

# ESG POLICY

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## Introduction

Job Booster Chad's SARL existence is part of a bigger system of people, nature, values, other organizations. We aim to make a positive change in the society while preserving the wellbeing of people and the environment. More concretely, we aim to provide access to dignified (self-) employment opportunities for the youth. This is the policy of Job Booster Chad SARL to implement and comply with environment, social and governance standards (ESG) as set out herein ("ESG Policy"). This ESG policy establishes the scope and the ESG goals. Job Booster Chad SARL is referred to in this policy as the Company.

## Purpose and Objective

The purpose of this ESG policy is to create and promote behaviours that generate value to people and the environment.

The principle and objective of this ESG Policy is to ensure that the Company:

- i. complies with all the applicable Chadian laws relating to environment, social and governance to ensure overall sustainable development of the society and the sector in which the Company is operating.
- ii. implement best practices for its business relating to the environment and the health and safety of its work force.
- iii. take into consideration the ESG Policy in decisions relating to its business and operations.
- iv. implement transparency in its business operations; and
- v. initiate steps that minimise adverse impact and enhance positive effects on the environment, workers, and all stakeholders.

## Scope

This policy applies to Job Booster Chad SARL. It may also refer to suppliers, partners, and the supported start-ups.

## Key Definitions.

The following capitalized terms used in this ESG Policy shall have the meaning ascribed below:

- i. "Company" for the purpose of this ESG Policy shall mean and include the Company and its Affiliates;
- ii. "ESG Action Plan" means the plan specifically designed for the Company defining actions, responsibilities, budgets, deliverables, compliance indicators, and a timeframe for the measures required to meet ESG Requirements in the business activities of the Company, including the establishment of an appropriate ESG Management System;
- iii. "ESG Laws" mean Environmental Laws, Social Laws or Governance Laws and the terms of any permits, licenses, consents, approvals or other authorisations held by the Company under Environmental Laws or Social Laws;
- iv. "ESG Management System" means a management system, appropriate to the size and nature of the business which is designed to (i) ensure a systematic approach to compliance with ESG Requirements, (ii) monitor progress against the ESG Action Plan, (iii) provide a mechanism to assess environmental, social and governance risks and address those risks, (iv) monitor and report on progress and (v), to the extent possible, involve stakeholders.
- v. "ESG Requirement" means the requirements and compliances set out in this ESG Policy.

- vi. “Environment” means humans, animals, plants, and all other living organisms including the ecological systems of which they form part and the following media:
  - a. air (including, without limitation, air within natural or man-made structures, whether above or below ground).
  - b. water (including, without limitation, territorial, coastal, and inland waters, water under or within land and water in drains and sewers); and
  - c. land (including, without limitation, land under water);
- vii. “Environmental Law” means any applicable law, rule, or regulation (including international treaty obligations) concerning the Environment and natural resource management applicable in each jurisdiction where the Company has its operations.
- viii. “Financial Crime” means:
  - a. the promise, offering or giving to, and/or the solicitation or acceptance by, any person, directly or indirectly, of anything of value, to induce any person to act improperly or improperly refrain from acting in connection with any business or public function (or to reward them for improperly acting or refraining from acting) and includes a breach of anti-corruption law in any jurisdiction applicable to the Company.
  - b. any action or omission, including any misrepresentation, that knowingly or recklessly misleads, or attempts to mislead, a party to obtain a financial benefit or to avoid an obligation; or
  - c. deliberately destroying, falsifying, altering, or concealing material evidence, making false statements, limiting access or other actions which materially impede an investigation by government or any third party into allegations of the matters referred to in (i) or (ii) above, and/or threatening, harassing, or intimidating any party to prevent it from disclosing its knowledge of matters relevant to the investigation or from pursuing the investigation.
- ix. “Governance Laws” means any law, rule or regulation relating to bribery, corruption, financial crime, anti-terrorism, terrorism financing, anti-money laundering, export controls, trade embargoes, travel bans applicable to the Company including, without limitation, the economic sanctions and regulations of a Governmental Authority including any African Union restrictive measure that has been implemented pursuant to any African Commission.
- x. “Governmental Authority” means any central, union, state, local or other statutory, governmental, administrative, regulatory, judicial, or quasi-judicial authority or self-regulating authority or agency, government department, commission, board, tribunal, court or other entity having jurisdiction over the Company.
- xi. “IFC Performance Standards” means the most updated performance standards issued by International Finance Corporation (IFC) as currently available on [www.ifc.org](http://www.ifc.org) or such other website as directed by IFC.
- xii. “ILO Conventions” means the conventions and recommendations of International Labour Organization (ILO) as currently available on [www.ilo.org](http://www.ilo.org) or such other website directed by the ILO;
- xiii. “Social Law” means any law, rule or regulation (including international treaty obligations) applicable in the jurisdiction of the Company concerning (i) labour, (ii) social security, (iii) the regulation of industrial relations (between government, employers and employees), (iv) the protection of occupational as well as public health and safety, (v) the regulation of public participation, (vi) the protection and regulation of ownership of land rights (both formal and traditional), immovable goods and intellectual and cultural property rights, (vii) the protection and empowerment of indigenous peoples and ethnic groups, (viii) the protection of cultural heritage, and (ix) all other laws, rules and regulations providing for the protection of employee and citizens, including the payment of wages which meet or exceed industry or legal national minima;

## Commitments

1. The Company commit to:
  - a. comply with all applicable ESG Laws;
  - b. not to commit any Financial Crime;
  - c. adopt, maintain and ensure compliance with the anti-bribery and corruption policy and whistle blowing policy and further shall ensure that the employees, agents or contractors or any person retained by the Company are aware of such policies.
  - d. not engage in any business or action that is not permitted under law;
  - e. immediately intimate the Company in the event of a breach of ESG Laws;
  - f. not engage or invest (directly or indirectly) in any business set out in Annex 1; and
  - g. not receive (whether directly or indirectly) any proceeds of any crime or offence and such contributions have not supported the activities or business of the Company in any way.
  - h. comply with the ESG Requirements, subject to any period permitted to achieve compliance with a ESG Requirement set out in the ESG Action Plan; and
  - i. take all reasonable steps in anticipation of known or expected future changes to the ESG Requirements.
  - j. implement all actions set out in the ESG Action Plan within the timeframes set out in that plan.
  - k. pay wages which meet or exceed industry or legal national minima that enables them to live a dignified life.
  - l. Create a thriving work environment for its employees
  - m. not discriminate in terms of recruitment, progression, terms and conditions of work and representation, on the basis of personal characteristics unrelated to inherent job requirements, including gender, race, colour, caste, disability, political opinion, sexual orientation, age, religion, social or ethnic origin, marital status, membership of workers' organisations, legal migrants, or HIV status (unless positive discrimination is permitted by law and is intended to address a historical imbalance);
  - n. provide an appropriate grievance mechanism that is available to all workers and where appropriate other stakeholders, and which includes grievances brought by those affected by the operation of the Company; and
  - o. implement policies and procedures for, and encourage, the reporting of wrongdoing and misconduct by staff, employees, and contractors in their dealings with each other or with third parties that includes protection for the reporter and appropriate disciplinary action for anyone found to harass the reporter.
  - p. The Company must ensure that the Company upholds high standards of business integrity and honesty; and adopts and implements policies and practical procedures to prevent extortion, fraud, bribery, corruption, and financial crime in accordance with local law requirements and international best practice, including anti-corruption and anti-money laundering best practice, including:
    - i. the adoption and periodic review of a code of ethics which must incorporate a whistle-blower policy, the anti-bribery and corruption policy (including explanations and procedures) in the agreed form and other appropriate business integrity and legal compliance policies to ensure compliance with applicable Governance Laws (including prohibiting employees and contractors acting on the Company's behalf from promising, making or receiving gifts of substance in the course of business or making of payments as improper inducement to confer preferential treatment);
    - ii. employee training programmes; and
    - iii. appropriate due diligence procedures to evaluate the integrity and business history of persons and entities with whom they wish to transact.
  - q. properly maintain records, reports and reviews financial and tax information and adopt internationally recognised accounting standards.
  - r. establishes corporate governance practices appropriate to the size and nature of the business.
  - s. deals with regulators in an open and co-operative manner.

- t. use information received from its business partners only in the best interests of the business relationship and not for personal financial gain by any worker; and
- u. ensures that employees and third parties providing material goods and services to the Company are contractually bound not to engage in any Financial Crime in the performance of employment or services on its behalf.
- v. not, directly or indirectly, finance the activities of any person or entity then on any list of specifically designated nationals or designated persons or entities issued under the Governance Laws (each as amended, supplemented or substituted from time to time) or who is in a country or territory which is subject to trade, economic or financial sanctions embargoes or travel bans imposed, administered or enforced by a regulatory body under the Governance Laws, to the extent that the financing would currently be prohibited by a regulatory body.

## Best Practices

1. Unless specifically required under ESG Law, the Company shall undertake to implement the following:
  - a. not employ or make use of forced labour in accordance with ILO Convention No. 29 (Forced Labour) and ILO Convention No. 105 (Abolition of Forced Labour);
  - b. not employ or make use of child labour in accordance with ILO Convention No. 138 (Minimum Age) and ILO Convention No. 182 (Worst Forms of Child Labour);
  - c. adopt an open attitude towards workers' organisations and respect the right of all workers to join or form workers' organisations of their own choosing, to bargain collectively and to carry out their representative functions in the workplace in accordance with the Applicable Law, ILO Convention No. 87 (Freedom of Association and Right to Organise) and ILO Convention No. 98 (Right to Organise and Collective Bargaining);
  - d. provide reasonable working conditions including a safe and healthy work environment, working hours that are not excessive in accordance with ILO Convention No. 1 (Hours of Work (Industry)) and clearly documented terms of employment, respecting any collective bargaining agreements that are in place or (where these do not exist or do not address working conditions) or conditions established, by collective agreement or otherwise, for work in the trade or industry concerned in the area where the work is carried out;
2. The Company should consider the potential for positive environmental and social impact from their business activities and how these could also benefit the business, for example through cost savings, reduced staff turnover or improved stakeholder relations. These should include adopting, developing, offering, or marketing:
  - a. products, services, skills, or employment opportunities that could benefit community stakeholders.
  - b. a living wage that is sufficient to meet workers' needs; and
  - c. resource efficient, greenhouse gas reducing or low carbon technologies or working practices.
3. If the activities of the Company involve or could be reasonably expected to involve:
  - a. significant air emissions (including of greenhouse gases), use of water or generation of liquid effluents, generation of hazardous or other solid wastes or resource use inefficiencies.
  - b. transactions that generate adverse community health and safety impacts;
  - c. the acquisition and/or use of land that will lead to the economic or physical displacement of communities;
  - d. significant negative impacts on biodiversity, habitat or ecosystem services, including without limitation (A) provisioning services such as food or timber, (B) regulating services such as water flow regulation, (C) cultural services such as sacred sites and (D) supporting services such as soil formation;
  - e. impacts to indigenous peoples (or other marginalized and vulnerable groups);

- f. impacts to cultural heritage; or
- g. other significant negative environmental or social impacts

then the Company shall (A) implement the relevant IFC Performance Standards and (B) develop an appropriate stakeholder engagement plan in line with the applicable IFC Performance Standard, and (C) develop an environmental and social impact assessment and/or issue specific action plan (e.g. a resettlement action plan) for any such activities.

4. If the activities of the Company could reasonably be expected to involve:
  - a. significant risks to the health and safety of workers or to other stakeholders, including affected communities, the Company should assess and mitigate those risks, for example through a Health and Safety audit and action plan, in line with the relevant IFC Performance Standards;
  - b. coal-fired power, the use of coal must be justified by the impact of the proposed activity by the Company and that no practicable alternatives exist;
  - c. significant emissions of greenhouse gases, ensure that adequate measures to reduce emissions to the extent possible and mitigate adverse climate impacts are implemented.

### **ESG Management System**

1. The Director of Job Booster Chad is responsible to ensure the implementation, operation and maintenance of the ESG Management System. Different officers or personnel may be responsible for different aspects of the ESG Management System.
2. The Company must implement, maintain, and continuously improve the ESG Management System, including deploying employees of sufficient expertise and seniority as is necessary for this purpose.
3. The ESG Management System Is supervised by the sole shareholder of Job Booster Chad, Job Booster Netherlands BV. Supervision of the ESG Management System must include:
  - a. overseeing implementation of the ESG Action Plan;
  - b. reports to the Board on any material issue that has arisen as a result of the operation of the ESG Management System since the last meeting and an explanation as to how it is being dealt with;
  - c. ensuring that the Company has the systems and resources (including employees of sufficient expertise and seniority) to understand and determine the applicability of the ESG Requirements to the Company and monitor the underlying ESG Laws, IFC Performance Standards and ILO Conventions for applicable changes;
  - d. examining policies and procedures relating to the ESG Requirements and their implementation and making recommendations for their improvement to the Board;
  - e. considering periodic reports from management on the implementation of the ESG Action Plan;
  - f. reviewing and approving the report to the Board, as required under clause 3(b) above;
  - g. considering ESG assessment reports on new projects or acquisitions, if consummated, would cause the Company to be in breach of the ESG Requirements; and
  - h. appointing consultants to investigate alleged breaches of the ESG Requirements or the related policies and procedures of the Company.

### **Information Rights, Reporting and Intimations and Audit**

1. In addition to the reports set out in the investment agreements, the Company shall provide the following to the Board:
  - a. The Company must, as soon as it is available, but in any event no later than 180 days after each financial year end, deliver to the Board an environmental, social and governance monitoring. The monitoring report must set out in detail the progress the Company has made towards implementing the ESG Action Plan. The monitoring report must be approved annually by the Company's board of directors.

- b. The Company must promptly send to the Board any internal audit report prepared for the Company which addresses Company's compliance with all or any part of the ESG Requirements.
- c. The Company must ensure that the work plan of any internal audit firm (or internal audit function within the Company) includes a review of:
  - i. the assessment of the bribery and financial crime risks faced by the Company,
  - ii. the systems, policies, and procedures for managing such risks, and
  - iii. the implementation and effectiveness of those policies and procedures.

#### **Annex 1: list of prohibited businesses**

1. The production of, or trade in:
  - a. hazardous chemicals, pharmaceuticals, pesticides and wastes, as specified in the 2004 Stockholm Convention on Persistent Organic Pollutants; the 2004 Rotterdam Convention on the Prior Informed Consent Procedure for Certain Hazardous Chemicals and Pesticides in International Trade; the 1992 Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal and WHO Recommended Classification of Pesticides by Hazard Class 1a (extremely hazardous); or 1b (highly hazardous);
  - b. ozone depleting substances, as specified in the 1999 Montreal Protocol on Substances that Deplete the Ozone Layer;
  - c. endangered or protected wildlife or wildlife products, as specified in the 1975 Convention on International Trade in Endangered Species or Wild Flora and Fauna.
  - d. any other product or activity deemed illegal under applicable local or national laws or regulations or subject to internationally agreed phase-outs or bans as defined in global conventions and agreements;
  - e. arms (i.e. weapons, munitions or nuclear products, primarily designated for military purposes); or
  - f. radioactive materials (excluding medical equipment, quality control (measurement) equipment and any equipment in which the radioactive source could reasonably be considered to be trivial or adequately shielded).
2. Production of, use of, or trade in unbonded asbestos fibres.
3. Unsustainable fishing methods such as blast fishing and drift net fishing in the marine environment using nets more than 2.5 kilometres in length.
4. Prostitution and Pornography.
5. Gambling, gaming casinos and equivalent enterprises.
6. Tobacco or tobacco related products.