

Crop Trust Policy for Engaging with the Private Sector and for Accepting Donations

Adopted	15 th June 2018
Adopting Body	Executive Secretary
Last Updated	6 th February 2025

1. Preamble

The Crop Trust is an autonomous international fund established under international law pursuing its objective to ensure the long-term conservation and availability of plant genetic resources for food and agriculture with a view to achieving global food security and sustainable agriculture. For this objective, in accordance with its Constitution, the Crop Trust has established an endowment fund to provide guaranteed long-term grants to support the maintenance of eligible collections of plant genetic resources for food and agriculture that meet agreed standards of management and availability of the genetic resources, related information, knowledge and technologies, and to cover operating expenses and other expenses incidental thereto.

As per its Constitution, the Crop Trust shall seek to raise, from governments, corporations, foundations, trusts and others, including individuals, adequate funds, including endowment funds, for the achievement of its objective. The Crop Trust recognizes that importance of the private sector in achieving its mission of establishing a cost-effective, rational and global system for the conservation of crop diversity supported by long-term and sustainable funding.

The Crop Trust believes that the private sector can contribute to the mission of the Crop Trust by, for instance, providing access to new and innovative sources of financing and communication while also providing a business case for safeguarding crop diversity. The Crop Trust recognizes the important role companies and individuals can play in safeguarding crop diversity in the long term and making it available for use. It aims to work with companies as they seek to become more environmentally sustainable and take bold steps toward sustainability that benefit plants, people and our planet.

For the reasons described above, the Crop Trust adheres to the internationally accepted principles and standards on due diligence. This Policy is developed to be in line with the due diligence policies of the United Nations and, where necessary, tailored to the specific risks potentially encountered by the Crop Trust.

1. Scope of Application

This Policy applies to partnerships between Crop Trust and entities from the Private Sector, as well as to donations made by natural persons, including to those made through the Crop Trust website.

2. Definitions

For the purposes of this Policy”;

“Donors” means all types of donors of the Crop Trust;

“Donations” means monetary donations made to the Crop Trust, including those made through the Crop Trust website;

“Partnership” means a voluntary and collaborative agreement, in-kind contributions made to the Crop Trust or arrangement between the Crop Trust and the Private Sector, in which all participants agree to work together to achieve a common purpose or undertake a specific task and to coordinate their respective responsibilities, resources, and benefits;

“Private Sector” includes for-profit and commercial enterprises or businesses of any size; business associations, coalitions and alliances (such as chambers of commerce, employers’ associations, cooperatives, industry and cross-industry initiatives, etc.)¹; corporate foundations; private foundations² and state owned enterprises.

3. General Principles for Engaging with the Private Sector

With a view to reducing the risk of damage to the Crop Trust’s reputation as a result of working with businesses, any interaction between the Crop Trust and the Private Sector should be:

¹ For the purposes of this Policy, business associations, coalitions and alliances shall be assessed on their own merits, rather than the merits of their members.

² Private foundations are independent grant-making organizations that are typically established and controlled by an individual, family or corporation and derive much of their support from a small number of sources and from investment income.

- 3.1 relevant to the Crop Trust's mission to empower the Crop Trust to implement its programmes.
- 3.2 consistent with the Crop Trust's Constitution, policies and all relevant rules of the Crop Trust.
- 3.3 advancing the goals of the Crop Trust: The Partnership needs to be articulated clearly and must advance the aims, activities and purposes of the Crop Trust including its efforts to advance the United Nations' Sustainable Development Goals.
- 3.4 securing adequate partner(s): The Crop Trust is interested in working with Private Sector entities that share its values, including internationally recognized principles concerning human rights, labour, the environment and anti-corruption and other rules and principles as reflected in relevant UN regulations and resolutions including, but not limited to the United Nations Global Compact and the United Nations Guiding Principles on Business and Human Rights.
- 3.5 effective and results-based with measurable outputs and outcomes.
- 3.6 ensuring no unfair advantage: Partnerships should not provide exclusivity in collaboration or imply endorsement or preference of a particular business sector entity or its products or services.
- 3.7 delineating clear responsibilities and roles by developing a clear roadmap that identifies and clarifies each partner's roles and responsibilities. Each Partnerships should be implemented only pursuant to a formal written agreement between the Private Sector entity and the Crop Trust, in accordance with the applicable Crop Trust rules and regulations.
- 3.8 efficient in the use of Crop Trust resources as compared to alternative actions.
- 3.9 transparent in the sense of ensuring public access to information, while respecting individual privacy and institutional confidentiality, as appropriate. Subject to the rules and regulations governing each party, this information should include disclosure of the partners, contributions, and matching funds for all relevant Partnerships.
- 3.10 respecting the autonomy of the Crop Trust in all matters relating to the operation of the Crop Trust and ensuring independence of the Crop Trust from the Private Sector.

3.11 building on commitment at the highest level within the Private Sector entity – including to sustainable development and social and environmental best practices.

3.12 Nothing in a Partnership should be deemed to establish either the Crop Trust or the partner as the agent of the other party or create a legal partnership or joint venture between the parties. Neither party has power to bind the other party to any specific course of action without that party's consent, or to contract in the name of the other party, or to create a liability against the other in any manner whatsoever.

4. Due Diligence Levels

4.1 Level 1: Exclusionary Criteria (L1)

4.1.1 Table 1 below demonstrates the exclusionary criteria of the Crop Trust and sets the minimum standards for engagement with the Private Sector whether as the main entity, subsidiary, parent company, distributor or supplier (including those of a corporate foundation's founding or host company). In cases where sufficient convincing evidence of a Private Sector entity's involvement in any of the activities listed in the exclusionary criteria is found, they will not be engaged with unless the Executive Board decides otherwise as per Clause 5.2.1 hereunder.

4.1.2 In cases where there is sufficient evidence of direct involvement in an exclusionary criterion where, according to the Table 1 below, the decision should be escalated to the Executive Secretary, the decision on whether or not to engage with the potential partner lies with the Executive Secretary of the Crop Trust.

TABLE 1: Exclusionary Criteria

	Type of Involvement Crop Trust's Exclusionary Criteria	Direct involvement of the potential partner in exclusionary criteria	Indirect involvement of the potential partner in exclusionary criteria through a subsidiary	Indirect involvement of a potential partner in exclusionary criteria through the parent company	Indirect involvement of a potential partner in exclusionary criteria through potential partner distribution / supply chain ³
1.	Manufacture, sale or distribution of controversial weapons or their components, including cluster bombs, anti-personnel mines, biological or chemical weapons or nuclear weapons	No engagement	No engagement	No engagement	No engagement
2.	Manufacture, sale or distribution of armaments and/or weapons or their components, including military supplies and equipment	No engagement if >5% of annual revenues of the company is derived from armaments	No engagement if potential partner owns >20% of subsidiary and sales revenues of subsidiary are >5% of total annual revenues	No engagement if parent company owns >20% of potential partner and its sales revenues are >5% of total annual revenues	No engagement if sales revenues from armaments are > 5% of total revenues

³ The potential partner company has no ownership of the distributor or supplier.

3.	Replica weapons marketed to children	No engagement if >10% of annual revenues are derived from toy / replica weapons.	No engagement if potential partner owns >20% of subsidiary and sales revenues of subsidiary are >10% of total annual revenues	No engagement if parent company owns >20% of potential partner and its sales revenues are >10% of total annual revenues	No engagement if >10% of annual revenues are derived from toy / replica weapons.
4.	Manufacture, sale or distribution of tobacco or tobacco products	No engagement with manufacturers No engagement with retail companies if sales revenues from tobacco products are >5% of total revenues	No engagement	No engagement	N/A
5.	Violations of UN sanctions and the relevant conventions, treaties, and resolutions, and inclusion in UN ineligibility lists; inclusion in EU Sanctions List; Sanctions List of the US Department of the Treasury, Office of Foreign Assets Control (OFAC) or the Sanctions List of the Federal Republic of Germany	No engagement	No engagement	No engagement	No engagement if sales revenues from products produced by companies that fall under this criteria are >10% of total revenues

6.	Involvement in the manufacture, sale and distribution of pornography	No engagement	No engagement if potential partner owns >20% of subsidiary	No engagement if parent company owns >20% of potential partner	No engagement if sales revenues from pornography are >10% of total annual revenues
7.	Manufacture, sale or distribution of substances subject to international bans or phase-outs, and wildlife or products and derivatives obtained illegally or in contravention of CITES. ⁴	No engagement	No engagement if potential partner owns >20% of subsidiary	No engagement if parent company owns >20% of potential partner	No engagement
8.	Gambling including casinos, betting etc. (excluding lotteries with charitable objectives)	No engagement if >20% of annual revenues derived from gambling	No engagement if ownership level is >20%	No engagement if parent company owns >20% of potential partner	N/A
9.	Involvement or complicity ⁵ in systemic or egregious human rights abuses	No engagement	No engagement if potential partner owns >20% of subsidiary	No engagement if parent company owns >20% of potential partner	Special caution should be exercised, and decision escalated to the Executive Secretary if systematic human rights abuses are evident in the supply chain / distribution chain of the potential partner where no action has been taken or planned on the part of the potential partner

⁴ CITES (the Convention on International Trade in Endangered Species of Wild Fauna and Flora) is an international agreement between governments. Its aim is to ensure that international trade in specimens of wild animals and plants does not threaten their survival. <https://www.cites.org>.

⁵ Aiding, abetting, counselling or procuring the commission of an offence by another person.

10.	Use or toleration of forced or compulsory labor	No engagement ¹¹	No engagement if potential partner owns >20% of subsidiary	No engagement if parent company owns >20% of potential partner	Special caution should be exercised, and decision escalated to the Executive Secretary if systematic human rights abuses are evident in the supply chain / distribution chain of the potential partner where no action has been taken or planned on the part of the potential partner
11.	Use or toleration of child labor	No engagement	No engagement if potential partner owns >20% of subsidiary	No engagement if parent company owns >20% of potential partner	Special caution should be exercised, and decision escalated to Executive Secretary if systematic human rights abuses are evident in the supply chain / distribution chain of the potential partner where no action has been taken or planned on the part of the potential partner

4.2 Level 2: Potentially High Risk Sectors (L2)

4.2.1 Table 2 below describes the sectors that are identified as 'Potentially High Risk Sectors'. These are sectors where occurrence of significant controversies is assessed to be high and hence, create either significant or high risk partnership as per Table 2 below in Article 5.

Table 2: Potentially high-risk sectors

Oil and gas Extraction of oil and gas (including oil sands); manufacture of refined petroleum products; transport via pipeline.
Metals and mining Mining (incl. coal, diamonds and other precious and semiprecious stones, metals, uranium, etc.), manufacture of basic iron, steel, non-ferrous metals, precious metals; casting of metals; treatment and coating of metals; quarrying.
Utilities Electric power generation from large dams, nuclear power plants, fossil-fuel power plants (e.g. gas and coal-fired); electric power transmission and distribution; water collection, treatment and supply; sewerage; waste treatment and disposal; materials recovery (recycling).
Large infrastructure Construction of buildings, roads, railways, civil engineering projects; construction or upgrading of large dams, nuclear power plants or pipelines.
Agriculture and fishing Intensive growing of crops in large monocultures, including palm oil (e.g. energy crops for biofuels); large-scale livestock farming and fishing; aquaculture.
Timber, pulp and paper Timber production; logging; sawmilling and planing of wood; production of pulp and paper.
Alcohol Manufacturers of alcoholic beverages, wholesale distributors and importers that deal solely and exclusively in alcohol beverages or whose primary income comes from trade in alcohol beverages. In addition, "alcohol industry" includes associations or other entities representing or funded largely by any of the above, as well as alcohol industry lobbyists.
Chemicals Manufacture of basic chemicals, pharmaceuticals, petrochemicals, agrochemicals, pesticides, fertilizers, plastics, paints, varnishes, coatings, detergents and

toiletries.
Clothing, toys and consumer electronics (risks are due mostly to issues in the supply chain).
Fast food, high sugar drinks and soda
Plant breeding Commercial research, producing, breeding, processing, selling and distributing seeds.

4.3 Level 3: Areas of Potential Controversies (L3)

4.3.1 Level 3 of the due diligence assessment includes obtaining information on the Environmental, Social, and Governance (ESG) performance of the Private Sector entity and identifying any controversies in these areas. This assessment will be used to calculate the risk level that any potential partnership might create for the Crop Trust. The areas of potential ESG controversies are identified in Table 3 below:

Table 3: Areas of potential controversies

Areas of assessment	Examples of issues to look for (including whether policy/management systems are in place)
Responsible leadership	<ul style="list-style-type: none"> <input type="checkbox"/> Poor financial standing <input type="checkbox"/> Any record of breach of overall commitment to sustainability (e.g. UN Global Compact, sustainability-related certifications, sustainability indices etc.) <input type="checkbox"/> Negative brand recognition <input type="checkbox"/> Leading market position in violation of competition laws <input type="checkbox"/> Poor track record of commitment to development and community involvement
Human rights	<ul style="list-style-type: none"> <input type="checkbox"/> Causing or contributing to adverse human rights impacts through business activities <input type="checkbox"/> Complicity in human rights abuses, including in supply chains <input type="checkbox"/> Lack of respect for rights of indigenous people when relevant <input type="checkbox"/> Violation of rights and equal opportunity for all employees regardless of race, color, age, gender, sexual orientation, religion, marital status <input type="checkbox"/> Occupational health and safety issues
Labor	<ul style="list-style-type: none"> <input type="checkbox"/> Discrimination at work, including violations of gender equality <input type="checkbox"/> Violation of freedom of association and the right to collective bargaining <input type="checkbox"/> Occupational health and safety issues

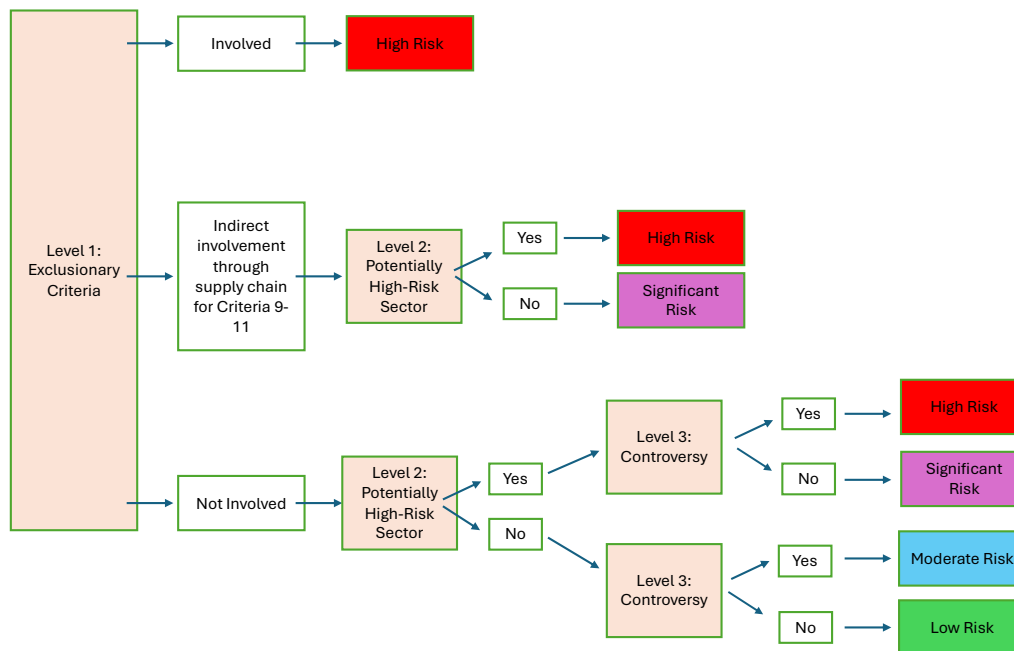
	<input type="checkbox"/> Poor employment conditions
Communities	<input type="checkbox"/> Disregard to community health and safety <input type="checkbox"/> Negative impacts on livelihoods <input type="checkbox"/> Prevention of local participation <input type="checkbox"/> Social discrimination
Environment	<input type="checkbox"/> Pollution (including climate change) <input type="checkbox"/> Negative impact on ecosystems and landscapes <input type="checkbox"/> Overuse of resources <input type="checkbox"/> Poor waste management <input type="checkbox"/> Mistreatment of animals
Governance	<input type="checkbox"/> Corruption <input type="checkbox"/> Fraud <input type="checkbox"/> Tax evasion <input type="checkbox"/> Illicit financial flows, incl money laundering and financing of terrorism
Product-related	<input type="checkbox"/> Product safety. issues <input type="checkbox"/> Controversial products or services <input type="checkbox"/> Marketing of breast milk substitutes contrary to the WHO's International Code of Marketing of Breast-Milk Substitutes. ⁶
Ownership or management	<input type="checkbox"/> Controversies related to the individuals owning or managing the potential partner
Access and Benefit Sharing (for seed companies)	<input type="checkbox"/> Non-compliance with the International Treaty on Plant Genetic Resources for Food and Agriculture and the Convention on Biological Diversity <input type="checkbox"/> Non-sharing of benefits arising out of the use of plant genetic resources for food and agriculture <input type="checkbox"/> Violation of the Standard Material Transfer Agreements (SMTA)

5. Risk Levels

5.1 The due diligence assessment conducted as per Article 4, will determine the risk level a potential Partnership may create for the Crop Trust. The risk levels will be identified based on the risk level scoring diagram in Table 4.

⁶ The WHO's International Code of Marketing of Breast-Milk Substitutes is available at <https://www.who.int/publications/i/item/9241541601>

Table 4: Risk level scoring diagram



5.2 The risk levels will be used to determine what actions will be taken in relation to the potential Private Sector entity.

5.2.1 High risk: No engagement unless otherwise decided by a decision of the Executive Board upon submission of an engagement plan by the Executive Secretary.

5.2.2 Significant risk: Engagement only upon a decision by the Executive Secretary. In cases where the Executive Secretary decides to establish partnership, there should be an engagement plan developed.

5.2.3 Moderate risk: Engagement with an engagement plan

5.2.4 Low risk: Engagement possible

5.3 The engagement plan required for engagement with significant or moderate risks should at minimum, include the following elements:

5.3.1 An analysis justifying how the partnership will have a prevailing benefit for the Crop Trust;

5.3.2 Any types of engagement with the potential Partner that the Crop Trust will refrain from;

5.3.3 How often the due diligence assessment should be repeated. This period should not be more than six months for significant risks and more than one year for moderate risks;

5.3.4 Whether or not any public space will be shared with the partner and if so, what measures will be taken to minimize any reputational risks;

5.3.5 Any other action that will be taken to mitigate the risks.

5.4 Any subsequent due diligence assessments made under Clause 5.3.3 resulting in significant risk levels shall require a decision by the Executive Secretary to “continue engagement” in order for the partnership to proceed.

6. Procedure

6.1 In case of any potential partnership or engagement with a Private Sector entity, the Crop Trust department concerned is required to initiate the due diligence process at the earliest possible stage of the engagement.

6.2 By using the Due Diligence module in the Crop Trust’s ERP system, the Crop Trust department conducting the engagement shall complete the Due Diligence Questionnaire (in Annex 1) to the extent possible and inform the Contracts, Compliance and Risk Management (CCRM) Office for review and assessment.

6.3 The CCRM Office shall review the answers provided, make any necessary corrections and conduct further detailed research to identify any missing issues. Based on the information gathered, the CCRM Office shall develop an assessment based on the criteria governed in Articles 4 and 5 above and concluding whether the potential partner has (1) passed (2) passed with a note or (3) not passed due diligence.

6.4 In cases where an engagement plan needs to be developed, such a plan shall be drafted by the External Affairs Team and approved by the Executive Secretary.

6.5 If the engagement evolves into a contract, the potential Partner will be asked to sign a Declaration of Undertaking prepared by the CCRM Office.

7. General Principles for Accepting Donations

These principles seek to establish a ‘know-your-donor’ framework with a view to reducing legal, financial, and reputational risks that the Crop Trust may encounter. To that end, the Crop Trust shall regularly develop and update its Implementation Plan (Supplement 1) in accordance with the rules and principles set forth hereunder on accepting donations while undertaking donor due diligence.

7.1 Anonymous donations shall not be accepted.

- 7.2 Donations from Private Sector Donors or natural persons who are engaged in activities that fall under any of the exclusionary criteria shall not be accepted and if already received, returned to the sender.
- 7.3 Donations in the amount of USD100,000 or above from Donors shall not be accepted via the online donation tool on the Crop Trust website.
- 7.4 Donations will be subject to a limited due diligence review as per Paragraph 7.5 below if:
 - 7.4.1 they are above USD 1,000 and below USD 100,000, or
 - 7.4.2 there is recurring payment from the same source, or
 - 7.4.3 there is any reason for suspicion, such as unusually large or small amount, the Donation being subject to a condition, any suspicion related to the payment currency or the payment method used, or complex banking transactions.
- 7.5 Provided that Paragraph 7.2 above is complied with, limited due diligence includes:
 - 7.5.1 keeping records of the names and contact information of Donors, as well as the dates, amounts, and payment methods of the Donations for a minimum of ten years following the date of the donation;
 - 7.5.2 monitoring of the Donations every three months.
- 7.6 In cases where the monitoring of donations leads to a reason for substantive suspicion, the Donation shall be subject to an enhanced due diligence review as per Paragraph 7.9 below.
- 7.7 Proposed Donations in the amount of USD100,000 or above shall be subject to an enhanced due diligence review, as per Paragraph 7.9 below, which shall include the conclusion of a risk assessment prior to accepting the Donation.
- 7.8 In the absence of a written contract, Donations amounting to USD100,000 or above shall be accepted upon issuance of an invoice by the Crop Trust to the Donor. Any Donation that is conditional on an undertaking or a commitment on the part of the Crop Trust shall be done through conclusion of a written contract, regardless of the amount of the Donation.

- 7.9 Provided that Paragraph 7.2 above is complied with, enhanced due diligence review shall seek answers to the following questions, as applicable:
- 7.9.1 Who is the Donor and what information do we have on them?
 - 7.9.2 Does the Crop Trust have any previous relationship with the Donor?
 - 7.9.3 Has there been previous Donations from the same source?
 - 7.9.4 From whose account and from which country does the money come from?
 - 7.9.5 What is the source of the Donation?
 - 7.9.6 In which currency has the Donation been made?
 - 7.9.7 How big is the Donation?
 - 7.9.8 Which payment methods have been used?
 - 7.9.9 Is the Donation subject to a condition? If yes, are these conditions acceptable for the Crop Trust?
 - 7.9.10 Are there any reasons for suspicion?
- 7.10 If accepting any Donation would potentially create significant risks to the Crop Trust's reputation or independence, such Donation shall not be accepted and if already received, returned to the Donor.
- 7.11 In cases where Donation is received through an intermediary, application of this Article 7 shall be limited to the intermediary entity itself and not be extended to each Donation made to that intermediary for the Crop Trust, provided that that the intermediary has sufficient due diligence processes in place for the donations it receives on behalf of the Crop Trust.

8. Establish due diligence

The Crop Trust reserves the right to choose its partners on a case-by-case basis and to undertake research in support of such decisions. The integrity of the partnership process will be ensured through a robust due diligence process to guarantee that adequate partners are selected. The Crop Trust may consult with other relevant organizations as part of the due diligence process.

All formal partnership agreements will be subject to internal clearance and approval by the Executive Secretary of the Crop Trust as well as relevant Crop Trust staff. Clearance and approval processes are established in line with the policies and other rules and regulations of the Crop Trust as approved by its Executive Board. Modalities for entering into partnerships with the Private Sector which are distinct from procurement activities may require flexibility in order to reflect the particular purposes and objectives of the partnerships. The

Crop Trust will apply its respective regulations, rules and procedures including, where applicable, those relating to staff conduct and financial regulations and rules.

The due diligence process for Private Sector Donors will include completing the 'Due Diligence Questionnaire to Engage with the Private Sector' (Annex I) by the Crop Trust staff at the earlier stages of engaging with a potential partner. Documentation of the due diligence process for private sector service providers is within the scope of the tender processes and included among the tender documents.

ANNEX I

Due Diligence Questionnaire to Engage with Private Sector

1. Proposed Partnership

1.1 Nature of the Partnership

Please explain how the Partner intends to work with the Crop Trust, e.g. financial volume of proposed support, type of contribution, timing of contribution, conditions/ earmarking attached to the contribution, any other relevant information to describe the proposed partnership

1.2 Motivation for the Partnership

Please explain the objectives of the proposed partnership and which benefits the Partner hopes to gain from engaging with the Crop Trust

2. General Information

2.1 Name and Contact Details of the Partner

Full legal name of the Partner	
Address	
Telephone	
Email	
Website	

2.2 Other Information about the Partner *(To the extent available, please attach certified copies of the Partner's organizational documents, as currently in effect.)*

Sector/Industry of the Partner	
Industrial, Trade or Other Associations of which the Partner is a Member	
Main Products/Services Offered <i>(list only the most important)</i>	

Number of Employees (including employees of subsidiaries, if known)	
Members of the Board of Directors or Equivalent Members of the Partner's Highest Governing Body	

2.3 Is the Partner currently a vendor with the Crop Trust or has been awarded a Crop Trust contract in the past five years?

Yes No

If yes, please provide information on the circumstances that may remove the conflict of interest or any measures taken to manage or mitigate the risk of conflict of interest:

2.4 Is there any other current or prior business relationship with the Crop Trust?

Yes No

If yes, please provide information on the circumstances that may remove the conflict of interest or any measures taken to manage or mitigate the risk of conflict of interest:

2.5 Has the Partner proposed a partnership with the Crop Trust in the past?

Yes No

If yes, please provide information about the outcome of the proposition:

3. Financial Information

3.1 Please provide following financial information, if available through an accessible source

Required Information	USD Equivalent
Gross Revenue/Turnover for the most recently completed fiscal year	
Net income for the most recently completed fiscal year	

Has the Partner experienced any financial difficulties over the past three years?

Yes No

If yes, what measures have been taken to address them?

4. Due Diligence

4.1 Human Rights

	YES	NO
Does the Partner have publicly accessible policies on the protection of human rights? <i>If yes, please attach</i>	<input type="checkbox"/>	<input type="checkbox"/>
Does the Partner have publicly accessible supplier code of ethics on human rights? <i>If yes, please attach</i>	<input type="checkbox"/>	<input type="checkbox"/>

4.2 Labour Rights

	YES	NO
Does the Partner have publicly accessible policies on the protection of labour rights? <i>If yes, please attach</i>	<input type="checkbox"/>	<input type="checkbox"/>
Does the Partner have publicly accessible policies on occupational safety and health? <i>If yes, please attach</i>	<input type="checkbox"/>	<input type="checkbox"/>
Does the Partner have publicly accessible supplier code of ethics on labour rights? <i>If yes, please attach</i>	<input type="checkbox"/>	<input type="checkbox"/>

4.3 Sexual Harassment

	YES	NO
Does the Partner have publicly accessible policies to mitigate any risks related to sexual abuse, exploitation, discrimination or harassment? <i>If yes, please attach</i>	<input type="checkbox"/>	<input type="checkbox"/>
Does the Partner have publicly accessible supplier code of ethics addressing sexual abuse, exploitation, discrimination or harassment? <i>If yes, please attach</i>	<input type="checkbox"/>	<input type="checkbox"/>

4.4 Environment

	YES	NO
Does the Partner have publicly accessible environmental policy? <i>If yes, please attach</i>	<input type="checkbox"/>	<input type="checkbox"/>
Does the Partner have publicly accessible supplier code of conduct on environmental protection? <i>If yes, please attach</i>	<input type="checkbox"/>	<input type="checkbox"/>

4.5 Anti-Corruption and Counter-Terrorism

	YES	NO
Does the Partner have publicly accessible anti-corruption and counter-terrorism policy? <i>If yes, please attach</i>	<input type="checkbox"/>	<input type="checkbox"/>
Does the Partner have publicly accessible supplier code of ethics on anti-corruption and counter-terrorism? <i>If yes, please attach</i>	<input type="checkbox"/>	<input type="checkbox"/>

5. Other Disclosures

	YES	NO
Has the Partner or its representatives or any of its subsidiaries or affiliates or their representatives been convicted by a final court decision or a final administrative decision for any human rights violations, child labour, forced labour, modern slavery, violation of freedom of association, right to collective bargaining, sexual abuse, exploitation, discrimination, harassment or financial irregularities including money laundering, corruption, bribery and extortion or for any terrorist activities or activities supporting terrorism and/or terrorist organisations?	<input type="checkbox"/>	<input type="checkbox"/>
<i>If yes, please provide details.</i>		
Has any of the Partner's major suppliers or their representatives been convicted by a final court decision or a final administrative decision for human rights violations, child labour, forced labour, modern slavery, violation of freedom of association, right to collective bargaining, sexual abuse, exploitation, discrimination, harassment or any financial irregularities including corruption, bribery and extortion or for any terrorist activities or activities supporting terrorism and/or terrorist organisations?	<input type="checkbox"/>	<input type="checkbox"/>
<i>If yes, please provide details.</i>		
Has the Partner or its subsidiaries or affiliates or their respective representatives, officers, directors, employees or agents ever been a subject of an allegation or investigation for bribery within the past five years?	<input type="checkbox"/>	<input type="checkbox"/>

If yes, please provide details.

Is the Partner or its subsidiaries or affiliates listed in any of the following sanction lists?

- United Nations Security Council Sanctions List (<https://scsanctions.un.org/search/>)
- European Union Sanctions List (<https://www.sanctionsmap.eu/#/main>)
- US Department of the Treasury, Office of Foreign Assets Control (OFAC) (<https://sanctionssearch.ofac.treas.gov/>)
- Sanctions List of Federal Republic of Germany (<https://www.finanz-sanktionsliste.de/fisalis/>)

At any time, has the Partner or any of its subsidiaries (or companies in which the Partner holds any interest), affiliates, parent companies or major suppliers been involved in any of the following activities:

Manufacture, sale or distribution of controversial weapons or their components, including cluster bombs, anti-personnel mines, biological or chemical weapons or nuclear weapons

Manufacture, sale or distribution of armaments and/or weapons or their components, including military supplies and equipment

Replica weapons marketed to children

Involvement in the manufacture, sale and distribution of pornography

Manufacture, sale or distribution of substances subject to international bans or phase-outs, and wildlife or products and derivatives obtained illegally or in contravention of CITES.

Gambling including casinos, betting etc. (excluding lotteries with charitable objectives)

Involvement or complicity in systemic or egregious human rights abuses

Use or toleration of forced or compulsory labor

Use or toleration of child labor

During the last three years, has the Partner been the subject of any major campaign or criticism, including those that may be impending, by a civil society organization, local community, government, the media, or other entity?

If yes, please provide details, including measures taken by the Partner to address such campaign or criticism.

--	--	--

Are there any other conditions that might disrupt a partnership with the Crop Trust if one were to result or any other information not otherwise requested above that, in the staff member's judgment, could be material to a partnership with the Crop Trust or that the staff member believes should be considered and reviewed in commencing a partnership with a prospective partner?	<input type="checkbox"/>	<input type="checkbox"/>
--	--------------------------	--------------------------

If yes, please provide details

--	--	--

SUPPLEMENT 1

IMPLEMENTATION PLAN OF POLICY FOR ACCEPTING DONATIONS

1. PURPOSE

The purpose of this Supplement is to establish an implementation plan by defining roles and responsibilities within the Crop Trust to ensure duly enforcement of and compliance with the Policy for Engaging with the Private Sector and for Accepting Individual Donations (henceforth "Policy").

2. RESPONSIBILITIES

Responsibility	Responsible Team
Ensuring that the online donations tool on the Crop Trust website is set up and functions in compliance with the Policy. This includes, among others,: <ul style="list-style-type: none"> - ensuring that sufficient data is collected from the Donors and making anonymous Donations is not possible; - ensuring that Donations in the amount of USD 100,000 or above are not accepted via the online donations tool; - ensuring that the online donations tool is set up in a way to block corporate or organizational donations from using the tool. 	IT/Partnerships
Conducting the limited due diligence by: <ul style="list-style-type: none"> - keeping records of the names and contact information of Donors as well as the dates, amounts, and payment methods of the Donations; - monitoring and analyzing the Donations every three months; and - informing and referring the matter to Compliance in cases of suspicion. 	Finance/Partnerships
Conducting enhanced due diligence and keeping records of the assessments	Compliance
Advising on whether to return any Donation to the Donor in cases of significant risks	Compliance
Deciding on whether to return any Donation to the Donor in cases of significant risks	Executive Secretary