



# FAIRCHAIN GOVERNANCE

## Policy on Sustainability, Responsibility, Ethical Conduct & Safeguarding

Including the PSEAH Policy and the Safeguarding & Child Protection Policy

**VERSION 2.0** · Launch date: September 2025

### FairChain Foundation

| Version | Date           | Author               | Summary of changes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|---------|----------------|----------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1.0     | 2019           | FairChain            | Initial general code of conduct (anti-bribery / conflict of interest).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| 1.1     | 24-06-2022     | N.E. Uitentuis       | Added CSR policy framework, workplace sexual harassment policy, safe working space clause, human rights / child labour commitment.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 2.0     | September 2025 | FairChain Foundation | Expanded into a full Prevention of Sexual Exploitation, Abuse and Harassment (PSEAH) and Safeguarding & Child Protection framework: extends protection from staff-only to programme participants, outgrowers, farmers and children in FairChain-supported committees; adds definitions of abuse, a community-facing reporting channel, designated safeguarding focal points, safe-recruitment and image/consent standards, partner and consultant obligations, and a signed declaration of compliance. Published on <a href="http://fairchaincoffee.com">fairchaincoffee.com</a> / <a href="http://fairchain.org">fairchain.org</a> and incorporated into staff and partner onboarding. |

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## 1. Introduction

FairChain is a social enterprise. With that, we mean that we do our best not to do harm and try every day to behave in the most social manner we can. That is a challenge, definitely in the locations that we work in and the value chains we work with. Bribery and exploitation are rooted in some of these systems at the best of times, and a cultural norm at the most challenging. Value chains that have been hollowed out at their origin by greed have resorted to acts of exploitation in order to sustain a bare minimum level of existence for all actors there. Working in these value chains means that our starting point is working with real people who have been suffering from these circumstances for a long time. Eradicating these practices is our goal, but we all must recognise this takes time and effort from all parties involved.

That is why we work from our Theory of Change towards a better situation, and why this document sets out, in one place, the practical policies that guide us there: our general code of conduct, our policy on the prevention of sexual exploitation, abuse and harassment (PSEAH), and our safeguarding and child protection policy. It goes without saying that these policies are also applicable to FairChain subsidiaries, and to our partners, contractors, consultants and other parties engaged in FairChain-supported or FairChain-funded activities.

*What's new in version 2.0: version 1.1 (2022) already contained a workplace sexual-harassment policy and a general commitment on child labour and human rights. This version keeps that material and adds what was missing to bring it to full safeguarding standard: explicit protection for programme participants (not only staff), definitions of exploitation and abuse, a reporting channel communities can actually use, named safeguarding focal points, safe-recruitment and consent standards for images of children, and a signed declaration of compliance for staff and partners. Sections marked ★ are new or substantially expanded in this version.*

## 2. FairChain's Social Responsibility Principles

We move far beyond CSR and towards corporate shared value. We combine entrepreneurial competitiveness with social impact. Our goal is to turn the world on its head by making it fairer. The aim is to add more value to the chain in the country of origin, with the ambition of a 50% share instead of the current 15%. With the philosophy of trade instead of aid, we create more development impact.

### 2.1 Creating shared value

FairChain is single-minded in its purpose: to create shared value with the countries where the majority of the world's raw commodities originate from. Not just a little bit of sharing – our aim is an even 50/50 split between producers in developing economies and consumers in the West.

### 2.2 Trade over Aid

Trade is not going to replace government aid overnight, but shifting value-adding activities – such as roasting and packaging – back to origin countries such as Ethiopia and Kenya would exponentially increase local earning capacity. This is already being done on a small scale, and multiplied across all coffee-producing countries, the impact would be extraordinary.

### **2.3 Compete on Quality, not Poverty**

The FairChain principle is built around competing on quality, not poverty. Our Articles of Association (“Statuten”) commit us to adding value in-country, a balanced distribution of production processes between origin and consumer country, fair distribution of proceeds to participants in the country of origin, organising business around shared value, and full transparency about how value is created and distributed.

## **3. Policies and Guidelines**

### **3.1 OECD/OESO guidelines and climate impact**

FairChain complies with the OECD guideline for Rio Markers for Climate Change Mitigation and Adaptation. We contribute to the objective of stabilising greenhouse gas concentrations in the atmosphere through measurement, footprint calculation and reduction programmes. When and where possible, we choose the most environmentally friendly solutions for travel, transport and packaging, sourcing talent locally and favouring remote meetings over long-distance travel.

### **3.2 FairChain General Code of Conduct**

FairChain is a social enterprise whose mission is to restore the balance in the distribution of value among global value chains, unlocking the power of technology to support smallholder farmers in earning a living income.

FairChain is fully committed to honesty, integrity and ethical values in all interactions. All FairChain staff, and ★ all partner-organisation personnel, consultants and sub-grantees engaged in FairChain-supported activities, are required to conduct themselves in an open, fair and impartial manner consistent with this Code.

Any employee, consultant or partner may bring questions about this policy to the Head of Human Resources (currently the CFO), who acts as Integrity Officer. If an employee feels the Integrity Officer is not impartial in a given matter, the Directors will appoint another person as acting Integrity Officer.

#### **3.2.1 Integrity and honesty**

No one associated with FairChain as an employee, contractor or partner will use their connection with FairChain to solicit advantage of their position. “Advantage” includes any gift, loan, fee, reward or commission; any office, employment or contract; release or discharge of any obligation; any other service or favour (other than entertainment); the exercise or forbearance of any right or duty; and any offer or promise of the foregoing.

Staff who wish to accept any advantage from persons having business dealings with FairChain (donors, clients, suppliers, contractors) must seek permission from the Board of Directors. Gifts over US\$25 offered in an official capacity are treated as gifts to the organisation and require supervisor permission before acceptance. Misuse of position for personal gain is grounds for disciplinary action, dismissal and legal prosecution.

#### **3.2.2 Avoiding conflict of interest**

A conflict of interest arises when the private interests of staff (financial or personal, including family, friends, and organisations they belong to) compete with FairChain's interests. Staff must declare any actual or perceived conflict in writing to their supervisor and abstain from the matter unless reassigned. Each staff member and contractor is required to sign the attached conflict-of-interest statement.

### **3.2.3 Safeguarding FairChain intellectual property, classified information, property and assets**

Staff and contractors may not disclose IP, classified or proprietary information without written authorisation, and must protect FairChain property from misuse or misappropriation. Breach results in investigation, potential dismissal and legal action.

### **3.2.4 Avoiding conflicting competition and/or employment**

Staff wishing to take up paid outside work must seek written approval from their supervisor, who will assess whether it conflicts with FairChain's interests.

### **3.2.5 ★ Ensuring a safe working and programme environment**

A safe environment applies not only within FairChain's offices but throughout the communities where FairChain and its partners operate. All FairChain staff and contractors must engage in professional, respectful interactions – and this standard extends explicitly to everyone FairChain and its partners interact with while delivering programmes, including outgrowers, farmers, cooperative members, and the community members and children who participate in Local Child Labour Committees (LCLCs) and other FairChain-supported structures in Ethiopia and Kenya.

The workplace and programme environment will be free of any religious or political promotion. FairChain's HR function will ensure that each staff member and contractor is inducted on this policy and on the Safeguarding & Child Protection Policy (Section 3.4), and signs the child-protection and conflict-of-interest statements (Section 6). There must be a confidential and safe manner for anyone – staff, contractor, or community member – to report an issue where they feel unsafe (see Section 3.3.5 and 3.4.9).

Intimate relationships between FairChain staff and contractors are discouraged; the HR Manager will assess any potential conflict of interest where a supervisory relationship is involved, and both parties must disclose the relationship. ★ Intimate or sexual relationships between FairChain staff, contractors or partner personnel and programme participants (outgrowers, farmers, community members) are prohibited regardless of any perceived consent, given the inherent power imbalance – see Section 3.3 (PSEAH).

### **3.2.6 Inappropriate behaviour**

FairChain does not tolerate inappropriate behaviour toward staff, contractors, vendors, partners, programme participants or other associates – conduct that is unwarranted and reasonably interpreted as demeaning or offensive, including but not limited to conduct of a sexual nature, bribery or other conflicts of interest, drug use, aggression, violence, bullying or child labour. Persistent inappropriate behaviour is treated as harassment.

### **3.2.7 Drug-free environment**

Staff may never work under the influence of any substance, legal or illegal, that affects their ability to perform duties. No drugs are permitted on FairChain property, offices or vehicles; working under the influence of alcohol is gross misconduct.

### **3.2.8 Compliance and enforcement**

It is the personal responsibility of every staff member, and ★ every partner organisation and consultant, to understand and comply with this Code. Acceptance forms an integral part of labour and consultancy agreements, and ★ of partnership and sub-grant agreements (see Section 7). Managers ensure their teams understand and comply; problems and suggestions are channelled to direct supervisors and then to FairChain Directors.

### **3.2.9 Consequences for violation**

Any FairChain employee, contractor or partner who violates this Code is subject to corrective action ranging from a disciplinary warning to termination, and to legal action in cases of suspected corruption or other criminal offences.

## **3.3 ★ FairChain Policy on the Prevention of Sexual Exploitation, Abuse and Harassment (PSEAH)**

This section replaces and substantially expands the 2022 “policy on sexual and other prohibited harassment.” The earlier policy addressed harassment between staff; this version adds the exploitation and abuse of the people FairChain and its partners serve – outgrowers, farmers and community members, including children – which is the core of what our grant agreements (including with the Embassy of the Kingdom of the Netherlands) require under “PSEAH.”

### **3.3.1 Sexual harassment (staff and workplace)**

Unwelcome sexual advances, requests for sexual favours, and other verbal or physical conduct of a sexual nature constitute sexual harassment when submission to such conduct is made a term or condition of employment, is used as a basis for employment decisions, or has the purpose or effect of creating an intimidating, hostile or offensive environment.

Sexual harassment can include, but is not limited to:

- Verbal harassment: sexual innuendos, suggestive comments or graphic expressions about a person's body; jokes or vulgar language of a sexual nature; sexually degrading words; repeated offensive flirtation, advances, propositions or threats; repeated verbal abuse.
- Physical actions: unwanted physical contact, including touching, pinching, brushing the body, impeding movement, or coerced sexual acts.
- Inappropriate displays: sexually suggestive objects or pictures, sexually graphic commentary, suggestive sounds, leering or obscene gestures.

This does not include occasional, socially acceptable compliments or consensual relationships; however, conduct that goes beyond what is socially acceptable in the workplace, or becomes unwelcome, may become harassment. This policy applies equally to communications via e-mail, internet, telephone, text message, voicemail or any other electronic means.

### **3.3.2 ★ Sexual exploitation and abuse (SEA) of programme participants and communities**

Sexual exploitation is any actual or attempted abuse of a position of vulnerability, differential power or trust for sexual purposes, including but not limited to profiting monetarily, socially or politically from the sexual exploitation of another. Sexual abuse is the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

All FairChain staff, contractors, consultants, board members, and partner-organisation personnel (including staff and volunteers of EECMY-DASSC, Mizan-Tepi University, KWEO, Kibiegion Bett Consultancy, and any future implementing partner) are strictly prohibited from:

- Exchanging money, employment, goods, services, assistance, preferential treatment or any other advantage for sex with any outgrower, farmer, community member, or any other person FairChain or its partners interact with in the course of their work.
- Any sexual activity with a person under the age of 18, regardless of the local age of majority or consent, and regardless of any claimed belief about the person's age.
- Any sexual relationship with a programme participant or community member that involves an actual or apparent abuse of the power imbalance inherent in the FairChain–beneficiary relationship, even where the other party is an adult and the relationship is said to be consensual.
- Any behaviour that could be perceived as coercive, exploitative or abusive towards a member of the communities FairChain works with.

These prohibitions apply at all times – on FairChain premises, at partner premises, in the field (farms, collection sites, community meetings), and outside working hours where the person's association with FairChain is a factor in the interaction.

### **3.3.3 Scope**

This policy applies to all FairChain (and FairChain Tech, FairChain Farming) employees, board members, consultants, interns and volunteers, and ★ to every partner organisation, sub-grantee and consultancy engaged in FairChain-supported activities, as a condition of their engagement. Partner agreements should reference this policy or an equivalent safeguarding standard (see Section 7).

### **3.3.4 Reporting and investigation of complaints**

Any employee, contractor, partner-organisation staff member, or community member who becomes aware of sexual harassment, exploitation or abuse – whether affecting themselves or others – has an obligation, or in the case of community members, an open and accessible route, to report it.

Staff should report to their supervisor, the Human Resources function, or any member of FairChain senior management, and are strongly encouraged to report before an issue becomes severe or pervasive. ★ Outgrowers, farmers and other community members can report through the community-facing channel described in Section 3.4.9 (via the Local Child Labour Committee, a named local contact, or directly to FairChain).

Any supervisor or manager who receives a complaint must promptly contact FairChain's senior management so an investigation can begin without delay. All complaints will be investigated promptly and thoroughly; FairChain may engage outside experts where appropriate. Confidentiality will be protected to the extent possible, recognising that an effective investigation may require revealing some information to the person accused and potential witnesses.

### 3.3.5 ★ Designated PSEAH and Safeguarding Focal Points

FairChain designates the following roles as first points of contact for PSEAH and safeguarding concerns. Names and direct contact details are maintained in Annex A and communicated to staff, partners and communities; they are not published in the public version of this policy for the personal safety and privacy of the individuals concerned.

- Global Safeguarding Focal Point (Netherlands) – a senior FairChain staff member, independent from day-to-day country operations, appointed by the Board.
- Ethiopia Field Safeguarding Focal Point – based at or near the Mizan farm operation.
- Kenya Field Safeguarding Focal Point – based at or near the Kericho operation.

Focal points are responsible for receiving concerns, ensuring confidentiality, initiating the response procedure, keeping a basic incident log, and escalating to FairChain senior management and, where legally required, to the relevant local authorities.

### 3.3.6 ★ Non-retaliation

No person – employee, contractor, partner-organisation staff, or community member – will suffer retaliation for a complaint of harassment, exploitation or abuse made in good faith, whether or not the complaint is ultimately substantiated, unless the complainant is found to have knowingly made a false allegation. Retaliation of any kind (dismissal, demotion, exclusion from programme benefits, threats, or social retaliation) is itself a violation of this policy and subject to disciplinary action.

### 3.3.7 Consequences for violation

Any FairChain employee, contractor or partner-organisation representative who violates this PSEAH policy is subject to corrective action ranging from a disciplinary warning to termination of employment or of the partnership/consultancy agreement, and to referral to law enforcement where the conduct may be criminal. FairChain may act to prevent inappropriate behaviour before it reaches the level of legally actionable harassment or abuse.

## 3.4 ★ FairChain Safeguarding and Child Protection Policy

Safeguarding is FairChain's responsibility to ensure that its employees, volunteers, partners, operations and programmes do no harm to children, young people or vulnerable adults (together, “vulnerable people” in this section); that they are not exposed to discrimination, neglect, harm or abuse; and that any concern about their safety is dealt with and, where appropriate, reported to the relevant authorities. Child protection is the process of protecting individual children identified as suffering, or at risk of, significant harm.

This section is new in version 2.0. It responds directly to the nature of FairChain's own programmes: children participate as formal members of Local Child Labour Committees in FairChain's Ethiopia programme, and both the Ethiopia and Kenya programmes work closely with women and children in vulnerable circumstances. FairChain therefore has a specific and direct obligation to put safeguarding measures in place – this is not boilerplate donor compliance.

### 3.4.1 Definitions

- **Abuse** – a violation of a person's human and civil rights by any other person(s): physical, psychological, financial or sexual abuse, neglect, or commercial or other exploitation,

resulting in actual or potential harm to the health, survival, development or dignity of a child, young person or vulnerable adult. Abuse may be a single act or repeated, and intentional or unintentional.

- **Physical abuse** – hitting, shaking, throwing, poisoning, burning, drowning, suffocating or otherwise causing physical harm, misuse of medication, or inappropriate sanctions.
- **Sexual abuse** – forcing, enticing or coercing a person to take part in sexual activities, whether or not the person is aware of what is happening; includes non-contact activities such as involving a child in looking at or producing sexual images, or grooming a child in preparation for abuse.
- **Psychological abuse** – emotional abuse, threats of harm or abandonment, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation, or serious bullying (including cyberbullying).
- **Neglect** – persistent failure to meet a vulnerable person's basic physical or psychological needs – food, clothing, shelter, protection from harm, supervision, or access to medical care.
- **Financial / material abuse** – theft, fraud, exploitation, or misuse of property, possessions, loan proceeds or benefits belonging to a vulnerable person – relevant to FairChain's outgrower loan and payment programmes.
- **Discriminatory abuse** – abuse motivated by a person's age, sex, tribe, nationality, disability, or other personal characteristic.
- **Child** – anyone under the age of 18, irrespective of the age of majority in the country where the child lives.
- **Young person** – individuals aged 15–25; this group spans “child” and “adult” categories and is treated as having distinct safeguarding needs.
- **Vulnerable adult** – a person aged 18 or above who, by reason of disability, age, gender, social or economic status, or context, may be unable to protect themselves against abuse, harm or exploitation.

### 3.4.2 Policy statement

FairChain has zero tolerance for abuse and exploitation of vulnerable people. Safeguarding is everyone's responsibility. FairChain works to the following key principles:

- Everyone has an equal right to protection from abuse and exploitation, regardless of age, sex, disability, ethnicity, religion or other status.
- The best interests of the vulnerable person are paramount in FairChain's decision-making.
- FairChain will meet its duty of care and act where it believes a child or vulnerable adult is at risk or has been harmed.
- FairChain will ensure staff and volunteers are inducted in these standards, and that partner organisations are informed of and comply with them.
- FairChain respects confidentiality and shares sensitive information only on a need-to-know basis.

- Cultural sensitivity matters, but culture is never an acceptable justification for abuse of a child, young person or vulnerable adult.

### **3.4.3 Scope**

This policy is mandatory for everyone who works for or on behalf of FairChain, paid or unpaid – employees, board members, contractors, consultants, interns, volunteers and visitors to FairChain sites – and covers implementing partners and sub-grantees whom FairChain funds or works through, including EECMY-DASSC, Mizan-Tepi University, community-based organisations such as KWEO, and consultancies such as Kibiegion Bett Consultancy, as a condition of their involvement.

### **3.4.4 ★ Particular attention: children participating in FairChain-supported governance structures**

Children serve as formal members of Local Child Labour Committees in FairChain's Ethiopia programme, alongside adult committee members, teachers and community leaders. This is a deliberate and valuable design choice – giving children a voice in decisions that affect them – but it also means FairChain has a direct, specific safeguarding duty toward these children, distinct from its general duty toward beneficiaries. In any one-to-one interaction with a child or young person committee member, staff and partner personnel must ensure another adult is aware the contact is taking place, and, wherever possible, that another adult is present or within sight.

### **3.4.5 Responsibilities**

All people working with or on behalf of FairChain will: read, understand and adhere to this policy and the FairChain Code of Conduct; strive for a zero-tolerance approach to discrimination, harassment and abuse; place the safety and welfare of children and vulnerable people above all other considerations; and report any concern about the welfare of a child or vulnerable person, or about the behaviour of any FairChain or partner representative.

All people working with or on behalf of FairChain will not: sexually, physically or emotionally harass, assault or abuse another person; act in ways that are violent, inappropriate or sexually provocative; develop or fail to act on relationships with children or vulnerable people that could be sexual, exploitative or abusive; or agree with a child to keep a secret that has implications for their safety.

Managers at all levels ensure their teams and any partner organisation they work with are aware of this policy and supported to implement it, and act immediately on any concern raised. Designated Safeguarding Focal Points (Section 3.3.5) handle reports appropriately, maintain a basic log, ensure risk assessments are carried out at project locations, and ensure this policy is reviewed annually. FairChain's Board holds ultimate responsibility for this policy.

### **3.4.6 Safe recruitment**

Where a role involves direct, regular contact with children or vulnerable people – field staff, LCLC facilitators, and equivalent partner-organisation roles – FairChain and its partners will apply reasonable safe-recruitment practice: reference checks, and a local criminal-record or community-reputation check where such a mechanism realistically exists in-country. Where formal background-check systems are not available locally, FairChain will rely on documented references and local partner vouching, and will record that this was the basis for the decision.

### **3.4.7 ★ Images, names and communications involving children**

FairChain's annual reports, website and communications materials include photographs and stories from its Ethiopia and Kenya programmes, sometimes involving children. FairChain will:

- Use images and names of children that are respectful and do not expose them to further vulnerability – never degrading or sexualised images.
- Obtain written or clearly documented verbal consent from a parent or guardian (recorded by the field team) before publishing a photograph or name of a child in a report, on the website, or on social media.
- Make clear to families that agreement to provide a photo, story or quote is never a condition of participation in FairChain-supported activities.
- Avoid identifying a child's exact home location in published material where this could create a safety risk.

### **3.4.8 Induction, training and data protection**

This policy, and the PSEAH policy in Section 3.3, form part of onboarding for all new FairChain staff and are communicated to partner-organisation leadership as part of every new or renewed partnership or consultancy agreement. Personal and safeguarding-related information is kept confidential and shared only where necessary – including, where required, with the appropriate child-welfare or law-enforcement authority in relation to a safeguarding concern.

### **3.4.9 ★ Raising and responding to concerns – the community-facing channel**

Anyone – staff, contractor, outgrower, farmer, LCLC member, or any other community member – can raise a safeguarding or PSEAH concern in any of the following ways:

- Speaking directly to the relevant Field Safeguarding Focal Point (Section 3.3.5), in person or by phone.
- Speaking to a trusted local contact within the Local Child Labour Committee or partner organisation (e.g. KWEO in Kenya, or the school/kebele contacts in Ethiopia), who will pass the concern on.
- Contacting FairChain directly by phone or email (contact details displayed at project sites and in Annex A).

Reports can be made anonymously where the reporter prefers. FairChain will acknowledge receipt of a report within a reasonable time, treat it confidentially on a need-to-know basis, and, for anything indicating actual or potential abuse or exploitation, escalate it to the Global Safeguarding Focal Point without delay. It is not the responsibility of the person raising a concern to prove it – only to report it in good faith. Where the matter may be criminal, FairChain will refer it to the relevant law-enforcement or child-welfare authority, recognising that FairChain itself is not an investigative authority.

### **3.4.10 Review**

This Safeguarding & Child Protection Policy is reviewed annually alongside the rest of this document (Section 5), and earlier if a significant incident or change in FairChain's operating context makes this necessary.

### **3.5 Dealing with customers and producers**

#### **3.5.1 Producer feedback**

We have an inclusive approach to the producers of our products and want them to be happy and safe to sell their products to us. We work with our own people inside the communities who are in direct contact with farmers, village and religious leaders and other people of importance (e.g. school heads), and take their feedback seriously.

#### **3.5.2 Customer feedback**

We respect customer feedback and work with customers to resolve any issue with our products or services, reachable via website, telephone or email.

### **3.6 Human rights, modern slavery and child labour**

We are committed to upholding human rights by respecting internationally recognised human rights and taking special consideration of the rights of vulnerable groups, including the Universal Declaration of Human Rights, the International Pact on Civil and Political Rights, the International Pact on Economic, Social and Cultural Rights, the ILO Declaration on Fundamental Principles and Rights at Work, the UN Guiding Principles on Business and Human Rights, the Ten Principles of the UN Global Compact, and the OECD Guidelines for Multinational Enterprises.

We are committed to abolishing modern slavery and child labour in our value chains as soon as possible, by working with communities and relevant actors to provide better alternatives – this is the direct purpose of FairChain's Local Child Labour Committee programmes in Ethiopia and Kenya, which this policy (Sections 3.3 and 3.4) is designed to support safely.

### **3.7 Emergency and evacuation policies**

In case of emergency, sickness or injury of overseas staff members, the country-specific evacuation plan will be activated by the responsible country manager or the FairChain CEO. The goal is to keep all staff and expatriate family members safe.

## **4. Behaving in Correspondence with These Policies**

#### **4.1 CSR activities**

Corporate social responsibility is fully integrated into FairChain's core business: capacity building and training for smallholder farmers, a FairChain premium fund for capacity building and pre-harvest investment, CO2 compensation through local reforestation, training in roasting to ISO/HACCP standards, monitoring farmers via the International Wealth Index, monitoring employees via the Living Wage Indicator, and lobbying/advocacy for FairChain development.

#### **4.2 CSR impact reporting**

Annually, FairChain publishes an Impact Report detailing status, ambition, dilemmas, activities and progress on its three main pillars: economic, social and environmental impact. ★ From this version onward, every annual report submitted to donors (including the Embassy of the Kingdom of the Netherlands) will include a standing section confirming this policy is in place, naming any changes since the previous report, and stating the number of safeguarding/PSEAH concerns received and how

they were handled (including “none received”, which is itself a meaningful, reportable data point once the channel exists).

#### **4.3 ★ Communication of our policies**

As a radically transparent company, we share these policies with whomever wants to see them. This policy is published on FairChain's website and is part of the onboarding process for all new employees, consultants and partner organisations, so that it is public, citable and does not depend on being re-attached to each new report.

#### **4.4 Consequences**

Any FairChain employee, partner, supplier, producer or contractor who violates FairChain's policies is subject to corrective action, from a disciplinary warning to termination, and to legal action where appropriate.

#### **4.5 Yearly review**

Every year, FairChain management reviews this policy and its effectiveness, including whether staff and partners know of its existence and content. Amendments are made as needed and the version history (cover page) is updated.

## 5. Declaration of Compliance

This declaration operationalises the “child protection statement” referenced in earlier versions of this policy. It is signed by every FairChain employee and by every consultant or partner-organisation representative engaged in FairChain-supported activities, at the start of their engagement and on any material update to this policy.

*I, \_\_\_\_\_, declare that I have received, read and understood the FairChain Policy on Sustainability, Responsibility, Ethical Conduct and Safeguarding (version 2.0), including the PSEAH Policy (Section 3.3) and the Safeguarding & Child Protection Policy (Section 3.4), and I undertake to comply with its requirements. I confirm that I am not aware of any actual or potential conflict of interest, and I understand that any breach of this policy – including any act of sexual exploitation, abuse or harassment toward a colleague, an outgrower, a farmer, a community member, or a child – may result in disciplinary action up to termination, and referral to law enforcement where appropriate.*

|                            |  |
|----------------------------|--|
| <b>Name</b>                |  |
| <b>Role / organisation</b> |  |
| <b>Country</b>             |  |
| <b>Signature</b>           |  |
| <b>Date</b>                |  |

## 6. Conflict of Interest Statement

As a condition of engagement, I confirm that I will not use my position or relationship with FairChain to seek personal gain or advantage; will disclose in writing any actual or potential conflict of interest as soon as it arises; and will not participate in decisions (procurement, recruitment, partner selection) where such a conflict exists without first disclosing it to my supervisor.

|                            |  |
|----------------------------|--|
| <b>Name</b>                |  |
| <b>Role / organisation</b> |  |
| <b>Signature</b>           |  |
| <b>Date</b>                |  |

## 7. ★ Annex A – Partner and Consultant Safeguarding Undertaking

This one-page undertaking is attached as an addendum to every new or renewed partnership, sub-grant or consultancy agreement involving FairChain-funded activities in Ethiopia and Kenya (currently including EECMY-DASSC, Mizan-Tepi University, KWEO, and Kibiegon Bett Consultancy).

The undersigned organisation confirms that it:

1. Has received and reviewed FairChain's Policy on Sustainability, Responsibility, Ethical Conduct and Safeguarding (version 2.0 or later), including the PSEAH and Safeguarding & Child Protection Policies.
2. Will ensure that its own staff, volunteers and sub-contractors engaged in FairChain-supported activities are made aware of these standards, in a manner and language appropriate to their role.
3. Will apply reasonable safe-recruitment practice for any role involving direct contact with children or vulnerable people.
4. Will promptly report to FairChain's Global Safeguarding Focal Point (contact details in Annex B) any concern, allegation or incident involving sexual exploitation, abuse, harassment, or other safeguarding breach, arising in connection with FairChain-supported activities.
5. Confirms that it either has an equivalent safeguarding policy of its own in place, or agrees to operate under FairChain's policy for the purposes of this engagement.

|                             |  |
|-----------------------------|--|
| Organisation                |  |
| Represented by (name, role) |  |
| Signature                   |  |
| Date                        |  |

## 8. ★ Annex B – Focal Point Contact Details (internal)

*This annex is for internal and partner distribution only – for personal safety and privacy, individual names and direct phone numbers are not included in the public (website) version of this policy. Fill in current post-holders below before circulating internally.*

|                                         |  |
|-----------------------------------------|--|
| Global Safeguarding Focal Point (NL)    |  |
| Ethiopia Field Safeguarding Focal Point |  |
| Kenya Field Safeguarding Focal Point    |  |
| Reporting email address                 |  |

|                                  |  |
|----------------------------------|--|
| <b>Reporting phone number(s)</b> |  |
|----------------------------------|--|

*End of document.*