

# Danki Impact Scoring

## Methodology Whitepaper for Regulators and Investors

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# 1 DANKI IMPACT SCORING

Methodology Whitepaper — Scoring Framework, Data Architecture & Validation

v1.0 · January 2025 · For analysts, compliance officers, regulators & LPs

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## 2 Executive Summary

Danki Impact Scoring is a dual-layer scoring engine designed for impact investors who need to go beyond ESG compliance. It produces a composite impact score (0–100) for any investment project, covering 8 impact dimensions weighted toward social outcomes, with full regulatory compliance verification across 5 EU frameworks.

### 2.0.1 Key differentiators from ESG scoring:

- **Social-first philosophy:** Gender & Social Equity (20%) + Social Mobility (15%) + Governance (15%) = **50% of total weight** on social foundations
- **Social veto rule:** Projects scoring below 30 on Gender or Social Mobility are **capped at Amber** regardless of environmental performance
- **Regulatory completeness:** EU Taxonomy, SFDR (Art. 6/8/9), CSRD/ESRS, TCFD, MiFID II suitability — all checked automatically
- **Explainable by design:** Every score traces to a published formula and regulatory standard — zero black box

### 2.1 Why Not ESG?

ESG ratings measure **risk to the company from sustainability factors**. Impact scoring measures **the company’s effect on the world**. These are fundamentally different questions.

A mining company with excellent ESG governance can still destroy communities. A solar farm with perfect environmental metrics can still exploit workers. ESG would score both highly. **Danki Impact Scoring would not.**

The social veto rule operationalises this distinction: no project achieves a Green band if it fails people, regardless of how well it treats the planet.

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## 3 The Scoring Framework

### 3.1 Architecture Overview

#### DANKI IMPACT SCORING Scoring Architecture

##### INPUT

- Project metadata (country, sector, asset class, size)
- 8 dimension indicators (quantitative + qualitative)
- PAI values (GHG intensity, gender gap, corruption flag)
- SFDR classification intent (Art. 6 / 8 / 9)

##### LAYER 1 - Regulatory Compliance Gate

- EU Taxonomy: Substantial Contribution + DNSH
- SFDR: 18 mandatory PAI indicators
- CSRD/ESRS: Double materiality scope
- TCFD: Physical + transition risk
- MiFID II: Sustainability preference alignment

##### LAYER 2 - Impact Composite Score (0-100)

- 8 weighted dimensions (social-first: 50% social weight)
- Social Veto Rule (Gender<30 OR Social<30 → Amber cap)
- Band assignment: Red / Amber / Green / Dark Green

##### LAYER 3 - ML Calibration (roadmap)

- XGBoost adjustment for country/sector/size interactions
- Trained on validated benchmark data

##### OUTPUT

- Composite score + band + radar chart
- Regulatory gate dashboard (pass/fail per framework)
- PAI traffic-light dashboard
- Warnings & strengths
- PDF due diligence report

### 3.2 The 8 Impact Dimensions

#### 3.2.1 Social-First Weighting Philosophy

Academic literature (World Bank, UNDP, GIIN) consistently shows that social determinants are upstream of environmental outcomes. Gender equality is the single strongest predictor of long-term development. Social

mobility determines whether economic value stays in a territory. Governance is the multiplier — it either amplifies or destroys every other dimension.

**The Danki principle:** a solar farm built on grabbed land, staffed by imported labour, with a 40% gender pay gap is not impact. ESG would score it green. Danki would not.

Table 1: Danki Impact Scoring — Dimension Weights

Dimension	Weight	Key Indicators	Regulatory Basis
<b>Gender &amp; Social Equity</b>	<b>20%</b>	Gender pay gap, board diversity, pay ratio, anti-discrimination policy	SFDR PAI 12–13, CSDDD Art. 3–7, IFC PS2
<b>Social Mobility</b>	<b>15%</b>	Local hiring %, living wage ratio, skills uplift, education access	OECD Guidelines Ch. V, SDG 1/4/8/10
<b>Governance &amp; Corruption</b>	<b>15%</b>	Beneficial ownership transparency, AML flags, CPI score, sanctions	SFDR PAI 15–16, EU AML Directive 6
<b>Climate &amp; Environment</b>	<b>18%</b>	GHG avoided, energy transition alignment, biodiversity net gain	EU Taxonomy Obj. 1–2, TCFD, SFDR PAI 1–6
<b>Pollution &amp; Health</b>	<b>10%</b>	Scope 1–3 emissions, toxic exposure, air/soil quality	SFDR PAI 1–4, 8–9, EU Taxonomy Obj. 5
<b>Water &amp; Resources</b>	<b>8%</b>	Water intensity, circular economy rate, waste	EU Taxonomy Obj. 3, SFDR PAI 7–8
<b>Territory &amp; Local Wealth</b>	<b>8%</b>	Local GDP contribution, supply chain localisation, tax transparency	CSRD ESRS S3, OECD MNE Guidelines
<b>Innovation &amp; Resilience</b>	<b>6%</b>	Tech transferability, employment durability, R&D intensity	EU Taxonomy Obj. 6, SDG 9

**Social total: 50%** (Gender 20% + Social Mobility 15% + Governance 15%) — **Environmental total: 36%** (Climate 18% + Pollution 10% + Water 8%) — **Economic total: 14%** (Territory 8% + Innovation 6%)

### 3.3 Social Veto Rule

**! Important**

**SOCIAL VETO:** If a project scores below 30/100 on Gender & Social Equity **OR** Social Mobility, the maximum achievable band is **Amber**, regardless of the composite score.

A project scoring 85/100 overall but 25/100 on gender is capped at Amber with an explicit veto warning.

**Regulatory basis for the veto:**

- **SFDR PAI 12–13:** Gender pay gap and board gender diversity are mandatory disclosure indicators
- **CSDDD Art. 3–7:** Companies must identify, prevent and address adverse human rights impacts
- **IFC Performance Standard 2:** Labour and working conditions requirements for all IFC investments

- OECD Guidelines for MNEs, Ch. V: Employment and industrial relations standards

Implementation:

```
def _assign_band(composite: float, gender_dim: float, social_dim: float) -> tuple:
    veto = gender_dim < 30.0 or social_dim < 30.0
    if composite >= 75:
        raw_band = "Dark Green"
    elif composite >= 55:
        raw_band = "Green"
    elif composite >= 35:
        raw_band = "Amber"
    else:
        raw_band = "Red"

    if veto and raw_band in ("Dark Green", "Green"):
        return "Amber", True # Capped
    return raw_band, veto and raw_band == "Amber"
```

### 3.4 Score Bands

Table 2: Score Band Decision Table

Band	Range	Meaning	SFDR Alignment
<b>Dark Green</b>	75–100	Exceptional positive impact across all dimensions	Article 9 eligible
<b>Green</b>	55–74	Meaningful positive impact, minor gaps	Article 8+ eligible
<b>Amber</b>	35–54	Mixed impact, significant improvement needed	Article 8 minimum / Article 6
<b>Red</b>	0–34	Net negative or negligible impact	Article 6 only

## 4 Dimension Scoring Formulas

Each dimension score is computed from observable indicators using transparent, auditable formulas. All scores are on a 0–100 scale.

### 4.1 Gender & Social Equity (20%)

$$G = \min\left(100, 100 \times (1 - \text{gender\_pay\_gap}) \times \text{board\_diversity} \times \text{policy\_factor}\right)$$

Where:

- **gender\_pay\_gap** [0, 1]: Ratio of pay gap (0 = no gap, 1 = complete gap)
- **board\_diversity** [0, 1]: Proportion of women on board
- **policy\_factor** {0.6, 0.8, 1.0}: Anti-discrimination policy strength (none / basic / comprehensive)

**Score interpretation:** A company with 0% pay gap, 50% board diversity and comprehensive policy scores ~50. To reach 80+, the company needs near-zero gap with majority-female leadership.

## 4.2 Social Mobility (15%)

$$S = \min\left(100, 100 \times \text{local\_hire\_ratio} \times \text{living\_wage\_ratio} \times \text{skills\_factor}\right)$$

Where:

- **local\_hire\_ratio** [0, 1]: Proportion of workforce hired locally
- **living\_wage\_ratio** [0.5, 2.0]: Ratio of median wage to local living wage
- **skills\_factor** {0.6, 0.8, 1.0}: Skills uplift programme (none / basic / comprehensive)

## 4.3 Governance & Corruption (15%)

$$V = \min\left(100, \text{CPI}_{\text{country}} \times \text{transparency\_factor} \times (1 - \text{sanctions\_flag})\right)$$

Where:

- **CPI\_country** [0, 100]: Transparency International Corruption Perceptions Index
- **transparency\_factor** {0.5, 0.75, 1.0}: Beneficial ownership disclosure level
- **sanctions\_flag** {0, 1}: Active sanctions or AML flags (binary penalty)

## 4.4 Climate & Environment (18%)

$$C = \min\left(100, \text{taxonomy\_alignment} \times 100 \times \text{transition\_factor} \times (1 - \text{stranding\_risk})\right)$$

Where:

- **taxonomy\_alignment** [0, 1]: EU Taxonomy substantial contribution score
- **transition\_factor** {0.6, 0.8, 1.0}: Energy transition pathway strength
- **stranding\_risk** [0, 1]: Probability of asset stranding under 1.5°C scenario

## 4.5 Pollution & Health (10%)

$$P = \max\left(0, 100 - (\text{emission\_intensity} \times 0.5) - (\text{toxic\_exposure} \times 30)\right)$$

Where:

- **emission\_intensity**: tCO<sub>2</sub>e per €M revenue
- **toxic\_exposure** {0, 1, 2, 3}: Categorical (none / low / medium / high)

## 4.6 Water & Resources (8%)

$$W = \max\left(0, 100 - (\text{water\_intensity} \times 10) + (\text{circular\_rate} \times 30)\right)$$

## 4.7 Territory & Local Wealth (8%)

$$T = \min\left(100, \text{local\_procurement\_rate} \times 100 + \text{tax\_transparency} \times 20\right)$$

## 4.8 Innovation & Resilience (6%)

$$I = \min\left(100, \text{R\&D\_intensity} \times 500 + \text{tech\_transfer} \times 30 + \text{employment\_durability} \times 20\right)$$

## 4.9 Composite Score

$$\text{Danki Score} = \sum_{d=1}^8 w_d \times D_d$$

Where  $w_d$  are the dimension weights and  $D_d$  are the dimension scores. The composite is then subject to the social veto rule before band assignment.

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## 5 Regulatory Framework Mapping

### 5.1 Layer 1 — Compliance Gates

Each investment is checked against 5 regulatory frameworks. The output is pass/fail with specific failure reasons.

### 5.2 EU Taxonomy (Regulation 2020/852)

Check	Logic	Source
Substantial Contribution	Climate score 60 AND sector is taxonomy-eligible	Art. 3, Delegated Acts
DNSH	No dimension below 25	Art. 17
Minimum Safeguards	Governance 40 AND Gender 40	Art. 18, OECD/ILO/UNGP

### 5.3 SFDR (Regulation 2019/2088)

Classification	Logic
Article 9	Composite 75 AND taxonomy aligned AND no veto
Article 8	Composite 45 AND taxonomy partially aligned
Article 6	All other products

### 5.4 CSRD/ESRS (Directive 2022/2464)

- **In scope:** Companies with 1,000 employees and €450M turnover (post-Omnibus, December 2025)
- **Out of scope projects:** Danki uses proxy data and reasonable estimates — a key differentiator vs. tools that require full CSRD disclosure

### 5.5 TCFD (FSB Recommendations)

- Physical risk: Country climate vulnerability  $\times$  sector exposure
- Transition risk: Carbon intensity  $\times$  1.5°C scenario alignment

### 5.6 MiFID II Sustainability Preferences

- Taxonomy alignment percentage
  - PAI consideration flag
  - SFDR article classification
-

## 6 Exploratory Data Analysis

The following analysis is based on the synthetic benchmark dataset of 2,000 investment projects across 50 countries, 20 sectors and 6 asset classes.

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## 7 ML Calibration Methodology

### 7.1 Approach: Composite Weighted Index with XGBoost Adjustment

The Danki scoring approach prioritises **explainability** — a requirement for regulatory acceptance (SFDR Art. 4, MiFID II suitability assessment). The ML layer is a calibration adjustment, not a replacement for the deterministic composite.

#### 7.1.1 Why Composite First, ML Second

Table 5: ML Approach Comparison

Approach	Explainability	Regulatory Acceptance	Accuracy
Pure ML (black box)	Low	Rejected by AMF/EBA	High
Pure composite (no ML)	High	Accepted	Medium
<b>Composite + ML calibration</b>	<b>High</b>	<b>Accepted</b>	<b>High</b>

#### 7.1.2 XGBoost Calibration Layer (Phase 3 Roadmap)

The ML layer adjusts the deterministic composite for interaction effects that linear weighting cannot capture:

1. **Country x Sector interactions:** Renewable energy in Norway vs. Nigeria has fundamentally different risk profiles that a country score alone doesn't capture
2. **Investment size non-linearity:** A EUR 1,500 microfinance project and a EUR 50M infrastructure project are scored on the same 0-100 scale but behave very differently
3. **Temporal calibration:** As benchmark data accumulates, the model recalibrates weights to reflect observed impact outcomes

**Training pipeline:**

Phase 3 Pipeline:

1. Validated benchmark dataset (2,000+ scored projects)
2. Feature engineering: dimension scores + country/sector/size interactions
3. XGBoost regressor: target = expert-validated Danki score
4. SHAP values for every prediction -> full explainability preserved
5. Human-in-the-loop: ML adjustment capped at +/- 10 points from composite
6. Quarterly retraining on new validated data

#### 7.1.3 ML Architecture

### 7.2 Simulated Feature Importance

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## 8 Data Sources

### 8.1 Public / Open Data Sources



Table 6: Public / Open Data Sources

Source	Data Provided	Coverage	Frequency	Access
<b>Transparency International CPI</b>	Country corruption perception index (0-100)	180 countries	Annual	Free
<b>World Bank Open Data</b>	GDP per capita, Gini, electricity access, education enrollment	217 countries	Annual	Free
<b>ILO STAT</b>	Gender pay gap, labour force participation, working conditions	189 countries	Annual	Free
<b>UNDP HDI</b>	Human Development Index, gender inequality index	191 countries	Annual	Free
<b>ND-GAIN Index</b>	Climate vulnerability and readiness scores	185 countries	Annual	Free
<b>EU Taxonomy Compass</b>	Taxonomy-eligible activities, technical screening criteria	EU	Ongoing	Free
<b>EDGAR (JRC)</b>	GHG emission inventories by country and sector	Global	Annual	Free
<b>Global Living Wage Coalition</b>	Living wage benchmarks by country/region	35+ countries	Annual	Free
<b>OECD DAC</b>	ODA flows, development finance statistics	180+ countries	Annual	Free
<b>OpenSanctions</b>	Sanctions lists, PEP data, enforcement actions	Global	Daily	Free
<b>UN Comtrade</b>	International trade data (supply chain localisation proxy)	200+ countries	Monthly	Free
<b>Eurostat</b>	EU employment, energy, environment statistics	EU-27	Quarterly	Free
<b>SFDR PAI RTS Annex I</b>	18 mandatory PAI indicator definitions and methodologies	EU regulation	Regulatory	Free
<b>ESMA/EBA Joint PAI Report</b>	Supervisory guidance on PAI indicator calculation	EU regulation	Annual	Free

## 8.2 Proprietary / Commercial Data Sources

Table 7: Proprietary / Commercial Data Sources

Source	Data Provided	Use Case	Approx. Cost/yr
<b>MSCI ESG</b>	ESG ratings, carbon data, PAI metrics, controversy scores	Benchmark calibration, PAI pre-fill	EUR 30k-100k
<b>Sustainalytics</b>	ESG risk ratings, carbon emissions, PAI indicators	Cross-validation	EUR 25k-80k
<b>CDP</b>	Corporate climate disclosures, water security, forests	Climate & water enrichment	EUR 5k-20k
<b>Refinitiv ESG</b>	630+ ESG metrics, controversies, carbon data	Large-cap coverage	EUR 20k-60k
<b>Bloomberg ESG</b>	ESG scores, supply chain data, governance metrics	Terminal-integrated scoring	Bloomberg Terminal
<b>Preqin</b>	PE/VC fund data, impact fund benchmarks	Private market calibration	EUR 15k-50k
<b>S&amp;P Trucost</b>	Environmental cost data, carbon earnings at risk	Pollution & climate dimensions	EUR 20k-40k
<b>RepRisk</b>	ESG risk incidents, controversy tracking	Governance & corruption alerts	EUR 10k-30k
<b>Clarity AI</b>	Impact measurement, SDG alignment, PAI automation	Full PAI dashboard pre-fill	Custom
<b>Moody's ESG</b>	Climate risk, physical risk, transition risk scoring	TCFD compliance layer	EUR 15k-45k

### **i** Note

**Danki v1.0 operates entirely on public data.** The scoring engine requires only country-level indicators (CPI, HDI, climate vulnerability) plus project-level inputs from the user. Proprietary sources are optional enrichments for Phase 3 ML calibration and automated PAI pre-fill.

## 8.3 Data Integration Architecture

## 9 Validation Statistics

### 9.1 Benchmark Dataset Summary

The synthetic benchmark dataset contains 2,000 investment projects designed to stress-test the scoring engine across extreme conditions.

### 9.2 Scoring Engine Validation

Three representative test cases demonstrate the engine produces economically coherent results:

Table 8: Validation Test Cases

Test Case	Country	Sector	Size	Danki Score	Band	SFDR	Veto
Renewable energy	France	Solar PV	EUR 5M	77.2	Dark Green	Article 9	No
Extractive industry	Nigeria	Oil & Gas	EUR 250k	28.7	Red	Article 6	No
Microfinance	Bangladesh	Financial Inclusion	EUR 8k	54.4	Amber	Article 8	No
Digital infra (forced veto)	Nigeria	Telecoms	EUR 1M	65.0	Amber (capped)	Article 8	<b>Yes — Gender</b>

## 10 Deployment

### 10.1 Technical Requirements

- **Python 3.10+** with pandas, numpy, matplotlib
- **Quarto 1.4+** for report rendering
- **No database required** — the app runs entirely client-side in the browser

### 10.2 Installation & Build

```
# 1. Clone the repository
git clone https://github.com/your-org/danki-impact-scoring.git
cd danki-impact-scoring

# 2. Install Python dependencies
pip install -r requirements.txt

# 3. Generate the benchmark dataset (first time only)
cd src
python generate_data.py
# -> data/processed/investment_impacts.csv (2,000 projects)

# 4. Render the whitepaper
cd ../report
quarto render index.qmd --to html --output-dir ../docs

# 5. Render the scoring app
quarto render app.qmd --to html --output-dir ../docs

# 6. Deploy to GitHub Pages
quarto publish gh-pages
```

### 10.3 Deployment Options

Table 9: Deployment Options

Option	Setup	Best For
<b>GitHub Pages</b>	<code>quarto publish gh-pages</code>	Public demo, LP access
<b>Internal server</b>	Copy docs/ to any static file server	Analyst team, compliance
<b>Offline</b>	Open docs/app.html directly in browser	Field due diligence

The scoring app is **fully static** — no server, no database, no API calls. All scoring logic runs in JavaScript in the user’s browser. This means:

- **Zero infrastructure cost**
- **Works offline** for field due diligence in low-connectivity environments
- **No data leaves the user’s device** — important for pre-investment confidentiality
- **Instant deployment** — any static hosting works (GitHub Pages, Netlify, S3, internal server)

## 10.4 Project Structure

```
danki-impact-scoring/
|-- data/
|   +-- processed/
|       +-- investment_impacts.csv    <- 2,000-row benchmark dataset
|-- docs/                             <- GitHub Pages output
|   +-- assets/
|-- notebooks/
|   +-- eda_marimo.py                 <- exploratory analysis
|-- report/
|   |-- index.qmd                    <- this methodology whitepaper
|   |-- app.qmd                     <- Danki scoring app
|   +-- report-style.css             <- shared brand stylesheet
|-- src/
|   |-- generate_data.py              <- synthetic dataset generator
|   |-- scoring.py                   <- composite scoring engine
|   +-- viz.py                       <- chart functions
|-- requirements.txt
|-- _quarto.yml
+-- README.md
```

## 11 Limitations & Roadmap

### 11.1 Current Limitations (v1.0)

1. **Synthetic data only:** The benchmark dataset is generated, not sourced from real investments. Dimension scores are calibrated to be realistic but are not validated against actual outcomes.
2. **No temporal dimension:** Scores are point-in-time. Impact trajectories (improving vs. declining) are not captured.
3. **Equal treatment of PAI indicators:** All 18 mandatory PAI indicators are tracked but not differentially weighted within their parent dimensions.
4. **No automated data ingestion:** Users manually input project data. API connections to data providers are not yet implemented.

5. **ML layer is simulated:** The XGBoost calibration layer is designed but not yet trained on validated data.

## 11.2 Roadmap

Table 10: Development Roadmap

Phase	Deliverable	Timeline
<b>Phase 1</b> (complete)	Scoring engine, whitepaper, interactive app, synthetic benchmark	Q1 2025
<b>Phase 2</b>	Real investment data onboarding, expert validation of dimension scores	Q2 2025
<b>Phase 3</b>	XGBoost calibration layer with SHAP explainability	Q3 2025
<b>Phase 4</b>	API connections to public data sources (TI CPI, World Bank, ND-GAIN)	Q3 2025
<b>Phase 5</b>	Proprietary data integration (MSCI, CDP, RepRisk)	Q4 2025
<b>Phase 6</b>	Portfolio-level scoring (aggregate multiple projects into fund-level impact)	Q1 2026
<b>Phase 7</b>	Temporal impact tracking and trajectory scoring	Q2 2026

## 12 References

1. **EU Taxonomy Regulation** (2020/852) — Official Journal of the European Union
2. **SFDR** (2019/2088) — Regulation on sustainability-related disclosures in the financial services sector
3. **CSRD** (2022/2464) — Corporate Sustainability Reporting Directive
4. **CSDDD** (2024/1760) — Corporate Sustainability Due Diligence Directive
5. **TCFD Recommendations** (2017) — Task Force on Climate-related Financial Disclosures, FSB
6. **MiFID II** (2014/65/EU) — Markets in Financial Instruments Directive, as amended for sustainability preferences
7. **ESMA/EBA Joint Report on PAI** (JC 2024/68, October 2024) — Principal Adverse Impact disclosures
8. **EU Omnibus Simplification Package** (December 2025) — CSRD scope narrowing to 1,000+ employees / EUR 450M turnover
9. **MSCI SFDR Adverse Impact Metrics Methodology** (2024) — PAI calculation standards
10. **Transparency International CPI** (2024) — Corruption Perceptions Index methodology
11. **UNDP Human Development Report** (2024) — HDI and Gender Inequality Index
12. **ND-GAIN Country Index** (2024) — Climate vulnerability and readiness
13. **GIIN** — Global Impact Investing Network, Annual Impact Investor Survey (2024)
14. **IMP** — Impact Management Project, Five Dimensions of Impact framework
15. **IFC Performance Standards** (2012) — Environmental and Social Sustainability
16. **OECD Guidelines for Multinational Enterprises** (2023 update) — Responsible business conduct

**Danki Impact Scoring v1.0** · Methodology Whitepaper Designed for impact investors who refuse to confuse compliance with change.