions (PAI 1-3): Scope 1, 2, and 3 emissions measurement and intensity calculations
- Fossil fuel exposure (PAI 4): Portfolio company activity screening and disclosure
- Non-renewable energy (PAI 5): Energy consumption and production source analysis
- Energy intensity (PAI 6): Sector-specific energy performance measurement
- Biodiversity impacts (PAI 7): Ecosystem impact assessment within financed boundaries
- Additional environmental and social PAIs as material to specific investments

6 CONSOLIDATION RULES

Portfolio-level reporting requires careful aggregation to avoid double-counting while ensuring comprehensive coverage of our impact. Our consolidation methodology balances precision with practicality, recognizing that some metrics can be meaningfully added across deals while others require more nuanced treatment.

The challenge in consolidation is maintaining accuracy when deals have different characteristics, geographies, and maturity levels. Some investments provide highly detailed data while others are still developing their reporting capabilities. Our approach accommodates this reality while ensuring transparency about data quality and methodology evolution.

Aggregation Methodology

Deal-level indicators are consolidated using standardized rules that prevent double-counting while ensuring comprehensive coverage:

- Land-based metrics undergo cross-deal overlap checks before summation to prevent double-counting of shared boundaries
- Areas reported to nearest hectare where data precision supports this level of accuracy
- Climate Benefits calculated to appropriate tCO_2e precision based on underlying data quality
- Material methodology changes trigger portfolio-level restatements with clear explanations of what changed and why

Annual Reporting Package

Public disclosures provide stakeholders with accessible yet comprehensive information:

- Portfolio-level KPI results with methodology summary explaining calculation approaches
- "What changed this year" section covering method updates, improved data sources, and system enhancements
- Explanation of transitions from proxy to reported data, including timeline expectations for remaining proxies
- Summary of independent assurance findings and management responses

7 KNOWN LIMITATIONS AND CONTINUOUS IMPROVEMENT

No measurement system is perfect, and transparency about limitations builds rather than undermines credibility. We acknowledge areas where our methodology continues to evolve and where external factors affect data quality. This honest assessment helps stakeholders interpret results appropriately and understand our improvement trajectory.

Our approach to limitations is proactive rather than defensive. By identifying and addressing weaknesses systematically, we strengthen the overall framework while maintaining stakeholder confidence. This commitment to continuous improvement reflects both technical rigor and accountability to our impact commitments.

Current Limitations

- **Data quality varies** by investee maturity and geographic context, with newer partnerships and emerging market locations sometimes requiring additional support and verification steps.
- **Proxy dependencies** exist where some indicators begin with sector averages or Joint Impact Model estimates, though these are systematically replaced by investee-reported figures as internal systems develop and reporting capabilities mature.

- **Evolving methodologies** mean certain calculation modules continue developing, particularly automated climate assessments and advanced ecosystem service quantification, as technology and industry standards advance.

Improvement Process

Our systematic approach to framework enhancement includes:

- Annual methodology review incorporating stakeholder feedback, regulatory updates, and technical advances
- Dated improvement plans embedded directly in investee SVCPs, ensuring accountability and progress tracking
- Periodic comprehensive re-verification cycles that validate both methodology application and results accuracy
- Technology platform enhancements expanding dataset integration, automation capabilities, and analytical sophistication

Confidential Material (Non-Public)

Transparency and confidentiality must be balanced to protect competitive advantages, investee privacy, and proprietary methodologies developed through significant investment and experience. This section clarifies what remains confidential and why, ensuring stakeholders understand both what we share publicly and what we protect.

This public framework relies on a comprehensive suite of internal guidance notes, procedures, and protocols that form SAIL's unique selling proposition and competitive advantage. These proprietary tools have been developed over years of implementation experience and represent significant intellectual property investment. While we maintain transparency about our overall approach and results, the detailed methodologies that enable our differentiated impact measurement and verification capabilities remain confidential.

Our confidentiality approach focuses on protecting detailed implementation tools and deal-specific information while maintaining transparency about overall methodology and results. This balance enables meaningful stakeholder engagement while preserving competitive positioning and respecting investee confidentiality requirements.

The following elements remain confidential to protect competitive advantages and investee privacy:

- **Internal guidance notes and technical protocols**: Detailed procedural documentation that operationalizes this framework across diverse investment contexts and geographies
- **Removal-factor calculation tables and sector benchmarks**: Proprietary coefficients and reference values developed through extensive research and calibration
- **Detailed workbook logic and sampling methodologies**: Specific algorithms, quality control procedures, and statistical approaches that constitute competitive intellectual property
- **QA/QC checklists and evidence validation procedures**: Internal control processes and verification standards that ensure data integrity
- **Deal-specific triggers, thresholds, and covenant details**: Individual transaction terms, performance targets, and corrective action protocols

- **Geospatial processing configuration files:** Technical parameters, data source specifications, and processing scripts that enable automated analysis

List of Guidance Notes and Protocols used in the MRV Framework

GN: Forest Definition & Eligibility. Sourcing of forest definition from **national definitions** (crown cover, minimum area, land-use type), **exclusion of plantations**, eligibility for **forest conserved** vs **forest restored**, and **reversals** handling.

GN: Establishing GHG Removal Factors for Forests. IPCC-aligned RF construction by restoration type (active/passive; degraded vs re/afforestation), conservative multipliers, FRL/FREL cross-checks; example local study adjustments.

GN: GHG Emissions Materiality & Rebound Emissions. Materiality threshold (25,000 tCO_2e/year), Tier 1–2 IPCC methods for CH_4/N_2O, deduction rules and SVCP integration.

GN: Climate Hazard, Vulnerability & Resilience Assessment. Method for climate-risk screening and adaptation logic aligned with IPCC AR6 / ISO 14091; links to EU Taxonomy context for defining material components.

MRV Protocol for IFC Performance Standards (PS) Alignment Verification. Scoring (0/25/50/75/100), roles, evidence logs, annual verification and 3–4 year full re-verification; portfolio dashboarding and ISAE-aligned assurance scaffolding.

MRV Protocol for Geospatial/Nature & Climate OPIs. ROI/shapefile intake, dataset registry, QA, config/versioning; notes the Climate Benefits module status; lists TNFD/biome/land-cover sources used.

List of Datasets used for monitoring

- Mapbiomas – Provides forest cover information
- Global forest change – Provides forest cover, quality and loss
- Global Ecological Zones (GEZ) – Provides information for GHG calculations
- Tropical Moist Forest – Provides forest cover information (Only moist forest)
- Global forest cover (JRC) – Provides forest cover in 2020 (used for EUDR)
- Sentinel-2 10-Meter Land Use/Land Cover – Provides land cover analysis between 2017/2024
- IvC Land Cover – Provides land cover information for IvC in 2020
- IUCN Global Ecosystem Typology (GET)
- IUCN Red List species

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