



Environmental, Social and Governance Policy

Version 2.0, October 2026

Field	Detail
Policy owner	Dr Kristie Drucza, Chief Executive Officer
Applies to	All Includovate staff, contractors, consultants and partner researchers
Supersedes	Environmental, Social and Governance Policy, reviewed September 2022
What changed	Executive pay set at 15% below benchmark, leadership targets for women and people from low- or middle-income countries, measurable targets added, links to our anti-corruption and other policies, updated language and address
Next ESG review report	By 31 December 2027
Next full policy review	October 2028

Why we updated this policy

We wrote our first ESG Policy in 2022. In 2025, our Legal team reviewed how well we implemented it (Includovate, 2025). The review found strong practices in pay moderation, our low-carbon virtual model, and inclusive procurement. It also found gaps that this policy addresses.

Our commitment

We are committed to reducing inequality and keeping the environmental impact of our work as low as we can. We want to help build a world that is ecologically safe and socially just.

We focus on gender, racial and disability inequality. We also focus on gaps in pay, power, and recognition between researchers in high-income countries and those in low- and middle-income countries. We will use our best efforts to meet the commitments below.

Scope

This policy applies to everyone who works with Includovate, regardless of contract type. Where we work through partners, we ask them to show similar commitments. We check this through our Partnership Vetting Guidelines.

Environment

Our commitments

1. We run a virtual business with no physical office. This cuts energy use, emissions and office waste.
2. We use online data collection and remote methods wherever they suit the research and the people taking part.
3. We hire consultants based in the countries where we work. We travel internationally only when needed and when the client requires it.
4. We consider environmental impact when we buy goods and services.
5. We buy from local small businesses wherever we can, for example refreshments for focus group discussions.
6. Teams print materials such as consent forms only when necessary. They use recycled paper where possible and email forms when that works for participants.
7. We include environmental and climate risks in project and company risk planning. We report the main environmental risks in our Annual Report.
8. We run awareness sessions for staff on biodiversity and ecosystem protection.
9. We undertake research that supports environmental sustainability, including our work on land rights and water.

Where we are now

From 2024 to mid-2025, we delivered 24 projects. Only four needed limited international travel, or 16.7% (Includovate, 2025).

Social

Our commitments

1. We support the rights of people of diverse sexual orientations, gender identities and expressions, and sex characteristics (SOGIESC). We welcome diversity in our team.
2. We offer equal employment opportunities. We base recruitment and promotion on merit. We also take active steps to attract and support people from under-represented groups.
3. We share leadership fairly. We actively encourage women and people from low- and middle-income countries to apply for leadership positions, mentor them and remove barriers to their leadership.
4. We pay a living wage. We pay everyone above the local minimum wage. Our Remuneration, Benchmarking and Engagement Policy sets pay. We use one formula for every country and level, based on where a person lives, not their nationality.
4. We work to reduce income inequality between researchers in high-income countries and researchers in low- and middle-income countries.

5. We protect children and adults from sexual exploitation, abuse and harassment. Our Child Safeguarding Policy and Procedures and our Prevention of Sexual Exploitation and Abuse Policy set the rules. We assign a Safeguarding Adviser/Buddy to projects involving children, people with disabilities, or other participants at risk of harm.
6. We vet partners before we work with them. Our Partnership Vetting Guidelines check each partner's business model, finances, legal compliance and reputation.
7. Our suppliers must follow our Supplier Code of Conduct. It favours suppliers owned by women and other under-represented groups. It also asks suppliers to use fair labour practices and reduce their environmental impact.
8. Anyone can raise a concern under our Grievance Policy. An independent Grievance Committee handles each case.
9. We look after our team's wellbeing. Under our Self and Collective Care Policy, we will run semi-regular sessions on mental health and offer peer support through our mentoring program.
10. We work with partners on fair terms to advance equality and sustainable development in the countries where we work.

Disclosure

Our social targets include some personal information, such as disability and SOGIESC identity. Disclosure is always voluntary and confidential. We never require anyone to disclose, and we report only totals.

Governance

Our commitments

1. **Board diversity.** We reserve a Board place for a person with a disability.
2. **Executive pay.** We set executive pay at least 15% below the benchmark produced by our Remuneration, Benchmarking and Engagement Policy. This applies to Levels 7 to 9 in OECD countries. We do not reduce pay for the same levels in other countries.
3. **Profits.** As a certified social enterprise, our constitution includes our mission. We reinvest at least 51% of our profits in our mission. In 2025, we reinvested 76.3% (Includovate, 2025).
4. **Transparency.** We publish an Annual Report or Impact Report each year, with our financial statements and a summary of our ESG results. We publish our governance policies on our website.
5. **Integrity.** We do not tolerate fraud, corruption, tax evasion or bribery. Our Fraud, Corruption, Tax Evasion and Anti-Bribery Policy sets the rules. All staff and contractors complete anti-corruption and Code of Conduct training each year.

6. **Oversight.** The Board and the leadership team oversee this policy and review progress against the targets below.
7. **Consistency.** When we update other policies and manuals, we check that they match this policy.

Targets

All targets are due by 2027 unless stated otherwise. We will pursue these targets through inclusive international recruitment and equitable access to employment opportunities. Recruitment and employment decisions will comply with applicable Australian anti-discrimination laws. The target will not be used to justify unlawful discrimination based on gender, race, descent or national or ethnic origin, sexual orientation or disability status.

Area	Measure	Target	Owner
Environm ent	Projects that involve international travel	Less than 20%	Head of Project Management
Environm ent	Procurement spend with local suppliers	70%	Finance team
Environm ent	Environmental learning sessions for staff and consultants	1 a year	Chief Executive Officer
Social	Leadership positions held by women	At least 70%	Chief Executive Officer
Social	Leadership positions held by people from low- or middle-income countries	At least 30%	Chief Executive Officer
Social	Staff who identify as persons with disabilities	7%	Human Resources Manager
Social	Staff who identify as SOGIESC	7%	Human Resources Manager
Social	Staff based in low- and middle-income countries	At least 75%	Human Resources Manager
Social	Projects with safeguarding training and a Safeguarding Adviser	At least 50%	Head of Project Management
Social	Mental Health & Well-being session in place	2 per year	Human Resources Manager
Governan ce	Executives at Levels 7 to 9 in OECD countries paid at least 15% below benchmark	100%	Chief Executive Officer
Governan ce	Profits are reinvested into Includovate mission as per Social Enterprise requirements	51%	Chief Executive Officer



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Area	Measure	Target	Owner
Governance	Annual or Impact Report published within three months of the financial year-end	Every year	Chief Executive Officer
Governance	Governance policies published on our website	100%	Legal
Governance	Staff and contractors completing anti-corruption and Code of Conduct training	100% each year	Legal
Governance	Board members who identify as persons with disabilities	20%	Chief Executive Officer
Governance	Board members who identify as women or another gender (not male)	50%	Chief Executive Officer
Governance	Board members based in low- and middle-income countries	40%	Chief Executive Officer

Monitoring and reporting

1. Project managers record travel, local suppliers, and safeguarding in Yes/No columns on our project monday.com board.
2. The BD Coordinator audits partnership vetting once a year and reports the results to the leadership meeting.
3. The leadership meeting reviews progress against the targets every six months.
4. Our Annual Report includes a short ESG summary and the main environmental risks.
5. We publish a formal ESG review report every two years. The next one is due by 31 December 2027.

Standards we align with

This policy supports Sustainable Development Goals 5 (gender equality) and 10 (reduced inequalities). Our 2025 review compared it with three global standards:

1. ISO 14001 for environmental management
2. the International Labour Organization's Decent Work standards for the social commitments
3. the UN Global Compact for governance.

Related policies

1. Remuneration, Benchmarking and Engagement Policy
2. Child Safeguarding Policy and Procedures
3. Prevention of Sexual Exploitation and Abuse Policy

4. Fraud, Corruption, Tax Evasion and Anti-Bribery Policy
5. Partnership Vetting Guidelines
6. Supplier Code of Conduct
7. Grievance Policy and Grievance Guidelines
8. Self and Collective Care Policy
9. Artificial Intelligence Use Policy
10. Privacy Policy
11. Anti-money laundering, Counter-terrorism financing and Sanctions Compliance Policy
12. Equal employment policy
13. Supply chain policy
14. Recruitment and Selection Policy

Responsibility and approval

As Chief Executive Officer, I am responsible for ensuring this policy is implemented. Every team member is responsible for following it in their own work. If something in this policy is not working, tell me.

Endorsed by Dr Kristie Drucza, Chief Executive Officer, Includovate Pty Ltd

Signature: Kristie Drucza Date: 21 October 2026

References

Includovate (2022) *Environmental, Social and Governance Policy*. Reviewed September 2022. Available at: <https://www.includovate.com/wp-content/uploads/2025/12/Environmental-Policy.pdf> (Accessed: 18 October 2026).

Includovate (2025) *2024-25 ESG Policy Review Report*. Available at: <https://www.includovate.com/wp-content/uploads/2025/11/2024-25-ESG-Policy-Review-Report.pdf> (Accessed: 18 October 2026).