



POLICY

# ESG POLICY

Environmental, Social and Governance (ESG) policy for Rimba Collective PTE LTD

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Rimba Collective Pte Ltd is referred to as the Company or Rimba Collective.

## Purpose

The ESG Policy describes Rimba Collective's approach to conducting its business. It is committed to operating in a manner consistent with the highest standards of conduct pertaining to integrity and ethics, compliance with law and internationally recognized best practices in the treatment of its employees, business partners, public authorities, communities where it operates and other stakeholders in order to promote good governance and positive impact.

## Applicability

The ESG Policy is applicable to Lestari Capital Pte. Ltd. (the "**Rimba Collective Manager**") and all of its subsidiaries, including Rimba Collective, and to all employees and Representatives.. Third party suppliers or contractors such as the Project Operators of the Projects in the Rimba Collective will be required to agree, affirm and comply with the ESG Policy.

In the event of a failure to comply with the ESG Policy by:

- A. the Company or the Rimba Collective Manager, the matter will be brought to the attention of the respective board of directors for their review and determination on appropriate corrective and/or disciplinary action to be taken, including the identification of the individuals directly responsible. In addition, the Company and the Rimba Collective Manager shall comply with its contractual obligations relating to the compliance of the ESG Policy under the terms of their respective contracts with its users, customers and other contract parties; or
- B. employees or Representatives, the matter shall be determined by the senior management of the Company or the Rimba Collective Manager, as the case may be.

### Definitions

**"Anti-Money Laundering Laws"** means all applicable financial record keeping and reporting requirements and money laundering statutes and all applicable rules and regulations and any related or similar rules, regulations or guidelines in relation to the Money Laundering Practice.

**"Corrupt Practices"** means the offering, giving, receiving or soliciting, directly or indirectly, anything of value to influence improperly the actions of another party which shall include such practices prohibited by:

- a) the Republic of Indonesia Law No. 11 of 1980 on the Criminal Act of Bribery, and Law No. 31 of 1999 on the Eradication of Crimes of Corruption as amended by Law No. 20 of 2001 on the Amendment of Law No. 31 of 1999 on the Eradication of Crimes of Corruption and their implementing regulations and any other applicable Indonesian laws and regulations pertaining to bribery or corruption;
- b) the UK Bribery Act of 2010;
- c) the United States of America Foreign Corrupt Practices Act;

- d) the Malaysian Anti-Corruption Commission Act 2009 and the Malaysian Anti-Corruption Commission (Amendment) Act 2018; or
- e) any similar laws, rules or regulations issued, administered or enforced by the United States of America, the United Kingdom, the European Union or any of its member states, the Republic of Indonesia, Malaysia or any other country where Rimba Collective operates.

**“Fraud”** means dishonestly obtaining a benefit or causing a loss by dishonest or other improper means.

**“Guidelines”** means the written elaborations on Rimba Collective policy that provide further information and interpretation for the implementation of policy.

**“Misconduct”** means any behaviour or conduct (or attempt at such behaviour or conduct) that is prohibited by state or local law, rule or regulation or Rimba Collective Manager’s code of conduct, including: bribery, sexual misconduct, human trafficking or forced labour, fraudulent billing or financial reporting, scientific misconduct, harassment, assault and theft.

**“Money Laundering Practice”** means any activity, practice or transaction prohibited by any anti-money laundering laws or regulations in any jurisdictions to which Rimba Collective is subject.

**“Personally Identifiable Information”** means any data that could potentially identify a specific individual or any information that could be used to distinguish one person from another and can be used for de-anonymizing anonymous data.

**“Prohibited Practices”** means the Corrupt Practice and the Money Laundering Practice.

**“Public Official”** means an elected or appointed executive, administrative, legislative or judicial officer or employee of a country, state, territory, or political subdivision thereof; an officer or employee of a public international organisation; or an officer or employee of a public enterprise or public body, including officers or employees of state owned or controlled entities. In addition, Public Official includes any person who performs a public function or exercises public authority, by employment or contract, for any branch of the national, state, local or municipal government of any country or territory. Public Official also includes employees or officers of political parties as well as candidates for political office.

**“Representative”** means an employee or any entity, organisation or person who has an independent individual contractual relationship with Rimba Collective, whether as a contractor, consultant or agent of Rimba Collective. This includes non-executive directors of the board.

**“Responsible Official”** means all board members or employees of the Company.

**“Standard Operating Procedures”** or **“SOPs”** are the detailed written descriptions of business processes that aim to ensure consistency and quality in process execution.



# The ESG Policy for Rimba Collective

## 1.1. Environmental

### 1.1.1. Protection and promotion of Land Rights and FPIC Principles

Rimba Collective is committed to respect the rights and title to property and land of the individual, indigenous people and local communities. All negotiations with regard to their property or land, including the use of and transfers of it, adhere the principles of free, prior and informed consent (FPIC), contract transparency and disclosure. Where applicable, due diligence is undertaken to uphold individual or indigenous people's established rights to property and land.

### 1.1.2. Responsible Financing

Rimba Collective will not approve the financing of any project found to include or involve:

- the obstruction of legal or customary community rights or the unwilling and/or illegal physical relocation of individuals or communities;
- activities in violation of the terms of the concessionary license or land tenure type established for the development of the project, including:
  - forest/land clearance;
  - commercial production of timber or another agro-commodity (with the exception of community-level activities which are part of either a socio-economic engagement by the project or otherwise approved by the project and community partnership);
  - production of illegal products as defined by national/jurisdictional government law, regulation or international agreements; and
  - wildlife trafficking or the hunting of wild animals which are covered under the Convention on International Trade and Endangered Species.
- Working conditions for which evidence exists of:
  - forced labour or child labour; or
  - conditions of employment by a project which provide earnings below a minimum living wage applicable to the relevant jurisdiction.

### 1.1.3. Sustainability and Reduced Environmental Impact

Rimba Collective engages in environmentally sustainable development, promotes conservation and sustainable use of natural resources, conservation of biodiversity and heritage sites and disaster risk reduction planning, ensuring compliance with environmental protection legislation in the countries where it is registered and the countries where it operates.

## 1.2. Social



### 1.2.1. Whistle-blower protection

Rimba Collective conducts its work with integrity. The Company requires that Representatives and other individual associated with it who have reasonable grounds to suspect, or have actual knowledge of, Misconduct report such information to their line manager or another member of management.

Rimba Collective is committed and will not tolerate retaliation against a whistle-blower. Any attempt to deter a whistle-blower from reporting Misconduct is a serious offence and may be subject to disciplinary action including termination of any contractual relationship with the Company.

### 1.2.2. Anti-discrimination, Inclusion and Diversity

Rimba Collective values diversity and employs and partners with individuals and organizations from a wide range of cultures and races. The Company is committed to an open and discrimination free workplace. Representatives will not engage in discriminatory behaviours on the basis of race, colour, gender, language, religion, political or other opinion, national, ethnic or social origin, property, birth, pregnancy, marital status, disability, sexual orientation, age or any other status.

Further, Rimba Collective is dedicated to promoting gender equality and inclusive workplaces where persons with disabilities and other disadvantaged or vulnerable groups are reasonably accommodated. The Company or any Representatives must not engage in any discriminatory behaviours including, but not limited to, the following:

- refusing to hire someone on the basis of their status;
- terminating employees on the basis of their status;
- refusing to promote employees on the basis of their status;
- refusing to make adjustments to the workstation of employees with a disability;
- treating employees unfavourably due to their status; and
- refusing to excuse employees for pregnancy appointments, disability-related appointments, gender reassignment surgery or other such medical reasons related to their status.

## 3.2.3 Responsible Employment Management

### 1.2.2.1. Health and Safety

Rimba Collective is committed to a safe working environment that protects the health and wellbeing of employees. The Company complies with all work health and safety legislative requirements and, in doing so, focuses on actions to prevent harm and ensure reasonable care of all employees.



#### 1.2.2.2. Anti-Narcotics and Drugs Free Workplace

The Company maintains a drug-free workplace and does not tolerate the manufacture, sale, transportation, distribution, possession or use of any drug or narcotic substance deemed to be illegal in the countries in which it is registered or operates. The Company will not knowingly allow any payments provided to or by it to provide direct or indirect support or resources to entities and individuals involved in drug trafficking.

#### 1.2.2.3. Working Hours and Compensation

The Rimba Collective complies with local laws and regulations regarding employees' contracts and working hours.

#### 1.2.2.4. Anti- harassment

Workplace safety includes safety from harassment or any form of offensive or disrespectful behaviour. Any form of harassment is unacceptable and may result in disciplinary action including termination or referral to local law enforcement authorities, as appropriate. Harassment includes any form of unwelcome verbal, non-verbal, visual, physical or other form of communication or conduct of any kind that cause others to feel uncomfortable or creates an intimidating, offensive or hostile work environment; and, as examples, may be related to racial, ethnic, sexual, gender, religious or personality matters.

#### 1.2.2.5. No forced nor child labour

Rimba Collective is committed to the safety and protection of all children that we encounter in our work and believes that all children have the right to be free from violence, abuse, and exploitation of any kind. Further, the Company embraces and respects the cultural and social diversity of the countries in which we work and places great importance on operating with honesty and integrity. As such, Rimba Collective is committed to the protection of children in all aspects of our work.

Employment decisions must be based on free choice. Employment contracts must clearly state the terms of employment and must not restrict worker movement through the retention of identity papers, holding of deposits, or other actions aimed to prevent worker termination of their employment. In addition, workers must not be required to pay recruitment or other similar fees to obtain or retain their employment and suppliers shall ensure that any third-party recruitment agencies comply with these principles.



Rimba Collective adheres to the minimum employment age limit defined by national law or regulation and complies with relevant International Labor Organization (ILO) standards.

### **1.3. Governance**

#### **1.3.1. Accountability and Compliance with Laws**

Rimba Collective is committed to comply in all respects with all laws and regulations to which it or they may be subject.

Rimba Collective holds itself and its Representatives accountable for their conduct and it shall and expects all Representatives and others with which the Company does business to adhere to the spirit and letter of this Policy. To ensure compliance with this Policy, the Rimba Collective asks its Representatives to:

- review this Policy and commit to abide by it;
- ensure that questions about this Policy are addressed promptly and all Representatives know how to seek guidance about complying with this Policy;
- ensure that non-compliant conduct is reported through any means including Rimba Collective email or telephone as soon as practicable; and
- report any known or suspected unlawful or unethical conduct related to the Rimba Collective.

Self-reporting of non-compliance is encouraged.

The Company will investigate any report of a violation of this Policy or any unethical or unlawful conduct.

#### **1.3.2. Transparency and Record Keeping**

Rimba Collective is committed to transparency in all business dealings. Representatives must ensure that all official records are properly identified and maintained. The records are required to be true and accurate and any intentional misuse, editing or handling of the official records is prohibited.

#### **1.3.3. Privacy Safeguarding, Responsibilities and Expectations**

Access to and protection of information and safeguarding sensitive and Personally Identifiable Information and preventing its misuse are essential to ensure that the Company maintains the highest standards of professional conduct. Representatives, partners with which we do business, beneficiaries have a right to



be protected against unwarranted invasions of their privacy resulting from the collection, maintenance, use and dissemination of their personal information. The Company is dedicated to the protection of the information which we hold to prevent actions that could result in substantial harm, embarrassment, inconvenience or unfairness to anyone with which the Company has a relationship.

#### 1.3.4. Prohibited Practices

##### 1.3.4.1. Anti Bribery and Corruption

Rimba Collective and the Rimba Collective Manager are committed to compliance with laws in relation to anti-bribery and corruption, including laws of other countries that are, or may be of potential relevance, that are regulating the Corrupt Practice. Accordingly, the Company and the Rimba Collective Manager will ensure that neither it, nor any of its directors, officers, employees, agents, subcontractors nor any other person or entity acting on its behalf, shall make any offer, payment, or promise or gifts, money or any other thing of value to either:

- a. a Public Official; or
- b. any representative of a third party,

for the purpose of improperly influencing any act or decision of such person or a Public Official to act in violation of his/her lawful duty or for the purpose of securing any improper advantage or obtaining or retaining business.

Rimba Collective and the Rimba Collective Manager shall ensure that no ownership interest in the Rimba Collective or the Rimba Collective Manager, direct or indirect, is held or controlled by or for the benefit of a Public Official.

Rimba Collective, including the Representatives are required to:

- reject Prohibited Practices in all of its forms;
- understand and appreciate that Corrupt Practices are unlawful and therefore strictly prohibited, regardless of jurisdiction or circumstance;
- adopt and enforce all policies that prevent Corrupt Practice in the conduct of its business;
- operate with internal accounting controls and maintain accurate records that document relevant transactions; and
- immediately inform their supervisor if information is discovered indicating that a Corrupt Practice has been committed, has been requested or otherwise suggested by any person, including a Public



Official or private individual, in connection with, in relationship with, or working for the Rimba Collective or the Rimba Collective Manager.

The Company or the Rimba Collective Manager, including the Representatives must not:

- directly or indirectly, commit or attempt to commit, any Corrupt Practice;
- use their authority for personal gain; or
- offer, provide or receive unlawful gifts, benefits, hospitality, advantages, courtesies or entertainment from a Public Official where a reasonable person could interpret the offer, provision or receipt as a Corrupt Practice made in connection with the Representative's duties, status or authority.

Hospitality is permitted under specific circumstances. Bone fide hospitality or other business expenditure with the aim of presenting the Company or the Rimba Collective Manager, products or services, or establishing cordial relations is permitted.

However, hospitality or promotional expenditure can be misinterpreted as Corrupt Practices and Representatives must keep in mind appearances and perceptions and not offer hospitality where it could be mistaken to have the intention of influencing an official to secure a business advantage, to perform a function improperly or to expedite the performance of a routine government action.

- Anti-Money Laundering

The operations of the Rimba Collective are conducted at all times in compliance with all Anti-Money Laundering Laws and it shall not permit or authorise any person or entity to directly or indirectly use the proceeds to:

- a) violate any Anti-Money Laundering Laws; and
- b) lend, invest, contribute or otherwise make available any funds for the benefit of any subsidiary, affiliate, partners or any other individual or entity in a manner that will result in a violation of any Anti-Money Laundering Laws.

#### 1.3.4.2. Conflicts of Interest

Employees



Rimba Collective believes in open and transparent business dealings. Representatives must separate their own personal interests from those of the Company. Conflicts of interests arise when a Representative or any member of his or her immediate family, his or her partner, an organisation which employs or is about to employ any of the above, or any outside employment in which the Representative is engaged, has a financial or other interest in, or will receive a tangible personal benefit, from an action taken by the Representative.

Actual or potential conflicts of interest must be reported immediately to the Representative's supervisor so that action can be taken to manage and mitigate the conflict of interest, including but not limited to the exclusion of the Representative from any relevant decisions.

In the event that a Representative is subject to codes or rules of conduct other than those contained in the Rimba Collective Policies, Guidelines and Standard Operating Procedures (such as other professional codes), and a conflict arises between these codes, it is the Representative's responsibility to bring the conflict to the attention of the Representative's supervisor for resolution.

#### Rimba Collective and Rimba Collective Manager

The Rimba Collective is managed and facilitated by the Rimba Collective Manager. When managing Rimba Collective, the Rimba Collective Manager must always act in the best interests of the Rimba Collective and the Users.

However, instances could arise where the interests of the Rimba Collective or the Users are in conflict, or where a conflict of interest occurs between the Rimba Collective Manager employees and the Rimba Collective, or where a conflict of interest occurs between the interests of the Rimba Collective and other activities of the Rimba Collective Manager.

The Rimba Collective Manager conducts its business according to the principle that it must identify and manage conflicts of interests fairly. To avoid conflicts of interests, the Rimba Collective Manager has established comprehensive rules, guidelines and procedures and instigated measures to prevent or handle potential conflicts of interests.



#### 1.3.4.3. Terrorism and Sanctions

Rimba Collective does not tolerate or condone the engagement, directly or indirectly, in terrorism or in the financing of or support of terrorists. Further, the Company uses its best efforts to ensure that payments provided to or by the Company do not provide direct or indirect support or resources to entities and individuals involved in terrorism. Transactions with, and the provision of resources and support to, individuals and organizations associated with terrorism are prohibited.

Rimba Collective abides by the sanctions put in place by the international community including but not limited to the United Nations, the European Union, the United States Office of Foreign Asset Control, the United Kingdom Foreign and Commonwealth Office, and the Australian Department of Foreign Affairs and Trade.

The Company abides by sanctions related but not limited to:

- Counter Narcotics Trafficking;
- Counter Terrorism;
- Non-Proliferation;
- Rough Diamond Trade Controls; and
- Transnational Criminal Organisations.

#### 1.3.5. Proper Use and Protection of Rimba Collective Resources

In the performance of their duties, Representatives of Rimba Collective may be granted access to many sources of information, confidential or otherwise. Any information provided as part of a Representative's duties or any information to which the Representative has access must be used only for official purposes. Representatives will not make any unauthorized, improper or unlawful use of any information made available to them in the performance of their duties. Further, Representatives will not access information without an official purpose related to the performance of their duties. In addition to information, the Company's resources must also be protected.

*Note: The ESG Policy is accessible on the website of Rimba Collective Pte. Ltd. and will be updated from time to time after approval of the Steering Committee of the Users of the Rimba Collective.*