

Mandala Capital SSEA Food Programme Indigenous Peoples Planning Framework (IPPF)

Mandala Capital Limited

1. Purpose and Scope

This policy outlines how Mandala Capital and its investees will identify, avoid, manage, and mitigate potential risks and impacts on Indigenous Peoples (IPs) resulting from investments. This policy applies to all investments in areas where Indigenous Peoples may be present or have interests—whether legally recognized or under customary use.

2. Definition and Context

Indigenous Peoples are distinct social and cultural groups that are often referred to in national contexts as “Scheduled Tribes,” “ethnic minorities,” “hill tribes,” “aboriginal groups,” or “first nations.” They often maintain unique cultural traditions, languages, and spiritual ties to the land and natural resources and tend to be more vulnerable to adverse impacts due to their limited legal and economic status. In line with paragraph 14 of the GCF Indigenous Peoples Policy, the following characteristics are used to identify Indigenous Peoples:

- a) Self-identification as members of a distinct indigenous social and cultural group and recognition of this identity by others;
- b) Collective attachment to geographically distinct habitats, ancestral territories, or areas of seasonal use or occupation as well as to the natural resources in these areas;
- c) Customary cultural, economic, social, or political systems that are distinct or separate from those of the mainstream society or culture; and
- d) A distinct language or dialect, often different from the official language or languages of the country or region in which they reside. This includes a language or dialect that has existed but does not exist now due to impacts that have made it difficult for a community or group to maintain a distinct language or dialect.

This framework is designed to ensure respect for their dignity, human rights, and self-determined development paths.

3. Objectives

In line with the GCF Indigenous Peoples Policy, this programme commits to the following objectives:

- Ensure full respect for human rights, dignity, aspirations, culture, and natural resource-based livelihoods of IPs;
- Anticipate and avoid adverse impacts on Indigenous Peoples, or when avoidance is not possible, minimize and/or compensate for such impacts;
- Establish and maintain ongoing relationships through meaningful Consultation and Participation (ICP);
- Ensure Free, Prior, and Informed Consent (FPIC) in circumstances defined under this framework “Mandala Capital Indigenous People Planning Framework;
- Respect and preserve the knowledge, traditions, and culture of IPs.

4. Risk Identification and Opportunities

All investments will be screened during ESG due diligence to determine the presence of Indigenous Peoples and potential impacts on their rights, territories, livelihoods, knowledge and culture. These assessments will:

- Identify affected IP communities and potential project-related impacts.
- Consider gender-specific vulnerabilities and the distinct roles of women in indigenous communities.
- Establish whether legal or customary rights to land and resources exist.
- Conversely, potential benefits and co-benefits will be noted, particularly in terms of enhancing the inclusion of IPs in climate-resilient agricultural value chains and recognizing traditional ecological knowledge.

Where impacts are identified, the project must prepare a dedicated **Indigenous Peoples Plan (IPP)** or integrate targeted IP components into a broader **Environmental and Social Management Plan (ESMP)**. Mandala Capital will involve third party experts to carry out these plans if required.

5. Participation and Consent

Engagement with Indigenous Peoples (IP) communities will be carried out in a culturally appropriate, inclusive, and ongoing manner. This process will include the identification and involvement of legitimate representative institutions such as tribal councils, elders, and local community groups.

All relevant information will be translated into local languages and presented in accessible formats to ensure clear understanding.

Consultations will be designed to be gender-inclusive and sensitive to the needs of youth, allowing sufficient time for Indigenous communities to deliberate and make fully informed decisions.

6. Free, Prior and Informed Consent (FPIC)

FPIC is required in the following situations:

- **Impacts on lands and natural resources subject to traditional ownership or under customary use or occupation**” Investees will document and minimize the area and impact, identify and review all property interests and traditional uses, assess gender-specific roles, and offer fair compensation and development opportunities.
- **Relocation of indigenous peoples from lands and natural resources subject to traditional ownership or under customary use or occupation:** Projects involving relocation of Indigenous Peoples will only proceed after obtaining FPIC. If possible, relocated persons will be allowed to return when the cause of relocation no longer exists.
- **Cultural heritage:** Where projects impact cultural, ceremonial, or spiritual heritage, FPIC must be obtained.

FPIC must be obtained before final project approval, and documented evidence of consent must be maintained. Consent must be voluntary, without coercion, obtained in advance of any physical activity, and based on full disclosure of relevant information.

7. Relocation of Indigenous Peoples

Where relocation is unavoidable and consented to through FPIC, it must be conducted:

- In a manner that safeguards dignity, rights, and livelihoods.
- With access to culturally appropriate housing, land of equal or greater value, and compensation for losses.
- In accordance with a Resettlement Action Plan (RAP) aligned with GCF standards and IFC PS5.
- With a clear plan for return should the project cease or relocate.

8. Cultural Heritage and Indigenous Knowledge

Projects shall avoid adverse impacts on critical cultural heritage, spiritual sites, or traditional knowledge systems. Where avoidance is not possible, FPIC must be obtained, and culturally appropriate mitigation agreed. Mandala Capital promotes the recognition and use of indigenous knowledge in adaptation and sustainable development practices.

9. Mitigation and Benefit Sharing

Mitigation measures will follow the mitigation hierarchy: avoid, minimize, restore, and compensate. Where relevant, projects will:

- Provide equitable and culturally appropriate benefit-sharing mechanisms.
- Establish clear eligibility criteria (individual, household, or collective).
- Ensure transparency and accountability in the distribution of benefits.
- Support improved access to education, healthcare, markets, and natural resource governance for IPs.

10. Monitoring and Grievance Redress

- Implementation of IPPs and FPIC agreements will be monitored through participatory monitoring systems involving Indigenous Peoples.
- Projects will establish a **Grievance Redress Mechanism (GRM)** that is culturally appropriate, gender-sensitive, and accessible to IPs at all stages.
- Regular reports will be disclosed to IPs in an accessible and timely manner.
- In addition to the project-level GRM, Indigenous Peoples may submit complaints or grievances to the GCF Independent Redress Mechanism (IRM) and may seek advice or assistance from the GCF Indigenous Peoples Specialist, in line with paragraph 70 of the GCF Indigenous Peoples Policy.

11. Capacity Building and Support

- Investees and implementing partners will receive training on Indigenous Peoples rights and FPIC procedures.
- Indigenous representatives may be supported to participate in governance and oversight activities where appropriate.

12. References and Alignment

This framework aligns with the following frameworks:

- Green Climate Fund Indigenous Peoples Policy (2018)
- IFC Performance Standard 7 (Indigenous Peoples)
- UN Declaration on the Rights of Indigenous Peoples (UNDRIP, 2007)
- ILO Convention 169
- UNDP Guidelines on Indigenous Peoples' Issues (2008)