INOKS CAPITAL IMPACT FRAMEWORK

POLICY UPDATE

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1 INTRODUCTION

INOKS Capital ("INOKS") is an asset manager seeking the best interest for all stakeholders, both in terms of financial return and sustainability. To ensure the latter, INOKS has a two-fold Impact and ESG Strategy in place. This strategy outlines how INOKS aims to invest its capital responsibly by *doing good* (contributing to solutions that address specific sustainability challenges) and *doing no harm* (mitigating the negative effects of its investments on people and planet).

In order to adhere to the principles of the Impact Strategy in its daily operations, INOKS has implemented a suite of procedures and tools, which form an Impact Framework.

The objective of the Impact Framework is to ensure conformity of INOKS' activities by:

- Identifying the (national and international) standards INOKS adheres to;
- Formalising procedures and outlining how INOKS' principles and standards are implemented in practice throughout the full investment cycle;
- Outlining the tools that enable staff to apply the relevant standards consistently and correctly to all their transactions;
- Setting clear responsibilities for staff and management to operate and implement the Impact Framework.

In this document, INOKS' Impact Framework is further explained in the following sections:

- *About INOKS Capital*: an introduction to INOKS and its key activities;
- *Impact Strategy*: a clarification of INOKS' Impact Strategy and its key elements;
- *Do good*: explanation of principles, standards and tools INOKS has in place to achieve a positive impact;
- *Do no harm*: an explanation of principles, standards and tools to mitigate Environmental, Social and Governance ("ESG") risks;
- *Implementation*: an explanation of the procedures to bring the Impact Strategy into practice;
- *Learning & improvement*: a description of activities to ensure continuous learning and improvement.

2 About INOKS Capital

INOKS Capital is an independent asset manager of collective investment schemes, prudentially regulated by FINMA and headquartered in Geneva, Switzerland.

INOKS' mission is to provide substantial and resilient value creation for stakeholders by channelling impactful investments to support sustainable value chains worldwide (namely across agriculture, food, renewable energy). INOKS' vision is to become a market leader in deploying capital efficiently and sustainably to real economy actors using both innovation and its values (rigor and excellence, teamwork, integrity).

Since its inception in 2004, INOKS channels capital for growth to companies through managed collective investments schemes (Ancile Fund Lux SICAV-FIS) and segregated portfolios. Companies range from SMEs to Majors with the majority operating across emerging markets.

INOKS understands that its fiduciary duty extends to seek the investment community's best interest considering economic and sustainability matters alike, allowing both views to work in aligned interest or

synergy rather than being adverse. INOKS will therefore always seek to generate through an investment - on equal grounds - a real economic value generation and a tangible positive impact in sustainability provided the investment complies at any time with INOKS' ESG and Impact requirements.

INOKS, as a delegated asset manager of several funds managed according to its Impact and ESG strategy, complies with the Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector as amended by the Taxonomy Regulation (EU) 2020/852 of 18 June 2020. All Funds managed by INOKS Capital qualify as Article 9 SFDR.

3 Impact Strategy

INOKS' Impact Strategy is to channel capital to companies, operating across emerging economies, that generate a positive impact, to contribute to more sustainable agriculture & food value chains worldwide.

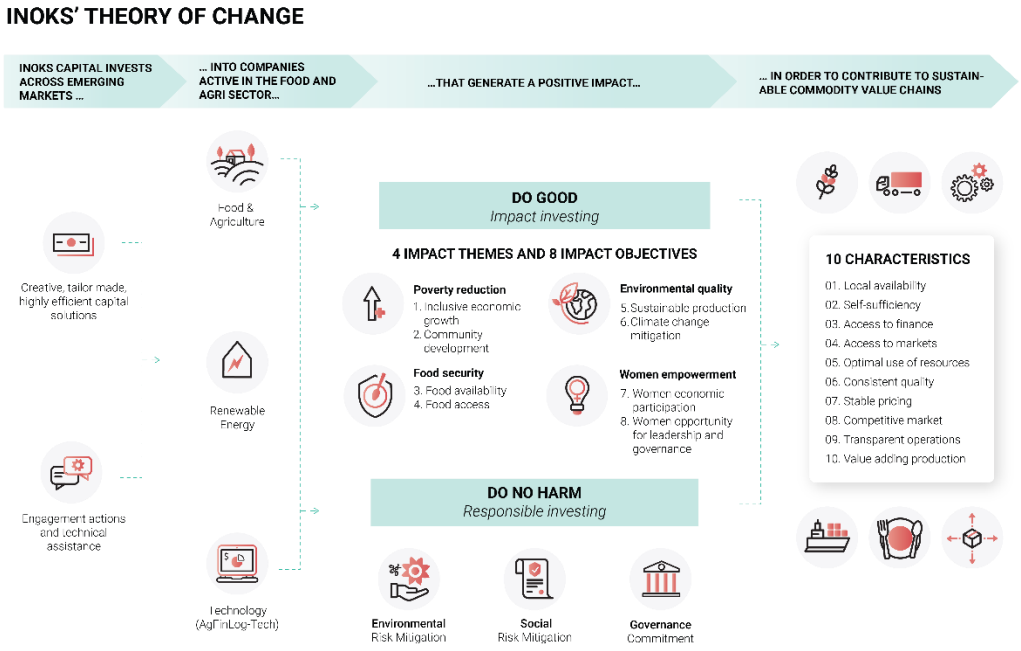

Figure 1. INOKS' Theory of Change

Each of the elements depicted in Figure 1 are further described below.

INOKS predominantly invests across emerging economies...

INOKS offers highly efficient capital solutions that are bespoke and adapted to the real needs of (predominantly emerging market) companies or Alternative Trade Financiers/Aggregators (ATFs) which aim to sustain and/or support sustainable local business growth.

...into companies in agriculture and food value chains...

INOKS provides capital to non-speculative commodity and food value chain participants with a high focus on agriculture and food and selected interventions in energy.

Agriculture and Food – Main investment sector

Global food security constitutes one of the main important challenges of this century given a growing population to feed and climate change risks degrading agriculture productivity, food availability and quality.

To tackle this challenge, INOKS has the capacity to intervene at each segment along the agricultural value chain and support companies involved in value-adding activities such as production, aggregation, processing, conditioning, transport and distribution that contribute to the development of sustainable agriculture and food markets.

Energy (subsistence and renewable) – Selected interventions

In emerging markets, energy supply infrastructures remain poor leading to unreliable access to electricity. By supporting companies to produce and consume energy from renewable sources, INOKS seeks to improve access to clean and reliable electricity for urban and rural communities

Alternative Trade Finance and Aggregators – Selected interventions

Alternative Trade Financiers (ATFs) are classified as any intermediary that arranges or provides trade or supply chain finance or aggregation for SMEs. By supporting those companies INOKS seeks to reach small borrowers who are active members of local economies, such as SMEs and micro entrepreneurs, to foster greater financial inclusion.

… that generate a positive impact…

Within its focus sectors of Agriculture, Energy and ATFs, INOKS seeks companies that can generate a positive impact. This means that companies are only eligible for financing if they contribute to addressing specific sustainability challenges (ergo they *do good*) and they commit to mitigating the negative environmental or social impact of their operations (ergo they *do no harm*).

Do good

INOKS believes that efficient and innovative companies in the commodity value chains have strong potential to help solve some of the most pressing sustainability challenges that our world is facing. With this logic in mind, INOKS selects companies that contribute to solutions in, at least, one of the following themes:

1. *Poverty reduction:* the company's activities, products or services contribute to (i) Inclusive Economic Growth, fostering local employment, improving the standards of living and livelihood of the communities, and supporting productive, value-adding and profitable activities; and/or (ii) Local Community Development;
2. *Food security:* the company's activities, products or services contribute to (i) increasing food availability through improved agricultural productivity, local and efficient food production systems and increased level of food trade; and/or (ii) strengthening food access; and/or; and/or (iii) ensuring sustainable food production systems and implementing resilient agricultural practices that increase productivity and production, that help maintain ecosystems, that strengthen capacity for adaption to climate change, extreme weather, drought, flooding and other disasters and that progressively improve land and soil quality;
3. *Environmental quality:* the company's activities, products or services contribute to (i) Sustainable Production: improving the sustainable management and efficient use of natural resources, reducing waste generation, improving supply chain practices; and/or (ii) Climate Change, improving business' capacity on climate change mitigation and adaptation.
4. *Women empowerment:* the company's activities, products or services contribute to (i) increasing women's full and effective economic participation (at both company and value chain levels); and/or (ii) ensuring women's equal opportunities for leadership at levels of decision-making; and/or (ii) ensuring women's equal opportunities for ownership.

More details on INOKS' principles, standards, tools and responsibilities with regards to impact management are provided in Section 4.

Do no harm

At the same time, economic activity may also bring a risk of harmful effects on the environment and/or society. Yet there are ways to mitigate, and sometimes even eliminate, these risks by operating a company in a sustainable way. INOKS selects the companies it works with based on environmental, social and governance standards they adhere to and the commitment they show to further improve their performance in the following areas:

- *Environmental & social risk mitigation:* the commitment and capacity of a company to mitigate its negative social risks and environmental footprint through greenhouse gas emissions reduction, waste management and energy efficiency as well as its adherence to human rights, labour standards, and health & safety regulations.
- *Corporate governance:* the company's commitment and capacity to ensure strong business ethics and international standards regarding transparency, accountability, responsibility and fairness in its operations.

More details on INOKS' principles, standards, tools and responsibilities with regards to ESG risk management are provided in Section 5.

… in order to contribute to sustainable ecosystems and the agri-food value chain

In the long term, INOKS seeks to support agri-food value chains that develop into mature, efficient markets and deliver lasting positive impact, characterized by the following:

1. *Self-sufficiency:* countries are self-sufficient in meeting the commodity demand of their population;
2. *Competitiveness:* multiple companies compete to meet consumer demand;
3. *Optimal use of resources:* companies efficiently use human and natural resources;
4. *Access to finance:* companies have access to financial resources to sustain/grow their business;
5. *Access to markets:* all actors across the value chain are well integrated into markets;
6. *Local availability:* commodity products are available on the local market;
7. *Consistent quality:* quality of commodity products is reliable and constant;
8. *Stable pricing:* prices of commodities do not experience high fluctuation;
9. *Value-addition:* activities and processes that encourage greater productive capacity, skill development, and additional incomes in the local market;
10. *Transparency:* relevant market information (prices, production, weather, trade, consumption and stocks) is available to enhance market efficiency and reduce unfair trading practices.

4 Do good: principles, standards and tools for managing impact

INOKS Capital carefully assesses the positive impact that companies can make and selects those companies that can deliver the strongest contribution to its impact strategy.

4.1 Principles

Beyond the financial criteria that it applies to its investment selection, INOKS uses two explicit 'do good' principles to decide if it wants to engage with a prospective investee; a short-term and a long-term one.

Short-Term - A company generates positive impact on INOKS' impact areas by the nature of its products, services or activities.

For a prospective investee to be eligible for financing, it should prove that – by the nature of its products, services or activities – it contributes to at least one of INOKS' four impact areas:

- Poverty reduction, or;
- Food security, or;
- Environmental quality, or;
- Women Empowerment.

Long-Term - A company offers solutions to help achieve sustainable agriculture or food value chains worldwide in the long term.

As a second eligibility criterion, a prospective investee should be able to show how its nature of business (again products, services or activities) positively contributes to the transformation towards a sustainable commodity value chain (*e.g. development of processing/conditioning/transformation activities in the country of origin instead of via transportation to a third country,).*

4.2 Standards

The Operating Principles for Impact Management ("The Principles")

INOKS Capital has been one of the first 75 early adopters of the Operating Principles for Impact Management in September 2019. The Principles are intended to be a framework for investors for the design and implementation of their impact management systems, ensuring that impact considerations are integrated throughout the investment lifecycle (Figure 2). INOKS Capital implements the nine principles throughout its *Do Good* Strategy and *Do no Harm* Strategy (the latter being addressed via principle 5). INOKS' Independent Verification and Disclosure Statement can be found on INOKS' website.

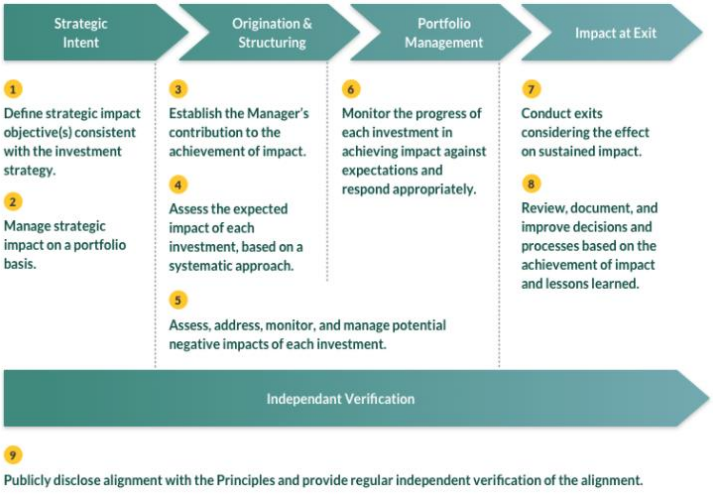

Figure 2. The 9 Operating Principles for Impact Management

The Sustainable Development Goals

The Sustainable Development Goals (SDGs) are the universally recognised framework to combat pressing global sustainability issues, such as poverty, hunger, and climate change. INOKS will report the achievements of its own operations as well as those of investees on impact in alignment with the SDGs.

Figure 3 shows how INOKS' four impact themes are linked to the SDGs and their targets, while Table 1 provides more details on INOKS' contribution to each SDG.

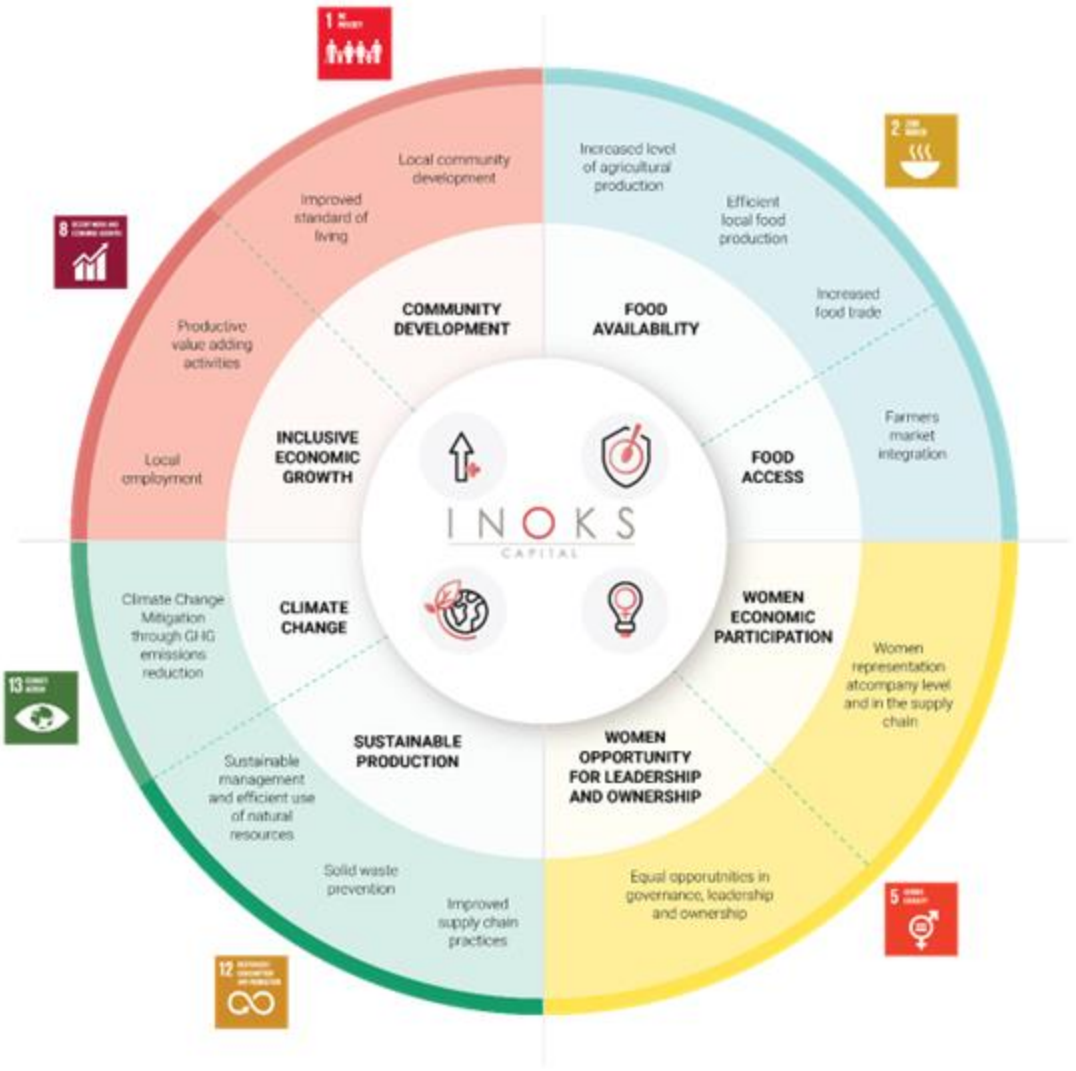

Figure 3. Link between INOKS' impact themes, strategic goals & outcomes and the SDGs

Table 1: INOKS' contribution per SDG target

SDG	TARGET	INOKS' CONTRIBUTION
	1.2: By 2030, reduce at least by half the proportion of men, women and children of all ages living in poverty in all its dimensions according to national definitions	Support companies that promote local value-adding activities, generate local employment and offer decent work to enhance the livelihood of low-income household. Help local organisations that employ small-scale food producers directly or indirectly in their value chains and have a mechanism, policy or certification that seeks to ensure that smallholder farmers are paid a fair price for goods, services, and/or crops supplied to the company. Support companies that participate in community development programs.
	2.1: By 2030, end hunger and ensure access by all people, in particular the poor and people in vulnerable situations, including infants, to safe, nutritious and sufficient food all year round	Finance local food production and processing companies to raise national production and contribute to countries' self-sufficiency. Increase local and global markets access to safe and nutritious food by supporting sustainable trade.
	2.3: By 2030, double the agricultural productivity and incomes of small-scale food producers, in particular women, indigenous peoples, family farmers, pastoralists and fishers, including through secure and equal access to land, other productive resources and inputs, knowledge, financial services, markets and opportunities for value addition and non-farm employment.	Finance companies in agricultural value chains to create a strong and sustainable food system where smallholder farmers are well integrated and empowered to transition away from subsistence farming.
	2.4: By 2030, ensure sustainable food production systems and implement resilient agricultural practices that increase productivity and production that help maintain ecosystems, that strengthen capacity for adaptation to climate change, extreme weather, drought, flooding and other disasters and that progressively improve land and soil quality.	Require and support companies to improve their operations, implement sustainability standards and sustainable agricultural practices to enhance soil quality and food production, while building strong capacities to manage climate change effects.
	5.1: End all forms of discrimination against all women and girls everywhere.	Raise awareness on gender issues by evaluating investees' gender practices and discussing identified issues with management.
	5.5: Ensure women's full and effective participation and equal opportunities for leadership at all levels of decision-making in political, economic and public life	Promote gender balance amongst employees, executive management and at supply chain level on both quantitative and qualitative aspects taking into consideration the nature of the investee's activity as well as the country's socio-economic context. Promote women ownership by increasing the number of portfolio companies that are women-owned.
	8.1: Sustain per capita economic growth in accordance with national circumstances and, in particular, at least 7 per cent gross domestic product growth per annum in the least developed countries	Help companies to sustain and/or boost local business growth and employment opportunities.

	8.3: Promote development-oriented policies that support productive activities, decent job creation, entrepreneurship, creativity and innovation, and encourage the formalization and growth of micro-, small- and medium-sized enterprises, including through access to financial services	Provide financial support to small and medium companies in emerging markets, through efficient and tailored capital solutions, that may otherwise struggle to obtain financing from traditional banking systems to develop their local activities.
	8.5: By 2030, achieve full and productive employment and decent work for all women and men, including for young people and persons with disabilities, and equal pay for work of equal value	Require and support companies to meet decent work standards and/or improve their policies and practices; support companies that promote and/or seek to improve equal opportunities (e.g. non-discrimination and equal opportunities policies, fair income, social protection, average working hours, personal development and training programs, women in managerial position, etc.).
	8.8: Protect labour rights and promote safe and secure working environments for all workers, including migrant workers, in particular women migrants, and those in precarious employment	Put in place a thorough assessment of companies in order to ensure that at least fundamentals of labour standards are implemented before investment (e.g. security in the workplace, HR policy and terms of employment, provision of PPE, grievance mechanisms, etc.). Push companies to go beyond the fundamentals and develop best practices standards.
	**12.2**: By 2030, achieve the sustainable management and efficient use of natural resources	Support companies that implement energy, material and water conservation measures.
	12.5: By 2030, substantially reduce waste generation through prevention, reduction, recycling and reuse	Support companies that take measures to reduce wastes and develop efficient waste management systems. Finance business models based on recycling and circularity.
	**13.1**: Strengthen resilience and adaptive capacity to climate-related hazards and natural disasters in all countries	Invest in low-carbon activities to reduce GHG emissions and support transition toward renewable and cleaner energies.
	13.3: Improve education, awareness-raising and human and institutional capacity on climate change mitigation, adaptation, impact reduction and early warning	Educate companies on sustainability risks and opportunities through sustainability check and technical assistance.

IRIS+

INOKS has based some of its impact indicators on IRIS+ metrics, which is the generally accepted system for measuring, managing, and optimising impact.

2X Challenge Criteria

INOKS applies the 2X Challenge Criteria to qualify an investment or company as women supporting, women-led, women-owned, and / or women employed.

EU Regulatory Framework (SFDR and Taxonomy)

INOKS relies on Regulatory Technical Standards (RTS) from European Supervisory Authorities (ESAs) with regards to content, methodology and presentation of SFDR disclosures both at entity level and at product level.

The EU Taxonomy regulation framework is also used as part of the Impact Assessment to assess the investments' performance on EU Taxonomy objectives.

4.3 Tools

INOKS uses numerous instruments to manage impact throughout different stages of its investment cycle. The most important tools used are:

1. *ESG/Impact pre-screening checklist:* This checklist allows INOKS to check that a potential investee complies with its Impact and ESG principles and to get an initial estimation of (a) the potential positive impact of a prospective investee on INOKS' impact areas; (b) the investee's ESG risk pre-classification (based on inherent and contextual risks). The outcome of this estimation determines a prospective investee's eligibility for financing. The ESG/Impact pre-screening checklist is used at origination.
2. *Impact Questionnaire(s):* different questionnaires have been produced in order to accommodate for different business models. These questionnaires are used to delve further than an estimation of potential impact and to help to quantify the actual impact performance of a company – either based on current production or future capacity figures. This questionnaire is used at due diligence.
3. *Impact Due Diligence tool and Impact Scoring:* This Due Diligence tool allows to review and analyse data collected through the Impact Questionnaire. This tool also includes an *Impact Scoring* which rates the level of impact contribution of a prospective investee across INOKS' four impact themes as well as computes the investee scores to the Sustainable Agriculture Index and Climate Change Mitigation Index. The outcome of this tool informs INOKS' opinion regarding a prospective company's impact level and its potential to improve in the future.
4. *Impact Factsheet:* The impact factsheet is used to document and formalise the ex-ante impact analysis of the potential investee, based on data gathered with the Impact Questionnaire(s) and due diligence interviews. This factsheet is produced at due diligence.
5. *Impact Plan:* This plan is used to describe the measures that the prospective company needs to take in order to achieve or increase the impact that INOKS deems necessary and feasible. The plan is used at contracting and formalised in the *ESG/Impact Engagement Letter*. It may be renewed alongside loan renewals.
6. *ESG/Impact Engagement Letter:* This is a formal agreement between INOKS and the investee stipulating the measures that the company is committed to take. The ESG/Impact Engagement Letter is part of the legal loan documentation and formalised during contracting. It may be renewed alongside loan renewals.
7. *Impact/ESG Monitoring Questionnaire:* This questionnaire is sent on an annual basis to collect input from the investee, track and analyse its E&S impact and report on the investee's impact performance as well as the funds' achievements across INOKS' impact themes.
8. *Impact Monitoring tool:* This monitoring tool allows to review and analyse data collected through the Impact Monitoring Questionnaire.
9. *Impact Report:* Both at the level of individual loans and aggregated portfolio level, INOKS tracks and reports the achievements on impact performance on an annual basis. This report is produced during post-investment monitoring.
10. *EU Regulation disclosures* tools: set of excel tools allowing to compute and report on the proportion of sustainable investments (with E&S objectives), compliance with pre-contractual limits, key sustainability indicators, Principal Adverse Indicators, alignment with EU Taxonomy.

4.4 Responsibilities

INOKS has formally appointed an Impact and ESG team, formed by Impact and ESG specialists, delegated from Senior Management. Other non-permanent roles are assigned to other staff. The responsibilities with the INOKS team are further described below.

FUNCTION	RESPONSIBILITIES
Permanent Assignees	
Impact Specialist	• Oversee impact management and the implementation of the Impact Framework. • Evaluate the ex-ante E&S impact of a prospective investee and contribution to INOKS' four impact themes through a qualitative and quantitative (Impact Scoring / Impact Measurement Framework) analysis. • Raise any impact-related concerns on prospective investees during weekly Sourcing Committee meetings to decide whether to proceed with a transaction. Escalate concerns to the Investment Committee in a timely manner. • Ensure that all investment decisions are supported by appropriate due diligence documentation, including, but not limited to, an Impact Factsheet, and an Impact section in each Final Investment Approval ("FIA"). • Ensure that any Impact Action Plan, if any, is incorporated into the legal documentation. • Monitor and manage impact of INOKS' investments on an annual basis. Conduct analyses during and after the investment period (ex-post) to complement the ex-ante analysis and capture the impact generated throughout the investment period. • Monitor progress on the implementation of the impact action plan measures (if any). • Report on impact generated by INOKS' investments via the Annual Impact Report. • Identify, manage and monitor impact engagement initiatives. Coordinate Technical Assistance projects between TA beneficiary (INOKS investee) and TA delivery consultant/agent. • Contribute to the implementation of the EU Regulatory Framework (SFDR and EU Taxonomy), with sustainability data from the portfolio.
Impact Committee	INOKS Capital's Impact Committee serves an advisory role, supporting the practical integration of ESG and Impact considerations into the investment process by bringing together internal and external perspectives. It exists to help evolve not only the framework itself, but also its application across INOKS' investments. Objectives 1. Provide guidance to the ESG and Impact team in the continued evolution of the Impact Framework. 2. Support the development of practical plans for delivery on ESG and Impact goals in existing and future investment strategy(ies). 3. Help embed ESG and Impact considerations into the investment process in a meaningful way. 4. Research and revise the strategic pipeline's Agri. & Food value chains' countries and segments to empirically define their inherent (i) ESG risk exposure with resulting available management/mitigation tools and (ii) Impact potential under the 4-target spectrum. 5. Advise on ESG and Impact considerations in the current investment pipeline, helping assess opportunities, risks, and alignment with ESG and Impact goals. Key responsibilities and additional detail is formalised in its terms of reference.
Non-Permanent Assignees	
Business Developer	• Screen for potential investees along guidelines defined by INOKS' impact investment principles (Do Good principles) supported by (i) the Systematic Sourcing Database which incorporates the Country-Commodity value chain E&S impact assessment combination (High Impact Areas "HIAs") and (ii) the Impact/ESG checklist that captures potential impact first estimation. • Follow-up with the investee on the ICPTs (INOKS Capital Proprietary Tools) delivery to acquire the compulsory impact data. • Conduct on-site due diligence. • Support the impact specialist in negotiating with the investee in the adoption and implementation of possible impact measures.
Investment Committee	• Decide whether to proceed with a transaction after receiving conclusions from impact analyses and due diligence documentation. • Manage resources (budget and staff) for impact management and training. • Ensure that there are adequate resources to fulfil impact requirements
Legal Manager	• Ensure that INOKS' impact requirements are incorporated in the legal documentation.
Risk Manager	• Proceed to 2nd level-controls of the ESG/Impact due diligences and monitoring on a quarterly basis. • Control investment decision consistency related to the ESG/Impact warning raised. • Follow-up on Impact/ESG warnings. • Monitor SFDR-compliance checks related to proportion of sustainable investments (as indicated in pre-contractual disclosure) on a monthly basis.

5 Do no harm: principles, standards and tools for managing E&S risks

INOKS Capital engages with companies to identify and mitigate the negative environmental and social effects of their operations and improve their corporate governance practices.

5.1 Principles

INOKS applies the following principles when assessing a company's potential adverse impacts and the relevant mitigation measures in place, in order to determine whether a company is eligible for financing.

A company does not develop any activities mentioned in the Exclusion List
INOKS does not provide financing to companies with activities listed in INOKS' Exclusion List .[1]

A company is in compliance with the Environmental, Social and Governance (ESG) standards of INOKS
INOKS requires all companies to comply with its ESG Standards, which include the IFC Performance Standards and IFC Corporate Governance Guidelines as well as applicable local, provincial, and national laws and regulations on environment, health, safety, social and corporate governance issues.

A company is committed and capable to mitigate its negative environmental and social effects
INOKS seeks to work with companies operated by a team that has the willingness, knowledge and skills to reduce the company's environmental footprint, increase quality and safety of working conditions and improve corporate governance practices. INOKS also encourages companies to operate in accordance with good international industry practices.

5.2 Standards

INOKS evaluates prospective investees against all applicable local laws on environment, health and safety as well as the IFC Performance Standards and Corporate Governance Guidelines. Any red flag will be thoroughly analysed and – depending on the severity of the issue – either addressed with a correction plan or it may stop the investment process.

Regulatory framework
INOKS requires companies to comply with all applicable national and local environmental and social legislation, as applicable to their operations.

IFC Performance Standards
The IFC Performance Standards ("IFC PS") offer an internationally recognised framework for understanding and managing environmental and social risks for potential investment. The IFC PS encompass eight topics:

- PS 1: Assessment and Management of Environmental and Social Risks and Impacts
- PS 2: Labour and Working Conditions
- PS 3: Resource Efficiency and Pollution Prevention
- PS 4: Community Health, Safety, and Security
- PS 5: Land Acquisition and Involuntary Resettlement
- PS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources
- PS 7: Indigenous Peoples
- PS 8: Cultural Heritage

[1] Please refer to Annex A for the INOKS Exclusion list.

As part of its due diligence process, INOKS uses the IFC PS to identify and assess environmental and social risks associated with a prospective investee and its operations. If a specific IFC PS is triggered by the nature of the operation, INOKS will verify if the company complies with the performance criteria of that standard.
In case of non-compliance with the identified IFC PS, INOKS can – depending on the severity of the issue – require the prospective investee to implement a corrective action plan for addressing the issue in a reasonable timeframe and stipulate this as E&S Condition Precedents and/or Subsequent Conditions in the contractual documentation (ESG/Impact Engagement Letter).
Although the IFC PS are a guiding framework for INOKS' environmental and social standards, it is important to note that its investee base also requires a practical approach given the characteristics of its companies and markets. INOKS therefore requires investees to improve operations through means that are appropriate to the nature and scale of their operations and commensurate with the associated environmental and social risk.

IFC Corporate Governance Methodology
The IFC Corporate Governance Methodology is an approach to evaluate (and improve) the corporate governance of a company depending on its characteristics (size and ownership structure).
It includes the assessment of six key CG parameters:
1. Commitment to Environmental, Social, and Governance (Leadership and Culture)
2. Structure and Functioning of the Board of Directors
3. Control Environment
4. Disclosure and Transparency
5. Treatment of Minority Shareholders
6. Governance of Stakeholder Engagement

In this way, INOKS Capital ensures that the company can:

- Establish an internal structure enabling proper growth and ensuring long-term operations continuity.
- Avoid overreliance on key people, threatening short to long term operations continuity *(e.g., share of responsibilities, complementary skills at management level, existence of a supervisory board).*
- Mitigate corruption risks threatening business ethics and reputation (of both investee and investor) *(e.g., setup of internal controls, bank account separated to the founder account, non-financing of political campaigns).*

EU Regulatory Framework (SFDR and Taxonomy)
INOKS relies on Regulatory Technical Standards (RTS) from European Supervisory Authorities (ESAs) with regards to content, methodology and presentation of SFDR disclosures both at entity level and at product level.
The EU Taxonomy regulation framework is also used as part of the ESG Assessment to ensure that no significant harm is caused to any EU Taxonomy objectives (DNSH analysis) and principal adverse impacts are collected to the extent relevant and feasible (PAI analysis).

Additional standards
INOKS may agree with an investor, on an ad-hoc or a continuous basis, to additional standards of terms, conditions and obligations (the "ESG Additional Requirement(s)"). Any such agreement by INOKS would need to be contracted by the inclusion and clear definition of the ESG Additional Requirement(s) in a written contractual arrangement at least similar to an investment agreement or a service agreement or a private placement memorandum.

5.3 Tools

INOKS uses numerous instruments to manage ESG risks in the portfolio throughout different stages of its investment cycle. The most important tools used are:

1. *ESG/Impact pre-screening checklist:* this checklist allows INOKS to check that a potential investee complies with its Impact and ESG principles and to get an initial estimation of (a) the potential positive impact of a prospective investee on INOKS' impact areas; (b) the investee's ESG risk pre-classification (based on inherent and contextual risks). The outcome of this estimation determines a prospective investee's eligibility for financing. The ESG/Impact pre-screening checklist is used at origination.
2. *ESG Questionnaires:* different questionnaires have been produced in order to accommodate for different business models. These questionnaires are used to help quantify the environmental and social issues and corporate governance risks related to the company's activities, as identified at due diligence phase. They are also used to identify the gaps with the ESG standards that INOKS applies to its investments. The analysis of the questionnaire responses informs INOKS of the prospective company's ESG risks and the measures that it needs to take in order to comply with INOKS' lending requirements.
3. *ESG Rating Tools*: an Environmental and Social Risk Identification Tool ("ESRI") and a Corporate Governance Tool have been developed to measure the level of compliance of the investee with IFC Performance Standards and IFC CG Methodology and is used to support a final scoring according to IFC E&S Risk Categorisation system (from Category A – high risk – to Category C – low risk). The ESRI Tool provides granularity in terms of nature of the risk (policy/action/result), risk occurrence and value chain segment where the risk might occur.
4. *ESRI Factsheets:* the ESRI Factsheet is used to document and formalise the ESG risk analysis of the potential investee, based on data gathered with the ESG Questionnaires and due diligence interviews. INOKS classifies the ESG risk level of a transaction based on the assessment of inherent and contextual risks and in alignment with the IFC E&S Risk Categorisation Methodology.
5. *ESAP and CGAP:* The Environmental and Social Action Plan (ESAP) and Corporate Governance Action Plan (CGAP) are used to list and describe the measures that INOKS identifies for the prospective company to implement in order to mitigate the potential negative effects of its operations and enhance practices. The plan is used at contracting and formalised in the ESG/Impact Engagement Letter.
6. *ESG/Impact Engagement Letter*: This is a formal agreement between INOKS and the investee stipulating the measures that the company is committed to take. The ESG/Impact Engagement Letter is part of the legal loan documentation and formalized during contracting.
7. *ESG Risk Status and Warning Report*: For internal use, INOKS tracks and reports the ESG risks identified for its counterparties on an annual basis. This report is produced during post-investment monitoring.
8. *Impact/ESG Monitoring Questionnaire*: This questionnaire is sent on an annual basis to collect ESG data from the investee, identify potential non-compliance with INOKS' standards and/or identify improvement actions.
9. *EU Regulation disclosures* tools: set of excel tools allowing to compute and report on proportion of sustainable investments (with E&S objectives), compliance with pre-contractual limits, key sustainability indicators, Principal Adverse Indicators, alignment with EU Taxonomy.

5.4 Responsibilities

INOKS has formally appointed an Impact and ESG team, formed by Impact and ESG specialists, delegated from the Senior Management. Other non-permanent roles are assigned to other staff. The responsibilities with the INOKS team are further described below.

FUNCTION	RESPONSIBILITIES
Permanent Assignees	
ESG Specialist	• Oversee ESG risk management and the implementation of the Impact Framework. • Screen a prospective investee against INOKS Do No Harm Principles and Standards. • Complete E&S risks due diligence, conducting quantitative and qualitative analysis and collecting necessary E&S documentation (with BD support as appropriate), to evaluate a prospective investee's compliance with applicable standards (including IFC Performance Standards and IFC Corporate Governance Methodology) and categorise the level of E&S risk of a prospective investee. • Raise any major ESG-related risks related to prospective investees during weekly Sourcing Committee meetings to decide whether to proceed with a transaction. Escalate risks to the Investment Committee in a timely manner. • Identify mitigation measures (when applicable) through the development of an ESAP and CGAP, for investees' implementation. • Ensure that all investment decisions are supported by appropriate due diligence documentation, including, but not limited to, an ESRI Factsheet, Corporate Governance Factsheet, and an ESG section in each Final Investment Approval ("FIA"). • Ensure appropriate social and environmental representations, warranties, and covenants are incorporated into the legal documentation inclusive of i). the "ESG/Impact Engagement Letter (including an ESAP/CGAP (if any))", and/or ii. Conditions Precedent/Subsequent • Monitor and manage the ESG performance on an annual basis. Conduct analysis to determine whether the investees implement minimum safeguards and do no significant harm or cause adverse impacts on sustainability factors through their activities, whether new or elevated ESG risks have arisen, and assess the implementation or introduction of ESAPs/CGAPs as appropriate. • Report any serious incidents related to ESG issues to senior management and in annual reporting to external parties. • Ensure that the procedures are implemented for each potential investment, and that records of environmental and social reviews are maintained • Assess all investees in accordance with the EU Regulatory Framework (SFDR and EU Taxonomy) and report sustainability data from the portfolio to relevant stakeholders.
Non-Permanent Assignees	
Business Developer	• Pre-screen for potential investees along guidelines defined by INOKS' responsible investment principles (Do no Harm principles) supported by (i) the Systematic Sourcing Database which incorporates the Country-Commodity value chain E&S risks assessment combination (Hot Risk Areas "HRAs") and (ii) the Impact/ESG checklist that captures potential ESG risks first estimation. • Follow-up with the investee on the ICPTs (INOKS Capital Proprietary Tools) delivery to acquire the compulsory ESG data with a view to allow the ESG Specialist to identify possible specific ESG issues. • Conduct on-site due diligence. • Support the ESG Specialist in negotiating with the investee the adoption and implementation of possible environmental and social mitigation measures, with a view to improve the risk profile, if not the prompt compliance.
Investment Committee	• Decide whether ESG risks are acceptable to INOKS' overall exposure to risk before proceeding with a transaction. • Manage resources (budget and staff) for ESG risk management and training. • Ensure that there are adequate resources to fulfil ESG requirements

Compliance Manager	• Review Corporate Governance conclusions from the ESG Specialist in line with IFC Corporate Guidelines.
	• Collect and analyse necessary Corporate Governance documentation.
	• Issue conclusions and potential recommendations.
	• In the event an investee does not comply with INOKS' standards (in conjunction with the Legal Manager):
	  o Oversee contact with and disclosure by the investee,
	  o Ensure that the investee receives a timely notification of next steps. This may constitute in a written warning, non-investment, or a prompt divestment on the existing and future (if any) financings by any of the Requiring Parties depending on the seriousness of the actions and/or consequences. If the latter is considered as an Event of Default under the terms of the legal documentation, then ensure that the incident escalated to and followed up by Senior Management.

Legal Manager	• Ensure that INOKS' ESG requirements are incorporated in the legal documentation.
Risk Manager	• Proceed to 2nd level-controls of the ESG/Impact due diligences and monitoring on a quarterly basis. • Control investment decision consistency related to the ESG/Impact warning raised. • Follow-up on Impact/ESG warnings.

6 Implementation

INOKS has implemented processes, standards and tools at each stage of the investment cycle to bring its Impact Strategy into action (Figure 4). Each step is further detailed in subsequent sub-sections.

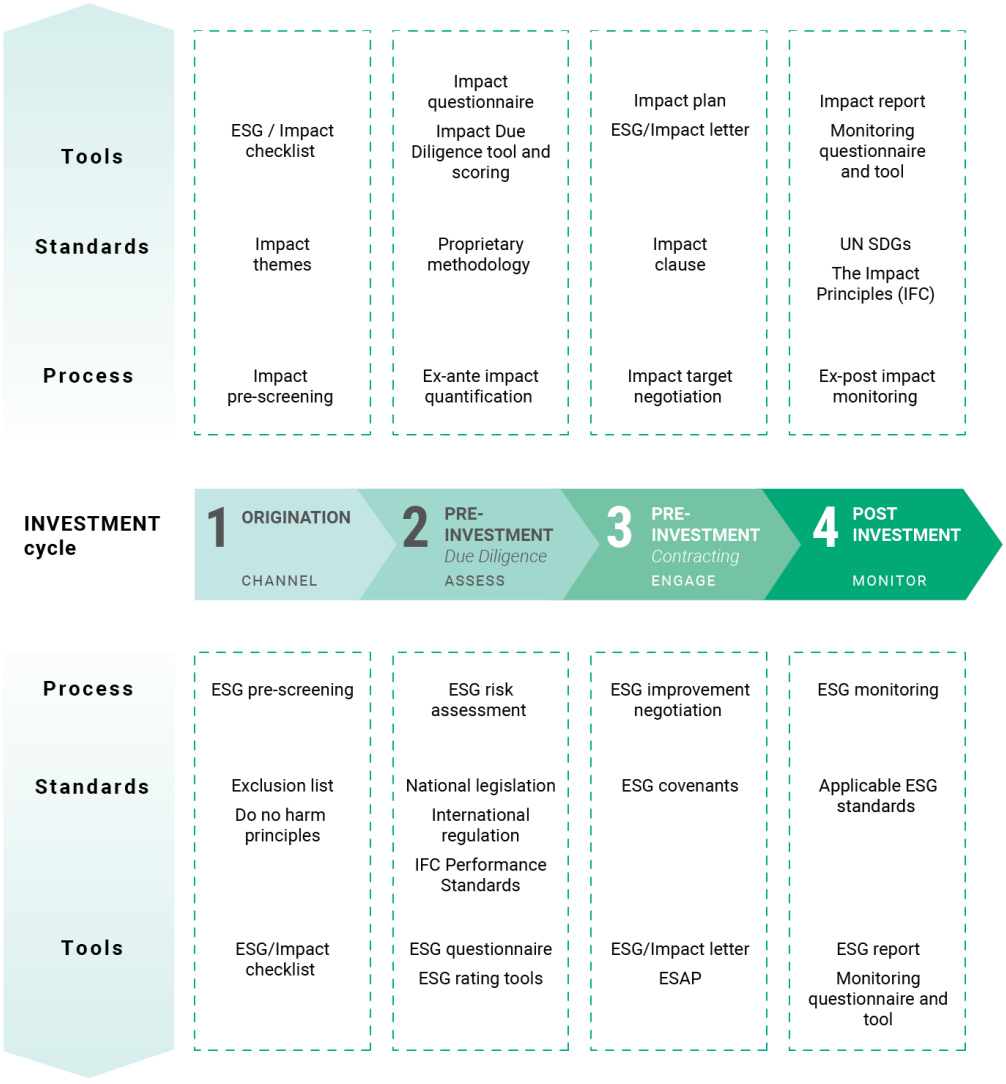

Figure 4. Process, standards and tools used by INOKS to implement its dual Do Good and Do no Harm strategy along the investment cycle.

The decision to continue or stop the investment can be taken at all stages. Figure 5 summarises relevant performed Impact and ESG decisions throughout the Transaction Cycle.

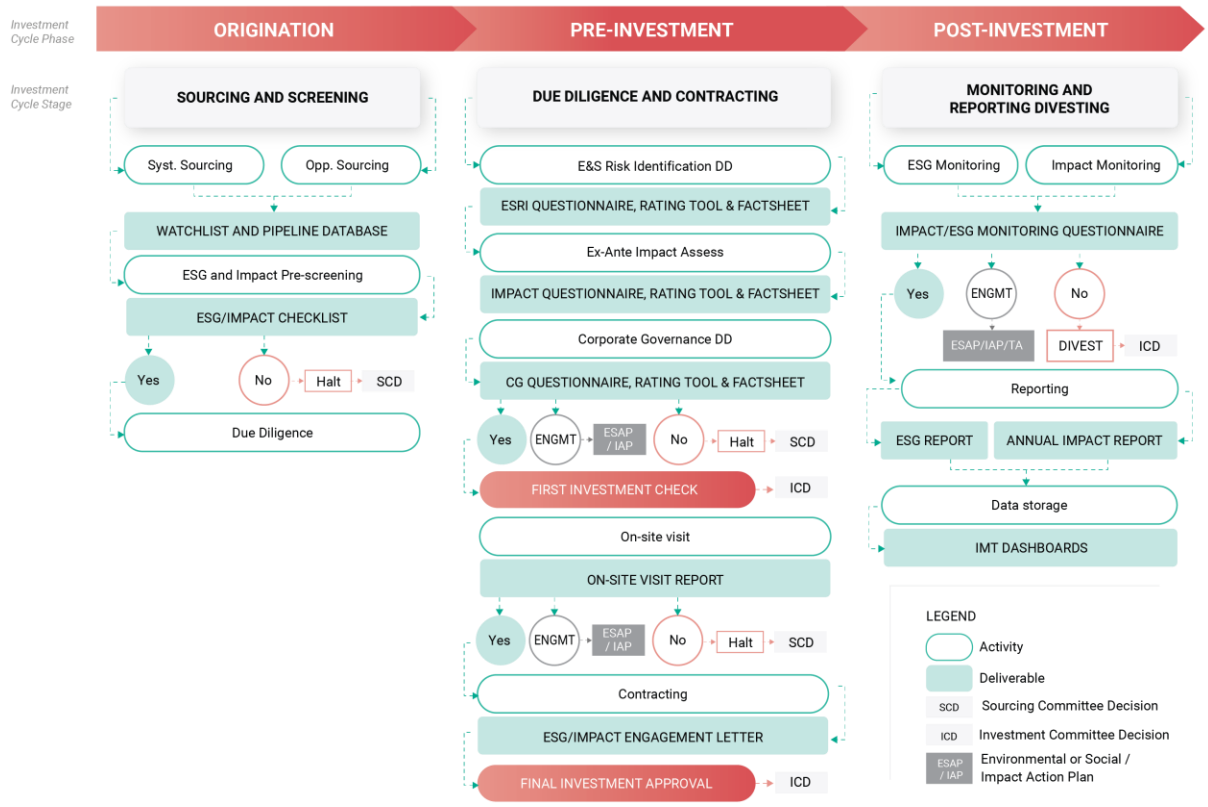

Figure 5. Flowchart of Impact and ESG decisions process

6.1 Origination

6.1.1 Sourcing	
ACTIVITY	• Within the **Systematic Sourcing approach**, INOKS' Business Developers will actively source potential investments using the Systematic Sourcing Data Base, which identifies High Risk Areas (HRAs) and High Impact Areas (HIAs) at country, commodity and value-chain segment level. This educational resource offers a preliminary view of where investing would add the greatest value and enables business developers to contextualise a potential investee's activity. • Potential investees can also be sourced under an **Opportunistic Sourcing approach**, which refers to any sourcing activity that does not arise from an active approach of the Business Developers or that arise from a potential investee liaising in an unsolicited manner with a Business Developer.
RESPONSIBILITY	Business developers and Investee Relations Team
TOOLS	+ Systematic Sourcing Data Base
DELIVERABLE	+ Watchlist and pipeline database

6.1.2 Pre-term approval: Pre-screening	
ACTIVITY	At an early stage of a proposed investment, the activities of a potential investee are pre-screened against *Do no Harm* (ESG) and *Do good* (Impact) Principles: • *Do No Harm* Principles:

	○ A potential investee does not perform any activities mentioned in INOKS Exclusion List[2] • *Do Good* Principles: ○ A potential investee generates positive impact for at least one of INOKS' impact areas by nature of its products, services or activities ○ A potential investee offers solutions to help achieve sustainable commodity value chains worldwide in the long term
RESPONSIBILITY	Business developers and Investee Relations Team
TOOLS	+ ESG/Impact Checklist
DELIVERABLE	+ PREFIC_QUEST

6.2 Pre-Investment

6.2.1 Pre-First Investment Check ("FIC) Due Diligence

ACTIVITY	During the Pre-FIC DD, INOKS will finalise a PI screening against the two last ESG principles: ○ A potential investee is in compliance with INOKS' ESG Standards ○ A potential investee is committed and capable to mitigate its negative E&S effects • E&S Risks Assessment: INOKS conducts an Environmental and Social (E&S) Risks Assessment by using the IFC Performance Standards to identify and evaluate E&S risks associated with a prospective investee and its operations. If a specific IFC PS is triggered by the nature of the operation, INOKS will verify if the company complies with the performance criteria of that standard. In case of non-compliance with the identified IFC PS, INOKS can – depending on the severity of the issue – require the prospective investee to implement a corrective action plan (ESAP) for addressing the issue in a reasonable timeframe and stipulate this as E&S condition precedents and/or subsequent conditions in the contractual documentation (ESG/Impact Engagement Letter). The E&S risks assessment process is composed of the following steps: 1. Collection of E&S data information 2. E&S risks identification and mitigation measures analysis 3. Project E&S risk categorisation[3] • Corporate Governance assessment: The CG assessment process is comprised of: 1. Collection of Corporate Governance data and information 2. Evaluation of the effectiveness of Corporate Governance of a prospective investee; 3. Issuance of conclusions and potential recommendations (CGAP). • Ex-ante Impact Quantification: During the Pre-FIC Due Diligence phase, INOKS proceeds to a thorough impact assessment which aims at (1) understanding the investee business and impact models, 2) assessing the company's contribution to INOKS' impact themes and related SDGs, 3) producing the investee's impact scoring and quantifying the ex-ante impact that will serve as a baseline, 4) forecasting & identifying expected impact, impact targets, INOKS' contribution and additionality, 5) assessing potential impact opportunities and/or TA needs. The ex-ante impact quantification process consists in: 1. Impact Data Collection 2. Impact Measurement (incl. scoring) 3. Impact Analysis
RESPONSIBILITY	• Impact Specialist / ESG Specialist • Compliance Manager
TOOLS	+ ESRI_Questionnaire (Environmental & Social Risk Identification) + ESRI_Rating + Impact_Questionnaire + Impact_Due_Diligence_Tool (including scoring and indexes) + Corporate_Governance_Questionnaire

[2] Please refer to Annex A

[3] Please refer to Annex B for more details on INOKS Risk Categorisation Methodology[4] INOKS Capital Exclusion List is aligned with the Harmonized European Development Finance Institutions (EDFI) Exclusion List (1-8) and contains additional requirements (9-12).

	+ Corporate_Governance_Rating
DELIVERABLE	+ ESRI_Factsheet + Impact_Factsheet + Corporate_Governance_Factsheet

6.2.2 Post-Fic Due Diligence

ACTIVITY	• On-site visit: During Post-FIC Due Diligence, an on-site due diligence will be conducted to confirm desk review and potentially uncover risks and impacts that were not previously identified: 1. Pre-FIC Due Diligence deliverables will be checked. 2. The E&S Risk Categorisation will be confirmed or amended in the ESRI Factsheet with regards to confirmed or newly identified E&S issues during the on-site due diligence. • ESAP / IAP / CGAP 3. Depending on the severity of the potential E&S issues flagged, if any (during desk review and/or on-site visit), an Environmental and Social Action Plan (ESAP) can be issued before a Final Investment Approval is given. The purpose of a corrective action plan is to mitigate potential environmental and social risks in the context of a transaction to an acceptable level for INOKS. The corrective action plan would include a description of the specific mitigation actions to be taken by the investee; a timeframe for implementation and a reporting requirement to inform INOKS on the status of completion. 4. When impact improvement measures have been identified during the Pre-Fic due diligence and/or confirmed during the on-site visit and agreed upon with the investee, an Impact Action Plan (IAP) will be developed. This IAP will provide a clear framework for implementing agreed impact improvement measures related to INOKS' Impact Themes (including but not limited to key activities and delivery times). 5. In the same way, a Corporate Governance Action Plan can also be setup.
RESPONSIBILITY	• Business Developers • ESG/Impact Specialist • Compliance Manager
TOOLS	+ On-Site Visit + ESRI_Factsheet + CG Factsheet + Impact_Factsheet
DELIVERABLE	+ On-Site Visit Report + (Only if needed) ESAP, CGAP and/or IAP

6.2.3 Contracting

ACTIVITY	• ESG/Impact Engagement Letter: Following approval by INOKS Investment Committee, beneficiaries certify that the information provided during due diligence is accurate, whilst agreeing to comply with INOKS' Impact and ESG principles and requirements as stipulated in the Impact Framework. This is formalised by the signing and executing of the ESG/Impact Engagement Letter. Subject to the findings of the due diligence, Impact and ESG action plans are included to introduce impact targets, initiatives and ESG corrective measures to be addressed within established timeframes. The non-compliance with the provisions, deliverables and/or undertakings contained in the Engagement Letter by the Company may result in a written warning, non-investment or a prompt divestment on the existing and future (if any) financings by any of the Requiring Parties depending on the seriousness of the actions and/or consequences.
RESPONSIBILITY	• ESG/Impact Specialists • Legal Manager • Compliance Manager
TOOLS	N/A
DELIVERABLE	+ ESG/Impact Engagement Letter

6.3 Post-investment

6.3.1 Monitoring and Reporting

ACTIVITY	• ESG monitoring and reporting: The environmental and social performance of investees will be monitored and evaluated on a periodic basis to ensure on-going compliance with INOKS' Standards. Following the investment decision and commencement of disbursement, changes in the investee's operations or production processes may result in changes to the environmental and social risk profile. The purpose of monitoring an investee's environmental and social performance is to assess existing and emerging environmental and social risks associated with an investee's operations during the whole duration of an investment. The ESG monitoring process consists in: 1. Publishing internally an annual ESG Risk Status and Warning report (as well as ad-hoc flag report if needed) to report on: o An incident, accident or circumstance pertinent to environmental, social, labour or health and safety associated with an investee's operations, o Any fines and penalties for non-compliance with environmental and social regulations, o Any complaints submitted by stakeholders about an investee, o A breach of any contractual covenant or condition precedent that would potentially present a liability, financial, reputational, credit, market risk to INOKS, o A portfolio-level overview of ESG risks, including risk severity, o A summary of material ESG risks by investee, 2. Monitoring changes in investees' ESG policies and guidelines on an annual basis. 3. Assessing and monitoring the implementation of any mitigation measures specified in the ESAP (if any). 4. Checking the validity of Environmental and Social permits or licenses. 5. Attention to environmental and social issues related to the investee. 6. Conducting spot on-site visit. • Impact monitoring and reporting: INOKS measures and manages the impact of an investment by collecting qualitative and quantitative indicators on an annual basis and comparing these results with the baseline data and the expected impact targets (if any). The Impact monitoring and reporting process is composed of the following steps: 1. Collecting data on INOKS' Key Impact Performance Indicators for all of its investees by using the Impact/ESG Monitoring Questionnaire. 2. Analysing the impact performance of an investee through quantitative (impact scoring and evolution of key indicators) and qualitative measurement and assessment (interviews with investees). 3. Aggregating data at portfolio level. 4. Conducting portfolio analysis. Reporting and communicating on the overall impact of INOKS portfolio in the Annual Impact Report.
RESPONSIBILITY	• ESG Specialist /Impact Specialist • Compliance Manager • Business Developer
TOOLS	+ Impact/ESG_Monitoring_Questionnaire + Impact_Monitoring_Tool + On-site visit report + EU_Regulation_disclosures_tools
DELIVERABLE	+ Annual Impact Report + Ad-hoc flag report (if needed) + ESG Risk Status and Warning report + EU Regulation disclosures

6.3.2 Divestment for ESG non-compliance	
ACTIVITY	• ESG non-compliance: In case INOKS identifies an investee's material non-compliance with ESG requirements stipulated in the legal documentation and/or if the counterparty does not demonstrate its intent to implement corrective actions within a reasonable timeframe by implementing the ESAP, INOKS will require: 1. A flag report with a follow up with the intent to resolve these in a reasonable timeframe, and/or 2. A new corrective action plan If an agreement is not reached or timely implemented: 1. Written warning 2. A default notice will be issued 3. The Investment Committee will control divestment
RESPONSIBILITY	• ESG Specialist • Compliance Manager • Investment Committee
TOOLS	N/A
DELIVERABLE	+ Ad-hoc flag report + New ESAP (if any) + Default notice

7 Learning and improvement

7.1 Capacity building

This framework will be communicated to all staff and operational employees of the company. Adequate training will be provided to make sure that requirements are understood and respected.

7.2 Evaluation

A revision of the Impact Framework will be done periodically to ensure that it remains relevant and effective over time. This includes:

- Identifying potential difficulties with operational aspects of Impact Framework implementation and making changes as necessary,
- Updating the procedure to reflect any internal changes and/or improvements in INOKS' ESG and Impact processes,
- Updating the Impact Framework to include additional requirements resulting from revisions in applicable national laws on environment, health and safety and/or compliance with additional E&S Standards.

If any *major changes* in the Impact Framework, the revision(s) will need to be beforehand vetted by:

(a) The Investment Committee,

and communicated to:

(b) Any third party with whom INOKS would have contracted with as to its Impact Framework and any amendments thereto.

Annexes

Annex A: INOKS Capital Exclusion List[4]

INOKS will not finance any activity, production, use of, trade in, distribution of, involving:

1) Forced labour[5] or child labour[6]
2) Activities or materials deemed illegal under host country laws or regulations or international conventions and agreements, or subject to international phase-outs or bans, such as:
   a) Ozone depleting substances, PCBs (Polychlorinated Biphenyls) and other specific, hazardous pharmaceuticals, pesticides/herbicides or chemicals;
   b) Wildlife or products regulated under the Convention on International Trade in Endangered Species or Wild Fauna and Flora (CITES); or
   c) Unsustainable fishing methods (e.g. blast fishing and drift fishing in the marine environment using nets in excess of 2.5 km in length)
3) Cross-border trade in waste and waste products, unless compliant to the Basel Convention and the underlying regulations
4) Destruction[7] of High Conservation Value areas[8]
5) Radioactive materials[9] and unbounded asbestos fibres
6) Pornography and/or prostitution.
7) Racist and/or anti-democratic media
8) In the event that any of these following products form a substantial part of a potential investee's primary financed business activities:[10]
   a) Alcohol beverages (except beer and wine);
   b) Tobacco;
   c) Weapons and munitions;
   d) Gambling, casinos and equivalent enterprises
9) Animal testing
10) Genetically Modified Organisms
11) Construction of new and extension of any existing coal fired thermal power plants
12) Investment in a Country under sanction (OFAC, EU, DFAE) unless the sanctions are only limited to defined territories and / or activities and / or entities and / or individuals. In the latter case, only these territories and / or activities and / or entities and / or individuals are excluded.

[4] INOKS Capital Exclusion List is aligned with the Harmonized European Development Finance Institutions (EDFI) Exclusion List (1-8) and contains additional requirements (9-12).

[5] Forced labor means all work or service, not voluntarily performed, that is extracted from an individual under threat of force or penalty as defined by ILO conventions.

[6] Persons may only be employed if they are at least 15 years old, as defined in the ILO Fundamental Human Rights Conventions (Minimum Age Convention C138, Art.2), unless local legislation specifies compulsory school attendances or the minimum age for working. In such cases the higher age shall apply.

[7] Destruction means the (1) elimination or severe diminution of the integrity of an area caused by a major, long-term change in land or water use or (2) modification of a habitat in such a way that the area's ability to maintain its role is lost.

[8] High Conservation Value (HCV) areas are defined as natural habitats where these values are considered to be of outstanding significance or critical importance (see http://www.hcvnetwork.org).

[9] This does not apply to the purchase of medical equipment, quality control (measurement) equipment or any other equipment where the radioactive source is understood to be trivial and/or adequately shielded.

[10] For portfolio companies, "substantial" means more than 10% of their consolidated balance sheets or earnings. For financial institutions (banks), "substantial" means more than 10% of their underlying portfolio.

Annex B: INOKS Environmental and Social Risk Categorisation Methodology

The E&S risk categorisation reflects the magnitude of risks and impacts of potential investments based on available information at the time of the E&S Due Diligence.

INOKS' E&S risk categorisation is in line with the IFC Risk Categorisation which classifies investments from Low Risk (C) to High Risk (A) based on i) actual and potential risks and impacts identified during the E&S Due Diligence, ii) the consideration of inherent risks and iii) contextual risks.

i) E&S risks and impacts identified during the DD

E&S risks refer to a combination of probability of certain hazard occurrence and severity of impacts resulting from such an occurrence.
E&S impacts refer to any potential change to the physical, natural, or cultural environmental; impacts on surrounding community; and/or health of community or workers resulting from the business activity to be supported.

ii) Inherent risks

Inherent risks are the E&S risks related to the generic characteristics of an industrial sector or commercial activity, excluding management or mitigation measures.

iii) Contextual risks

Contextual risks are the E&S risks arising from the context and settings of the investment's business activity:

- Geographic location of primary production (and primary processing if relevant)
- Legislation and regulatory enforcement

As such, INOKS has adopted the following risk categorisation as per IFC standards (the "IFC Risk Categorisation"):

- Low-Risk (Category C): Investment opportunity with minimal or no adverse social or environmental impacts;
- Medium Risk (Category B): Investment opportunity with potential limited adverse social or environmental impacts that are few in number, generally site-specific, largely reversible and readily addressed through mitigation measures;
- High-Risk (Category A): Investment opportunity with potential significant adverse social or environmental impacts that would be diverse, irreversible or unprecedented. Such project will require the help of an outside consultant. Example of High-Risk activities can be found in the Annex B. However, our focus is on SMEs evolving in the Primary Production and Processing Sectors.

When DD is being conducted on prospective investees that would be considered alternative trade financiers ("ATFs"), the IFC Environmental and Social Categorisation for Financial Institutions is used:

Category FI: Business activities involving investments in financial institutions (FIs) or through delivery mechanisms involving financial intermediation. This category is further divided into:

FI–1: when an FI's existing or proposed portfolio includes, or is expected to include, substantial financial exposure to business activities with potential significant adverse environmental or social risks or impacts that are diverse, irreversible, or unprecedented.

FI–2: when an FI's existing or proposed portfolio is comprised of, or is expected to be comprised of, business

activities that have potential limited adverse environmental or social risks or impacts that are few in number, generally site-specific, largely reversible, and readily addressed through mitigation measures; or includes a very limited number of business activities with potential significant adverse environmental or social risks or impacts that are diverse, irreversible, or unprecedented.

FI–3: when an FI's existing or proposed portfolio includes financial exposure to business activities that predominantly have minimal or no adverse environmental or social impacts.

INOKS will document the rationale for such categorisation in its ESRI Factsheet.