751.EARTH FAMILY GROUP

Since Time Began

GOVERNANCE, SAFEGUARD, GENDER AND INTEGRITY POLICY MANUAL

This manual contains the following approved policies of the 751.Earth Family Group:

1. Environmental and Social Safeguards Policy (ESMS)
2. Gender Equality and Social Inclusion Policy (GESI)
3. Anti-Money Laundering and Countering the Financing of Terrorism Policy (AML/CFT)
4. Fraud and Anti-Corruption Policy
5. Conflict of Interest Policy
6. Child Protection and Safeguarding Policy

751 EARTH LTD | Company No. 15950608

Registered Office: 7 Millfield Avenue, Northallerton, England, DL6 1AT

www.751.earth

Approved August 2026 | Applies to all 751.Earth Family Group trading names

Contents

1. Environmental and Social Safeguards Policy
(Environmental and Social Management System, ESMS)

Approved by: The Board of 751 Earth Ltd, on behalf of the 751.Earth Family Group

Effective date: August 2026

Applies to: 751.Earth, and all trading names and regional arms operating under the 751.Earth Family Group, including North America, South America, Atlantic, Pacific, and Africa

1.1 Purpose
This policy sets out how the 751.Earth Family Group identifies, avoids, minimises, mitigates, and manages environmental and social risks arising from the projects it designs, funds, executes, or coordinates. It is designed to meet the fiduciary and safeguard expectations of the Green Climate Fund (GCF), UNDP, the World Bank, and other multilateral and bilateral partners, and to protect the communities, ecosystems, and partners the Group works with across Africa and Latin America.

1.2 Scope
This policy applies to every project, programme, concept note, and funding proposal developed or executed under the 751.Earth Family Group name, regardless of which trading arm or regional office leads the work. It applies to staff, consultants, executing partners, and any third party engaged to deliver activities on the Group's behalf.

1.3 Guiding Principles
- Do no harm: projects must not cause or contribute to environmental degradation, community harm, or human rights violations.
- Avoidance first: risks are avoided at design stage wherever possible, before mitigation or compensation measures are considered.
- Proportionality: the depth of assessment matches the risk category of the project, aligned with GCF's ESS categorisation and World Bank ESF standards.
- Free, Prior and Informed Consent (FPIC): any project affecting Indigenous Peoples or traditional land users requires documented FPIC before proceeding.
- Transparency and disclosure: assessments are disclosed to affected stakeholders and, where required, to the GCF Secretariat, NDAs, and World Bank task teams.
- Continuous monitoring: safeguard performance is tracked throughout implementation, not only at appraisal.

1.4 Environmental and Social Risk Categorisation

Every project taken on by the 751.Earth Family Group is screened at concept stage and assigned a category consistent with GCF's ESS categorisation system:

Category	Description	Assessment Requirement
A	Potential for significant adverse impacts that are diverse, irreversible, or unprecedented	Full Environmental and Social Impact Assessment (ESIA), Resettlement Action Plan if applicable, independent review
B	Potential for limited adverse impacts that are few, site-specific, largely reversible, and readily mitigated	Environmental and Social Management Plan (ESMP), targeted studies as needed
C	Minimal or no adverse environmental or social impacts	Screening checklist and self-certification, light-touch monitoring

1.5 Roles and Responsibilities

- The Founder and Principal holds overall accountability for safeguard compliance across the Family Group.
- A designated Safeguards Focal Point is assigned to each active project to lead screening, monitoring, and reporting.
- Executing partners and Accredited Entities are contractually required to implement agreed mitigation measures and report on safeguard performance.
- All staff and consultants are required to flag any observed environmental or social risk immediately to the Safeguards Focal Point.

1.6 Grievance Mechanism

Any individual or community affected by a 751.Earth Family Group project may raise a concern or complaint through the Group's Grievance Redress Mechanism. Complaints are logged, acknowledged within 5 working days, and resolved or escalated within 30 working days. No complainant will face retaliation for raising a concern in good faith.

1.7 Monitoring and Reporting

Safeguard performance is reviewed at each major project milestone and reported to the relevant Accredited Entity, National Designated Authority, and funding partner as required. Any serious incident is reported within 48 hours of the Group becoming aware of it.

1.8 Review

This policy is reviewed annually, or sooner if GCF, UNDP, or World Bank safeguard requirements change materially.

1.9 Signatories

For and on behalf of 751 Earth Ltd, and the 751.Earth Family Group:

Name: Dr Karen Sumser Lupson Position: Founder and Principle

Signature: Date: 17.04.2026

2. Gender Equality and Social Inclusion Policy

(GESI Policy)

Approved by: The Board of 751 Earth Ltd, on behalf of the 751.Earth Family Group

Effective date: August 2026

Applies to: 751.Earth, and all trading names and regional arms operating under the 751.Earth Family Group, including North America, South America, Atlantic, Pacific, and Africa

2.1 Purpose

This policy commits the 751.Earth Family Group to designing, funding, and delivering projects that advance gender equality and the meaningful inclusion of women, youth, persons with disabilities, Indigenous groups, and other marginalised populations. It reflects the Green Climate Fund's and World Bank's requirement that all funded activities be gender-responsive across the full project cycle, from concept note through implementation and evaluation.

2.2 Scope

This policy applies to every programme and project developed or executed under the 751.Earth Family Group name, across all regional trading arms, and to all staff, consultants, executing partners, and Accredited Entities engaged in delivery.

2.3 Policy Commitments

- Every concept note and full funding proposal will include a gender analysis identifying differentiated risks, needs, and opportunities for women, men, and marginalised groups.
- Projects will set measurable gender-responsive targets and indicators, tracked through the Group's monitoring and evaluation framework.
- Community consultations and stakeholder engagement processes will actively include women, youth, and marginalised groups, not only community leaders.
- Employment, procurement, and consultancy opportunities generated by Group projects will be open on an equal basis, with active outreach to qualified women-led and youth-led enterprises.
- The Group maintains zero tolerance for gender-based violence, harassment, and discrimination in any project it designs or executes.
- Gender-disaggregated data will be collected and reported wherever feasible in monitoring and results frameworks.

2.4 Gender Action Planning

For Category A and B projects, or as required by the funding partner, a dedicated Gender Action Plan (GAP) will be prepared alongside the ESMP, setting out specific actions, responsible parties, timelines, and indicators to close identified gender gaps.

2.5 Roles and Responsibilities

- The Founder and Principal holds overall accountability for GESI commitments across the Family Group.
- A designated Gender Focal Point is assigned to each active project to lead gender analysis, GAP development, and monitoring.
- Executing partners and Accredited Entities are contractually required to implement agreed gender actions and report on progress.
- All staff and consultants receive guidance on identifying and reporting gender-related risks or incidents.

2.6 Reporting Gender-Based Violence and Harassment

Any incident of gender-based violence, sexual exploitation, abuse, or harassment linked to a Group project must be reported immediately through the Group's Grievance Redress Mechanism or PSEA reporting channel. All reports are handled confidentially, survivor-centred, and without retaliation against the person reporting.

2.7 Monitoring and Reporting

Progress against gender-responsive targets and any Gender Action Plan is reviewed at each project milestone and reported to the relevant Accredited Entity, National Designated Authority, and funding partner as required.

2.8 Review

This policy is reviewed annually, or sooner if GCF, UNDP, or World Bank gender policy requirements change materially.

2.9 Signatories

For and on behalf of 751 Earth Ltd, and the 751.Earth Family Group:

Name: Dr Karen Sumser Lupson Position: Founder and Principle

Signature: Date: 17.04.2026

3. Anti-Money Laundering and Countering the Financing of Terrorism Policy

(AML/CFT Policy)

Approved by: The Board of 751 Earth Ltd, on behalf of the 751.Earth Family Group | Version 1.1

Effective date: 12 December 2025 (updated August 2026)

3.1 Purpose and Scope

751 Earth Ltd ("the Company") is committed to conducting all its activities in full compliance with applicable anti-money laundering and counter-terrorist financing laws and regulations, including the UK Proceeds of Crime Act 2002, the Terrorism Act 2000, and the Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017. This Policy applies to all directors, employees, consultants and representatives of the Company, and to all funds received, held, or disbursed by the Company in connection with its work, including grants, donations, contracts and co-financing arrangements with development partners such as the United Nations Development Programme (UNDP), the Green Climate Fund (GCF), and the World Bank.

3.2 Policy Statement

The Company will not knowingly engage in, facilitate, or turn a blind eye to money laundering or the financing of terrorism in any form. The Company commits to identifying and verifying the identity of all counterparties, funders, and beneficiaries prior to entering into a financial relationship, and to reporting any suspicious activity to the appropriate UK authorities without delay.

3.3 Customer and Partner Due Diligence

- Verification of identity and legal status of all funding partners, co-financiers, and major counterparties before funds are accepted or committed
- Enhanced due diligence applied to any partner based in, or transacting through, a jurisdiction identified as high risk by the Financial Action Task Force (FATF)
- Screening of directors, beneficial owners, and key counterparties against UK, UN, EU, US OFAC, and World Bank debarment and sanctions lists prior to onboarding
- Ongoing monitoring of transactions for patterns inconsistent with the stated purpose of funds received

3.4 Record Keeping

The Company will retain all due diligence records, transaction records, and supporting documentation for a minimum of five years from the date of the relevant transaction or the end of the business relationship, whichever is later, in accordance with UK regulatory requirements and donor audit expectations.

3.5 Reporting Suspicious Activity

Any director, employee, or consultant who becomes aware of activity that may constitute money laundering or terrorist financing must report this immediately to the Company's designated compliance lead, who will assess whether a Suspicious Activity Report (SAR) should be filed with the National Crime Agency (NCA).

3.6 Training and Review

All directors and staff will receive an introduction to this Policy upon engagement with the Company. This Policy will be reviewed annually by the Board, or sooner if there is a material change in applicable law or in the nature of the Company's funding relationships.

3.7 Governance

This Policy is approved and owned by the Board of 751 Earth Ltd, and compliance with it is a condition of engagement for all directors, employees and consultants.

3.8 Signatories

Name: Dr Karen Sumser Lupson   Position: Founder and Principle

Signature: Date: 12.12.2025

4. Fraud and Anti-Corruption Policy

Approved by: The Board of 751 Earth Ltd, on behalf of the 751.Earth Family Group | Version 1.1

Effective date: 12 December 2025 (updated August 2026)

4.1 Purpose

751 Earth Ltd ("the Company") operates a zero-tolerance approach to fraud, bribery and corruption in all its activities, in compliance with the UK Bribery Act 2010 and the UK Fraud Act 2006. This Policy applies to all directors, employees, consultants and representatives of the Company, and to all funds received, held or disbursed in connection with its work, including grants and co-financing arrangements with UNDP, the Green Climate Fund, and the World Bank.

4.2 Prohibited Conduct

- Offering, giving, requesting or accepting any bribe, kickback, or improper payment in connection with the Company's business
- Misrepresentation of costs, deliverables, qualifications or results in any report, invoice or funding application
- Misuse or misappropriation of funds, assets or resources belonging to the Company or to a funding partner
- Facilitation payments of any kind, which are strictly prohibited regardless of local custom or practice

4.3 Gifts and Hospitality

Directors, employees and consultants must not accept gifts or hospitality that could reasonably be seen to influence a business decision. Any gift or hospitality above a nominal value (GBP 50) offered in connection with Company business must be declared and recorded in the Company's Gifts and Hospitality Register.

4.4 Financial Controls

- Segregation of duties between those who authorise expenditure and those who process payments
- Dual authorisation required for all payments above GBP 1,000
- Retention of supporting documentation (invoices, receipts, contracts) for all expenditure for a minimum of five years
- Independent review of financial records at least annually

4.5 Reporting and Whistleblowing

Any director, employee or consultant who suspects fraud, bribery or corruption must report this immediately through the Company's whistleblowing channel. Reports may be made confidentially and no individual will suffer any detriment for raising a concern in good faith.

4.6 Investigation and Sanctions

All reports will be investigated promptly and proportionately. Confirmed instances of fraud, bribery or corruption will result in termination of engagement with the Company and referral to the appropriate UK authorities where warranted, and disclosure to affected funding partners.

4.7 Governance

This Policy is approved and owned by the Board of 751 Earth Ltd, and is reviewed annually.

4.8 Signatories

Name: Dr Karen Sumser Lupson   Position: Founder and Principle

Signature: Date: 12.12.2025

5. Conflict of Interest Policy

Approved by: The Board of 751 Earth Ltd, on behalf of the 751.Earth Family Group | Version 1.1

Effective date: 12 December 2025 (updated August 2026)

5.1 Purpose

This Policy sets out how 751 Earth Ltd ("the Company") identifies, discloses and manages actual, potential or perceived conflicts of interest that may arise for its directors, employees, consultants and representatives, in order to protect the integrity of its decision-making and its relationships with funding partners including UNDP, the Green Climate Fund, and the World Bank.

5.2 Definition of a Conflict of Interest

A conflict of interest arises where an individual's personal, financial, or professional interests could reasonably be seen to compromise, or actually compromise, their objectivity or duty to act in the best interests of the Company. This includes, but is not limited to, financial interests in a counterparty, family or close personal relationships with a counterparty, or simultaneous engagement with an organisation with competing or conflicting objectives.

5.3 Disclosure Obligations

- All directors and key personnel must disclose any actual, potential or perceived conflict of interest to the Board as soon as they become aware of it
- Disclosures must be made in writing and recorded in a Register of Interests maintained by the Company
- Disclosure is required before any decision is made or contract entered into where a conflict may exist

5.4 Management of Conflicts

Where a conflict is disclosed, the individual concerned will be excluded from any discussion, decision-making, or approval process relating to that matter. The Board will determine, on a case-by-case basis, whether additional safeguards are required, such as independent review of a decision or recusal from a specific project.

5.5 Register of Interests

The Company maintains a Register of Interests, reviewed and updated at least annually, or immediately upon any relevant change in circumstance. The Register is available for inspection by funding partners as part of standard due diligence.

5.6 Consequences of Non-Disclosure

Failure to disclose a conflict of interest in a timely manner will be treated as a serious breach of this Policy and may result in termination of engagement with the Company.

5.7 Governance

This Policy is approved and owned by the Board of 751 Earth Ltd, and is reviewed annually.

5.8 Signatories

Name: Dr Karen Sumser Lupson Position: Founder and Principle

Signature: Date: 17.04.2026

6. Child Protection and Safeguarding Policy

Approved by: The Board of 751 Earth Ltd, on behalf of the 751.Earth Family Group | Version 1.1

Effective date: 12 December 2025 (updated August 2026)

6.1 Our Commitment

751 Earth Ltd ("the Company") is committed to protecting the safety, dignity and wellbeing of every child we come into contact with through our work, whether directly or through the partners, communities and projects we support. This applies wherever we operate, including in the countries where our food security and climate resilience projects are based, such as Zambia and the Democratic Republic of Congo. We recognise that children are among the most vulnerable people affected by the projects we help design and deliver, and we take our responsibility towards them seriously.

6.2 Who This Policy Applies To

This Policy applies to every director, employee, consultant, volunteer and representative of the Company, and to any partner organisation, contractor or supplier engaged to deliver work on the Company's behalf. Anyone acting for the Company is expected to understand and follow this Policy, regardless of their role or seniority.

6.3 Our Guiding Principles

- The best interests of the child come first, in every decision and every interaction
- Every child has an equal right to protection, regardless of age, gender, disability, ethnicity, religion or any other status
- We listen to children and take their views seriously in matters that affect them
- We work in partnership with local communities, families and authorities to keep children safe

6.4 Standards of Behaviour

Anyone working for or with the Company must never behave in a way that could harm, exploit or endanger a child. This includes physical, sexual, emotional or psychological abuse, neglect, or exploitation of any kind. It also includes behaviour that might seem minor but could still cause harm or create risk, such as being alone with a child unnecessarily, sharing personal contact details with a child without a clear and appropriate reason, or taking photographs of children without proper consent.

6.5 Recruitment and Screening

- Anyone whose role involves regular contact with children will be subject to appropriate background checks before they begin work

- References will be sought and verified for all new staff, consultants and volunteers in child-facing roles
- Partner organisations engaged to deliver activities involving children must demonstrate they have their own safeguarding measures in place

6.6 Raising a Concern

If anyone working for the Company sees or hears something that worries them about the safety of a child, they have a duty to speak up. Concerns should be reported straight away to the Company's designated safeguarding lead. No one will get in trouble for raising a genuine concern, even if it later turns out to be unfounded. We would always rather someone spoke up than stayed silent.

6.7 How We Respond

Every concern will be taken seriously, recorded, and dealt with promptly and sensitively. Where a child may be at immediate risk, the Company will contact local child protection authorities or the relevant government body without delay. We will cooperate fully with any investigation and keep records confidential, sharing information only with those who need to know in order to keep a child safe.

6.8 Training and Awareness

Everyone working for the Company will be given a clear introduction to this Policy when they join, and will know who to go to if they have a concern. We will refresh this training regularly, so that safeguarding stays part of how we think and work, not something we only think about once.

6.9 Working With Partners

Where our projects involve government ministries, NGOs, or community organisations, such as our work in Zambia and the DRC, we will make sure safeguarding expectations are clearly set out in partnership agreements, and that any concerns raised by or about a partner are followed up properly.

6.10 Review

This Policy is owned by the Board of 751 Earth Ltd and will be reviewed at least once a year, or sooner if we learn something that means it needs to change.

6.11 Signatories

Name: Dr Karen Sumser Lupson Position: Founder and Principle

Signature: Date: 17.04.2026