



**INVESTMENT FUND FOR
DEVELOPING COUNTRIES**

SUSTAINABILITY POLICY

FEBRUARY 2019

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1. Introduction

IFU is a development finance institution providing equity, loans and guarantees on commercial terms to private sector investments in developing countries and emerging markets. IFU's objective is to promote investments which support sustainable development in its three dimensions – economic, social and environmental – in a balanced and integrated manner in developing countries and contribute to the realisation of the UN Sustainable Development Goals (SDGs)¹.

IFU, the Danish SDG Investment Fund and the other IFU managed funds strive to contribute to the achievement of the SDGs by participating in relevant, inclusive and sustainable investments through the mobilization of Danish and foreign public and private capital, technology and knowhow based on international standards for responsible business conduct.

IFU's dual purpose is to generate measurable, beneficial development impacts alongside financial returns, realising that long-term investment returns are prerequisites for creating continued development. IFU believes that responsible business conduct adds value to investments and generates development impacts. This includes, but is not limited to, creation of decent work opportunities, access to affordable and sustainable energy, reduction in greenhouse gas emissions, resilient infrastructure, local tax contribution, sustainable consumption and production, gender equality and health, community health and food security.

As sustainability is an evolving agenda, this policy has been prepared in consultation with peers, the private sector, government and civil society, and IFU continuously wishes to learn about and adopt high standards and good practices in order to strengthen capacity and improve due diligence, monitoring and development impact.

2. Purpose and scope

This Sustainability Policy sets out IFU's commitment to invest in sustainable development and outlines the sustainability and responsible business conduct requirements that apply to IFU itself, IFU managed funds, IFU's direct investments in the form of equity and loans to project companies, as well as investments in private equity funds, financial institutions and other financial intermediaries.

Sustainability and responsible business conduct concern Environmental, Social and Governance issues (ESG) as well as development impacts. This Sustainability Policy is the overarching policy for the ESG issues, which in some areas, like climate change, is supplemented by thematic policies (see Annex F for the structure of IFU's policies). Where appropriate in this policy, reference is made and links are provided to such supporting policies.

IFU's commitments related to sustainable economic development form an integral part of IFU's Investment Strategy and the Investment Policy of the Danish SDG Investment Fund.

In addition to such overall policies, IFU implements its policies using various internal guidelines and tools for investment professionals as well as handbooks for investment partners. Annexes A-E outline specific requirements that apply to the different types of investments. These requirements are conveyed to the project sponsor and inserted in legally binding agreements. In some cases, for instance syndication with other DFIs, IFU may opt to use other formats covering in scope and contents the same type of sustainability requirements.

It is IFU's experience that high standards within sustainability and ESG are prerequisites for continuous positive returns and long-term business success. Investments in developing countries are challenged by volatility, uncertainty, complexity and ambiguity, and this calls for due diligence in relation to ESG issues. Effective due diligence of sustainability issues reduces risks to workers, the environment, local communities and other stakeholders, improves impact and

¹) In agreement with the 2030 Agenda for Sustainable Development

provides business benefits like access to markets, reduced staff turnover, cost efficiency in production and improved stakeholder relations.

2.1 International commitments to development

The international development agenda, Agenda 2030, and its three core components:

- the Sustainable Development Goals (2015),
- the UNFCCC Paris Declaration (2015) and
- the Addis Ababa Action Agenda on Finance for Development (2015)

form the international development policy framework for IFU's investments.

The Danish Government – IFU's owner – is committed to the Agenda 2030 through its 2017 development policy "The World 2030" and its SDG action plan. Over the years, the Danish Government has signed up to and ratified all relevant internationally agreed UN, ILO and OECD conventions, declarations, agreements and principles for sustainable development. IFU commits to adhering to the same.

Since 2017, the UN Guiding Principles on Business and Human Rights (UNGPR) have been part of the legal basis for IFU's operations, cf. section 9 of the Danish Act on International Development Co-operation.

The Sustainable Development Goals (SDGs) define global sustainable development priorities and aspirations for 2030. IFU applies the SDGs as an overarching framework to shape, manage and communicate our contribution to sustainable development. That implies maximising positive impacts on people, planet and profit and thereby contributing to prosperity and preventing and minimising adverse impacts.

Furthermore, IFU in its investment strategy and individual investment decisions takes into account the effects of its investments on the goals expressed in the Rio Declaration on Environment and Development, the Paris Agreement on Climate Change and the UN Convention Against Corruption.

In 2009, IFU signed up to the principles of the UN Global Compact, which outline the fundamental responsibilities of business in the areas of human rights, labour, environment and anti-corruption. In 2019, IFU will sign up to the UN Principles for Responsible Investment (UNPRI) and the Equator Principles and Climate Action in Financial Institutions.

2.2 Danish, host country and international obligations for benchmarking

IFU is domiciled in Denmark and subject to Danish law. With regards to sustainability, IFU will adhere to the Danish guidelines on responsible business conduct (Erhvervsstyrelsen 2018) and the OECD Guidelines for Multinational Enterprises (2011), including the two sub-set publications; Responsible Business Conduct for Institutional Investors (2017) and Due Diligence Guidance for Responsible Business Conduct (2018), see also annex G.

In countries where IFU invests, IFU requires project companies to follow international standards and principles in addition to complying with national regulations. IFU considers local national policies and priorities when relevant to the specific investment. In order to operationalize the management of ESG impacts in accordance with international principles, the primary standards that guide the scoping of IFU's due diligence and monitoring of investments are:

- the IFC Environmental and Social Performance Standards (2012)
- the World Bank Group General and Sector-specific Environmental Health and Safety Guidelines (2007 and later amendments), respectively
- the UN Guiding Principles on Business and Human Rights (2011)
- the 10 principles of the UN Global Compact (1999)
- the UN Convention against Corruption (2010) and OECD's Convention on Combating Bribery (1997)

3. Thematic sustainability commitments

Sustainability being an integral part of IFU's investment strategy, IFU is committed to contributing to social, environmental and economic sustainable development, including the UN Sustainable Development Goals (SDGs).

Aligned with the UNGP and the OECD Guidelines for Multinational Enterprises, IFU will furthermore identify, prevent and mitigate potential adverse impacts related to environmental, social and governance impacts that IFU may cause or contribute to, or to which IFU is directly linked through investments and other business relationships.

Where adverse impacts are identified, IFU will use its leverage to address and mitigate such adverse impacts.

IFU is committed to ensuring that Environmental, Social and Governance issues in investments are aligned with international standards (as listed in Annex G) where these go beyond regulation in host countries and where these standards may improve operational excellence of the companies. This includes finding innovative solutions using IFU's leverage as an investor.

In the following, the ESG issues highlighted are those that IFU considers particularly relevant in order for investments to be contributing to the SDGs.

3.1 Environmental sustainability

Reduce contribution to climate change

IFU aims to conduct its business so that it is aligned with the international targets agreed on climate, including contributions to reducing the increase in temperature. IFU is committed to ensuring that the management of its business and investments is in line with applicable international conventions, declarations and agreements related to climate change, including the UNFCCC Paris Declaration (2015).

By this commitment, IFU recognizes that climate change is a short-term threat hampering poverty reduction and sustainable development in many parts of the developing world, affecting livelihoods, private sector development and economic growth. Hence, climate change is impacting several of the SDGs individually and in combination.

IFU works proactively to promote low carbon aspects of projects. This is done e.g. through specific renewable energy projects, energy efficiency projects and as components of large infrastructure projects. IFU works proactively to promote the commitment by aiming for one third of the Danish SDG Investment Fund to be invested in renewable energy projects.

For other projects, IFU is committed to addressing in its due diligence less carbon-intensive options to be assessed in order to incorporate these factors into the business strategies of its investment companies.

Further information about IFU's position on climate change-related investments is outlined in IFU's climate policy, which will be made available on IFU's website.

Prevent and minimise pollution and protect nature

IFU is committed to supporting and promoting a preventive and precautionary approach to environmental challenges in accordance with the Rio Declaration on Environment and Development and to conduct environmental and social due diligence and monitoring to guide IFU's investments. IFU strives to protect biodiversity and invest in sustainable and resilient agriculture and forestry.

By continuously focusing on preventing and minimising adverse impacts on the environment and nature related to its investments, IFU works to ensure that local stakeholders are not exposed to unhealthy environments, and that they have access to and benefit from biodiversity and ecosystem services.

Ensure animal welfare

IFU is committed to setting high animal welfare standards and using Danish rules and regulations as a comparative benchmark for (but not limited to) good management practice, physical environment, veterinary practice and the use of medicine, transport and slaughtering.

Guidance from the principles referred to as the Five Freedoms of Animal Welfare and the Terrestrial Animal Health Code of the World Organisation for Animal Health (OIE) is implemented in IFU's investment process. This means that animals (e.g. pigs, cattle, sheep and poultry) used in food production and for other commercial purposes and testing should be housed, fed, watered and looked after in consideration of their physiological and behavioural needs and protected against pain, suffering, fear, distress, injury or disease in the best possible manner.

Further information about IFU's position on animal welfare is outlined in a specific policy available on IFU's website.

3.2 Social sustainability

Respect and support human rights

IFU is committed to respecting human rights and is subject to the UNGP according to Danish law.

The Office of the United Nations High Commissioner for Human Rights defines human rights as the rights inherent to all human beings, whatever their nationality, place of residence, sex, national or ethnic origin, colour, religion, language, or other status. All human beings are equally entitled to human rights without discrimination. These human rights are described in the International Bill of Human Rights. Additional human rights treaties define these rights in greater detail with respect to particular groups of people or circumstances.

IFU respects internationally recognized human rights and takes measures to avoid supporting activities that may cause, contribute or are directly linked to human rights abuses. This means that all internationally recognized human rights are considered potentially relevant to IFU's activities.

In line with the UNGP, IFU maintains a grievance mechanism for handling complaints where IFU's project companies may have caused or contributed to adverse impacts on human rights or been directly linked to activities causing or contributing to adverse impacts on human rights. Where IFU has caused or contributed to adverse impacts of human rights, IFU will provide access to remedy.

Further information about our position on implementation of the UNGP can be found in a specific human rights policy, which will be made available on IFU's website.

Support and promote decent work

IFU is committed to supporting and promoting decent work, and all IFU's investments must adhere to core ILO conventions on child labour, forced labour, non-discrimination and freedom of association. Furthermore, IFU's requirements for decent work cover working conditions and terms of employment, collective dismissals, gender equality, privacy, occupational health and safety, grievance mechanisms and worker accommodation.

The pursuit of economic growth through job creation and income generation should be accompanied by protecting the fundamental rights of workers. For any business, the workforce is a valuable asset, and a sound worker-management relationship is crucial to the sustainability of a business.

Prevent land grabbing and ensure human rights related to involuntary resettlement and livelihood restoration

IFU is committed to preventing land grabbing and securing human rights related to involuntary resettlement and livelihood restoration by ensuring that its investments adhere to IFC Performance Standards.

The avoidance of land grabbing and securing human rights in relation to involuntary resettlement and livelihood restoration are considered important to support the ability of people and families to be able to sustain their living conditions and provide the basis for local business and markets.

Ensure informed consultation, participation and inclusiveness

IFU is committed to ensuring that local stakeholders affected by its investments are consulted on an informed and participatory basis that promotes inclusiveness. IFU pays special attention to vulnerable groups, such as elderly or disabled community members.

Specifically, where indigenous peoples are potentially affected by projects, IFU is - in line with IFC Performance Standards - committed to ensuring that the process of Informed Consultation and Participation meets the principles of Free, Prior and Informed Consent (FPIC).

IFU recognizes the importance of informed consultation and participation to ensure the respect for human rights. In addition, an informed and participatory consultation process can strengthen the basis for sustaining development effects in terms of improved transfer of knowledge and technology as well as for developing local capabilities and capacities.

Hereby, IFU contributes to the implementation of pillar 3 in 'The World 2030' of the Danish Ministry of Foreign Affairs (2017): Inclusive, sustainable growth and development.

Improve and promote gender equality and health

IFU is committed to improving gender equality in the private sector in developing countries when mobilizing capital and investing in projects. This will help advance women as entrepreneurs, business leaders, employees and consumers and enhance their economic empowerment. Furthermore, IFU will support and motivate investment companies to address and demonstrate a commitment to empowerment of women through issues related to leadership, pay equity, workplace benefits and professional development, workforce participation, workplace environment, including women's health and sexual and reproductive health.

The unequal treatment of women in the global economy is recognized as an important human rights challenge and, if managed, holding a significant positive potential for sustainable development. IFU seeks to integrate "gender smart" decision-making into its investment processes and to demonstrate that investing with a gender lens can reap business returns in addition to social returns. Further information about IFU's position on gender equality and health is outlined in a specific policy, which will be made available on IFU's website.

3.3 Governance

Uphold and promote good corporate governance

IFU is committed to the global Corporate Governance Development Framework (CGDF). The importance of good corporate governance to the success of individual enterprises and the sound development of the private sector economy is today well-established. IFU's experience as an active participant in the CGDF and in the governance of IFU's investments demonstrates that careful and continuous attention to governance is essential to achieve IFU's financial, sustainability and developmental goals.

IFU upholds high corporate governance standards in its own operations and promotes continuous improvement in the structure and practice of good corporate governance in its investments through IFU's roles of shareholder, board member nominee and adviser. IFU contributes to the development of a corporate governance culture in the developing countries in which IFU operates through capacity building, the introduction of best practices and the demonstration effect IFU's investments provide in society and the broader economy. IFU's policy on corporate governance can be found on IFU's website.

Maintain zero tolerance towards corruption

IFU is committed to maintaining a zero-tolerance policy regarding corruption, including bribery, fraud and facilitation payment. The central instruments are the UN Convention against Corruption and the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions, and both are incorporated in Danish law, which IFU is subject to. IFU participates in the Danish Ministry of Justice's working group on the implementation of the OECD Convention into Danish law. IFU ensures that investment companies take a clear stand against corruption, and responds immediately to any allegations of corruption, implementing corrective and preventive measures.

IFU recognises that corruption is one of the greatest barriers to sustainable development with a disproportionate impact on developing countries and that combating corruption is a key element to poverty alleviation. Further information about IFU's position on anti-corruption is outlined in a specific policy guideline available on IFU's website.

Avoid money laundering

IFU is committed to avoiding money laundering. Although IFU is not a bank, IFU has chosen to apply anti-money laundering measures in accordance with the Danish Anti-Money Laundering Act to its lending business to prevent criminals' illegal use of legal entities and the financial system for the purposes of money laundering and terrorist financing. This includes checking IFU's borrowers' identity, ownership and governance structure and legal status.

Uphold fair tax planning and tax payment

IFU is committed to ensuring proper payment of taxes. IFU believes that taxation is a key component of sustainable development. The companies in which IFU invests must at all times comply with local tax laws and pay taxes where they have their economic activity. IFU would never use holding companies in third countries (countries which are neither host countries for the investors nor the investment) to evade taxes or to conceal anything. If holding companies in third countries are necessary for other reasons (commercial or legal), IFU will not incorporate them in third countries that are either on the EU list of non-cooperative jurisdictions for tax purposes or do not comply with OECD's Global Forum.

IFU's tax policy can be found on IFU's website.

4. Operational implementation – investment process

The Sustainability Policy is implemented and embedded into IFU's procedures for:

- Investment process
- Stakeholder engagement
- Disclosure, transparency and accountability
- Grievances and remedy

4.1 Investment process

IFU's investment process has been designed in such a way that investments are assessed and approved according to a gradually increased engagement level passing several approval stages. At each stage, ESG aspects will be investigated and findings integrated in IFU's decision papers at "Clearance in Principle", Binding Commitment" and "Shareholder Agreement" level.

Identifying and managing sustainability issues are an integral part of IFU's investment process for both direct project investments and investments in funds, financial institutions and other financial intermediaries. IFU's investment process consists of appraisal, due diligence, active ownership and exit and is aligned with the UNGP and the OECD Guidelines for Multinational Enterprises.

4.1.1 Appraisal

The appraisal process leading up to “Clearance in principle” includes:

- Ensuring that IFU does not finance activities on the EDFI exclusion list, either directly or indirectly. See Annex E for the exclusion list IFU has committed to.
- Carrying out risk-based appraisal for categorisation, including EDFI ESG risk categories (A, B+, B, C. IFU identifies environmental, human rights and social issues as well as corporate governance issues which may cause severe adverse impacts, and which are relevant for the project companies or the portfolio of funds and financial institutions.
- Evaluating the project sponsor’s, project company’s, fund manager’s or financial institution’s awareness of and capability to manage sustainability issues.
- Assessing ex-ante the project’s potential development effects and contribution to the SDGs.

4.1.2 Due diligence

The due diligence process leading up to “Binding commitment” includes aspects such as:

- Assigning **dedicated ESG specialists** within IFU to engage actively with all category A, B+, and, where warranted, category B clients. The level and exact focus of engagement depend on the type and severity of impact and/or the extent to which they pose a risk to the client/IFU.
- For **all projects**, IFU’s due diligence comprises:
 - Completing the UN Global Compact **self-assessment**.
 - Reviewing thoroughly the **expected direct and indirect development effects** and conduct an ex-ante assessment according to IFU’s Development Impact Model (DIM).
 - Conducting a **pre-investment assessment of potential adverse impacts on human rights** for relevant rightsholders to assess the potential impacts related to each human right relevant for the investment. Businesses have a responsibility to undertake due diligence to address the actual and potential human rights impacts of their business activities and relationships as set out in the UNGP.
 - If ESG issues have been identified during due diligence and require further actions, an **ESG Action Plan** will be prepared. The action plan could include mitigation of the potential adverse human rights impacts identified in the appraisal and due diligence to comply with IFU requirements and relevant international sustainability standards. Action points could also include initiatives that would enhance development effects and improve the contribution to the SDGs.
- For category **A and B+ projects**, IFU’s due diligence is extended to comprise:
 - Assessing the extent to which relevant **international sustainability standards** are met. The standards will include the IFC Performance Standards and the related IFC/World Bank Group Environmental, Health & Safety (EHS) Guidelines or other relevant and credible, globally or regionally recognised standards that encourage continuous improvements.
 - Ensuring that an **Environmental and Social Impact Assessment** (ESIA) has been conducted to meet international standards (IFC Performance Standards). This can be achieved in terms of analyses identifying the gaps in an ESIA meeting national requirement standards against international standards (IFC Performance Standards).
 - If the pre-investment assessment of potential adverse impacts on human rights shows that there is risk of severe adverse human rights impacts, which are not already managed in mitigation measures proposed based on IFC Performance Standards, IFU will complement the work with an assessment of these impacts in order to address them.
 - Approving an **ESG Action Plan** that describes the actions and timeframe required for addressing sustainability issues. The action plan must be approved by the project partners, including IFU.
 - The ESG Action Plan includes the establishment of an **Environmental and Social Management System (ESMS)**, including a procedure to handle complaints and providing **access to remedy**

- Confirming the existence of a **written sustainability policy** for the project company, approved by management, and, if not, ensure that such a document is prepared.

Where IFU co-invests with other Development Finance Institution partners, IFU may choose to apply requirements differing from IFU's own in order to harmonise the requirements of all co-investors, as long as they are not substantially different from IFU's or the IFC/WBG Performance Standards, including due consideration of the UNGP.

4.1.3. Active ownership and exit

IFU uses its leverage as a minority shareholder and/or lender to:

- **Exercise and build leverage**, e.g. through board membership, typically over several years, where IFU shares and disseminates its experience and facilitates networking and partnerships regarding the business environment and sustainability issues. In case of identified adverse impacts, IFU will use its leverage and if needed seek to increase its leverage to have such adverse impacts addressed and mitigated.
- Ensure **timely implementation** of the Environmental and Social Management System and the ESG Action Plan.
- **Monitor compliance** with IFU's requirements (see Annex A-D) through e.g. site visits by IFU board members, investment professionals or ESG officers or external experts.
- Initiate ESG improvements and assist project companies, fund managers and financial institutions in establishing **Environmental and Social Management Systems** through the provision of training and tools.
- Require an **Annual Sustainability Report** and regularly review and assess the sustainability performance of the investment companies in order to ensure continuous improvement throughout the extensive investment period.

Furthermore, when exiting projects, IFU will register expectations regarding development effects, review key impact data as appropriate and conduct final evaluation reporting according to IFU's Development Impact Model (DIM) procedures, which will be continuously improved and further aligned with the SDGs.

4.2. Stakeholder engagement

IFU is committed to proactively engaging external stakeholders and will, where appropriate, engage in general policy dialogue with relevant stakeholders in society on issues related to sustainability in line with informed consultation and participation described in section 3.2.

4.3 Disclosure, transparency and accountability

IFU is committed to requiring the project companies to exercise a pro-active and constructive dialogue with stakeholders by disclosing relevant information in a transparent manner.

4.4 Grievances and remedy

IFU is committed to using its leverage as an investor to ensure that the project companies establish grievance mechanisms and provide access to remedy that are appropriate taking into account the cultural and social context of the investments and in line with the UNGP. Where IFU is investing in funds, IFU is also committed to promoting the said approach.

5. Operational implementation - IFU's own operations

IFU is committed to integrating sustainability considerations in its own operations at its head office as well as in its regional offices. IFU's operations based in Copenhagen follow Danish rules and regulations within all sustainability-related issues.

The sustainability issues that IFU is committed to working to improve are:

5.1 Environment

IFU strives to continuously limit energy consumption, apply energy efficient solutions, minimise water consumption, substitute hazardous materials and increase recycling of waste.

IFU pays attention to environmental issues related to its supply chain. Furthermore, environmental as well as health & safety considerations are reflected in the terms and conditions of its contractors working at its premises.

5.2 Social, including implementation of the UNGP

As part of implementing the UNGP in the internal operations, IFU is committed to maintaining a healthy and safe working environment for its staff. It is therefore a key priority for IFU to continue to regularly conduct staff satisfaction surveys, work place assessments and staff appraisal interviews.

It is important for IFU to maintain high standards for safety and security for employees traveling to jurisdictions that are considered having elevated health and security risks. IFU is committed to striving for equal representation in management and will work towards promoting equal opportunities for promotion.

All IFU's investment professionals are trained in sustainability issues so that they can manage basic ESG assessments for EDFI categories B and C. Each year they will receive supplementary competence development training to keep abreast with new developments.

5.3 Governance

IFU is committed to upholding high corporate governance standards in its own operations and continuously promotes improvements in the structure and practice of good corporate governance in IFU managed funds, investment boards and committees.

5.4 Stakeholder engagement

As an organisation, IFU continuously seeks dialogue with its stakeholders in order to be able to act proactively on stakeholder concerns. IFU will meet with civil society organizations twice a year to ensure a dialogue about stakeholder input and concerns.

IFU cooperates with other development finance institutions to harmonise ESG requirements and procedures. Harmonisation improves efficiency during appraisal, due diligence, monitoring and in the engagement processes, as well as simplifies and increases negotiation leverage towards project companies and fund managers.

IFU has a Sustainability Advisory Board with members appointed in their personal capacity, each representing important IFU stakeholder issues: human rights, environment, development research and policy. The advisory board meets regularly to discuss and advise on key issues.

IFU is a member of European Development Finance Institutions (EDFI), UN Global Compact Network Denmark, Transparency International Denmark, The Tax Dialogue, the Danish Ethical Trading Initiative (DIEH) and the DFI Gender Finance Collaborative, in order to keep abreast of the latest international developments within sustainability and responsible business conduct.

5.5 Disclosure, transparency and accountability

IFU is committed to providing transparent, accountable information about IFU's sustainability activities and performance and continuously endeavours to improve the quality of this information. Information is shared in many ways, including on IFU's website and through stakeholder meetings.

The development impact of IFU's investments and the contribution to the SDGs are measured by a set of indicators (Development Impact model (DIM)) across the investment portfolio. A selection of these are reported in IFU's Annual

Report aligned with disclosure according to the global goals. The DIM indicators include mobilisation of private capital, number of direct and indirect jobs created, total reduction in greenhouse gas emissions, local tax contribution, financial performance, additionality, catalytic effects and sustainability.

IFU's Annual Report also constitutes the mandatory Communication on Progress to the UN Global Compact on actions taken to support the Global Compact principles, as well as the corporate social responsibility reporting required by the Danish Financial Statements Act, including reporting on gender, climate and human rights. In addition, IFU will report to the UN-PRI according to their formats.

IFU aims at being transparent about the use of holding company structures in all investments and annually discloses the use of holding companies, the reasons for using holding companies in third countries, and the aggregate amount of tax payments as reported in the accounts of companies in which IFU invests.

5.6 Grievances and remedy

IFU is committed to maintaining a grievance mechanism through which external stakeholders can report alleged breaches of this policy. Grievances from those affected by an IFU project can be resolved locally by the project company or the affected individuals, and communities can use IFU's grievance mechanism in an effort to reach a solution. Based on experience, the grievance mechanism will be reviewed regularly and further developed as deemed fit for purpose.

IFU is committed to addressing grievances in a manner that is fair, objective and constructive, including to investigate the matter and seek to resolve any breach of policy. IFU will consider a variety of options, including third party investigations, negotiated settlements, contractual remedies and the future relationship(s) with the breaching parties. Furthermore, IFU will whenever justified use its leverage to seek to ensure access to remedy for affected individuals and communities and/or notify the appropriate authorities.

IFU reports grievance cases to its board of directors and publicly reports on the status and outcome of grievances received on an aggregated basis, considering confidentiality regulations and legal obligations.

6. Approval and revisions

This policy was approved by IFU's Board of Directors on 6 February 2019. The policy is publicly accessible and communicated to all relevant parties internally and externally.

IFU's Sustainability Unit monitors developments in the relevant international conventions and sustainability requirements. The unit is responsible for proposing future adjustments and changes to IFU's management in connection with the statutory annual policy review by IFU's board of directors.

ANNEX A:

Sustainability requirements for direct investments

The vast majority of IFU's investments are direct investments. The project companies must continuously work towards achieving satisfactory long-term sustainability results contributing to the 2030 Agenda, and such activities must be anchored in the business plan. Project companies should contribute to creating jobs and income, improving corporate governance, sound environmental and social performance and development impacts in the local community. Businesses have a responsibility to undertake due diligence to address the actual and potential sustainability impacts of their business activities and relationships, including human rights, as set out in the UN Guiding Principles on Business and Human Rights. Project companies are also encouraged to actively engage with local stakeholders.

Through the shareholder agreements, IFU requires project companies to:

- Operate in **compliance with host country regulations**.
- Continuously identify, **prevent and/or mitigate potential and actual adverse impacts** on sustainability issues, including human rights, that the company may cause or contribute to, or to which they are directly linked through a business relationship. Including considering energy efficient and low carbon solutions.
- **Comply with relevant international standards** for sustainability identified during appraisal and due diligence and work towards implementing international standards over time. For each project company, international standards are defined as specifically and operationally as possible, taking into consideration the risks and opportunities specific to the individual business, its local context, size and resources.
- **Adopt a written sustainability policy** approved by their board of directors or similar governance body, which is made publicly available and communicated internally and externally to relevant stakeholders.
- **Appoint a person with overall responsibility for sustainability**, including the management of activities and resources and delegation of tasks. It must be a suitably trained person with appropriate knowledge of sustainability issues related to the project.
- Establish an **Environmental and Social Management System (ESMS)** to ensure continuous improvement and implement sustainability decisions relevant to the company size and sector as well as the environmental, economic, cultural and social context in which the project operates.
- Implement **corrective Action Plans** to address any identified shortcomings in relation to sustainability issues.
- Take a clear, **written stand against corruption** and **implement anti-corruption procedures and controls** in accordance with international principles and standards.
- **Promote sustainability issues** in interaction with suppliers and business partners and require them to demonstrate due diligence in relation to **potential and actual adverse** impacts.
- **Prepare and submit to IFU an annual report** that provides a status on sustainability issues and development impacts, including the implementation of the action plan and actions taken to address adverse impacts, for discussion and approval by the company's board of directors or a similar governance body.
- **Be transparent and informative** about their business and performance in order to help affected communities and other stakeholders understand the risks, impacts and opportunities of the project communities.
- **Establish a procedure to handle complaints** by individuals and communities, who may be adversely affected by the activities of the project company and ensure access to remedy for the affected persons and/or notify the appropriate authorities.

ANNEX B:

Sustainability requirements for funds

IFU applies EDFI's Environmental and Social Standards for Fund Investments for all IFU investments in funds. IFU's requirements also include issues related to corporate governance and business ethics as well as development impacts. Funds must employ management systems that effectively address sustainability risks in portfolio companies and realise opportunities for improvements over the investment period.

IFU requires fund managers to:

- **Commit to an investment code on sustainability**, promoting energy efficiency and to apply the EDFI exclusion list in selecting portfolio companies.
- Use **international standards as a benchmark** for portfolio companies.
- Implement and maintain an appropriate **Environmental and Social Management System (ESMS)** in order to ensure continuous improvement, including a procedure to handle complaints and ensure access to remedy.
- **Take a clear, written stand against corruption** and **implement anti-corruption procedures and controls** in accordance with international principles and standards.
- **Assign sustainability responsibilities** to a designated representative of senior management and a suitably qualified expert who can be an external consultant.
- **Assess the ESG aspects** of all new investments as an integral part of the investment appraisal procedure.
- Enter into agreements that **contractually bind portfolio companies to comply** with the fund investment code.
- Agree with the portfolio companies on **corrective action plans** to address any identified shortcomings in relation to sustainability issues.
- **Monitor sustainability performance** of portfolio companies including their progress towards action plans and targets for continuous improvements as well as any serious incidents.
- **Report annually** on the fund's social and environmental management system and sustainability performance of portfolio companies. Such annual sustainability reporting should also include development impacts like number of jobs, tax payments, etc.

ANNEX C:

Sustainability requirements for financial institutions

IFU applies EDFI's Harmonized Environmental and Social (E&S) Standards for financial institutions (FIs) for all IFU investments in financial institutions, including micro-finance. A shortened version is presented below. E&S Standards for FIs are graduated and implemented according to the EDFI-FI category definitions. The categorization depends on the institution's portfolio risk and will be commensurate with the potential E&S impact and risk profile of the existing and/or proposed FI's portfolio and will consider the type, size and sector exposure of the FI's entire portfolio.

FIs must employ management systems that effectively address sustainability risks in relation to own operations and clients and realise opportunities for improvements over the loan period. IFU's requirements below also include issues related to corporate governance and business ethics as well as development impacts.

IFU requires FIs to:

- **Commit to fair treatment, non-discrimination and equal opportunity of own employees**, to maintain or improve employee-management relationships, and comply with all relevant local environmental, health & safety and labour laws and the requirements of the IFC Performance Standard 2.
- Take a clear, **written stand against corruption** and implement "**Know Your Customer**" (KYC) policy, procedures and controls in order to comply with national anti-money laundering and terrorist financing regulations.
- Comply with and apply the **EDFI exclusion list** in selecting clients.
- Develop, implement and continuously improve an appropriate **Environmental and Social Management System (ESMS)** and ensure integration into transaction due diligence and monitoring processes.
- **Appoint a representative of senior management** and/or board member to take accountability for the overall sustainability management and allocate appropriate resources for implementation of the ESMS.
- **Assign sustainability responsibilities to a fully-dedicated and suitably qualified professional** within the FI or retain external suitably qualified sustainability professional(s) to support the FI's relevant teams.
- **Implement an action plan** to address any gaps against IFU's sustainability requirements.
- Provide IFU with **annual sustainability monitoring report**. Report serious sustainability events directly related to the FI shortly after having become aware of the event and report any planned retrenchment as soon as possible.
- **Contractually bind clients** to comply with the minimum requirements as follows:
 - **Review the operations of non-retail clients** for compliance with the national E&S laws and regulations, as applicable where financing presents sustainability risks.
 - **Assess risks of Higher Risk Transactions (project finance and/or long term corporate finance with tenor of not less than 36 months, and at least USD 10 million or loan size above USD 5 million)** against the IFC Performance Standards.
- Implement an **E&S tracking Management Information System (MIS)**, which monitors Higher Risk Transactions and transactions that expose the FI to contextual E&S risks.

Investment in microfinance

When investments include micro-financing, IFU is committed to requiring micro-finance institutions (MFI's) to endorse the Client Protection Principles as set forth by the SMART Campaign¹ to ensure prudent, transparent and respectful treatment of clients. IFU requires the principles to be the minimum standards that clients should expect when doing business with a financial service provider and include appropriate product design and delivery, prevention of over-indebtedness, transparency, responsible pricing, fair and respectful treatment of clients, privacy of client data and mechanisms for complaint resolution.

1) The Smart Campaign is a global effort to unite microfinance leaders. Smart Microfinance encompasses core Client Protection Principles to help microfinance institutions practice good ethics and smart business.

ANNEX D:

Sustainability requirements for Danida Business Finance

IFU has an administrative role in the execution of the Danish Business Finance (DBF) programme, which provides soft and concessional loans to public entities. DBF investments must promote the SDGs and be aligned with national development plans. Projects should contribute to creating jobs and socioeconomic returns, improving good governance, sound environmental and social performance including on gender equality and health and development impacts in the local community. Project implementors are also encouraged and, depending on the specific project context, obligated to actively engage with local stakeholders.

DBF requires project implementors to:

- Operate in **compliance with host country regulations**.
- Continuously **identify, prevent and/or mitigate potential and actual adverse impacts** on sustainability issues, including human rights, that the project may cause or contribute to, or to which they are directly linked.
- **Comply with relevant international standards** for sustainability identified during appraisal and work towards implementing international standards over time. For each project, international standards are defined as specifically and operationally as possible, taking into consideration the risks and opportunities specific to that project, its local context, size and resources.
- **Take a clear, written stand against corruption**.
- **Ensure that project management units have competent staff to handle sustainability issues**, including the management of activities and resources and delegation of tasks. It must be suitably trained staff with appropriate knowledge of sustainability issues related to the project.
- **Promote sustainability issues** in interaction with suppliers and business partners and require them to demonstrate due diligence in relation to significant impacts.
- **Report to IFU/ Danida Business Finance** status on sustainability issues, including the implementation of the action plan and actions taken to address adverse impacts. Compliance is closely monitored.
- **Be transparent and informative** about their activities and performance in order to help affected communities and other stakeholders understand the risks, impacts and opportunities of the project communities.

ANNEX E:

Exclusion list

IFU applies this exclusion list, which has been adopted by all the European DFIs which are members of the European Development Finance Institutions (EDFI).

IFU does not finance:

- 1) Production or activities involving forced labor¹ or child labor²
- 2) Production or trade in any product or activity deemed illegal under host country laws or regulations or international conventions and agreements.
- 3) Any business relating to pornography or prostitution.
- 4) Trade in wildlife or wildlife products regulated under CITES³
- 5) Production or use of or trade in hazardous materials such as radioactive materials⁴, unbounded asbestos fibers and products containing PCBs⁵.
- 6) Cross-border trade in waste and waste products unless compliant to the Basel Convention and the underlying regulations.
- 7) Drift net fishing in the marine environment using nets in excess of 2.5 km in length
- 8) Production, use of or trade in pharmaceuticals, pesticides/herbicides, chemicals, ozone depleting substances⁶ and other hazardous substances subject to international phase-outs or bans.
- 9) Destruction⁷ of Critical Habitat⁸
- 10) Production and distribution of racist, anti-democratic and/or neo-Nazi media.

In addition to the above, the financing of projects is excluded, when the following activities form a substantial⁹ part of a project sponsor's primary operations or those of the project:

- 11) Production or trade in¹⁰
 - a. weapons and munitions
 - b. tobacco
 - c. hard liquor
- 12) Gambling, casinos and equivalent enterprises¹⁰

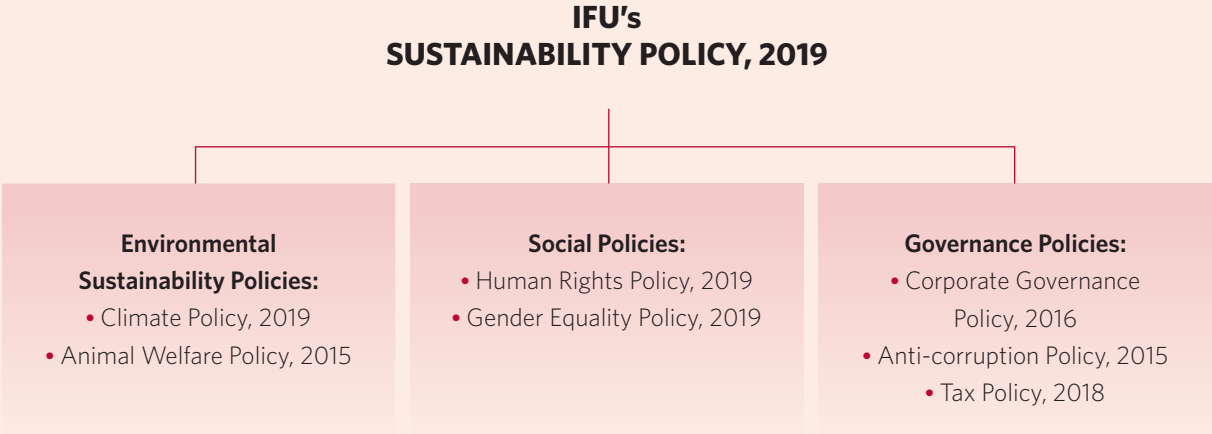
- 1) Forced labor means all work or service, not voluntarily performed that is extracted from an individual under threat of force or penalty as defined by ILO conventions.
- 2) Employees may only be taken if they are at least 14 years old, as defined in the ILO Fundamental Human Rights Conventions (Minimum Age Convention C138, Art. 2), unless local legislation specifies compulsory school attendance or the minimum age for working. In such cases the higher age shall apply.
- 3) CITES: Convention on International Trade in Endangered Species or Wild Fauna and Flora.
- 4) This does not apply to the purchase of medical equipment, quality control (measurement) equipment and any other equipment where EFP considers the radioactive source to be trivial and/or adequately shielded.
- 5) PCBs: Polychlorinated biphenyls, a group of highly toxic chemicals. PCBs are likely to be found in oil-filled electrical transformers, capacitors and switchgear dating from 1950-1985.
- 6) Ozone Depleting Substances: Chemical compounds, which react with and delete stratospheric ozone, resulting in "holes in the ozone layer". The Montreal Protocol lists ODS and their target reduction and phase-out dates.
- 7) Destruction means the (1) elimination or severe diminution of the integrity of a habitat caused by a major, long-term change in land or water use or (2) modification of a habitat in such a way that the habitat's ability to maintain its role (see footnote 10) is lost.
- 8) Critical habitat is a subset of both natural and modified habitat that deserves particular attention. Critical habitat includes areas with high biodiversity value that meet the criteria of the World Conservation Union (IUCN) classification, including habitat required for the survival of critically endangered or endangered species as defined by the IUCN Red List of Threatened Species or as defined in any national legislation; areas having special significance for endemic or restricted-range species; sites that are critical for the survival of migratory species; areas supporting globally significant concentrations or numbers of individuals of congregatory species; areas with unique assemblages of species or which are associated with key evolutionary processes or provide key ecosystem services; and areas having biodiversity of significant social, economic or cultural importance to local communities. Primary Forest or forests of High Conservation Value shall be considered Critical Habitats.
- 9) A benchmark for substantial is 5 - 10 % of the balance sheet or the financed volume.
- 10) In financial institutions this is calculated with regard to the portfolio volume financing such activities.

ANNEX F:

Supporting documents

IFU's Sustainability Policy is the leading policy document and sets out IFU's commitments and obligations in relation to sustainability. IFU's commitments in relation to major global sustainability issues are clarified in underlying policies, that further explain IFU's approach and implementation. IFU's Sustainability Handbook explains and specifies IFU's sustainability requirements and expectations for project companies and introduces IFU tools developed to support companies in their sustainability efforts. IFU's Sustainability Procedures Manual is developed to assist IFU's investment professionals with their sustainability tasks and describes the actions and available tools in each phase of the investment process.

Overview of Sustainability Policy and underlying policies:



ANNEX G:

Applicable international framework for sustainability

International conventions, declarations and agreements

Agenda 2030 Development

1. UN Sustainable Development Goals (UN 2015)
2. UNFCCC Paris Declaration (UN 2015)
3. UN Addis Ababa Action Agenda for Development Finance (UN 2015)

Human rights:

1. International Bill of Human Rights (IBHR) covering The Universal Declaration of Human Rights (UN, 1948), including the International Covenant on Civil and Political Rights (UN, 1966) and the International Covenant on Economic, Social and Cultural Rights (UN, 1966)
2. UN Guiding Principles on Business and Human Rights (2011)
3. UN Declaration on the Rights of Indigenous Peoples – UNDRIP (UN, 2007)

Labour rights:

1. ILO Convention 29 on Forced Labour (ILO, 1930)
2. ILO Convention 105 on the Abolition of Forced Labour (ILO, 1957)
3. ILO Convention 87 on Freedom of Association and Protection of the Rights to Organize (ILO, 1948)
4. ILO Convention 98 on the Right to Organize and Collective Bargaining (ILO, 1949)
5. ILO Convention 100 on Equal Remuneration (ILO, 1951)
6. ILO Convention 111 on Discrimination (Employment and Occupation) (ILO, 1958)
7. ILO Convention 138 on Minimum Age (ILO, 1973)
8. ILO Convention 182 on the Worst Forms of Child Labour (ILO, 1999)

Environment and climate:

1. Rio Declaration on Environment and Development (UN, 1992)
2. Montreal Protocol on Substances that Deplete the Ozone Layer (UNEP, 1999)
3. Stockholm Convention on Persistent Organic Pollutants (POPs) (UNEP, 2004)
4. The Rotterdam Convention/PIC Convention on Certain Hazardous Chemicals in International Trade (UNEP, FAO, 2004)
5. UN Convention on Biological Diversity (UNEP, 1993)
6. Kyoto Protocol to the UN Framework Convention on Climate Change (UN, 1997)
7. Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and Their Disposal (UNEP, 1992)
8. CITES Convention on International Trade in Endangered Species of Wild Fauna and Flora (UNEP, 1975)

Gender equality and sexual and reproductive health and rights:

1. The Convention on the Elimination of all Forms of Discrimination Against Women (CEDAW) (UN, 1979)
2. CEDAW's Optional Protocol (UN, 1999)
3. Beijing Declaration and Platform for Action (PFA) (UN, 1995)
4. Convention on preventing and combating violence against women and domestic violence (Istanbul Convention) (2014)
5. Cairo Declaration on Population and Development (UN, 1994)

ANNEX G: CONTINUED

Anti-Corruption:

1. UN Convention Against Corruption (UN, 2010)
2. Convention on Combating Bribery of Foreign Public Officials in International Business Transactions (OECD, 1997)

Tax:

1. OECD's Global Forum on Transparency and Exchange of Information for Tax Purposes (OECD, 2009)
2. EU list of non-cooperative tax jurisdictions (EU, 2017)

Danish Government - agreed strategy covering IFU investments:

The World 2030, Danish strategy for development cooperation, Ministry of Foreign Affairs (2017)

ANNEX H:

International principles, guidelines and standards that IFU has signed, adopted or acceded to

- IFC Performance Standards (IFC, 2012)
- World Bank Group General and Sector-specific Environmental Health and Safety Guidelines
- UN Guiding Principles on Business and Human Rights (UN, 2011)
- ILO Declaration on Fundamental Principles and Rights at Work (ILO, 1998)
- UN Principles for Responsible Investment (UN-PRI, 2005)*
- UN Global Compact's 10 Principles (UNGC, 1999)
- OECD Guidelines on Multinational Enterprises (OECD, 2011)
- OECD Responsible Business Conduct for Institutional Investors (OECD, 2017)
- OECD Due Diligence Guidance for Responsible Business Conduct (OECD, 2018)
- EDFI Principles for Responsible Financing (EDFI, 2009)
- Equator Principles (EPA, 2013)*
- G20/OECD Principles of Corporate Governance (OECD, 2015)
- DFI Corporate Governance Development Framework (CGDF, 2011)
- SMART Campaign Client Protection Principles

**UN-PRI and Equator Principles will be adopted to after board approval of this policy*

ANNEX I:

Abbreviations used

CGDF	Corporate Governance Development Framework
DIM	Development Impact Model developed by IFU
EDFI	European Development Finance Institutions Association
EHS	Environment, Health and Safety
ESG	Environment, Social and Governance
ESIA	Environmental and Social Impact Assessment
ESMS	Environmental and Social Management System
IFC	International Finance Corporation
IFU	Investeringsfonden for Udviklingslande (Investment Fund for Developing Countries)
ILO	International Labour Organisation
MFI	Microfinance institution
OIE	World Organization for Animal Health
SDG	Sustainable Development Goal
UNGC	United Nations Global Compact
UNGP	United Nations Guiding Principles on Business and Human Rights
WBG	World Bank Group