

## ENVIRONMENTAL AND SOCIAL MANAGEMENT POLICY (ESPM) AND EXCLUSION LIST

<b>Origin</b>	MODEL		
<b>Validation level</b>	1		
<b>Responsible</b>	Marketing	<b>Recipients</b>	Board, Shareholders, Subsidiaries
<b>Document Location</b>	Pol_Pro_Guid_Public\10_Policies		

LAST UPDATE	VERSION	BY	MODIFICATIONS
26/06/2020	1	Katherine Brown	

ORGANISATION REVIEW	BY	SIGNATURE
Oladimeji SHOGBOLA		

VERSION	VALIDATION DATE	BY	SIGNATURE
1	18/03/21	Board of Directors	

## OBJECTIVES

> **The present policy aims to :**

- + Formalize fundamental social and environmental principles with the objective of relaying them to employees, clients, and the partners with whom Advans Nigeria will interact while it accomplishes its mission.
- + Define key commitments that shall be respected by Advans Nigeria and its employees when conducting operations.
- + Ensure that Advans Nigeria's activities do no harm and have a positive social and environmental impact.

## RELATED DOCUMENTS

Social and Environmental Management System (SEMS)

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# 1. Scope of Advans Nigeria's Social and Environmental Policy

- This policy aims to define Advans Nigeria's Environmental and Social Management practices in line with its mission through defining guiding principles to be implemented to ensure that Advans Nigeria's activities do no harm and create a long lasting positive social and environmental impact.
- This policy is defined in line with the recommendations of Advans shareholders and partners.
- This policy applies to the management of all Advans activities. Advans Nigeria commits to applying the defined environmental and social principles and to raising awareness on them:
  - ⊕ Internally: in the organisation of operations and management of human resources;
  - ⊕ Externally: in all its relations with clients, communities and partners.
- Advans Nigeria will also ensure that it analyses the performance of its financial services and business operations from a socially and environmentally responsible perspective, to make sure that environmental and social performance is an intrinsic value across all areas of operations and is part of Advans' strategies for growth.
- Appropriate training on this policy and associated procedures should be provided to all staff concerned.

## 2. Guiding principles

### 2.1 Fundamental principles of the policy

Advans commits to:

- ⊕ **Comply with local regulations and identify relevant social and environmental issues prevailing in its areas of operations:** depending on the environmental, social and economic context.
- ⊕ **Respect fundamental human and social principles, based on International Conventions:** Advans Nigeria will accept and uphold the principles contained in the United Nations Universal Declaration of Human Rights and the International Labour Organisation Conventions. Advans Nigeria will also encourage clients and business partners to do the same.
- ⊕ **Increase awareness of social and environmental issues:** among employees, clients, partners and wider communities.
- ⊕ **Constantly seek to refine its social and environmental practices:** taking into account best practices in the microfinance and banking industry and international standards.

### 2.2 Advans Vision, mission and values

#### 2.2.1 Our vision

Being a model financial institution which contributes to strengthening local businesses, creating and sustaining jobs and improving clients’ living standards in order to foster private sector–led economic and social development in Nigeria.

**2.2.2 Our mission**

Respond to the need for financial services of small businesses and other populations who have ill–adapted, limited or no access to formal financial services through providing tailored financial services in a sustainable and responsible manner.

**2.2.3 Our values**

- + Open to all
- + Committed to having a positive and lasting impact
- + Entrepreneurial in what we do
- + Innovative in our approach

**2.3 Our impact strategy**

Our social goals are as follows:



**3. Detailed description of Advans Nigeria’s Social Goals**

**3.1 Have a positive impact on clients’ revenues and savings through supporting their activities and building their financial stability:**

*Through offering appropriate financial services such as loans, deposits and insurance Advans Nigeria aims to help clients grow and streamline their businesses so as to create and sustain jobs and improve profitability. Via these products we also strive to help reduce clients’ financial vulnerability and improve household living standards.*




CPP linked	Appropriate Product Design and Delivery Prevention of over-indebtedness Responsible Pricing
SDGs linked	    

This includes:

- **Clearly defining our target clients** which include small businesses, farmers and other populations through defining a clear segmentation of our portfolios and designing services in line with their needs.
- **Offering a wide range of financial services** to help clients grow their activities and achieve their professional or personal goals. These include (but are not limited to):
  - ⊕ all types of business and activity loans
  - ⊕ loans for some family needs especially education and housing
  - ⊕ current accounts, savings accounts, savings plans
  - ⊕ insurance,
  - ⊕ other financial services.
- **Monitoring our impact on clients businesses and lives over time** through key indicators and impact studies.

### 3.2 Reach out to underserved populations with appropriate products and channels

*Advans Nigeria endeavours to create tailored products and use innovative distribution channels to serve clients in urban and rural areas who have ill-adapted, limited or no access to formal financial services due to their economic activity, gender, social status, level of education or location.*

CPPs linked	Appropriate Product Design and Delivery Prevention of over-indebtedness Responsible Pricing Transparency Mechanisms for Complaint Resolution
SDGs linked	    


This includes:

- **Employing a client centric approach** to ensure that products and services are tailored to clients' needs, using client centric tools in the creation, delivery and optimization of services, tailoring them to the specific needs of each of the target segments and enabling them to build their financial resilience.
- **Providing clients with a wide range of channels** so that they can access services easily, with a high-tech, high-touch omni-channel approach.

- **Targeting specifically excluded clients** such as farmers and clients in rural areas with dedicated products and services.

### 3.3 Provide clients with quality services in a transparent, respectful and conscientious manner

*Advans Nigeria commits to give clients full and clear information on its products and to raise awareness of good financial management, while maintaining high standards of customer service and ensuring the respectful treatment of clients. We promise to lend responsibly through conducting individual risk assessments and follow up and supporting the prevention of over-indebtedness in the market.*



CPP linked	Appropriate Product Design and Delivery Prevention of over-indebtedness Responsible Pricing Transparency Fair and Respectful treatment of clients Privacy of client Data Mechanisms for Complaint Resolution
SDGs linked	

**This includes:**

- **Ensuring that clients have a quality client experience** and are able to make an informed choice of products and services through providing them with clear and sufficient information as well as feedback mechanisms if they are not satisfied with Advans services.
- **Defining and implementing clear credit policies and processes** to ensure that clients have the capacity to repay their loans.
- **Defining a Code of Ethics** which details how clients should be treated respectfully and without discrimination of any kind.

### 3.4 Create a fair, healthy and dynamic working environment for our staff

*Advans Nigeria upholds high and progressive HR standards, building a working environment based on equal opportunity, fair remuneration, social protection and open communication. We focus on the professional development of employees through providing adapted training and opportunities for career progression based on merit as well as offering assignments across different affiliates.*

SDGs linked	 
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**This includes:**

- **Seeking to comply with basic human rights and social principles** set by international conventions<sup>1</sup> and national regulations and, where possible, applying measures going beyond those standards.
- **Defining comprehensive HR policies and procedures** and documents to ensure the creation of a fair, healthy and dynamic working environment.
- **Defining a Code of Ethics** which sets standards for staff behavior, and grievance mechanisms so that staff can report any issues or problems.

### 3.5 Be accountable and build awareness of social and environmental issues amongst employees and clients:

*Advans Nigeria aspires to set an example to its clients, staff and partners through raising awareness of the importance of environmental and social questions, finding pragmatic solutions and in defining and implementing a list of activities unsuitable for financing due to non-respect of human rights or working standards or their potential negative impact on society or the environment.*

SDGs linked



This includes:

- **Integrating Environmental and Social requirements into our lending policy** through the definition of an Exclusion List (see Annex 1) describing activities which cannot be funded by Advans Nigeria directly or indirectly and an Environmental and Social Management System (SEMS). Advans Nigeria commits to approving and implementing the Exclusion List and the SEMS as well as applicable S&E Laws. Advans Nigeria will adapt and improve the Exclusion List and client monitoring as knowledge of the local social and environmental context progresses, this may include introducing context specific rules on certain activities.
- **Managing our internal environmental impact** through assessing our carbon footprint, defining objectives and ways to reduce our impact and raising awareness amongst our staff.
- **Seeking to build client's and communities awareness on environmental and social issues and resilience to climate change** through offering them adapted training and when possible dedicated services and products (such as green finance products, insurance) in collaboration with partners.

## 4. Application of the Client protection Principles

- As part of their commitment to providing clients with quality services all Advans Group subsidiaries

<sup>1</sup>

United Nations Universal Declaration of Human Rights and the International Labour Organisation Conventions.

- + Aim to comply with local Client Protection Laws and take all reasonable steps in anticipation of known or expected future changes to or obligations under the same
- + Endorse and aim to comply with all Client Protection Principles (CPP), together with any updated, revised or successor principles thereto, as listed below.
- + These principles are integrated in our social goals as seen above.

#### 4.1.1 Appropriate product design and delivery

Advans Nigeria aims to adhere to this principle by:

- + Offering products and services that are suited to clients' needs.
- + Monitoring the suitability of products, services and delivery channels.
- + Putting in place mechanisms to prevent aggressive sales techniques and forced signing of contracts.

#### 4.1.2 Prevention of overindebtedness

Advans Nigeria aims to adhere to this principle by:

- + Defining a policy and well-documented process for loan approvals and making decisions using appropriate information and criteria.
- + Using credit reporting information, when feasible in the local context.
- + Maintaining sound portfolio quality.
- + Incentivising staff to approve quality loans.
- + Ensuring Advans senior management and board monitor the market and respond to heightened over-indebtedness risk.

#### 4.1.3 Transparency

Advans Nigeria aims to adhere to this principle by:

- + Putting in place policy and documented process to require transparency on product terms, conditions and pricing.
- + Communicating with clients at an appropriate time and through appropriate channels.
- + Taking adequate steps to ensure client understanding and support client decision making.

#### 4.1.4 Responsible Pricing

Advans Nigeria aims to adhere to this principle by:

- + Managing its operations sustainably to provide services in the long term.
- + Aligning its pricing policy is aligned with the interest of clients.
- + Evaluating its pricing against its financial ratios.

#### 4.1.5 Fair and respectful treatment of clients

Advans Nigeria aims to adhere to this principle by:

- + Promoting and enforcing fair and respectful treatment of clients in line with a Code of Ethics.



- ⊕ Defining a policy and documented processes to avoid discriminating against Protected Categories in selecting clients and setting terms and conditions.
- ⊕ Ensuring loans are collected by staff and collection agents in an appropriate manner.
- ⊕ Implementing effective systems to prevent and detect fraud.
- ⊕ Ensuring insurance claims are processed in a fair and timely manner by partners.
- ⊕ Ensuring Advans Nigeria management and oversight support fair and respectful treatment of clients.

#### 4.1.6 Confidentiality of client's data

Advans Nigeria aims to adhere to this principle by:

- ⊕ Ensuring client data is kept secure and confidential.
- ⊕ Ensuring clients are informed about data privacy and consent to the use of their data.

#### 4.1.7 Mechanisms for complaints resolution

Advans Nigeria aims to adhere to this principle by:

- ⊕ Having effective systems in place to receive and resolve client complaints.
- ⊕ Informing clients about their right to complain and how to submit a complaint.
- ⊕ Using information from complaints to manage operations and improve product and service quality.

## 5. Governance and application of the ESPM

Advans Nigeria commits to ensuring that Environmental and Social Performance are an integral part of its governance and policies.

### 5.1 Advans Nigeria's commitments:

- ⊕ Advans Nigeria will ensure that i) Board members are provided information on Advans Environmental and Social policy and strategy when they are nominated on the board and confirm their commitment to Advans Nigeria's mission; ii) Environmental and Social issues are discussed actively during Board meetings, including information on client surveys, the application of the client protection principles and information on the application of the SEMS and; iii) that Board takes into account Environmental and Social issues in his decision making and suggest areas for improvement if necessary.
- ⊕ Each year, annual Social Objectives will be defined and approved by the Board as part of strategic orientations and budget in line with each of the five social goals. These objectives shall be associated with a clear quantitative target.

## 5.2 Responsibilities

Advans Nigeria		
Board	<b>ESPM Champion</b>	Board member nominated to raise awareness on E&S issues and review and make suggestions for improvement on E&S performance.
Operations Division	<b>ESPM Coordinator &amp; Referent<sup>2</sup></b>	Staff members at subsidiary level responsible for ensuring that procedures are followed and that the ESPM Policy is properly enforced. Act as the coordinator and main contacts at subsidiary level on ESPM matters. They work in close collaboration with Operations, HR and Risk departments.
Cross functional	<b>ESPM Task Force/Committee</b>	Committee consisting of members from across departments to guarantee that environmental and social performance concerns are adequately addressed by all departments.

## 5.3 Monitoring and reporting on Environmental & Social Performance

### 5.3.1 Monitoring our social goals

Advans Nigeria commits to defining key indicators to measure its achievement of its social goals. Examples of indicators to measure our social goals can be found in the table below. These indicators will evolve and change as Advans’ systems and reporting methods improve. Advans Nigeria will link these indicators to best reporting practices in the industry and to indicators linked to the Sustainable Development Goals.

Social goal	1. Have a positive impact on revenues and savings	2. Reach out to underserved populations	3. Provide quality services	4. Create a fair, healthy and dynamic working environment	5. Be a responsible player

<sup>2</sup> Correspond also to Client Protection Coordinator and Client Protection Manager as defined in the Shareholders agreement. Advans will communicate these contacts to its shareholders and update them when there is a change in responsibilities.

Example Indicators					
	<ul style="list-style-type: none"> <li>Loan purpose</li> <li>% active clients</li> <li>% of clients who use savings only</li> <li>% of clients on their 3rd cycle or more</li> <li>% of clients with an insurance product               <ul style="list-style-type: none"> <li>% of clients who perceive a positive change in their businesses/lives since using Advans services</li> <li>Impact surveys / research into loan files</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>Clients in rural areas (%)</li> <li>Female borrowers (%)</li> <li>Female depositors (%)</li> <li>Youths 18-30 (%)</li> <li>% of transactions through ADCs</li> <li>% of clients who have not had previous access</li> </ul>	<ul style="list-style-type: none"> <li>PAR 30</li> <li>Borrowers per CO</li> <li>Loan decision time</li> <li>Retention rate borrowers (over 12 months)</li> <li>% Complaints resolution</li> <li>Complaints categories</li> <li>% Client satisfaction rate</li> <li>CPP Self Assessment</li> </ul>	<ul style="list-style-type: none"> <li>Female staff</li> <li>Female Managers</li> <li>Average age of staff</li> <li>Number of days of training per employee</li> <li>Turnover</li> <li>% Staff satisfaction rates</li> </ul>	<ul style="list-style-type: none"> <li>% of loans disbursed in IFC category C (low risk)</li> <li>% of loans refused on E&amp;S grounds</li> </ul>

### 5.3.2 Reporting

The Social and Environmental performance of Advans Nigeria will be evaluated on a quarterly and annual basis. Performance evaluations will be undertaken by the ESPM Manager and ESPM Coordinator, in collaboration with relevant departments.

Type of report/action	Description	Frequency	Shared with
Social Performance Dashboard	Snapshot of key indicators relating to social goals	Quarterly (45 days after the end of the quarter)	<ul style="list-style-type: none"> <li>ESPM Manager</li> <li>ESPM Champion</li> <li>Presented to board at least twice a year</li> </ul>
Social Performance Report	Quantitative and Qualitative report on overall SPM practices and improvements and the achievement of social objectives for the year. Confirming compliance with the requirements of the Environmental and Social Management System, or as the case may be, detailing any non-compliance together with the action being taken to ensure compliance as well as (ii) including, for the avoidance of doubt, reporting on compliance with Client Protection Requirements.	Annually (120 days after the end of the financial year)	<ul style="list-style-type: none"> <li>ESPM Manager</li> <li>ESPM Champion</li> <li>Board of Directors</li> <li>Shareholders</li> </ul>
Ad hoc reporting	In addition Advans may be asked to provide E&S information or data to partners or shareholders on an ad hoc basis.	When requested	<ul style="list-style-type: none"> <li>Shareholder or partner concerned</li> </ul>

### 5.3.3 Monitoring our performance against industry standards

Advans Nigeria will seek to analyse and audit its Environmental and Social performance and compare it against industry standards using the following tools (amongst others where appropriate) either using internal or external resources to perform the analysis:

- ⊕ SPI4–Social Performance Indicators 4—a social performance assessment tool for financial service providers and any relevant updated tools.
- ⊕ Client Protection Principles assessments

Advans Nigeria commits to performing an internal or external analysis using the two tools above every 3 years.

#### 5.3.4 Assessing impact on clients

Advans Nigeria will also use other methods such as impact studies and client surveys on annual basis to assess the impact of its services on clients where possible, and if relevant with external providers.

## 6. Implementation and review of the ESPM policy

This Policy will be updated, along with the supporting documents, based on the experience of Advans Nigeria and other subsidiaries, expectations of the Group, and evolution of the context.

## Appendix A – Exclusion list

Advans Nigeria’s Exclusion List is presented below with an explanation of how it is relevant to the microfinance operations Advans Nigeria will be conducting. This list is applied as part of the Advans Credit Policy.

**Advans Nigeria must not fund production or trade in any product or activity deemed illegal under host country laws or regulations or international conventions and agreements.**

- Knowledge and compliance with country laws and regulations is a fundamental principle for Advans Nigeria. It must nevertheless be recalled that Advans Nigeria will offer financial services to micro and small businesses.
- A large percentage of these businesses might be informal or semi-formal: they will pay some taxes but not all, they might have some kind of authorization to operate but they will not necessarily be registered with all the relevant authorities.
- This situation, which can be considered as illegal is, in most cases, linked to:
  - + inadequate regulations on setting-up a company;
  - + inadequate and unenforceable tax systems;
  - + widespread corruption practices.
- By offering access to a formal financial system, support and advice, Advans Nigeria contributes to making these businesses evolve towards “formalization”. In the meantime, Advans Nigeria will accept lending money to an informal and semi-formal clientele as long as their activities remain of a reasonable size and the materiality of risks associated with business operations.

**Advans Nigeria must not fund production or trade in products which have a substantial negative health or safety impact, such as:**

- + unbounded asbestos fibers (this does not apply to purchase or use of bonded asbestos cement sheeting where the asbestos content is less than 20%);
- + products containing PCBs<sup>3</sup>;
- + pesticides / herbicides subject to international phase outs and bans;
- + radioactive material (this does not apply to the purchase of medical equipment, quality control (measurement), equipment and any equipment where a Supranational Investor considers the radioactive source to be trivial and/or adequately shielded);
- + Pharmaceuticals subject to international phase outs or bans.
- + Advans Nigeria will sometimes be approached by potential clients who run small shops selling, among other things, medicines in very small quantities. The drugs that are handled by these small traders can be out-of-date or fake copies, making the absorption of these drugs potentially dangerous for the health of their clients.

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<sup>3</sup> PCB: 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

- Advans Nigeria will not finance any pharmaceutical traders nor any shop partially selling medicines without proper legal authorization, and credit agents will look out for this specific risk when conducting credit assessments.
- ⊕ Alcoholic beverages (excluding beer and wine), production or trade in tobacco.
  - We consider that lending to individuals with exclusive, large scale cigarette and liquor trading activities would be a way of supporting business models whose social impact is questionable. Advans Nigeria will nevertheless sometimes offer financial services to restaurant owners, or small shop owners which sell, among other things, cigarettes, tobacco, and alcoholic drinks. Precise eligibility criteria are defined concerning this specific matter:
  - The loan should not in any case finance the trade of the products mentioned above
  - The trade of these products shall not make up more than 50% of the sales volumes of the client. Affiliates are free to set up a lower percentage.

**Advans Nigeria must not fund activities threatening worker’s health or safety, or contrary to their basic human rights**

- ⊕ Production or activities that impinge on the lands owned, or claimed under adjudication, by Indigenous People, without full documented consent of such peoples;
- ⊕ Activities involving, prostitution, forced labour <sup>4</sup>, harmful labour <sup>5</sup> or harmful child labour<sup>6</sup>.
  - Advans Nigeria will offer financial services to populations which face great economic and social difficulties. Among the clients of these services, are very small family-run businesses in which children often work, either to learn a trade, or to help their family make a living. The high prevalence of child labour in some developing countries is linked to an economic and social reality which has to be taken into account.

Advans Nigeria’s staff will make sure that children are not less than the minimum age required for each type of work, as detailed below, and will aim to ensure that any children of schooling age are attending school on a full time basis. Any light work should not hinder children’s ability to attend school or to concentrate in school:

	Age limit
Hazardous work <sup>7</sup>	18 (16 under strict conditions)

<sup>4</sup> Forced labour means all work or service, not voluntarily performed, that is extracted from an individual under threat or force of penalty. It refers to situations in which persons are coerced to work through the use of violence or intimidation or by more subtle means such as manipulated debt, retention of identity papers or threats of denunciation to immigration authorities. *Please refer to the ILO Forced Labour Convention, 1930 and Protocol of 2014 to the Forced Labour Convention, 1930.*

<sup>5</sup> Harmful labour refers to work that is mentally, physically, socially or morally dangerous and harmful to workers.

<sup>6</sup> Harmful child labour refers to work that is mentally, physically, socially or morally dangerous and harmful to children; and interferes with their schooling by depriving them of the opportunity to attend school, obliging them to leave school prematurely, or requiring them to attempt to combine school attendance with excessively long and heavy work. *If you want further information, please refer to ILO Convention No. 182 and No.138.*

<sup>7</sup> Hazardous Child Labour includes : work underground, under water, at dangerous heights or in confined spaces; work with dangerous machinery, equipment and tools, or which involves the manual handling or transport of heavy loads; work in an unhealthy environment which may, for example, expose children to hazardous substances, agents or processes, or to temperatures, noise levels, or vibrations

Basic Minimum Age <i>The minimum age for work should not be below the age for finishing compulsory schooling.</i>	14
Light work <sup>8</sup> less than 14h/week <i>As long as it does not threaten children's health and safety or hinder their education or vocational orientation and training.</i>	12-14

- When it comes to potential harmful labour, Advans Nigeria will make sure health and safety issues are being checked for every client. In case it has doubts, Advans Nigeria will decide, depending on the seriousness of the issues, whether to propose accompanying measures to the client (mandatory for the obtention of the loan) or not to finance their activity.

**Advans Nigeria must not fund production or trade in activities which have a substantial negative social impact, such as:**

- + production, processing or distribution of illegal drugs;
- + weapons and ammunition;
- + manufacturing of equipment (including nuclear products), primarily designed or primarily designated for military purposes;
- + pornography or the provision of products or services of a substantially similar nature
- + gambling, casinos and equivalent enterprises;
- + production and distribution of racist, anti-democratic and or neo-nazi media;

**Advans Nigeria must not fund production or trade in activities which have a substantial negative environmental impact, such as:**

- + ozone depleting substances subject to international phase out;
- + drift net fishing using nets in excess of 2.5 km in length;
- + cross border trade in waste and waste products unless compliant to the Basel Convention<sup>9</sup> and the underlying regulations;
- + production or trade, storage or transport of significant volumes of hazardous chemicals, or commercial scale usage of hazardous chemicals (hazardous chemicals include gasoline, kerosene, and other petroleum products);
- + trade in wildlife or wildlife products regulated under CITES;
- + destruction<sup>10</sup> of critical habitats<sup>11</sup>

damaging to their health; work under particularly difficult conditions such as work for long hours or during the night or work where the child is unreasonably confined to the premises of the employer; the use, procuring or offering of a child for illicit activities, in particular for the production and trafficking of drugs as defined in the relevant international treaties.

<sup>8</sup> Light work includes any activities such as small chores, running errands, helping a family member on a market stall or in a restaurant.

<sup>9</sup> Convention aiming to ban the circulation of dangerous waste between countries, which is in effect since 1992. Dangerous waste is defined in the annexe III (art. 1 al. 1 a) of the Convention

<sup>10</sup> Destruction means the elimination or severe diminution of the integrity of a habitat caused by a major, long-term change in land or water use or modification of a habitat in such a way that the habitat's ability to maintain its role is lost.

<sup>11</sup> Critical habitat is a subset of both natural and modified habitat that deserves particular attention. Critical habitats include 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 assemblage of species or which are associated with key evolutionary processes or provide key ecosystem services; and

- ⊕ commercial logging operations for use in primary tropical moist forests;
- ⊕ wood or other forestry products other than from sustainably managed forests.
- ⊕ As potential clients will sometimes be involved in small trading of burning wood or charcoal, and since some clients will be carpenters, Advans Nigeria will pay close attention to prevailing national laws on forest management.
  - When working in rural areas, Advans Nigeria’s staff will make sure wood or charcoal comes from sustainably managed forests by checking any proof of entitlement/certificate of the client.

When funding significant agricultural projects (like value chain finance), Advans Nigeria commits to **finance only activities that are certified** under a local or international recognized certification organism.

- ⊕ Advans Nigeria will make sure certifications are genuine and have been legally obtained. What is more, Advans Nigeria will assess audits from certification organisms to ensure that cooperatives or farmer’s group employees are decently paid and respectfully treated, that lands are sustainably managed and that the use of chemicals is reasonable and has no impact on populations living next to the lands.

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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.