

Jive Asset Gestão de Recursos Ltda.
Jive Investments Consultoria Ltda.

Environmental & Social Management System

Environmental & Social Investment Policy

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1. Introduction

Jive is an integrated platform focused on the origination, acquisition and recovery of non-performing loans, and other distressed assets. Nowadays Jive Asset acts as an independent manager of structured funds, especially investment funds in credit rights and real estate funds (“Funds”). Considering the investment policy of the Funds, which includes, among other assets, court-order debts, credit rights, non-performing corporate credits, real estate assets and stressed properties, the guidelines defined below consider that the Funds are not credit/loan originators, but creditors, having no control or interference over business practices of debtors of credits acquired by the Funds (“Debtor(s)”)¹.

With regard to Real Estate Assets acquired by the Funds, regardless of the method of acquisition or payment, the focus of the environmental & social risk assessment will be the property and not the seller, with which no direct partnership, investment or granting of credit relationship will be established.

In the event the scope of Jive’s activities suffers material changes, the Environmental & Social Risk Management System shall be reviewed and adjusted to reflect the risks associated with its new form of operation.¹

In the event of Real Estate Asset acquisition pending the contracting of labor to complete engineering works, the environmental & social risk of the civil construction of the Real Estate Asset shall be verified, in the case indicated in the Valuation Table shown in item 5.2 below.

2. The Environmental & Social Management System

The Environmental & Social Management System (ESMS) details the policy, procedures as well as the flow to be followed by Jive to assess potential investments to be made by the Funds in Private Credit Assets and Real Estate Assets (as defined below – collectively hereinafter referred to simply as “Asset(s)”), including their subsequent monitoring.

The information used by Jive to evaluate investments based on this Environmental & Social Management System will be the same collected by Jive in the pricing procedure for a given Asset (usually provided by the assignor or seller of the Asset to be acquired), according to the Pricing Manual, as Jive will not have direct access to debtors given the scope of its operations, acquiring

¹ In case the company changes its strategy, investing in assets in operation with shareholding control, the practices described in this document will be updated to incorporate applicable environmental & social risk assessment practices as a requirement for new acquisitions with this profile. This review procedure will be carried out respecting the contractual obligations signed between Jive Investimentos and its investors.

only Assets, as defined above.

In addition to this policy, Jive always operates based on best market practices, in accordance with the national legislation (Brazilian Civil Code) and applicable international good practices (IFC Performance Standards).

The actions provided for in this document will be adopted by Jive's directors, employees, trainees and some service providers ("Employees"), especially those allocated to activities related to investment decision and assets recovery, establishing rules and guidelines for managing environmental and social risks.

All activities performed by the Employees must be guided by the guidelines and procedures of this policy. The Investment and Divestment Committees must observe the guidelines of this policy to approve the investments and divestments submitted to them.

To ensure that Jive's practices are aligned with the application of this policy, all Jive investment decisions related to the Assets must comply with this policy, considering:

- The list of excluded activities provided for in EXHIBIT I ("Excluded Activities")
- The list of applicable Brazilian legislation, whose main standards are described in EXHIBIT II ("Applicable Law");²
- The evaluation questionnaire developed based on the IFC Performance Standards³ set out in EXHIBIT III ("Questionnaire"), as applicable.

The list of Excluded Activities, the Applicable Legislation and the Questionnaire must guide the investment decisions in the Assets as defined in the following chapter.

3. Applicability

The Environmental & Social Management System application is exclusive to Private Credit Assets and Real Estate Assets (as defined below).

The following Private Credit Asset Debtors are not subject to the environmental and social risk

²The applicable laws listed may suffer updates according to the progress of the legal landmark.

³IFC Performance Standards :

https://www.ifc.org/wps/wcm/connect/Topics_Ext_Content/IFC_External_Corporate_Site/Sustainability-At-IFC/Policies-Standards/Performance-Standards

assessment of the current Policy: i) those who do not have an associated economic activity (credit rights and other assets without any associated economic activity) or whose operation is interrupted without the possibility of returning to activity; and/or ii) those whose assets are associated with individuals.

The properties linked to Private Credit Assets, either as collateral, or as a result of the effort to recover such Private Credit Assets (via judicial expropriation, payment in kind, or others), and allocated in the Credit Right Investment Funds (FIDCs) portfolios, will follow the environmental & social risk assessment proposed for Private Credit Assets.

The following assets are excluded from the environmental and social risk assessment of this Policy, even if present in the investment routine of the Funds:

- Court-ordered debts: payment orders arising from a final and unappealable judicial decision before a public entity, whose performance will depend on the payment of that credit in the budgetary law of the respective entity.
- Rights: rights with expectation of future payment orders, as they are still in the legal/procedural discussion phase before a public entity.
- Consortium Quotas: debts or obligations of individuals or legal entities under private law within a consortium group, corresponding to an ideal fraction, without any association with an economic activity.

3.1. New Products

New types of assets that may be acquired by the Funds shall be evaluated in order to define the applicable environmental & social risk assessment criteria and provided for in this policy. Such evaluation includes the issuance of an opinion of the Environmental & Social Officer (who may or may not contract third parties to assist it), pointing out the appropriate assessment procedure for New Products. If the opinion provides for the need to apply the Environmental & Social Management System to New Products, this policy shall be updated within 30 (thirty) days.

4. Procedures for Socio and Environmental Risk Assessment

Based on the types of Assets (Private or Real Estate Credit) and its method of acquisition (Single Names, Portfolio, Single Asset or Real Estate Portfolio), as well as its unit acquisition amount, Jive will make the best efforts for risk assessment of applicable environmental & social factors, based on the table below and considering that the applicable Brazilian legislation will always be complied with in

all Jive operations (“Evaluation Table”):

Type of Acquisition	Unit acquisition amount (R\$ MM)	Exclusion List	Questionnaire
Portfolio	< R\$ 2.75 mm	Best Efforts	N/A ³
Portfolio	> R\$ 2.75 mm – R\$ 27.5 mm	Yes	Best efforts, if applicable
Portfolio	> R\$ 27.5 mm	Yes	Sim
Single Name	< R\$ 2.75 mm	Yes	N/A
Single Name	> R\$ 2.75 mm - R\$ 27.5 mm	Yes	Best efforts, if applicable
Single Name	> R\$ 27.5 mm	Yes	Sim
Real Estate Portfolio	< R\$ 2.75 mm	N/A	N/A
Real Estate Portfolio	> R\$ 2.75 mm – R\$ 27.5 mm	N/A	N/A
Real Estate Portfolio	> R\$ 27.5 mm	N/A	N/A
Single Real Estate Asset	< R\$ 2.75 mm	N/A	N/A
Single Real Estate Asset	> R\$ 2.75 mm - R\$ 27.5 mm	N/A	N/A
Single Real Estate Asset under Construction	> R\$ 27.5 mm	N/A	YES, on issues related to civil construction
Single Real Estate Asset	> R\$ 27.5 mm	N/A	SIM

During the Asset valuation procedure with a unit acquisition amount greater than R\$ 27.5 million, according to the procedures and terms defined in item 5 below, Jive will be attentive to the sectorial specificities of the activities carried out by the Private Credit Asset Debtors (or guarantees attached to them) as well as the status of the Real Estate Assets that may represent high environmental & social risk. An Asset will be considered of high environmental & social risk if the recovery or sale of

³ N/A = Not Applicable

such asset, involving its guarantee, comprises one or more of the following events (“High Risk Asset(s)”):

- a) involuntary relocation; or
- b) risk of adverse impacts on indigenous peoples or traditional communities; or
- c) material risks or impacts to the environment, community health and safety, biodiversity, cultural heritage; or
- d) material occupational health and safety risks.

For transactions above R\$ 27.5 million, Jive will use its best efforts for environmental & social assessment based on the Questionnaire, including corrective action plans, when applicable. The responses to the Questionnaire will be obtained by Jive on a best efforts basis, from public, available and accessible sources. For this reason, it is recognized and acceptable that the environmental & social assessment based on the Questionnaire may be limited, without this representing a breach of this policy.

Additionally, for transactions involving High Risk Assets and with amounts above R\$ 27.5 million, it will be necessary to hire an external consultant to assess the risks associated with such an Asset. For transactions involving High Risk Assets, with an amount of less than R\$ 27.5 million, the assessment of environmental and social risks may be carried out internally based on the Questionnaire shown in EXHIBIT III.

For any Asset with a unit amount greater than R\$ 27.5 million, in the event Jive identifies relevant additional risks (considered as medium or high risk based on the criteria indicated above) as a result of the application of the Questionnaire (even if it is not considered a High Risk Asset), it shall hire an external opinion for such an assessment.

5. Procedures and Responsibilities

5.1. Private Credit Assets

“Corporate NPL” or “Private Credit Assets” are financial assets representing debts or obligations of legal entities under private law and securities whose issuers are different from the Federal Government. The Funds invest both in portfolios composed of two or more Private Credit Assets (“Portfolio”), as well as in one or more Private Credit Assets, issued against the same Debtor and acquired from the same assignor, in the same operation (“Single Name”).

The properties attached to Private Credit Assets are included in the environmental & social risk assessment, either as a guarantee or as a result of efforts to recover such assets (via judicial expropriation, donation in payment, or others).

5.1.1. Portfolio

Considering that in the acquisition of a Portfolio there is no possibility of prior selection of the credits to be acquired by the Funds, the identification of the sector of economic activity and practices will be carried out later.

The person responsible for this identification will be the Portfolio manager allocated for the management and recovery of such credits, together with the Governance, Risks and Compliance (“GRC”) team, and the communication about the existence or absence of credits framed in the Excluded Activities (EXHIBIT I) shall be made to the Investment Committee within 90 (ninety) days as of the date of settlement of the Portfolio.

After evaluation, if one or more Private Credit Assets of this Portfolio are included among the Excluded Activities, considering the CNAE code of its corporate purpose and other information available about its practices, this Private Credit Asset will be considered an “Impact Private Credit Asset”. Jive will make continuous efforts to monitor and recover such Impact Private Credit Asset, with the purpose of verifying whether the Debtor of such asset remains in operation and its activity is still among the Excluded Activities. Follow-up shall be carried out through questions directed to the Debtor, media research and/or internal research, under the guidance of the Environmental & Social Officer and the GRC team. Jive will use its best efforts to sell the identified Impact Private Credit Assets on commercially acceptable terms.

Efforts to recover and sell Impact Private Credit Assets shall be documented, and information recorded through manual and/or (preferably) automatic input can be used in the activity management system used by Jive, as defined in Jive’s Information and Cyber Security Policy.

5.1.2. Single Name

In the process of evaluating and acquiring a Single Name, the identification of High Risk Assets or Impact Single Name shall precede the acquisition of the Single Name.

If the economic activity of the Single Name Debtor is included among the Excluded Activities (EXHIBIT I), considering the CNAE code of its corporate purpose and other information available about its practices, such Single Name will be considered an “Impact Single Name”. The acquisition of an Impact Single Name will be discontinued.

This prohibition will not apply to inactive Debtors and to the Single Name that are not associated with the activity included among the Excluded Activities, even if their CNAE shows some connection. If a Debtor is associated with Excluded Activities, but the asset under evaluation (Single Name) has no relation to such activity, the evaluation process shall be documented and the prohibition will not apply.

5.2. Real Estate Assets

Real Estate Assets are properties acquired by the Funds (Real Estate Investment Funds – FIIs), which have a “stressed” component, as defined by the Real Estate Asset Investment and Management Policy. The Funds invest both in portfolios composed of two or more Real Estate Assets (“Real Estate Portfolio”), as well as in a single property, of one or more sellers (“Single Asset”).

Unlike Private Credit Assets, the environmental & social risk assessment of Real Estate Assets will be focused on the asset itself, therefore, the List of Excluded Activities does not apply to such Real Estate Assets.

In the event of the acquisition of real estate assets pending the contracting of labor to complete engineering works, the environmental & social risk of civil construction of the Real Estate Asset with a unit acquisition amount greater than R\$ 27.5 million shall be verified through the application of the Questionnaire .

A Real Estate Asset that needs to contract labor for building and civil engineering works shall be considered ‘under construction’. Real Estate Assets that require minor works, repairs, payment of fees, taxes and/or completion of bureaucratic procedures to obtain the occupancy permit will not be considered under construction.

This definition excludes properties received as collateral of the Private Credit Assets and those expropriated in court or out of court or received in payment from their Debtors. In this case, such properties will receive the same treatment as Private Credit Assets, as provided for above.

5.2.1. Real Estate Portfolio

Considering that in the acquisition of a Real Estate Portfolio there is no possibility to select the properties to be acquired by the Funds, the application of the Valuation Table and the identification of Impact or High Risk Real Estate Assets will be carried out after the acquisition.

An “Impact Real Estate Asset” will be considered to be that Real Estate Asset that is part of the Real Estate Portfolio that is occupied by social movements, traditional communities or indigenous

peoples.

In the event of occupation by social movements, the eviction and repossession or recovery of ownership shall be previously and formally planned, whenever possible in cooperation with the occupants, and accompanied by the Environmental & Social Officer. In the event of occupation by traditional communities and indigenous peoples, eviction shall be carried out based on rules provided for by the Brazilian legislation and Questionnaire.

For the purposes of this policy, social movements are the Movement of Landless Rural Workers (MST) and the Movement of Homeless Workers (MTST) formally and demonstrably established.

For properties occupied by defaulting owners or tenants, the negotiation for the eviction of the property will be made based on the best applicable practices, respecting the occupant's rights and limitations.

The person responsible for the identification of the Impact Real Estate Assets will be the Portfolio manager allocated for management of the Real Estate Portfolio, together with the GRC team, and the communication about the existence or absence of Impact Real Estate Assets shall be made to the Committee within 90 (ninety) days as of the settlement date of the Real Estate Portfolio.

5.2.2. Single Real Estate Asset

In the process of evaluating and acquiring a Single Real Estate Asset, the application of the Valuation Table and the identification of High Risk Assets or Single Impact Assets shall precede the acquisition of the Single Asset.

An "Impact Single Real Estate Asset" will be considered that Single Real Estate Asset that is occupied by social movements, traditional communities or indigenous peoples.

The acquisition of an Impact Single Real Estate Asset is not recommended, unless there is a prior and peaceful agreement to vacate the real estate with these occupants.

The agreement with the occupants of an Impact Single Real Estate Asset shall be submitted to the analysis of the Environmental & Social Officer. The opinion of the Environmental & Social Officer shall be submitted to the Investment Committee as a condition for approval of the investment.

5.3. Assets Recovery

In the process of recovering the Assets acquired by the Funds, when it becomes necessary to obtain

ownership of a property in some form expropriated, given or received in payment, Jive undertakes to carry out eviction and recovery of ownership of such properties based on the best international practices, especially in cases of legal occupations that may be subject to evictions related to mortgage defaults. In this way, Jive requires that its Employees in the recovery activities of the Assets acquired by the Funds, including the properties related to them in some way, and in the relationship with the Debtors, adopt:

- Professionalism, respect, trust and transparency;
- Valuation and respect to the ethical compliance with agreements and contracts; and
- Legality, impersonality, morality and efficiency in all acts practiced;
- The preservation of a relationship based on mutual respect;
- The rejection of contractual provisions that affront or minimize the dignity of Debtors.

Additionally, in any event of recovery or repossession of properties acquired, received in payment or expropriated, as part of the sale, maintenance or rental efforts of the Property, or even as part of the Credit recovery efforts, Jive requires that its Employees:

- Make their best efforts so that the eviction is carried out in a friendly manner;
- Negotiate in a transparent, honest and tolerant manner;
- Allow time for eviction to occur spontaneously.

All recovery or repossession efforts shall be duly documented and submitted to the Environmental & Social Officer whenever requested.

6. Environmental & Social Officer

The Environmental & Social Officer will be indicated in the minutes of the Jive Asset's meeting, for a period of 1 (one) year, with the possibility of extension for equivalent periods. The Environmental & Social Officer may cumulate other functions or boards.

The Environmental & Social Officer will be responsible for:

- Supervising compliance with this policy;

- Expressing its approval or disapproval to the Investment Committee for investments that depend on the fulfillment of previous conditions, in compliance with this policy;
- Providing human and financial resources, as well as assisting in the training of Employees allocated to the investment and credit recovery teams, for knowledge and application of this policy.

Non-compliance with this Policy must be reported by any Employee to the Environmental & Social Officer, who shall submit it to the Executive Committee for deliberation and measures.

7. Effectiveness and Update

The implementation of this Policy is subject to the completion of systemic modifications and adjustments and will be communicated in training to Employees by the GRC team. This policy will be reviewed annually and its amendment shall occur if there is a need to update its content. It may also be amended at any time due to circumstances requiring such action. The updates will be approved by Jive's Executive Committee. In the event the scope of Jive's activities suffer material changes, the Social & Environmental Risk Management System shall be reviewed and adjusted to reflect the risks associated with its new method of operation.⁴

⁴ This review process will be carried out respecting the contractual obligations signed between Jive Inverimentos and its investors.

EXHIBIT I

EXCLUSION LIST

ACTIVITIES	CNAE
Production or trade in any product or activity deemed illegal under host country laws or regulations or international conventions and agreements.	
Production or trade in unbonded asbestos fibers. This does not apply to purchase and use of bonded asbestos cement sheeting where the asbestos content is less than 20%.	899103
Production and trade of mineral coal	
Production or trade in radioactive materials. This does not apply to the purchase of medical equipment, quality control (measurement) equipment and any equipment where IFC considers the radioactive source to be trivial and/or adequately shielded.	725100
Production or trade in weapons and munitions. ⁵	2550101 2550102 3050400 4789009
Production or trade in alcoholic beverages (excluding beer and wine). ⁶	4635403 4635499 4723700 5611202 1111901 1111902 1113501
Drift net fishing in the marine environment using nets in excess of 2.5 km. in length.	311601 311602
Production or activities involving harmful or exploitative forms of forced labor ⁷ /harmful ⁸ child labor.	

⁵ This does not apply to project sponsors who are not substantially involved in these activities. "Not substantially involved" means that the activity concerned is ancillary to a project sponsor's primary operations.

⁶ This does not apply to project sponsors who are not substantially involved in these activities. "Not substantially involved" means that the activity concerned is ancillary to a project sponsor's primary operations.

⁷ Forced labor means all work or service, not voluntarily performed, that is extracted from an individual under threat of force or penalty.

⁸ Harmful child labor means the employment of children that is economically exploitive, or is likely to be hazardous to, or to interfere with, the child's education, or to be harmful to the child's health, or physical, mental, spiritual, moral, or social development.

Commercial logging operations for use in primary tropical moist forest.	220901 220902
Production or trade in tobacco. ⁹	114800 1210700 1220499 4623104 4636201 4636202 1220401 1220402 1220403 4729601
Production or trade in wood or other forestry products other than from sustainably managed forests.	
Gambling, casinos and equivalent enterprises. ¹⁰	9200399

⁹ This does not apply to project sponsors who are not substantially involved in these activities. "Not substantially involved" means that the activity concerned is ancillary to a project sponsor's primary operations.

¹⁰ This does not apply to project sponsors who are not substantially involved in these activities. "Not substantially involved" means that the activity concerned is ancillary to a project sponsor's primary operations.

EXHIBIT II

APPLICABLE LEGISLATION

1. Constitution of the Federative Republic of Brazil, 1988
2. Law No. 10.406/2002: Brazilian Civil Code
3. Law No. 9.613/1998: Provides for crimes of “laundering” or concealment of assets, rights and values (Law on Prevention of Money Laundering)
4. Law No. 6.385/1976: Provides for the securities market and creates the Brazilian Securities and Exchange Commission (CVM)
5. Law No. 12.843/2013 and Decree No. 8.420/2015: Provides for the administrative and civil liability of legal entities for the practice of acts against public administration, national or foreign (Anticorruption Law)
6. Law no. 8.668/1993: Provides for the constitution and tax regime of Real Estate Investment Funds.
7. ICVM 444/2006: Provides for the operation of Non-Standardized Credit Rights Investment Fund
8. ICVM 472/2008: Provides for the establishment, management, operation of Real Estate Investment Funds – FII
9. ICVM 510/2011: Provides for the registration of marketable securities players
10. ICVM 356/2011: Regulates the establishment and operation of investment funds in credit rights and investment funds in quotas of investment funds in credit rights
11. ICVM 555/2014: Provides for the establishment, management, operation and disclosure of investment fund information in general
12. ICVM 558/2015: Provides for the professional practice of managing securities portfolios
13. ICVM 578/2016: Provides for the establishment, operation and management of Equity Investment Funds

EXBITH III

CHECKLIST

The answers of this Checklist will be obtained by Jive in the best effort from public sourcers that are public and accessible. If it weren not possible to obtain some of the answers, the Checklist will be marked as (N/A) without that implying any noncompliance.

Debtors that are non operational legal entities or private individuals will not be exposed to this Checklist.

If a topic do not apply to the Asset that are being evaluated, it is understood that the subtopic also will not apply.

	Applicable? (yes or no)		
PS 1 – ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISK AND IMPACTS			
	YES	NO	N/A
1.1 Does the company have a management system in place to identify the environmental and social impacts and risks of their operations?			
1.2 Does the system identify mitigation and performance measures that address the impacts and risks of their operations? (For example, Quality Assurance; Environmental, Health, Safety & Social, OHS)			
1.3 Does the company establishes and maintains a process for identifying the environmental and social risks and impacts of the project?			
1.4 Does the company have a management program that describes mitigation and performance improvement measures and actions that address the identified environmental and social risks and impacts?			
1.5 Does the company have an organizational structure that define roles, responsibilities, and authority to implement the ESMS?			
EMERGENCIES			
1.6 Does the company indicates the areas where accidents and emergency situations may occur, communities and individuals that may be impacted, response, procedures, provision of equipment and resources, designation of responsibilities?			
1.7 Does the company assist and collaborate with the potentially Affected			

Communities and the local government agencies in their preparations to respond effectively to emergency situation, especially when their participation and collaboration are necessary to ensure effective response?			
1.8 Does the company provides to Affected Communities with access to relevant information on:			
a. The purpose, nature, and scale of the project			
b. The duration of proposed project activities			
c. Any risks to and potential impacts on such communities and relevant mitigation measures			
d. The envisaged stakeholder engagement process			
e. The grievance mechanism.			
1.9 Does the company implements and maintains a procedure for external communications? The procedures are according to the operations of the company?			
a. There is a mechanism that allows the Affected Communities to report and complain?			
b. Does the company have a community involvement process for affected communities?			
c. If applicable, does this process allows free and prior consult for the Affected Communities?			
d. Does the company have a mechanisms of claim for the Affected Communities?			
	Applicable? (yes or no)		
PS 2: LABOR AND WORKING CONDITIONS			
2.1 Does the company adopts and implements human resources policies and procedures appropriate to its size and workforce that set out its approach to managing workers consistent with the requirements of this Performance Standard and national law??			
2.2 Does the company provides workers with documented information that is clear and understandable, regarding their rights under national labor and employment law and any applicable collective agreements, including their rights related to hours of work, wages, overtime, compensation, and benefits upon beginning the working relationship and when any material changes occur?			
2.3 Does the company provides reasonable working conditions and terms of			

employment..			
2.4 Does the company identifies migrant workers and ensures that they are engaged on substantially equivalent terms and conditions to non-migrant workers carrying out similar work?			
2.5 Where accommodation services are provided to workers covered by the scope of this Performance Standard:			
a. Does the company puts in place and implement policies on the quality and management of the accommodation and provision of basic services?			
b. Does the company provides accommodation services in a manner consistent with the principles of non-discrimination and equal opportunity?			
2.6 Does the company have a contention plan to mitigate the adverses impacts of the containment on workers?			
2.7 Does the company ensures that all workers receive notice of dismissal and severance payments mandated by law and collective agreements in a timely manner?			
2.8 Does the company ensure child or forced labor is not used directly, or through contractors or in the supply chain?			
2.9 Does the company check the ages of all employees?			
2.10 Does the company ensure that young workers (15-18 years) are not employed in dangerous work?			
2.11 Does the company commit contractors and suppliers to not use child or forced labor?			
OCCUPATIONAL HEALTH AND SAFETY			
2.12 Does the company provide its workers with a safe and healthy work environment?			
2.13 Does this include providing workers with and mandating that workers use personal protective equipment (PPE)?			
2.14 Has the company taken steps to prevent accidents, injury, and disease by minimizing the causes of hazards?			
2.15 Does the company conduct appropriate monitoring and inspections to ensure worker safety?			
2.16 Does this include monitoring ambient and workplace exposure to noise, and workplace illumination, air quality and temperature as applicable?			
2.17 Does the company track and inform about the rates of injuries, occupational diseases, non-working days, abstentions and the number of workplace fatalities?			

2.18 Does the company track staff turnover?			
2.19 Does the company have training programs in place for workers in occupational health and safety?			
	Applicable? (yes or no)		
PS 3: POLLUTION PREVENTION			
3.1 Has the company ever conducted a cleaner production audit?			
3.2 Do the company's operations incorporate energy efficiency and water conservation measures?			
3.3 Does the company monitor air and water emissions? Is ambient air quality monitored on site?			
3.4 Does the company apply project-specific pollution prevention and control techniques?			
3.5 Does the company track the air and water emissions? The quality of the air and the water are monitored in the work environment?			
3.5 Does the company apply specific techniques of pollution prevention?			
WASTES			
3.5.1 Does the company have procedures for storage, handling, and disposal of solid wastes? Does this include waste management techniques?			
3.5.2 Does the company treat effluents prior to disposal?			
HAZARDOUS MATERIALS MANAGEMENT			
3.6.1 Does the company have procedures for storage, handling and disposal of hazardous materials?			
PESTICIDE USE AND MANAGEMENT			
3.7.1 How are pests monitored and controlled? If pesticides are used:			
a. Is their selection made with the following considerations in mind: low in human toxicity, effective against the target species, known to have minimal effects on non-target species and the environment?			
b. Are the pesticides packaged appropriately and labeled (including directions for safe and appropriate use)?			
c. Have the pesticides been manufactured by an entity licensed by the relevant regulatory agencies?			
d. Are the pesticides handled, stored, applied, and disposed of in accordance with the Food and Agriculture Organization's International Code of Conduct on the Distribution and Use of Pesticides or other good international industry practice?			

e. Are any of the pesticides in use on the World Health Organization Recommended Classification of Pesticides by Hazard Classes I a (extremely hazardous) and I b (highly hazardous); or Class II (moderately hazardous)?			
	Applicable? (yes or no)		
PS4 – COMMUNITY HEALTH, SAFETY AND SECURITY			
4.1 Are there communities in close proximity to the company's facilities?			
4.2 Does the company take community, health and safety considerations into account in the context of its operations?			
4.3 Do its requirements take into account company infrastructure and equipment safety, hazardous material release, transport and disposal considerations, natural resource use and community exposure to disease?			
4.4 Has the company designated contact persons within the organization responsible for receiving and responding to questions, concerns or complaints raised by nearby communities or other stakeholders?			
a. If yes, are the contact details for these persons will be displayed prominently on the company facility signage?			
COMMUNITY EXPOSURE TO DESEASE			
4.5 Does the company avoids or minimizes the potential exposure to water borne, water based, waterrelated, and vector-borne diseases, and communicable diseases that could result from company's activities?			
4.6 Is the company encouraged to explore opportunities during the company's life-cycle to improve environmental conditions that could help minimize their incidence?			
EMERGENCY PREPAREDNESS AND RESPONSE			
4.7 Does the company's emergency preparedness and response plan take into account risks and impacts from project activities to local communities?			
4.7.1 Does this include the requirement to inform affected communities of significant potential hazards in a culturally appropriate manner?			
SECURITY PERSONNEL			
4.8 Does the company engage security personnel to provide security services at their facilities?			
a. If yes, do the contract provisions include guidelines on how security personnel shall interact with communities in close proximity to the facility?			
4.8.1 Are security personnel armed?			
a. If yes, has the company provided training on the appropriate conduct			

towards workers and the nearby communities?			
4.8.2 Have there been any allegations of unlawful and/or abusive acts by security personnel towards workers or nearby communities?			
a. If yes, how were these dealt with by the company?			
	Applicable? (yes or no)		
PD 5: LAND ACQUISITION AND INVOLUNTARY RESE COMPENSATION AND BENEFITS FOR DISPLACED PERSONS			
5.1 Has there been any physical and/or economic displacement and resettlement as a result of land acquisition for this project?			
If yes, provide detailed information with regard to the type of displacement and the displaced persons and communities.			
5.2 Has the company engaged with the displaced persons and communities and/or provided opportunities to derive appropriate development benefits from the project?			
If yes, provide details.			
5.3 Has there been any physical and/or economic displacement and resettlement as a result of land acquisition for this project?			
If yes, provide detailed information with regard to the type of displacement and the displaced persons and communities.			
5.4 Has the company engaged with the displaced persons and communities and/or provided opportunities to derive appropriate development benefits from the project?			
If yes, provide details.			
ECONOMIC DISPLACEMENT			
5.5 Does the company develops a Livelihood Restoration Plan to compensate affected persons and/or communities and offer other assistance that meet the objectives of this Performance Standard?			
5.6 Does the company supports, as necessary to all economically displaced persons, based on a reasonable estimate of the time required to restore their income-earning capacity, production levels, and standards of living?			
	Applicable? (yes or no)		
PD 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1 Has the company identified and addressed the impacts on biodiversity as			

part of their operations?			
a. In the case of natural habitat, has the company considered alternatives and adequately mitigated any potential degradation?			
b. In the case of critical habitat, has the company suitably determined that there will be no measurable adverse impact on species or habitat?			
NATURAL HABITAT			
6.2 Does the company avoids impacts on biodiversity through the identification and protection of set asides?			
6.3 Does the company Implements measures to minimize habitat fragmentation, such as biological corridors?			
6.4 The company restores habitats during operations and/or after operations?			
6.5 Does the company Implements biodiversity offsets?			
	Applicable? (yes or no)		
PD 7: INDIGENOUS PEOPLES			
AVOIDANCE OF ADVERSE IMPACTS PARTICIPATION AND CONSENT			
7.1 Is it likely that Indigenous Peoples (IPs) will be adversely impact as a result of the project's operations?			
Does the ESIA conducted by the company identify the adverse impacts to IPs and identify ways to avoid these where possible?			
7.2 There is impact in the land and in the natural resources of tradicional property or tradicional use?			
7.3 Has the company informed IPs of their rights according to national laws including those recognizing traditional/customary rights?			
7.4 Has the company offered at least compensation and due process to those with full legal title to land together with culturally appropriate development opportunities			
7.5 Has the company provided land-based compensation or compensation-in-kind in lieu of cash compensation where feasible?			
7.6 Has the company entered in good faith negotiations with affected communities and documented their informed participation and the successful outcome?			
	Applicable? (yes or no)		
PS 8: CULTURAL HERITAGE			

8.1 Is the project located in an area where cultural heritage is expected to be found?			
8.3 Is it possible that the project may affect cultural heritage or has critical cultural heritage been identified where significant damage is unavoidable?			
If yes, has the company complied with the requirements of PS 8?			
8.4 Is the project located in a legally protected area or a legally defined buffer zone?			
If yes, has the company complied with the requirements of PS 8?			

EXHIBIT IV

FORM OF ANNUAL E&S REPORT

E&S PERFORMANCE REPORT

Environmental and Social Performance Report for Distressed Asset Management Company

This report is to be completed by the Sponsor that retains the overall responsibilities for environmental and social risk management of non-performing loan pools.

Name of Organization:			
Completed by (name):			
Position in organisation:			
Report Completion Date:			
Reporting period:	From:		To:

1. Portfolio Information

1.1. Assets Under Management (one chart per pool)

	Asset Type	Total Exposure Outstanding at the FY end (US\$)	Average Unpaid Principle Balance (US\$)
Real Estate Assets	Single Asset		
	Real Estate Portfolio		
Private Credit Assets	Single Name		
	Portfolio		
Other Assets	Rights		
	Court-ordered debts		
	Consortium Quotas		
	Other Assets		

1.2. Portfolio Details of Large Assets

Please provide information as requested below of all assets with unpaid principle balance of US\$ 1 million or larger [or top 100 assets].

Pool #	Company/ Project Name	Type of Loan	Operating Status	Value of Exposure	Industry Sector/	E&S comments
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		(large corporate/ SME/ retail)		(US\$ millions)	Business Description	(i) environmental and social risks identified (ii) mitigation measures taken if any (iii) update from previous reporting period

2. Environmental & Social Management System (ESMS)

Policies & Processes	Yes/No	Description
Has Jive's investment mandate been expanded?		If yes, describe the impacts of this policy.
There has been new products added to the investment portfolio?		If yes, describe if they will be submitted to the Risk Management of this policy.
Have your company and your servicer companies developed and implemented an ESMS?		<<Please attach copies of your company's ESMS and (samples of) your servicer companies' ESMS.>>
If there are ESMSs already in place, have there been any updates to these ESMSs or policy and procedures adopted by your company or your servicers during the last year/reporting period?		<<If yes, please describe these updates and provide a copy/copies of the updated ESMSs including dates and reasons for the same.>>
Has senior management signed off on the updated ESMSs or policy and procedures?		<<Please provide the internal communication indicating the same and the date of the communication.>>
Process and Implementation	Yes/No	Description
How did you assess and ensure that the debtors were in compliance with the national laws and regulations and the IFC Exclusion List (and where applicable, IFC Performance Standards), at the time of NPL (pool) acquisition?		<<Please describe the procedures to ensure the compliance.>>
How did you and/or your servicer(s) assess and ensure ongoing compliance of the debtors with national regulation and IFC Exclusion List (and where applicable, IFC Performance Standards)?		<<Please describe the procedures to ensure the ongoing compliance.>>
Have your and/or your servicer(s) visited any debtors to monitor their environmental and		<<If yes, please describe these site visits, for example, what typical E&S issues or concerns would trigger the E&S

social performance? How did you or your servicers record the findings of the visits?		visits? How often did these situations occur? How were these E&S issues discussed and resolved with the debtors? Provide a few examples.>>
Did you and/or your servicers require the debtors to report on any material social and environmental issues such as accidents/ litigation/ complaints/ regulatory notices and fines? And, were you actually notified of any such issues?		<<Please provide the details or copies of supporting documents, if they are not described in the portfolio tables above.>>
Have there been any incidents of non-compliance with the E&S Requirements?		<<If yes, have there been any measures that the debtors agree to take to address such incidents?>>
Have any assets been disposed on environmental, health, safety or social grounds during the reporting period?		<<Please give reasons and details of any assets disposed.>>
Have you and/or your servicers faced any difficulties and/or constraints related to the implementation of the social and environmental procedures?		<<Please describe the difficulties and/or constraints.>>
Capacity	Yes/No	Description
Has your company designated Environmental Officer(s) who has the overall responsibility for the implementation of the ESMS?		Env. Officer Name: Env. Officer Contact Info: E&S training and learning experience:
Has the staff in your company been trained on the environmental and social due diligence and monitoring procedures?		# trained during this fiscal year: # trained total:
Have your servicers designated Environmental Officers to be responsible for the implementation of their ESMS? Have your servicers trained their staff on their ESMS?		<<If yes, how did you know?>>
Monitoring and Reporting	Yes/No	Description
Is there an internal process in your company to report on environmental and social issues to Senior management?		<<Please explain the process and the actions taken during the reporting period.>>
How do you monitor your servicers' environmental and social performance?		<<Please describe the reporting requirements and measurement indicators you have with your servicers.>>
<ul style="list-style-type: none"> Do you prepare any environmental and social reports: - For other MLAs 		<<Please provide copies of these reports.>>

<ul style="list-style-type: none"> - Other stakeholders - S&E reporting in the Annual Report • Sustainability reports 		
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