



Spectrum Credit Limited

Environmental and Social Policy

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Document History

Version	Year	Description	Approval Date
1.0	2020	Environmental & Social Policy	02/10/2020

1. INTRODUCTION

This Environmental & Social Policy sets out the guidelines applicable to Spectrum Credit Ltd, thereafter referred to as ("The Company"). The company is committed to promoting environmentally sound and sustainable development in its investments where its efficient systems and promptness in financial service delivery are the hallmark of its operations. The company believes that sustainable development is a fundamental aspect of sound business management.

2. POLICY STATEMENT

The Company believes that serving its clients with innovative financial products and best of class customer service goes hand in hand with managing the environmental & social (E&S) implications of lending activities and risk management. E&S factors can materially influence its ability to meet its financial obligations in the long term. As a responsible corporate citizen, the company is convinced that economic performance is closely linked to respecting the E&S concerns of its stakeholders (employees, clients, communities, investors). The company achieves this goal through embedding E&S factors into its credit approvals process and decision making.

To this end, the company commits to:

- Comply with local E&S legislation and align with international E&S standards (in particular the European Development Finance Institution's Exclusion List, the International Finance Corporation's Performance Standards, ILO's Declaration on Fundamental Principles and Rights at Work¹, and the Customer Protection Principles);
- Respect all internationally recognized human rights, understood as the International Bill of Human Rights²;
- Develop and implement an E&S management system (ESMS) covering the credit approvals and decision-making process and allowing sound E&S risks management. This ESMS includes:
 - An Exclusion List of activities that the company will not finance for E&S reasons;
 - A process to assess E&S risks throughout the credit process;
 - A process to pass the company's E&S requirements on to clients when needed, including through loan agreements and direct engagements with clients;
 - A client monitoring procedure with respect to E&S matters;
 - Assigning specific roles and responsibilities concerning E&S matters within the company;

¹ This covers the 8 fundamental conventions identified by the ILO Governing Body and which are: Freedom of Association and Protection of the Right to Organize Convention (1948, No. 87); Right to Organize and Collective Bargaining Convention (1949, No. 98); the Forced Labour Convention (1930, No 29); Abolition of Forced Labour Convention (1957, No. 105); Minimum Age Convention (1973, No. 138); Worst Forms of Child Labour Convention (1999, No. 182); the Equal Remuneration Convention (1951, No. 100); and the Discrimination (Employment and Occupation) Convention (1958, No. 111).

² This consists of the Universal Declaration of Human Rights (1948), the International Covenant on Civil and Political Rights (ICCPR, 1966), and the International Covenant on Economic, Social and Cultural Rights (ICESCR, 1966).

- A framework to proactively respond to emergency situations at the company's Head Office or arising from clients' operations in any of its branches; and
- Procedures allowing for internal and external stakeholders to express their grievances;
- Establish a focused E&S training program for management, employees and loan officers;
- Maintain an open and transparent communication system with its employees, clients, suppliers, shareholders and other stakeholders regarding E&S issues;
- Periodically communicate on its E&S performance to employees, clients, shareholders and investors;
- Allocate the necessary resources towards the implementation of this E&S Policy.

3. INTERPRETATION AND REVIEW

3.1 Policy Ownership

The group CEO is the overall owner of the policy and Group Director – Human resources is the policy administrator

3.2 Review of the Policy

As part of a continuous improvement approach, this Policy shall be reviewed and updated on annual basis or when necessitated by changes internally.

4. APPROVAL

This policy is approved by the PHL Board of Directors via Board Minute No. BM/13/2020 on 2nd October 2020