



# Apollo Agriculture Environmental & Social Management System (ESMS)



# ESMS Overview



## ESMS Overview

Apollo Agriculture recognizes that an environmental and social management system (ESMS) is dynamic and must be tailored to the size of the business and the risks that are prevalent in a constantly evolving operating environment.

Apollo Agriculture’s ESMS is made up of nine interrelated parts. The E&S Policy is the overarching foundational document for the ESMS and guides the overall E&S strategy and its operational components.

	ESMS components	Status
1	E&S Policy	The policy is approved by the CXO team and the Board in Jan 2023.
2	E&S Risk Assessment Framework	E&S Risk Assessment Framework has been drafted with external expert advice as well as internal management inputs. This includes a methodology to categorize our credit portfolio by E&S risk profile. Additionally, we are implementing procedures for contractors, subcontractors, and third parties.  We routinely review and update the E&S risk assessment scorecard across existing, new, and changing activities/products/markets.
3	Management program: Action plans and procedures	This is currently addressed in the implementation procedures of the E&S Risk Assessment Framework.  We will continue to develop forms, templates, checklists, and other useful documents to help us implement the systems.
4	Organizational capacity	The E&S policy defines the overall management and oversight structure. In addition, the implementation will be delegated to cross-functional teams and/or project groups, with capabilities across E&S, credit, risk, tech, compliance, HR etc as relevant.
5	Emergency preparedness and response plan	Emergency issues (in the HQ and on-site) have been identified, and an effective preparedness plan is in place. Ongoing training and monitoring is being implemented.
6	Stakeholder	We are currently prioritizing communication of E&S policies, risks and



	engagement	<p>contractual requirements to our key suppliers and contractors.</p> <p>We will continue to engage with other stakeholders (eg: agents, agrodealers) on E&amp;S risk areas based on a materiality assessment.</p>
7	External communication and grievance mechanisms	The grievance mechanism is fully implemented, and there is a tracking system of internal and external grievances.
8	Communication to affected communities	<p>We have prioritized strengthening communication to customers on key E&amp;S risk areas. The E&amp;S Risk Assessment Framework provides the guiding principles for the implementation.</p> <p>Communication to other affected communities (if any) will be taken up in future implementation phases.</p>
9	Monitoring and Review	<p>Periodic reports and reviews will be conducted at frequency determined by the management. Further systems and procedures for periodic monitoring and review will be implemented as listed in the E&amp;S Policy. Our E&amp;S Risk Assessment Framework will guide our data collection methodologies.</p>



# Environmental & Social Policy



# **Apollo Agriculture - Environmental & Social (E&S) Policy**

---

## **1. Apollo Agriculture’s Mission**

Apollo Agriculture’s (“Apollo” or the “Company”) mission is to empower small-scale farmers to increase their profitability, farm more sustainably and ensure food security.

Apollo leverages modern technology to provide agricultural inputs, advice, insurance and financing in a highly scalable and commercially viable manner. Over time, Apollo will support customers to access increasingly productive and diversified products and services so that they can move beyond subsistence farming, to farming as a business and a pathway to financial resilience and stability.

## **2. Purpose and Scope of E&S Policy**

Apollo Agriculture’s business and its impact extends across several environmental and social (E&S) facets, including a continuously evolving set of risks and opportunities. Apollo’s E&S Policy supports our business decision-making at all levels and provides a frame of reference for our consideration of E&S principles while dealing with business opportunities and risks. We believe E&S principles are an important part of Apollo’s overall sustainability in the long run.

The purpose & the scope of Apollo’s E&S Policy (“E&S Policy”) is to outline Apollo Agriculture’s commitment (as a group) to environmental and social responsibility as it relates to our business, ensure compliance with laws, regulations and contractual obligations as they relate to E&S risks and considerations, and outline our vision to seize additional sustainability opportunities as we grow our business. The E&S Policy will further include focus areas and guidelines for Apollo’s approach to E&S responsibility and impact.

Some of the principles listed above may be further detailed in associated policies such as Apollo Agriculture’s Code of Conduct, Employee Handbook, Safeguarding Policy, Internal and External Public Grievance Mechanism and, Emergency Preparedness and Response Plan

## **3. Context for the Policy**

The agriculture sector is a key pillar of the economies of most sub-Saharan African countries, contributing approximately 23% of the Gross Domestic Product (GDP) in Sub-Saharan Africa (33% in Kenya<sup>1</sup> and 19% in Zambia). The agricultural sector employs more than 40% of the total population in

---

<sup>1</sup> <https://www.mckinsey.com/industries/agriculture/our-insights/winning-in-africas-agricultural-market>



Kenya and 75% of the population in Zambia<sup>2</sup> which is mirrored in the wider Sub-Saharan African context with 60% Africans primarily engaged in agriculture. The vast majority of agricultural land in Africa - 21% of the world's total agricultural land - is farmed by small-scale farmers. Across sub-Saharan Africa, average yields per area of staple crops like maize are below 20% of U.S. averages. The significantly lower yield leads to high levels of food insecurity, lower financial resilience, a high demand for farmland leading to deforestation among other adverse ecological, social and financial effects - all of which affect small-scale farmers most severely.

Small-scale farmers face many challenges including:

1. Poor access to credit generally, and for agricultural inputs specifically. Small-scale farmers only get a third of the total credit provided to the Kenyan agricultural sector which severely limits access to higher cost/quality agricultural inputs.
2. Limited access to newer or more productive technologies and cultivation techniques. Traditional cultivation practices can sometimes be sustainable. However, common practices, such as "slash and burn" agriculture degrade soil fertility and cause erosion.
3. Low soil fertility and high soil acidity in tropical zones where most small-scale farmers live and farm. This is often a result of decades of improper or inadequate fertilizer use and lack of crop rotation. Many small-scale farmers do not have the tools, knowledge or technical support to improve their soil fertility.
4. Changing weather patterns. Unpredictable rainy seasons reduce farmers' confidence in planting crops at the traditional time. Traditional varieties may produce low yields or fail altogether during drought or flooding. Changes in temperature and humidity increase the prevalence of pests and diseases. This is exacerbated by climate change.

Supporting small-scale farmers as the backbone of agricultural production is even more critical during this time of unprecedented global disruption in food supply chains. In this broad context, Apollo's work with small-scale farmers is increasingly important.

#### **4. Apollo Agriculture's Sustainability Objective**

Integral to Apollo Agriculture's overall mission, the Company's sustainability objective is:

**To drive financial security and food security to millions of small-scale farmers in a financially, environmentally and socially sustainable manner.**

This sustainability objective will serve as a directional guide for overall Company strategy while integrating the E&S Policy and approach into core operations (i) to monitor and mitigate E&S risks, and (ii) to seize additional sustainability opportunities.

There are several intersections of Apollo's core business model with important E&S considerations. For instance, we drive increased social impact by enabling access to credit, thereby driving yield and income improvements for farmers. The bundled insurance products help build financial resilience for farmer

---

<sup>2</sup> <https://www.trade.gov/country-commercial-guides/zambia-agriculture>



households in the face of climate risks. Providing access to specialized drought-resistant seeds and other higher quality inputs helps farmers adapt to the effects of climate change. Moving small-scale farmers towards scientific and sustainable agricultural techniques, thereby reducing deforestation and soil depletion, further drives long term sustainability. However, these opportunities may also come with trade-offs or risks.

With this sustainability objective and this E&S Policy, Apollo acknowledges these potential trade-offs and risks and aims to balance them with a view towards long term sustainability across key dimensions. The objective specified herein will further be broken down into measurable milestones and targets as defined as part of the implementation of this E&S Policy.

## **5. Guiding Principles for Apollo Agriculture’s E&S Approach**

‘E&S Factors’ as referenced in this section includes relevant risks, opportunities and indicators related to the environment, effects of climate change, social and employee matters, respect for human rights, as pertaining to Apollo’s business model and its long-term business sustainability.

To achieve the sustainability objective, Apollo Agriculture commits itself to the Guiding Principles listed below:

1. To comply with all applicable E&S laws and regulations in each jurisdiction where the Company operates
2. To progressively measure, study and minimize adverse impacts in key E&S risk areas
3. To learn from and implement relevant international best practices, standards and exclusion lists<sup>3</sup>; and
4. To develop and employ management systems that effectively address E&S risks, making E&S and sustainability opportunities a fundamental part of the Company’s operations and strategy

As a relatively young company with limited financial and management resources, Apollo’s approach to applying these Guiding Principles will be based on a risk-based prioritization approach. The Guiding Principles listed above are aimed at enhancing the scope of Apollo’s activities in these areas over time, and maximizing investment and innovation to the extent feasible. Apollo also recognizes that not all risks and impacts may be clearly known upfront and missteps are inevitable, but that it is important to start, learn, iterate and improve.

## **6. Key E&S Risk Areas & Apollo’s Approach**

To effectively translate these Guiding Principles into concrete actions, Apollo Agriculture has received advice from external expert advisors and consulted internal stakeholders to identify the key E&S risks and priorities. These priorities are tackled with specific actions as part of its Environmental and Social Management System (ESMS).

---

<sup>3</sup> International best practices, standards and exclusion lists are listed in Schedule 1





The risk assessment procedure for E&S risks was also guided by relevant international standards and best practices<sup>2</sup> including IFC and EDFI exclusion lists, Rabobank Policies and Procedures framework, IFC Performance Standards, and the IFC tool - Global Map of Environmental and Social Risk in Agro-Commodity Production.

This section covers the key risk areas associated with Apollo's activities, as identified during the initial assessment, and an overview of Apollo's approach to each, as guided by the sustainability objective. These may be updated in the future as the scope or nature of Apollo's activities changes.

## **6.1. Environmental sustainability**

Fundamentally, all agricultural activities have an impact on the environment such as creating demand for farmland, water usage, carbon emissions among others. Non-agricultural factors also generate adverse environmental impacts that affect small-scale farmers who are most vulnerable to the effects of environmental changes. These could manifest in the form of environmental pollution, natural resource scarcity, climate change, water availability and loss of biodiversity. Apollo Agriculture further acknowledges that through its own activities and those of its customers, impacts may be generated that threaten the environment. Apollo is determined to minimize such environmental impacts due to its activities and to assist its clients to prevent or mitigate these adverse impacts due to external factors.

### **6.1.1. Deforestation and farmland use**

Deforestation is defined as the loss of natural forest as a result of: i) conversion to agriculture or other non-forest land use; ii) conversion to a tree plantation; or iii) severe and sustained degradation. Loss of natural forest within this context is deforestation regardless of whether or not it is legal and without deduction for reforestation or another offset. Apollo is committed to reducing the demand for farmland and associated deforestation by developing solutions that enhance productivity and working with farmers to promote sustainable cultivation practices. Further, Apollo works with farming communities to raise awareness and to promote best practices that reduce deforestation.

### **6.1.2. Climate change**

Apollo Agriculture commits to continuously empowering farmers to adopt climate resilient farming practices through diversified seed and fertilizers varieties which can help reduce soil acidification and increase yields and promote sustainable farming techniques to restore soil health and fertility (e.g. intercropping, use of manure, drought-resistant seeds etc). Apollo also promotes the use of crop insurance that improves financial resilience of small-scale farmers in response to climate risks. The impacts of climate change may be manifest in the form of irregular rainfall, pest attacks, yield loss due to temperature changes, environmental imbalances such as loss of soil nutrient and so on. By offering a wider selection of inputs, scientific farming techniques, relevant training and developing innovative insurance partnerships, Apollo is committed to promoting adaptation to climate change as well as developing farmers' resilience to its impacts. This may be done through pilots or experiments, running comparative studies, investing in agronomy capability and identifying the initiatives that can be scaled in



a financially viable manner. In addition, Apollo intends to invest in the measurement and reduction of its net carbon footprint and participation in carbon marketplaces or other similar ecosystems that may enable farmers to reduce their own greenhouse gas emissions.

### **6.1.3. Use of harmful agrochemicals**

Agrochemicals have become an integral part of most farming systems. They can enable no-tillage farming systems, which have a positive impact on soil organic matter content and soil structure, and thereby lead to lower GHG emissions. However, agrochemicals by their nature, and without appropriate product stewardship, can also be the origin of adverse impacts. In their production (including supply chain), and in their use (including distribution and storage), agrochemicals can cause and contribute to adverse impacts on (i) people (e.g. acute and chronic toxicity related to inappropriate handling and applying and other forms of exposure), (ii) the environment (e.g. animals, plants, water, soil, and the ozone layer), and (iii) ecology (e.g. insects, soil life and biodiversity as well as the impacts further down the food chain).

While Apollo cannot eliminate the use of agrochemicals among its customers, our approach is based on the following principles:

- **Responsible use:** Create awareness of harmful effects and avoid overuse. Determine correct dosage recommendations and provide information and training to customers.
- **Safety:** Provide clear instructions on usage and assist and educate farmers to ensure safe storage and usage of agrochemicals.
- **Reduction:** Develop expert advisors to learn from global practices and standards. Develop internal knowledge and develop protocols to identify and promote alternative herbicides and pesticides that are less harmful to humans and the environment.

## **6.2. Social sustainability**

### **6.2.1. Client Protection**

Loans provided to our customers must be well structured and managed, otherwise, it may have negative impacts on the borrowers. Therefore Apollo Agriculture has designed and implemented its credit processes based on the principles of responsible finance i.e. Client Protection Principles (CPPs)<sup>4</sup>. Responsible finance principles are designed to prioritize clients, and key principles include appropriate product design and delivery, prevention of over-indebtedness, transparency, responsible pricing, fair and respectful treatment of clients, privacy of client data, and providing mechanisms for complaint resolution.

Some of the principles listed above are further detailed in associated policies such as Apollo Agriculture's Credit Policy and Data Protection Compliance Policy.

Further, Apollo endeavours to go beyond implementing the principles of client protection, towards empowering customers with greater knowledge, choice, and flexibility. This may be achieved through

---

<sup>4</sup> Client Protection Principles



training on financial literacy, ensuring productive use of money, allowing flexibility of payment options, and other similar product innovations.

### **6.2.2. Gender Equity**

There is a wide consensus that there is significant involvement of female members in agricultural activities in small-scale farming households. By many accounts, despite female labor force participation being upwards of 40%, there are gender-specific gaps across income, asset ownership, access to inputs/technology, literacy, and several other areas that inhibit long-term progress and gender equity.

There is a risk that women farmers may be excluded from accessing Apollo's products and services, due to a variety of reasons such as the nature of service delivery, technological literacy, and other sociocultural factors. Apollo is committed to working towards greater inclusion and empowerment of female farmers, through measurement of gender-disaggregated data, better understanding of gender considerations among our customers, and implementing gender-conscious approaches, where required to reduce inherent biases.

### **6.2.3. Human Rights**

Apollo Agriculture operates in challenging contexts where human rights issues may exist. Respect for human rights is a fundamental principle of Apollo Agriculture and we conduct our business with the highest respect for internationally recognized human rights as guided by global standards (eg: UN Guiding Principles on Business and Human Rights ) relating to businesses and human rights. Access to remedy and grievance redressal is a key tenet of Apollo's policies and procedures related to this area. Apollo Agriculture endeavours to actively and continuously identify, avoid, mitigate and manage adverse human rights impacts in its direct operations.

### **6.2.4. Child Labor & Labor Rights**

'Decent work and economic growth' is one of the UN Sustainable Development Goals (SDG 8) and a key impact targeted for Apollo Agriculture's employees. Apollo Agriculture upholds the principles concerning fundamental rights which cover the core labor standards including the elimination of child and forced labor, discrimination and freedom of association and collective bargaining, stemming from the International Labor Organization Declaration on Fundamental Principles and Rights at Work, adopted in 1998 and covering: (i) freedom of association and the right to collective bargaining, (ii) the elimination of forced and compulsory labor, (iii) the abolition of child labor and (iv) the elimination of discrimination in the workplace.

Apollo Agriculture offers high quality working opportunities and conditions and is guided by relevant global performance standards. e.g. ILO core Labour standards and the IFC Performance Standard 2 on Labor and Working Conditions.

As detailed in Apollo Agriculture's human resource policies and employee handbook, the Company respects the rights of its employees, including the freedom of association and the right to collective bargaining and provides a safe and healthy work environment. We do not tolerate discrimination in the workplace and respect diversity and inclusion (including gender, ethnicity, nationality, disability, and



sexual orientation). We provide access to grievance mechanisms through which labor-related complaints and disputes can be resolved in a fair and timely manner.

## **7. Implementation of the Policy**

This section of the E&S Policy outlines Apollo Agriculture's approach to monitoring and reporting and refers to the measurement of E&S risk and impact on an ongoing basis.

This E&S Policy is an integral part of Apollo's ESMS, whose key objective is to integrate E&S opportunities and risks as part of the company's strategic objectives, day-to-day activities, and risk management.

The implementation of the E&S Policy will be through the ESMS that includes:

- E&S risk categorization framework for customers and key business partners
- Implementation priorities
- Measurement and progress monitoring
- Compliance tracking
- Periodic review framework

The ESMS shall be aligned with relevant international standards (described in Schedule 1) to address common environmental and social risks.

## **8. Approval and revisions**

This policy has been prepared in consultation with key internal stakeholders and external advisors. Apollo Agriculture keeps this E&S Policy and the underlying procedures up to date and continuously improves them, based on lessons learned and feedback from stakeholders. This policy will be reviewed every two years unless a specific request has been made by our stakeholders or there is a change in applicable laws and regulations, or changes in business strategy or emerging environmental and social risks, in which case, Apollo will initiate a review. The policy is publicly accessible and communicated to all relevant parties internally and externally.



## Schedule 1: Summary of relevant international E&S standards

Apollo Agriculture’s E&S Policy and ESMS shall be guided by the international standards and exclusion lists listed in the section below. This list will be expanded in the future as Apollo’s activities expand and resource availability increases.

Topics	International conventions, standards, and protocols
<b>Cross-cutting E&amp;S Guidelines</b>	<ul style="list-style-type: none"> <li>● IFC Performance Standard 1 - Assessment and Management of Environmental and Social Risks and Impacts<sup>5</sup></li> <li>● The UN Global Compact<sup>6</sup></li> </ul>
<b>Environmental, Health &amp; Safety Guidelines</b>	<ul style="list-style-type: none"> <li>● IFC EHS Guidelines<sup>7</sup></li> <li>● IFC EHS industry sector guidelines e.g. annual and plantation cropping, livestock production<sup>8</sup></li> <li>● UN Framework Convention on Climate Change<sup>9</sup></li> <li>● The 2004 Stockholm Convention on Persistent Organic Pollutants<sup>10</sup></li> <li>● The 1992 Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal<sup>11</sup></li> <li>● The 1999 Montreal Protocol on Substances that Deplete the Ozone Layer<sup>12</sup></li> </ul>
<b>Social Guidelines</b>	<p><b>Human Rights</b></p> <ul style="list-style-type: none"> <li>● UN Guiding Principles on Business and Human Rights<sup>13</sup></li> </ul> <p><b>Labor Rights</b></p> <ul style="list-style-type: none"> <li>● IFC Performance Standard 2 (Labor and Working Conditions)<sup>14</sup></li> <li>● ILO Conventions: Minimum Age Convention from 1973, Worst Forms of Child Labour Convention from 1999, The Conventions on Freedom of Association and Collective Bargaining; Forced Labour; and Non-Discrimination<sup>15</sup></li> </ul>
<b>Exclusion Lists</b>	<p>Apollo does not directly or indirectly participate in activities listed in:</p> <ul style="list-style-type: none"> <li>● IFC Exclusion List<sup>16</sup></li> <li>● EDFI Exclusion List<sup>17</sup></li> </ul>

<sup>5</sup> [IFC Performance Standard 1](#)

<sup>6</sup> [The Ten Principles of the UN Global Compact](#)

<sup>7</sup> [World Bank Group Environmental, Health, and Safety Guidelines \(EHS Guidelines\)](#)

<sup>8</sup> [Environmental, Health & Safety guidelines - annual crop production](#)

<sup>9</sup> [UN Framework Convention on Climate Change](#)

<sup>10</sup> [The 2004 Stockholm Convention on Persistent Organic Pollutants](#)

<sup>11</sup> [Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal](#)

<sup>12</sup> [Montreal Protocol](#)

<sup>13</sup> [UN Guiding Principles on Business and Human Rights](#)

<sup>14</sup> [IFC Performance Standard 2 \(Labor and Working Conditions\)](#)

<sup>15</sup> [ILO Conventions on Child Labor](#)

<sup>16</sup> [IFC Exclusion List](#)

<sup>17</sup> [EDFI Exclusion List](#)



# E&S Risk Assessment Framework



# APOLLO AGRICULTURE - E&S Risk Framework Assessment

---

## 1. Purpose of the E&S risk framework

Apollo is primarily engaged in providing loans and advisory services to farmers, the sale and purchase of agricultural inputs, and the provision of insurance products (through partners). Apollo is not directly funding or involved in day-to-day farming operations.

Given the nature of its business, E&S risks are assessed at two levels: at the corporate level and at the customer/borrower level.

## 2. E&S risk framework at the corporate level

Risks related to offices and warehouses are addressed in the Emergency & Preparedness Plan.

The majority of Apollo's full time employees (FTEs) work from offices and the risk areas are inherently limited. The Emergency & Preparedness Plan focuses on the prevention of safety incidents and how to manage incidents when they do occur, e.g. fires.

With regard to Apollo warehouses, correct storage of fertilizer is essential to ensure safety and security as well as to reduce the risk of incidents (including the risk of fire or theft). Warehouse safety is also covered in the Emergency & Preparedness Plan and a Material Safety Data Sheet (MSDS) for hazardous chemicals is maintained by the Warehouse Manager and the Sustainability Manager.

Furthermore, Apollo Agriculture has all the following documented policies to ensure robust business integrity practices:

- Anti-bribery & Anti-corruption policy (ABC)
- Financial Policies including an Anti-Money Laundering policy
- Code of Conduct
- Employee handbook
- Safeguarding policy
- Sexual harassment policy
- Whistleblowing policy
- Third-Party Due Diligence Policy
- Data Protection policies (including customer privacy policy, employee privacy policy & data protection policy)

## 3. E&S risk framework at the borrowers' level

High E&S risks are identified at the customer/borrower level because of the sector of activity. Apollo has built an internal risk assessment framework, toolkit and procedures aligned with IFC categorization methodology which includes the following steps:

1. Review transactions against the IFC/EDFI Exclusion List



2. Review National E&S laws and regulations
3. Review IFC E&S risks assessment based on sector and country
4. Describe an E&S Risk Scoring Framework and Rationale specific to Apollo's current business and future roadmap
5. Obtain a blended average risk score for a particular period

Based on our self-assessment of the E&S risks and impact, we would place Apollo in **Category FI-3** in the IFC categorization, which corresponds to the existing or proposed portfolio that includes financial exposure to business activities that predominantly have minimal or no adverse environmental or social impacts.

The rationale behind the risk Category FI-3 is the following:

- Apollo's role is primarily limited to financial intermediation of the sale and purchase of inputs, providing advisory and insurance. Apollo is not directly funding or involved in the production activities or day-to-day farming operations. Therefore Apollo's direct or indirect influence over several of E&S risk areas is inherently limited.
- Business model: Providing financing for agricultural inputs and allied products to small-scale farmers
- Sector: 100% of the loans to small-scale farmers
- Geography: 95% Kenya with regional distribution covering Central and Western Kenya; rest in Zambia
- Loan size and duration: Average loan size is <\$100 with an average tenor of <12 months
- Type of financing: 100% unsecured loans
- Concentration: a single borrower concentration of below 0.001%; 100% sector concentration in agriculture and >95% geographic concentration (with in-country regional diversification)





# Emergency Preparedness and Response Plan



## Emergency Preparedness and Response Plan

---

The management of Apollo Agriculture is committed to the health and safety of its employees, contractors, sub-contractors, visitors and anyone involved in its operations. We are committed to continuing improvement toward an accident-free workplace through effective administration, education, and training.

### Applicability and Scope

The Emergency Preparedness and Response Plan is in place to address (i) the contingencies that could affect personnel and facilities (ii) the need to protect the health and safety of workers and (iii) the need to protect the health and safety of the affected communities. This plan may be consulted when responding to any type of emergencies. The company empowers employees to use good judgment when encountering a situation that has not been addressed in this plan.

### Personnel Roles and Responsibilities

The roles and responsibilities as well as delegation are listed in the matrix below. The personnel responsible for the response/activity shall be identified and communicated periodically.

- Emergency responders: Local emergency, police and/or fire services (see appendix below for phone numbers)
- Level 1 responders: First aid coordinators
- Level 2 responders: Level 1 responders to escalate to list of Slack channels and/or heads of departments

Identified personnel shall also be responsible for communication of this plan to all employees and for periodic review and updating of the plan.

### Emergency Communications

During an emergency, any or all of the following means of communication and methods will be used.

- In order of priority:
  - Cell phone or Whatsapp calls(possible outages during an emergency)
  - Slack messages
  - Emails
- Emergency Sirens (if available)

### Emergency Preparedness and Response Procedures

Apollo Agriculture's operations bring benefits to communities, including employment, services and opportunities for economic development. However, it can also increase the potential for community



exposure to risks and impacts such as the release of hazardous materials during its operations, a fire, utility failure, and community emergency. Employees are advised to follow the following procedures / principles to prepare and respond to an emergency:

- In case of imminent danger to life or safety, evacuate the premises safely through the nearest exit
- Contact Emergency Responder(s) in the case of a fire event or a serious medical emergency
- Inform Level 1 Responders immediately including first aid coordinators to assist with the evacuation and/or to coordinate escalation and communication
- Level 1 and Level 2 Responders to escalate promptly as per matrix above. When in doubt, employees are encouraged to over-communicate. Use of Slack is preferred for instant dissemination of information
- In cases of rented, shared or co-working facilities, Apollo employees will follow emergency procedures prescribed by the facility manager/owner.
- In the event of extended service outages caused by factors beyond our control (e.g., natural disasters, man-made events), employees will refer to Business Continuity and Disaster Recovery Procedure. This policy applies to Apollo's IT systems and is available

to all employees and introduces procedures for maintaining the continuity of critical IT services to ensure that our customers and agents on the ground continue to be served.

- In the event of an emergency impacting local communities where Apollo operates (either directly or indirectly), employees are encouraged to follow aforementioned emergency response procedures and resources. In addition, the company may engage with those affected and establish an ongoing stakeholder engagement plan, including an emergency preparedness, and response plan commensurate with the scale of operations.
- Relevant trained staff members shall coordinate hazardous material spill control in the warehouse. A material Safety Data Sheet for all hazardous chemicals shall be maintained by the identified staff members and shall be posted in company locations.

## Training

The success of this plan necessitates that the company maintains a constant state of readiness. This is accomplished through carefully planned and continuous training i.e., schedule of training and drills, including with local emergency response services (firefighters), clear identification of evacuation routes, and meeting points. The training will be conducted by or in consultation with qualified local agencies.

The content of the trainings are expected to include the following (but not limited to):

- All staff shall be instructed how to safely shut off machinery (if relevant or possible)
- All employees shall be made aware of the fire alarm system and evacuation procedures
- All employees shall be made familiar with emergency exits in the buildings (where required) and



evacuation routes posted by each exit.

- All employees shall be instructed to evacuate the building in an orderly manner immediately whenever the alarm is sounded or whenever they are instructed to evacuate the building and shall be informed of the designated gathering areas.
- Assisting the evacuation team where possible.
- Orientation and assistance for new employees and visitors
- Instruction on the safe use of hazardous materials (if any) for relevant personnel

## **Appendix**

### Emergency Responders

- Nairobi office
  - Emergency/fire service: 999
  - Police service: 999 / 112 / 911
- Amsterdam office:
  - 112 is the emergency number for fire, police and ambulance

First Aid Coordinators : Identified staff members (updated and communicated periodically)



# External Communication & Grievance Mechanism



# External Communication and Grievance Mechanism

---

## 1- Purpose

The Public Grievance Mechanism is a non-judicial mechanism by which Apollo Agriculture aims to ensure fair, timely, and objective resolution of an external grievance. It provides a platform for individuals and organizations to submit a grievance if they feel they have been negatively affected by Apollo Agriculture's activities.

The method of doing so is highlighted below.

## 2- Scope

The Public Grievance Mechanism procedure applies to all **external stakeholders** of Apollo Agriculture's operations. Apollo Agriculture has a separate Consumer Complaints Mechanism for customers.

The following criteria must be met before the grievance will be accepted:

1. A statement about a perceived or real wrong or unfair treatment for which Apollo Agriculture is held responsible and;
2. Factual and evidence-based grievance.

## 3- Grievance reporting channel

The grievance can be submitted electronically by using the online portal:

<https://www.apolloagriculture.com/grievances>.

The complainant must make sure that the details of the complaint (please refer to section 2 for further details) with supporting facts and evidence are provided to ensure prompt handling of the complaint.

Providing identity and contact details is optional. The grievant has the option to make an anonymous complaint.

## 4 - Confidentiality and data protection

Apollo Agriculture will take the necessary steps to protect the sensitive and personal information of the grievant. A grievant's personal details will only be made available to Apollo Agriculture employees involved in the grievance process. The protections of confidentiality and, where permitted, anonymity are provided through our website page.



## **5- Process**

Grievances shall be dealt with as follows:

### **Step1: Acknowledgement**

Written confirmation of receipt of the comment/complaint is sent in a timely manner.

### **Step 2: Record**

Complaints will be directed first to [grievance@apolloagriculture.com](mailto:grievance@apolloagriculture.com) (“Grievance Email ID”). Electronic record of the grievance, including relevant documents shall be maintained in Apollo’s email/IT systems.

A confirmation of receipt shall be provided electronically.

### **Step 3: Assessment**

The Grievance Email ID shall be monitored by at least 3 senior management members among those listed and updated from time to time.

Based on the nature of the complaint, the recipient(s) shall share the relevant information internally with relevant department leads to investigate the grievance.

### **Step 4: Investigation**

Within 14 business days of the date the grievance is received, Apollo Agriculture will take appropriate measures to investigate the complaint by an internal team assigned to this task. Depending on the seriousness of the complaint and feasibility, the investigation may include meetings with the complainant and other stakeholders and review of relevant documents. Where relevant, actions or decisions will be documented electronically.

### **Step 5: Resolution and communication**

Apollo Agriculture will formally advise the grievant in writing, with details of the resolution or actions, via email (where possible and required) within 30 business days of receipt of the complaint

### **Step 6: Monitoring and evaluation**



Apollo Agriculture will maintain an electronic tracking system for received complaints that allows periodic analysis to improve the company's internal processes and systems.

References:

UNCTAD-World Bank. Grievance redress mechanisms. Knowledge into Action Note Series 19.  
<https://www.worldbank.org/en/topic/agriculture/publication/responsible-agricultural-investment>