

## Environmental and Social Policy

### Nabni-B4P Facility's Partners

Grantee/Lead Organization	Kurdistan Organization for Human Rights Watch
Sub-Grantees	Accepting Others Organization (AOO) & Peace and Freedom Organization (PFO)



The KOHRW, AOO and PFO recognizes that all activities funded by Nabni Facility are in compliance with the environmental and social requirements stated in the applicable requirements of the Accountable Grant Agreement (AGA) for Co-Design and Implementation Phases, as well as the applicable local, provincial and national laws on environment, health, safety and social issues.

The E&S guiding principles of KOHRW, AOO and PFO Policy are as follows:

- Avoid, reduce or limit negative environmental, social and climate impacts and improve the E&S benefits of Nabni's interventions;
- Support the preservation and protection of biodiversity and sustainably manage natural resources;
- Avoid negative impacts on the living conditions, livelihoods and land tenure of communities;
- Ensure the health and safety at work of employees and workers under Nabni's interventions;
- Ensure the compliance to national labour laws and Nabni's Labour Management Procedures (LMP); and
- Comply with all relevant environmental and social as well as land acquisition policies of national laws and applicable international standards.

The KOHRW, AOO and PFO continually endeavors to ensure effective environmental and social management practices in all its activities, products and services with a special focus on the following:

- Implement Labour Management Procedures (LMP) in compliance with Nabni's LMP and National Labour Legislations (NLL);
- Implement effective Grievance Redress Mechanism (GRM) and Stakeholder Engagement Procedures (SEP) in compliance with Nabni's GRM Guideline and SEP;
- Screen all activities funded by Nabni Facility against Nabni's Exclusion List;
- Take informed grant-award decisions based on robust and E&S screening and categorization;
- Implement the E&S measures outlined in the safeguard instruments to deliver the commitments under this Policy and to monitor compliance with this Policy and periodically report to Nabni's on compliance status;
- Clearly define roles and responsibilities of implementation of the E&S activities across KOHRW, AOO and PFO:
- Have measures in place to monitor compliance with all relevant national E&S laws and regulations;
- Develop and improve institutional capacity to understand, assess and manage E&S impacts and risks associated with Nabni's interventions; and
- Communicate this policy with employees, and other external stakeholders.

This Policy will be communicated to all staff and operational employees of the KOHRW, AOO and PFO.

Signed

Hoshyar Mafo



Effective Date

20-5-2025