



EQUITABLE  
ORIGIN

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EO Inc. Policy  
EOP-102: EO100™ Policy on Association



# EO100™ Policy on Association

- Procedure
  - Policy**
  - Handbook
  - Checklist
- 

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## GLOSSARY

**Equitable Origin Board of Directors** - (EO Board) is the Board of Directors of Equitable Origin Inc.

**Association** - formally established through a contractual relationship between EO and operators or project developers of energy projects and facilities

**Chief Executive Officer** - General Manager of EO Inc, responsible for all aspects of EO's operations, strategic planning and financial management

**Disassociate** - is to separate from association or contract or any other formal relationship with an Operator and could also imply "de-certification" of EO certified operations

**Involvement** - refers to either direct or indirect involvement



## 1.0 PURPOSE AND SCOPE

This policy applies to

- Operators seeking certification

Equitable Origin shall conduct due diligence on any Operator that associates with EO, including Operators applying for certification to the EO100™ Standard. EO's requirements for due diligence are documented in EOPR-303 EO100™ Due Diligence Procedure.

To avoid any unnecessary costs, Operators and third parties consulting to Operators on EO's certification system and providing implementation support services are encouraged to review and be familiar with this policy.

## 2.0 REFERENCES

- EO100™ Standard for Responsible Energy Development and relevant Technical Supplements
- EOP-104: EO100™ Trademark Use and Licensing Policy
- EOPR-303: EO100™ EO Due Diligence Procedure
- EOP-103: EO100™ Certification System Comments, Complaints and Appeals
- EOH-202: EO100™ Assessor Handbook



### 3.0 OVERVIEW

The mission of Equitable Origin (EO) is to protect people and the environment by ensuring that energy development is conducted under the highest social and environmental standards. Equitable Origin is an independent, stakeholder-negotiated, market-driven certification system that distinguishes and rewards operators for outstanding social, environmental and safety performance.

Equitable Origin's EO100™ Standard and Certification System is designed to promote continuous improvements in environmental, health and safety practices and community relations at energy development projects. For avoidance of doubt, this means that the EO100™ Standard is applied to energy production and generation operations at the site level; it is not applied to a corporate entity. Effective adoption of the EO100™ Standard at any energy development project is expected to result in positive impacts on participating energy companies, as well as workers, local communities and the environment. We recognize, however, that Operators' independent actions could result in adverse effects on people and nature, and potentially undermine legal and governance frameworks, even at operations where the EO100™ Standard has been adopted.

For this Policy on Association, "Association" with EO means a formal relationship between EO and an operator or project developer that is seeking to achieve or has achieved certification to the EO100™ Standard. This includes contracts or agreements related to EO's Implementation Support Services and for the issuance of certificates in recognition of achieving EO100™ Certification.

Equitable Origin may associate with Operators that are part of or affiliated with a corporate entity that might also control operations that have not adopted the EO100™ Standard and which could be responsible for activities that have adverse effects. Association with Operators that are seeking or are already certified to the EO100™ Standard, or control operations that are not seeking certification and are not certified to the EO100™ Standard, and that are involved in activities that are broadly considered unacceptable, could undermine Equitable Origin's mission.

This Policy governs EO's approach to the management of financial, legal, and reputational risks arising from EO's association with Operators, the actions and activities of which might be considered unacceptable, in contravention of our values or responsible business principles, and which could undermine the mission of Equitable Origin. EO's Policy on Association incorporates both proactive measures to identify and avoid risks, and also how we respond to complaints about alleged unacceptable activities of Operators with which we are associated.

### 4.0 RISK MANAGEMENT PROCESS

Before associating with an Operator, EO conducts due diligence to identify and evaluate risks to EO's reputation, credibility, legal or financial good standing and risks that could undermine the integrity of EO's mission. Risks revealed by a due diligence might include the Operator's direct or indirect



involvement in unacceptable activities. Due diligence, whether completed by EO, a third-party contractor or by an EO approved AB will conform to EOPR-303: EO100™ Due Diligence Procedure.

EO's Chief Executive Officer (CEO) is responsible for ensuring the completion of due diligence and uses his/her discretion to consult with appropriate EO staff, third-party consultants, EO approved ABs, and EO governing bodies as needed.

Due diligence can be triggered by:

- An Operator seeking certification to the EO100™ Standard and/or to receive EO's implementation support services can contact EO directly through one of its staff or via the EO website
- An EO approved AB will notify EO that an Operator has requested certification services, as required by and in conformance with EOH-202: EO100™ Assessor Handbook.

Once triggered, the due diligence will be completed within a reasonable period in accordance with EOPR-303.

If EO considers that findings from the due diligence warrant direct discussions with the Operator, EO will seek to engage the Operator as early as possible.

EO's CEO will provide the EO Board with a summary of due diligence reviews at each EO Board meeting, including those reviews that did not result in a recommendation to not associate being made to the EO Board.

In addition to the proactive due diligence and review triggered by an Operator seeking association with EO, EO will monitor for unacceptable activities that could be regarded plausibly as 'risk events'. A 'risk event' of unacceptable activities involving an Operator with which EO has a formal association can be brought to the attention of EO's management by EO staff, by affected stakeholders or through EO's formal grievance mechanism, the process for which is explained in EOP-103: EO100™ Certification System Comments, Complaints and Appeals.

## 5.0 DISASSOCIATION

If the EO Board considers an Operator's direct or indirect involvement in an activity to be 'unacceptable', the decision of the EO Board may be to disassociate or not to associate in the first instance with an Operator. This decision may not be appealed.

Following a decision to disassociate, actions to terminate the contractual relationships with the Operator, including decertification of all sites where the Operator has sites certified to the EO100™



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Standard, shall be taken within a period of thirty calendar days. Certificate generation shall be suspended immediately and any un-sold EO Certificates associated with the Operators sites would be immediately withdrawn from any certificate-trading platforms.

Together with the decision to disassociate, the EO Board may specify a timeline and conditions for renewal of the association with EO.

## 6.0 REVISION HISTORY

Revision No.	Date	Substantive Revisions	Revision by	Approved by
1	6/24/2015	<ul style="list-style-type: none"> <li>Updated mission statement.</li> <li>Updated reference to EO Inc. and EO Board.</li> <li>Updated CTO to CEO.</li> <li>Updated scope to include energy development projects.</li> <li>Updated reference to “Assessment Body” procedures (previously, “Certification Bodies”).</li> </ul>	S. Mills	EO Board (EO-BM02-01JUL15)
2	1/24/2022	<ul style="list-style-type: none"> <li>Updated references and numbering</li> <li>Changed scope to operators seeking certification</li> </ul>	K. Hillis	S. Mills (1/27/2022) Pending approval by EO Board