

ENVIRONMENTAL, SOCIAL, AND GOVERNANCE, IMPACT (ESG-I) POLICY

Policy number:	PCG-11	Version:	1
Responsible person:	Implementation Manager	Approved by Board on:	25 th Jan 2023
Date for Next Revision:	January 2026		

INTRODUCTION

The Global EverGreening Alliance Ltd (“the Alliance”) places high importance on ESG-I management, and this Policy contains guidelines that are material to the success of its projects/programs.

SCOPE

This policy applies to:

- (a) the Alliance;
 - (b) organisations that have been contracted by the Alliance to implement an Alliance project/program (Implementing Partners); and
 - (c) where Implementing Partners sub-contract any of their obligations to the Alliance, they will ensure that each sub-contractor implements appropriate measures in order to adhere to this policy,
- each a **Party**, and in each case, as this policy (or any part of it) may be applicable to a Party from time to time.

All commitments must be extended to Implementing Partners by MOU or Project/Program Implementation Agreements.

POLICY COMMITMENTS

ESG-I and ESG-I Action Plan

A Party shall make all reasonable efforts to, demonstrate Good International Industry Practice (“GIIP”) in their management of ESG-I matters and in accordance with the requirements of this Policy.

Guiding laws, Standards and Guidelines

A Party shall comply with the following standards and norms, as may be amended, updated or revised from time to time to the extent applicable to the Party or the relevant project/program:

- The established program impact measurement and management framework (“IMMF”) or similar framework;
- UN Sustainable Development Goals¹ and the goals and objectives of the UNFCCC Paris Agreement²;
- The Equator Principles IV³;
- United Nation's ("UN") Guiding Principles on Business and Human Rights⁴;
- United Nations Declaration on Rights of Indigenous Peoples⁵; International Labour Organisation ("ILO") Fundamental Conventions⁶;
- The recommendations of the Task Force for Climate-Related Disclosure ("TCFD")⁷;
- U.S. Foreign Corrupt Practices Act and the U.K. Bribery Act 2010⁸ and the Australian anti-bribery and corruption laws (for the purposes of the Australian Criminal Code Act 1995, and similar laws in each Australian State and Territory); and
- All ESG-related Applicable Laws in the Host Country.

Positive Environmental and Social Impacts

A Party shall discharge their obligations in accordance with any relevant project/program’s IMMF and ESG-I Action Plan.

Environmental and Social Risk Management

A Party must in respect to a relevant project/program:

- have in place (or have access to and/or can make use of) relevant policies, procedures, protocols and resources to assess and manage environmental and social risks; and
- complete an environmental and social risk assessment to the extent applicable and have adequate plans in place to address identified risks prior to commencing project/program activities .

Technical Experts

A Party must make all reasonable efforts to ensure that relevant staff and contractors have appropriate and sufficient skillsets, experience and qualifications to undertake the required ESG-I studies and tasks to implement relevant projects/programs.

¹ <https://sdgs.un.org/goals>

² https://unfccc.int/sites/default/files/english_paris_agreement.pdf

³ Insert link https://equator-principles.com/app/uploads/The-Equator-Principles_EP4_July2020.pdf

⁴ Insert link

https://www.ohchr.org/sites/default/files/documents/publications/guidingprinciplesbusinesshr_en.pdf

⁵ https://www.un.org/development/desa/indigenouspeoples/wp-content/uploads/sites/19/2018/11/UNDRIP_E_web.pdf

⁶ Insert link https://www.ilo.org/wcmsp5/groups/public/---ed_norm/---declaration/documents/publication/wcms_095895.pdf

⁷ <https://assets.bbhub.io/company/sites/60/2021/10/FINAL-2017-TCFD-Report.pdf>

⁸ Insert link or official number/reference for finding <https://www.investor.gov/introduction-investing/investing-basics/glossary/foreign-corrupt-practices-act-fcpa>; <https://www.legislation.gov.uk/ukpga/2010/23/contents>

Conduct

A Party is expected to engage ethically with employees, local volunteers, extension workers and communities, in all project interactions, in line with the Alliance's and investors' codes of conduct.

A Party shall establish a grievance mechanism to receive complaints or issues and will make this available to surrounding communities.

Occupational Health and Safety ("OHS") OHS Management System

A party will provide a safe and healthy work environment for employees, to be maintained through an OHS Management System and/or procedures appropriate to the size and scale of the activities and operations of the relevant Implementing Partner.

A Party shall make all reasonable efforts to ensure that it and any of its subcontractors demonstrate that all relevant OHS risks and security protocols relevant to the project/program delivery have been identified, and adequate plans and processes are in place to manage these. This shall be demonstrated through:

- implementing an appropriate OHS management system;
- carrying out an OHS risk assessment and implementing safe work practices and procedures to manage identified risks; and
- implementing procedures for emergencies or incidents, including reporting of these events.

Labour and Working Conditions and Human Rights

A Party shall:

(a) comply with national labour laws in the countries where the relevant project/program and any related activities are being performed; and

(b) to the extent possible, comply with the Guiding Principles on Business and Human Rights and the ILO Fundamental Conventions, including the following major components:

- Have established Human Resources policies and procedures appropriate to its size and workforce;
- Must not use force or exploitative child labour in their workforce or directly supervised contractors;
- Treat all workers with dignity and respect;
- Promote equal opportunities;
- commit to a workplace free of harassment and abuse;
- Have a grievance mechanism in place and accessible so that workers (and contractor workers) can raise grievances without risk of repercussions; and
- Where accommodation is provided for employees or contractors, such accommodation complies with minimum reasonable standards for habitation.

(c) Implement appropriate measures to identify and mitigate potential risks to the safety and security of local communities participating in a project/program.

Stakeholder Engagement

A Party shall make all reasonable efforts to ensure that any stakeholder engagement is undertaken in an inclusive and iterative manner consistent with Free and Prior Informed Consent (FPIC) and GIIP, and following the requirement of any relevant Impact Standard, including but not limited to:

- Stakeholders, both directly and indirectly affected, are identified via a mapping process;
- Mechanisms are in place to identify and manage vulnerable households or persons;
- Identified stakeholders are consulted in an inclusive manner via appropriate mechanisms, the process is documented, and methods of communication and follow-up are clearly articulated;
- FPIC is obtained from participating communities; and
- Meeting the requirements of relevant impact standards as may be required from time to time.

Information Technology

A party shall operate adequate systems and technology to deter/mitigate cyber crime and protect all project/program data (including beneficiary information) from theft, misuse or misappropriation.

Supply Chain Management

A Party shall make all reasonable efforts to manage ESG-I risks in supply chains, suppliers in industries with high risks of child or forced labour and risks to health and safety of workers.

Business Integrity

A Party will:

- adhere to any relevant code(s) of conduct;
- uphold high standards of business integrity and honesty, and operate in accordance with international laws and good practice;
- adopt and implement policies and procedures to prevent extortion, bribery, fraud, corruption and financial crime in accordance with local law requirements and relevant internationally recognised practices;
- properly record, report and review financial and tax information required by relevant accounting standards; and
- implement, or have access to, a whistleblowing procedure for reporting wrongdoing and misconduct in the workplace.

Resourcing and Training

A Party will have sufficient capacity to discharge the ESG-I requirements under this Policy (as applicable to each Party).

A Party shall conduct regular training for programme staff and subcontractors, including but not limited to OHS induction and refresher training and safeguarding training for interactions with vulnerable adults and children.

DEFINITIONS

In this Policy, capitalised terms have the meaning set out in the Program Implementation Agreements in relation to the Alliance’s projects/programs, which includes but is not limited to the “Restore Africa Program” or are defined in the context in which they are used.

RELATED DOCUMENTS

1. GEA Child Safeguarding and Protection Policy and Procedure
2. GEA Complaints Policy and Procedure
3. GEA Environmental Policy
4. GEA Ethnical Procurement Policy
5. GEA Financial Wrongdoing Policy
6. GEA Prevention of Sexual Exploitation, Abuse and Harassment Policy
7. GEA Programme Design Policy
8. GEA Whistleblower Policy
9. GEA Work Health and Safety Policy

REVISION HISTORY

Revision Date	Revision no:	Summary description of revision(s) made	Section(s) changed:
25 th January 2023	1	Creation of Policy	All

AUTHORISATION



Signature of Board Secretary

Global EverGreening Alliance Ltd