

Non-Technical Summary

Environmental and Social Due Diligence of Robust Group

European Bank for Reconstruction and Development

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Nomenclature

ACRONYM	MEANING
CoC	Code of Conduct
EBRD	European Bank for Reconstruction and Development
EHS	Environmental, Health, and Safety
E&S	Environmental and Social
ESG	Environmental, Social, and Governance
ESAP	Environmental and Social Action Plan
ESIA	Environmental and Social Impact Assessment
ESDD	Environmental and Social Due Diligence
ESMP	Environmental and Social Management Plan
ESMS	Environmental and Social Management System
ESR	Environmental and Social Requirement
ESP	Environmental and Social Performance
HR	Human Resources
HRMS	Human Resources Management System
GBVH	Gender Based Violence and Harassment
GHG	Greenhouse Gas
GRM	Grievance Mechanism
IFC	International Finance Corporation
ILO	International Labour Convention
IP	Indigenous Peoples
IOM	International Organization for Migration
IVC	Ivory Coast
LBA	Limited Buying Agent
MRG	Minority Rights Group International
NESREA	National Environmental Standards and Regulations Enforcement Agency
NTS	Non-Technical Summary
SEP	Stakeholder Engagement Plan
SDG	Sustainable Development Goal
UN	United Nations
UNGP	United Nations Guiding Principles
WB	World Bank
WHO	World Health Organization



1.0 Introduction

1.1 Background

SLR Consulting France SAS (SLR) was appointed by the European Bank for Reconstruction and Development (EBRD or the 'Client') as an independent Environmental and Social (E&S) consultant to undertake an E&S Due Diligence (ESDD) of Robust Group International Ltd. ('Robust'), and its subsidiaries Robust International CI ('Robust IVC') in Ivory Coast and Robust International Commodities Limited ('Robust NIG') in Nigeria for its cashew and sesame trading activities.

The ESDD was undertaken in line with SLR's proposal submitted to EBRD dated 16 September 2025, and contract signed on 22-24 September 2025.

1.2 Objectives & Methodology

The aim of this ESDD was to analyse the E&S performance of Robust IVC and Robust NIG, by assessing their compliance with the E&S Reference Framework.

1.3 Reference Framework

This ESDD was mainly carried out in accordance with applicable local, national and regional requirements, the EBRD's ESP (2024) and its Environmental and Social Requirements (ESRs), and relevant European Union (EU) requirements.

1.4 Report Structure

This Non-Technical Summary (NTS) of the ESDD of the above-mentioned Project is intended to provide an overview of the outcomes of the ESDD.

This NTS is structured as follows:

- Introduction.
- Project Description.
- Summary of Environmental and Social Action Plan.
- Stakeholder engagement, information disclosure and contact details.



2.0 Project Description

2.1 Company Description

Robust International Pte Ltd. (**'Robust Group'**) is a Singapore based agro-commodities and trading group. Founded in 2006, Robust Group operates across the agricultural value chain in 20+ products across commodities.

The Ivorian subsidiary of Robust Group, Robust International CI (**'Robust IVC'**), is engaged in agro-commodities trading and processing. The subsidiary operates warehouses in Ossou and in Attinguié, as well an advanced Raw Cashew Nuts (RCN) processing plant in Ossou. At the country-level, Robust IVC employs approximately 800 persons as of October 2025.

The Nigerian subsidiary of Robust Group, Robust International Commodities Limited (**'Robust NIG'**), is also engaged in agro-commodities trading and processing. The subsidiary operates one warehouse and RCN processing facility in Ogun, as well as one warehouse and processing facility for Sesame in Kano. At the Kano site, Robust reportedly employs approximately 278 employees.

2.2 Project Categorization

The Project is categorized “**B**” in accordance with the EBRD Environmental and Social Policy (ESP) (2024), due to its environmental and/or social impacts that are mostly site-specific and/or readily identified and addressed through mitigation measures. (e.g. labour and working conditions, occupational health and safety, resource efficiency, hazardous materials management, waste management, air emissions, etc.).



3.0 Summary of Environmental and Social Action Plan

An Environmental and Social Action Plan (ESAP) has been prepared to support the Project in improving its E&S performance and further align it with national laws and regulations, as well as international financial institutions' environmental and social standards. These include provisions for the development of procedures to manage all environmental and social risks and impacts identified. ESAP items include the following:

ESR 1

- **Environmental Permits and Authorizations:** Finalise all necessary permits for the Ivory Coast facility, including the ICPE permit and borehole permit.
- **Organizational capacity and commitment:** Upskill internal resources for the successful implementation of E&S and Environmental, Health, and Safety (EHS) responsibilities. All functions related to E&S, EHS and HR, require training plans that are rolled out and have evidence of attendance.
- **Monitoring:** Finalize monitoring tools and complete tools regularly, providing training to relevant personnel to undertake monitoring activities. Ensure that E&S topics such as resource use, supply chain, and health and safety are embedded into monitoring procedures and tools.

ESR 2

- **Human Resource and Labour Management Policies and Procedures:** Reinforce training on the HRMS and Handbook to Ivory Coast and Nigeria HR Managers. Ensure that the Corporate HRMS is adapted for Robust IVC through the formalization of an employee handbook, reinforced training and outreach efforts. Also ensure the ESMS is adapted to Robust NIG activities during implementation, including that all group level provisions have associated in-country procedures with designated in-country HR personnel responsible for the roll-out and monitoring of HR policies and procedures.
- **Conditions of Work, including for Contracted Workers, Working Relationships, and Worker Casualization:** Ensure all provisions within the Group-level Contractor Management Plan are implemented in-country, including the performance of checks on labour brokers contracted by Robust IVC and Robust NIG. Conduct frequent monitoring on labour broker practices, including the adequate provision of pay, insurance, annual leave, and other conditions of work to workers retained by third parties.
- **Worker's Organisations:** Ensure that all workers, including third-party and female workers, have on-going access to consultation and feedback mechanisms through existing HR, stakeholder engagement and grievance mechanisms.
- **Internal Grievance Mechanism:** Train all HR Directors, relevant HR personnel, and employees in Ivory Coast on grievance redressal procedures.



Differentiate the grievance procedure for cases of Gender-Based Violence and Harassment (GBVH).

- **Non-Discrimination and Equal Opportunity (DEI):** Formalise and share a Women's Promotion & Inclusion Plan to demonstrate continued progress of women employment in line with corporate and country-level policies and strategy.
- **Supply Chain and Supply Chain Workers, including Child Labour and Forced Labour:** Dedicate additional human resources to supply chain management, including a permanent presence during harvest season acting as supply chain relays from regions where Robust procures commodities. During the off-season, conduct periodic outreach to trusted aggregators or cooperative members to ensure integrated planning, E&S risk assessment and training. Finalize and implement a farmer engagement plan with a focus on agricultural best practices, including pesticide use and climate resilience. Survey farmers to leverage farmer input in plan design. Additionally, ensure Responsible Sourcing Policy is implemented to avoid risk of unintended use of child or forced labour.

ESR3

- **Pesticide Use:** Reinforce outreach in supply chain on pesticide use and exert leverage on cooperatives and LBAs on pesticide use monitoring at farm-level, to the extent feasible.
- **Wastewater Treatment:** Ensure that wastewater release point is declared with Ivory Coast national authorities, and ensure that wastewater analysis indicates wastewater parameters in line with World Bank EHS guidelines. Obtain relevant permits and certificates associated with water source and wastewater discharge.
- **Carbon Monoxide Exposure:** Conduct third-party environmental sampling on ambient air quality.

ESR4:

- **Occupational Health and Safety (OHS):** Ensure that all required OHS policies and procedures are implemented on workplace noise, working from heights, ergonomic, exposure to dust, personal protective equipment, training, etc., including through reinforcing existing training practices. Consider updates to machinery for improved safety and conditions (i.e. reduced dust, reduced noise, managed procedures for working at heights) and implement as available and necessary. Maintain the facility so that all areas indicate proper housekeeping.
- **Traffic and Road Safety:** Ensure all contracts between Robust and logistic companies for commodity deliveries are aligned with Robust Corporate Contractor Management Guideline, including E&S legal clauses. Provide training and conduct monitoring on road safety practices for third-party delivery, especially targeted at the upstream supply chain transportation operations.
- **Community Health and Safety (CHS):** Develop a Community Health and Safety Management Plan (CHSMP), supplementing existing management



systems. Implement the measures within the CHSMP for Robust IVC and Robust NIG.

ESR6

- **Biodiversity Conservation:** Reinforce biodiversity and habitat conservation management program in line with the existing policies for Ivory Coast and Nigeria and roll out with dedicated management teams, including monitoring of deforestation through regular visits to farmers, cooperatives, and local buying agents.

ESR10

- **Stakeholder Engagement Plan:** Review and update in-country Stakeholder Engagement Procedures regularly, including stakeholder mapping exercises, tailored stakeholder outreach strategies, and designated roles and responsibilities for effective rollout of stakeholder engagement plan in Ivory Coast and Nigeria.
- **Grievance Mechanism:** Ensuring adequate implementation and roll-out, including training, to key supply chain actors and all other relevant community stakeholders on the Ivory Coast grievance mechanism, including access points and procedures for grievance redressal.



4.0 Stakeholder Engagement, Information Disclosure and Contact Details

A Stakeholder Engagement Plan (SEP) has been prepared for the Project in which all affected stakeholders are identified, including communication methods and the information to be disclosed to each stakeholder. The SEP will also include a process for filing grievances/complaints relating to the Project. A copy of the SEP will be made available at the Project's office and the Local Authorities.

All complaints/grievances relating to the Project can be submitted to the following contact:

111 Somerset Road

09-17, Singapore 234168

Email: CSR@Robust-International.com

Webpage: <https://www.robust-international.com/grievances/>

It is noted that the identification of the names of contact persons, as well as details regarding e-mail addresses and phone numbers is still to be confirmed at Robust level.

