



751.EARTH FAMILY GROUP

Since Time Began

VOL 2

INTEGRITY, DUE DILIGENCE AND OPERATIONAL POLICY MANUAL

This manual contains the following approved policies and standard operating procedures of the 751.Earth Family Group:

1. Policy on Prohibited Practices
2. Whistleblower and Witness Protection Policy
3. Institutional ESMS Alignment with IFC Performance Standards
4. Indigenous Peoples Policy
5. Protection from Sexual Exploitation, Abuse and Harassment (PSEA) Policy
6. Complaints and Independent Redress Mechanism (IRM)
7. Partner Due Diligence Policy and SOP
8. Procurement Policy and Manual
9. Data Protection and Information Security Policy
10. Financial Management Manual (SOP)
11. Human Resources and Code of Conduct SOP
12. Monitoring, Evaluation, Accountability and Learning (MEAL) SOP
13. Sanctions Screening SOP

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

Approved by: Dr Karen Sumser-Lupson, Founder and Principal

Contents

1. Policy on Prohibited Practices.....	5
1.1 Purpose	5
1.2 Defined Prohibited Practices.....	5
1.3 Application	5
1.4 Sanctions	5
1.5 Review	6
1.6 Signatories	6
2. Whistleblower and Witness Protection Policy.....	7
2.1 Purpose	7
2.2 Who Is Protected.....	7
2.3 Reporting Channels	7
2.4 Protection Against Retaliation	7
2.5 Confidentiality.....	7
2.6 False Reporting.....	7
2.7 Signatories	7
3. Institutional ESMS Alignment with IFC Performance Standards	9
3.1 Purpose	9
3.2 Alignment Table.....	9
3.3 Review	9
3.4 Signatories	9
4. Indigenous Peoples Policy	10
4.1 Purpose	10
4.2 Free, Prior and Informed Consent (FPIC).....	10
4.3 Impact Avoidance and Mitigation.....	10
4.4 Benefit Sharing	10
4.5 Grievance Access	10
4.6 Review	10
4.7 Signatories	10
5. Protection from Sexual Exploitation, Abuse and Harassment (PSEA) Policy	12
5.1 Purpose	12
5.2 Prohibited Conduct.....	12
5.3 Prevention Measures	12

5.4 Reporting and Response	12
5.5 Sanctions	12
5.6 Review	12
5.7 Signatories	13
6. Complaints and Independent Redress Mechanism (IRM)	14
6.1 Purpose	14
6.2 Who Can Complain	14
6.3 Process and Timelines	14
6.4 Independence Safeguard	14
6.5 Confidentiality and Non-Retaliation	14
6.6 Reporting	14
6.7 Signatories	15
7. Partner Due Diligence Policy and SOP	16
7.1 Purpose	16
7.2 The Seven Due Diligence Pillars	16
7.3 SOP: Screening Procedure	16
7.4 Record Keeping	16
7.5 Signatories	16
8. Procurement Policy and Manual	18
8.1 Purpose	18
8.2 Procurement Thresholds	18
8.3 Core Principles	18
8.4 Sole Source Exceptions	18
8.5 Review	18
8.6 Signatories	18
9. Data Protection and Information Security Policy	19
9.1 Purpose	19
9.2 Data Handling Principles	19
9.3 Information Security Measures	19
9.4 Data Breach Response	19
9.5 Review	19
9.6 Signatories	19
10. Financial Management Manual (SOP)	20

10.1 Purpose.....	20
10.2 Budgeting.....	20
10.3 Disbursement Controls.....	20
10.4 Audit Trail.....	20
10.5 External Audit	20
10.6 Review.....	20
10.7 Signatories	20
11. Human Resources and Code of Conduct SOP.....	22
11.1 Purpose.....	22
11.2 Recruitment and Screening	22
11.3 Code of Conduct.....	22
11.4 Disciplinary Process.....	22
11.5 Review.....	22
11.6 Signatories	22
12. Monitoring, Evaluation, Accountability and Learning (MEAL) SOP.....	23
12.1 Purpose.....	23
12.2 Results Framework.....	23
12.3 Monitoring Cycle	23
12.4 Accountability to Affected Populations.....	23
12.5 Learning.....	23
12.6 Review.....	23
12.7 Signatories	23
13. Sanctions Screening SOP	24
13.1 Purpose.....	24
13.2 Lists Screened	24
13.3 Screening Procedure.....	24
13.4 Record Keeping.....	24
13.5 Review.....	24
13.6 Signatories	24

1. Policy on Prohibited Practices

Approved by: Dr Karen Sumser-Lupson, Founder and Principal, on behalf of the 751.Earth Family Group

Effective date: April 2026

1.1 Purpose

This policy defines and prohibits corruption, fraud, coercion, collusion, and obstruction across all activities of the 751.Earth Family Group, aligned with the Green Climate Fund's definition of Prohibited Practices and equivalent World Bank and UN sanctionable conduct provisions.

1.2 Defined Prohibited Practices

Practice	Definition
Corruption	Offering, giving, receiving, or soliciting anything of value to improperly influence the actions of another party
Fraud	Any act or omission, including misrepresentation, that knowingly or recklessly misleads a party to obtain a financial or other benefit or avoid an obligation
Coercion	Impairing or harming, or threatening to impair or harm, a party or its property to improperly influence its actions
Collusion	An arrangement between two or more parties designed to achieve an improper purpose, including improperly influencing another party's actions
Obstruction	Deliberately destroying, falsifying, altering, or concealing evidence material to an investigation, or making false statements to investigators

1.3 Application

This policy applies to all directors, employees, consultants, executing partners, and sub-contractors engaged by any entity within the 751.Earth Family Group, in all jurisdictions in which the Group operates.

1.4 Sanctions

Confirmed instances of any Prohibited Practice will result in immediate termination of engagement, referral to relevant national authorities, and disclosure to affected funding partners, including the GCF, UNDP, and the World Bank, in accordance with their respective reporting obligations.



1.5 Review

This policy is reviewed annually by the Founder and Principal, or sooner if donor requirements change materially.

1.6 Signatories

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

Name: Dr Karen Sumser-Lupson

Position: Founder and Principal

Signature: _____

Date: 05.04.2026



2. Whistleblower and Witness Protection Policy

Approved by: Dr Karen Sumser-Lupson, Founder and Principal, on behalf of the 751.Earth Family Group

Effective date: April 2026

2.1 Purpose

This policy protects any individual who, in good faith, reports suspected fraud, corruption, misconduct, or breach of Group policy, and any witness who cooperates with a related investigation, from retaliation, detriment, or victimisation of any kind.

2.2 Who Is Protected

This protection extends to employees, consultants, directors, executing partners, community members, and beneficiaries of any 751.Earth Family Group project who raise a concern in good faith, regardless of whether the concern is later substantiated.

2.3 Reporting Channels

- Concerns may be raised directly to the Founder and Principal, or through the Group's confidential reporting channel
- Reports may be made anonymously where the reporter prefers
- External reporting to a funding partner's own integrity hotline (GCF, UNDP, World Bank) is also available and will not be treated as a breach of confidentiality

2.4 Protection Against Retaliation

No person who raises a genuine concern in good faith will suffer dismissal, demotion, harassment, discrimination, or any other detriment as a result. Any act of retaliation will itself be treated as a serious breach of Group policy and may result in termination of engagement.

2.5 Confidentiality

The identity of the reporter will be kept confidential to the fullest extent possible, disclosed only where required by law or where necessary to conduct a fair investigation, and only with appropriate safeguards in place.

2.6 False Reporting

This policy protects good faith reporting. It does not protect reports knowingly made in bad faith, with malicious intent, or with knowledge that the information is false.

2.7 Signatories

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



Name: Dr Karen Sumser-Lupson

Position: Founder and Principal

Signature: _____

Date: 05.04.2026

3. Institutional ESMS Alignment with IFC Performance Standards

Approved by: Dr Karen Sumser-Lupson, Founder and Principal, on behalf of the 751.Earth Family Group

Effective date: April 2026

3.1 Purpose

This policy confirms that the Environmental and Social Management System (ESMS) set out in Volume 1 of this manual is designed to operate consistently with the IFC Performance Standards, which underpin GCF and World Bank environmental and social safeguard expectations for accredited entities and their executing partners.

3.2 Alignment Table

IFC Performance Standard	How the Group Addresses It
PS1: Assessment and Management of E&S Risks	Category A/B/C screening and ESMP process set out in the ESMS Policy
PS2: Labour and Working Conditions	Addressed through the Human Rights and Code of Conduct SOP
PS3: Resource Efficiency and Pollution Prevention	Addressed at project design stage through the ESMP for Category A/B projects
PS4: Community Health, Safety and Security	Addressed through project-level risk screening and the Complaints and Redress Mechanism
PS5: Land Acquisition and Involuntary Resettlement	Triggers a Resettlement Action Plan for any Category A project involving land acquisition
PS6: Biodiversity Conservation	Addressed through the ESIA process for projects in ecologically sensitive areas
PS7: Indigenous Peoples	Addressed through the standalone Indigenous Peoples Policy in this manual
PS8: Cultural Heritage	Addressed through the ESIA chance-find procedures for projects near cultural or heritage sites

3.3 Review

This alignment statement is reviewed annually alongside the ESMS Policy in Volume 1, or sooner if IFC, GCF, or World Bank standards are updated.

3.4 Signatories

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

Name: Dr Karen Sumser-Lupson

Position: Founder and Principal



Signature: _____

Date: 05.04.2026

4. Indigenous Peoples Policy

Approved by: Dr Karen Sumser-Lupson, Founder and Principal, on behalf of the 751.Earth Family Group

Effective date: April 2026

4.1 Purpose

This policy sets out the 751.Earth Family Group's commitment to respecting the rights, dignity, aspirations, and cultures of Indigenous Peoples affected by any project it designs, funds, or executes, consistent with IFC Performance Standard 7 and GCF's Indigenous Peoples Policy.

4.2 Free, Prior and Informed Consent (FPIC)

Where a project may affect Indigenous Peoples' lands, resources, cultural heritage, or livelihoods, the Group will secure Free, Prior and Informed Consent through a documented, culturally appropriate consultation process before project design is finalised or activities begin.

4.3 Impact Avoidance and Mitigation

- Projects are designed to avoid adverse impacts on Indigenous Peoples wherever feasible
- Where impacts cannot be avoided, they are minimised, mitigated, and where appropriate, compensated in a culturally appropriate manner
- An Indigenous Peoples Plan is prepared for any Category A or B project where impacts are identified

4.4 Benefit Sharing

Where a project generates benefits, such as revenue, employment, or infrastructure, the Group will work with affected Indigenous communities to identify culturally appropriate and equitable ways for those communities to share in project benefits.

4.5 Grievance Access

Indigenous communities affected by a Group project have full access to the Complaints and Independent Redress Mechanism set out in Section 6 of this manual, including access in their own language where feasible.

4.6 Review

This policy is reviewed annually, or sooner if GCF, World Bank, or IFC Indigenous Peoples requirements change materially.

4.7 Signatories

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



Name: Dr Karen Sumser-Lupson

Position: Founder and Principal

Signature: _____

Date: 05.04.2026

5. Protection from Sexual Exploitation, Abuse and Harassment (PSEA) Policy

Approved by: Dr Karen Sumser-Lupson, Founder and Principal, on behalf of the 751.Earth Family Group

Effective date: April 2026

5.1 Purpose

This policy sets out the 751.Earth Family Group's zero-tolerance approach to sexual exploitation, abuse, and harassment (SEAH) of adults, distinct from and in addition to the Child Protection and Safeguarding Policy in Volume 1, consistent with UN system-wide PSEA standards.

5.2 Prohibited Conduct

- Any sexual act, attempt to obtain a sexual act, or exploitation of a position of vulnerability, differential power, or trust for sexual purposes
- Unwelcome sexual advances, requests for sexual favours, or other verbal or physical conduct of a sexual nature
- Exchanging money, employment, goods, or services for sex, including with project beneficiaries
- Any sexual relationship with a project beneficiary given the inherent power imbalance

5.3 Prevention Measures

- PSEA screening incorporated into recruitment and partner due diligence processes
- Mandatory PSEA briefing for all staff, consultants, and executing partners prior to project deployment
- Community awareness raising on PSEA standards and how to report concerns in every project the Group delivers

5.4 Reporting and Response

Any concern regarding SEAH must be reported immediately through the Complaints and Independent Redress Mechanism or directly to the Founder and Principal. Reports are handled confidentially, survivor-centred, and investigated promptly, with referral to local authorities where appropriate and required.

5.5 Sanctions

Confirmed SEAH violations result in immediate termination of engagement, referral to relevant authorities, and disclosure to affected funding partners in line with their reporting requirements.

5.6 Review

This policy is reviewed annually, or sooner if UN system-wide PSEA standards change materially.



5.7 Signatories

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

Name: Dr Karen Sumser-Lupson

Position: Founder and Principal

Signature: _____

Date: 05.04.2026

6. Complaints and Independent Redress Mechanism (IRM)

Approved by: Dr Karen Sumser-Lupson, Founder and Principal, on behalf of the 751.Earth Family Group

Effective date: April 2026

6.1 Purpose

This mechanism provides a formal, published channel through which any individual, community, or organisation affected by a 751.Earth Family Group project can raise a complaint, separate from internal staff grievance handling, consistent with the GCF's own Independent Redress Mechanism model.

6.2 Who Can Complain

Any project-affected person, community, partner, or member of the public may submit a complaint regarding the environmental, social, financial, or ethical conduct of a Group project, in person, in writing, by phone, or through a designated project focal point.

6.3 Process and Timelines

Stage	Timeline	Action
Acknowledgement	Within 5 working days	Complaint logged in the Group's Complaints Register and acknowledged to the complainant
Assessment	Within 15 working days	Initial assessment of validity and appropriate handling route
Investigation	Within 30 working days	Investigation conducted, involving independent review where the complaint concerns senior leadership
Resolution	Within 45 working days	Outcome communicated to the complainant, with escalation route explained if unresolved

6.4 Independence Safeguard

Where a complaint concerns the conduct of the Founder and Principal or a senior officer, the complaint will be reviewed by an independent third party agreed with the relevant funding partner, to preserve the integrity of the process.

6.5 Confidentiality and Non-Retaliation

Complainant identity is kept confidential wherever possible, and no complainant will face retaliation for raising a concern in good faith, consistent with the Whistleblower and Witness Protection Policy in Section 2 of this manual.

6.6 Reporting

A summary of complaints received and resolved is reported to relevant funding partners as part of standard project reporting, with sensitive details redacted as appropriate.



6.7 Signatories

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

Name: Dr Karen Sumser-Lupson

Position: Founder and Principal

Signature: _____

Date: 05.04.2026

7. Partner Due Diligence Policy and SOP

Approved by: Dr Karen Sumser-Lupson, Founder and Principal, on behalf of the 751.Earth Family Group

Effective date: April 2026

7.1 Purpose

This policy and procedure sets out how the 751.Earth Family Group screens and monitors every executing partner, sub-recipient, and major contractor before entering into a funding or delivery relationship, and throughout the life of that relationship.

7.2 The Seven Due Diligence Pillars

Pillar	What Is Assessed
Legal and Governance	Legal registration, constitution, board structure, and authority to contract
Financial Management	Accounting systems, audit history, financial statements, and solvency
Ethics and Integrity	Sanctions screening, past fraud or corruption findings, conflicts of interest
Operational Capacity	Track record of delivery, staffing, and technical competence for the proposed role
Safeguarding	Existence of the partner's own child protection, PSEA, and safeguarding policies
Data Protection	How the partner collects, stores, and protects beneficiary and financial data
Environmental and Social Management	Partner's own ESMS or equivalent capacity to manage E&S risk

7.3 SOP: Screening Procedure

- Step 1: Partner completes a standard due diligence questionnaire covering all seven pillars
- Step 2: The Group screens the partner and its beneficial owners against UN, UK, EU, US OFAC, and World Bank debarment lists
- Step 3: Supporting documents (registration certificate, latest audited accounts, safeguarding policies) are collected and filed
- Step 4: A due diligence score and risk rating (low, medium, high) is assigned and recorded in the Partner Due Diligence Register
- Step 5: High-risk partners are escalated to the Founder and Principal for a decision on whether to proceed, and if so, with what additional controls
- Step 6: Approved partners are re-screened annually or upon any material change in circumstances

7.4 Record Keeping

All due diligence records are retained for a minimum of five years from the end of the partnership, and are available for inspection by funding partners as part of standard audit or verification processes.

7.5 Signatories

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



Name: Dr Karen Sumser-Lupson

Position: Founder and Principal

Signature: _____

Date: 05.04.2026

8. Procurement Policy and Manual

Approved by: Dr Karen Sumser-Lupson, Founder and Principal, on behalf of the 751.Earth Family Group

Effective date: April 2026

8.1 Purpose

This policy ensures that all goods, works, and services procured by the 751.Earth Family Group, or on its behalf by executing partners, are obtained transparently, competitively, and at fair value, consistent with UNDP and GCF procurement expectations.

8.2 Procurement Thresholds

Value (GBP)	Method Required
Up to 1,000	Direct purchase, with receipt retained
1,001 to 10,000	Minimum of three written quotations, lowest compliant bid selected
10,001 to 50,000	Formal Request for Quotation (RFQ) with documented evaluation criteria
Above 50,000	Open or restricted competitive tender, with an evaluation panel of at least three people

8.3 Core Principles

- Segregation of duties between those who requisition, approve, and pay for goods and services
- No splitting of orders to avoid a higher procurement threshold
- Conflicts of interest declared and managed in line with the Conflict of Interest Policy in Volume 1
- All procurement decisions documented and retained for a minimum of five years

8.4 Sole Source Exceptions

Sole sourcing is permitted only in defined circumstances, such as genuine emergency, sole available supplier, or continuation of specialised work, and requires written justification approved by the Founder and Principal.

8.5 Review

This policy is reviewed annually, or sooner if UNDP or GCF procurement requirements change materially.

8.6 Signatories

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

Name: Dr Karen Sumser-Lupson

Position: Founder and Principal



Signature: _____

Date: 05.04.2026

9. Data Protection and Information Security Policy

Approved by: Dr Karen Sumser-Lupson, Founder and Principal, on behalf of the 751.Earth Family Group

Effective date: April 2026

9.1 Purpose

This policy sets out how the 751.Earth Family Group collects, stores, processes, and protects personal and organisational data, in compliance with UK GDPR and the Data Protection Act 2018, and consistent with donor expectations on beneficiary data protection.

9.2 Data Handling Principles

- Data is collected only for a clear, specified purpose, and only the minimum necessary is collected
- Personal and beneficiary data is stored securely, with access restricted to those who need it for their role
- Data is retained only as long as necessary and securely deleted thereafter
- Data is not shared with third parties without appropriate consent or legal basis

9.3 Information Security Measures

- Encrypted storage for all documents containing personal, financial, or beneficiary data
- Password-protected access to shared drives and cloud platforms, with access reviewed regularly
- Secure disposal of physical and electronic records at the end of their retention period

9.4 Data Breach Response

Any suspected data breach must be reported to the Founder and Principal immediately. Where a breach poses a risk to individuals, it will be reported to the UK Information Commissioner's Office within 72 hours, and affected individuals and funding partners notified as required.

9.5 Review

This policy is reviewed annually, or sooner if UK data protection law or donor requirements change materially.

9.6 Signatories

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

Name: Dr Karen Sumser-Lupson

Position: Founder and Principal



Signature: _____

Date: 05.04.2026

10. Financial Management Manual (SOP)

Approved by: Dr Karen Sumser-Lupson, Founder and Principal, on behalf of the 751.Earth Family Group

Effective date: April 2026

10.1 Purpose

This manual sets out the procedures the 751.Earth Family Group follows for budgeting, disbursement, financial control, and audit, providing the operational detail that sits beneath the financial control principles in the Fraud and Anti-Corruption Policy in Volume 1.

10.2 Budgeting

Every project maintains an approved budget aligned to the funding agreement. Budget revisions above 10 percent of any line item require written approval from the Founder and Principal and, where applicable, the funding partner.

10.3 Disbursement Controls

- Milestone-based disbursement, with funds released against agreed deliverables rather than in advance
- Dual authorisation for all payments above GBP 1,000, consistent with Volume 1's Fraud and Anti-Corruption Policy
- Bank reconciliation performed monthly for every project account

10.4 Audit Trail

All financial transactions are supported by an unbroken audit trail of invoices, approvals, and payment records, retained for a minimum of five years, and made available to funding partners and their auditors on request.

10.5 External Audit

Annual accounts are subject to independent audit in line with UK Companies Act requirements, and project-specific financial reports are subject to any additional audit required by the relevant funding partner.

10.6 Review

This manual is reviewed annually, or sooner if donor financial management requirements change materially.

10.7 Signatories

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



Name: Dr Karen Sumser-Lupson

Position: Founder and Principal

Signature: _____

Date: 05.04.2026

11. Human Resources and Code of Conduct SOP

Approved by: Dr Karen Sumser-Lupson, Founder and Principal, on behalf of the 751.Earth Family Group

Effective date: April 2026

11.1 Purpose

This procedure sets out the standards of conduct expected of all directors, employees, and consultants of the 751.Earth Family Group, and the recruitment and screening steps applied across the organisation, not limited to child-facing roles already covered in Volume 1.

11.2 Recruitment and Screening

- Identity verification and right-to-work checks for all new engagements
- At least two references sought and verified before a formal offer is confirmed
- Sanctions and adverse media screening conducted for all senior appointments and consultants handling project funds

11.3 Code of Conduct

- Act with honesty, integrity, and respect in all dealings with colleagues, partners, and communities
- Avoid any conduct that could bring the Group's reputation, or that of its funding partners, into disrepute
- Comply fully with all policies in Volumes 1 and 2 of this manual as a condition of engagement
- Report any breach of this Code, or any policy in this manual, without fear of retaliation

11.4 Disciplinary Process

Any breach of the Code of Conduct is investigated proportionately, with the individual given an opportunity to respond, before any decision on termination or other sanction is made by the Founder and Principal.

11.5 Review

This procedure is reviewed annually, or sooner if organisational structure or donor requirements change materially.

11.6 Signatories

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

Name: Dr Karen Sumser-Lupson

Position: Founder and Principal



Signature: _____

Date: 05.04.2026

12. Monitoring, Evaluation, Accountability and Learning (MEAL) SOP

Approved by: Dr Karen Sumser-Lupson, Founder and Principal, on behalf of the 751.Earth Family Group

Effective date: April 2026

12.1 Purpose

This procedure sets out how the 751.Earth Family Group tracks results, reports performance, and learns from experience across all projects, consistent with GCF and UNDP monitoring and evaluation expectations.

12.2 Results Framework

Every project maintains a results framework with baseline, target, and actual values for each indicator, aligned with the indicators agreed in the funding proposal or project document.

12.3 Monitoring Cycle

Activity	Frequency
Progress reporting to funding partner	Quarterly or as specified in the funding agreement
Internal results review	Quarterly
Independent mid-term evaluation	At project midpoint, for projects over 24 months
Final evaluation	Within 6 months of project completion

12.4 Accountability to Affected Populations

Project-affected communities are informed of project objectives, timelines, and their right to complain through the Complaints and Independent Redress Mechanism in Section 6 of this manual, as a standard part of project start-up.

12.5 Learning

Lessons learned are documented at project close and fed into the design of future concept notes and proposals, so that the Group's project pipeline improves over time.

12.6 Review

This procedure is reviewed annually, or sooner if GCF or UNDP monitoring and evaluation requirements change materially.

12.7 Signatories

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

Name: Dr Karen Sumser-Lupson

Position: Founder and Principal



Signature: _____

Date: 05.04.2026

13. Sanctions Screening SOP

Approved by: Dr Karen Sumser-Lupson, Founder and Principal, on behalf of the 751.Earth Family Group

Effective date: April 2026

13.1 Purpose

This procedure sets out how the 751.Earth Family Group screens every partner, contractor, beneficial owner, and key counterparty against applicable sanctions and debarment lists before entering into a relationship, and periodically thereafter.

13.2 Lists Screened

- UK HM Treasury Consolidated List of Financial Sanctions Targets
- United Nations Security Council Consolidated List
- European Union Consolidated Sanctions List
- US Office of Foreign Assets Control (OFAC) Specially Designated Nationals List
- World Bank Listing of Ineligible Firms and Individuals

13.3 Screening Procedure

- Step 1: Full legal name and, where available, date of birth or registration number of the party is checked against each list
- Step 2: Any partial or possible match is manually reviewed to confirm or rule out a true match
- Step 3: A dated screening record is filed in the Partner Due Diligence Register, whether or not a match is found
- Step 4: Confirmed matches result in immediate suspension of the relationship pending further review
- Step 5: Screening is repeated at least annually for all active partners and counterparties, and immediately before any new payment above GBP 10,000

13.4 Record Keeping

Screening records are retained for a minimum of five years and made available to funding partners and auditors on request.

13.5 Review

This procedure is reviewed annually, or sooner if sanctions regimes or donor screening requirements change materially.

13.6 Signatories

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



Name: Dr Karen Sumser-Lupson

Position: Founder and Principal

Signature: _____

Date: 05.04.2026