



Environmental and Social Management System

March 2020

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Abbreviations

EIB	European Investment Bank
EPRP	Emergency Preparedness and Response Plan
ESDD	Environmental and Social Due Diligence
ESG	Environmental, Social and Governance
ESHS	Environmental, Social, Health and Safety
ESIA	Environmental and Social Impact Assessment
ESAP	Environmental and Social Action Plan
ESMS	Environmental and Social Management System
IFC	International Finance Corporation
ILO	International Labour Organization
OHS	Occupational Health and Safety
PAP	Project Affected People
SEP	Stakeholder Engagement Plan

Preamble

Neo Themis (the Company) recognizes that the management of environmental, social and governance (ESG) issues related to the Business is essential in (a) making a more positive contribution to the world we live in, (b) enabling the Company to seek sustainable long-term, risk-adjusted portfolio returns for its investors and (c) mitigating financial, legal and reputational risks attendant to ESG matters.

The Company has undertaken to develop and implement an environmental and social management system (ESMS) and to act in accordance with its Responsible Investment Policy [(a copy of which is attached hereto)] in all its Business activities. The present document is the Company's Environmental and Social Management System (ESMS). It sets the policy, organization, roles, responsibilities and procedures for the management of ESG issues associated with the Business.

The ESMS is designed to ensure compliance with the requirements of several DFIs, including but not limited to IFC 2012 Performance Standards, EIB 2013 E&S Handbook, the AfDB's 2013 Integrated Safeguards System - Policy Statement and Operational Safeguards, etc.

In the context of the present document:

- The term "Project" means any project in which the Company is involved, whether the Project is at its development, financing, construction or operation stage.
- The Term "Proposed Project" refers to any Project considered by the Company for equity financing, which has not reached financial close yet.
- The term "Active Project" refers to any Project which has passed financial close and in which the Company is, directly or indirectly, a shareholder.
- The term "Projects Portfolio" or "Portfolio" means the entire portfolio of Proposed and Active Projects.
- The term "Project Company" means any company implementing a Project in which the Company holds an ownership interest.

1. Responsible Investment Policy

The Company is committed to investing in power generation assets in Africa with a primary focus on clean, affordable power. We believe that providing clean, affordable and accessible power is critical to create the building blocks that are necessary to alleviate poverty, and to increase educational access, health care and employment. Our Responsible Investment Policy establishes our commitments for protecting the environment, people and the communities where our Projects are developed or operate, as well as good governance practices.

We are committed to employ management systems that effectively address environmental and social risks and realize opportunities at key stages within the investment cycle:

Environment: As investors in renewable and low carbon energy projects, we are contributing towards the provision of clean energy and a low carbon future. We will work to safeguard the environmental impacts of our investments. This means, for example, seeking to minimize emissions to air and water, and preserving biodiversity at and around project sites, as well as promoting positive benefits.

Human Rights: We are committed to respecting human rights and believe that all people should be treated with fairness, respect and dignity. We will work with our Project Companies to identify potential risks to human rights in the supply chain (including local construction) at the earliest stage of investment decision-making, and will implement mechanisms to support this commitment.

Health and Safety: Protecting the health, safety and welfare of all those who work for the Company, for our Project Companies, and for the Projects in which we invest is our utmost priority. This also includes communities that may be affected by our investment activities. Where we cannot avoid impacts, we will implement measures to mitigate them in line with legal requirements as well as international good practice. Management measures will include occupational, health and safety procedures and accident prevention measures.

Communities: We acknowledge that the construction and operation of power projects can both positively and adversely impact communities. Prior to project development, our Project Companies are required to assess potential impacts to communities, including indigenous peoples. As well as adopting measures to manage and mitigate potential impacts, our Project Companies are required to implement a stakeholder engagement process throughout the project. We also encourage our Project Companies to identify and develop opportunities for achieving social benefits.

Governance: We structure our investments to ensure proper corporate governance, including ensuring that properly constituted governing bodies such as boards of directors have oversight over Project Companies activity. In particular, we will seek to minimize opportunities for corruption, bribery and other improper payments in our own operations, and those of our Project Companies. Project Companies are required to put in place and enforce systems to ensure compliance.

We will incorporate these commitments throughout the investment cycle of our Projects through the implementation of an Environmental and Social Management System (ESMS).

Company policies require that the ESMS has been designed to ensure compliance with the following Compliance Framework:

- Neo Themis Responsible Investment Policy
- The international, national and local laws and regulations on environment, health, safety and social issues applicable in the Projects countries;
- The IFC Environmental and Social Performance Standards, dated January 2012
- The EIB Environmental and Social Handbook, dated December 2013
- the AfDB's 2013 Integrated Safeguards System - Policy Statement and Operational Safeguards
- The ILO Core Labour Standards and ILO Basic Terms and Conditions of Work
- The International Bill of Human Rights in line with the UN Guiding Principles on Business and Human Rights
- U.S. Foreign Corrupt Practices Act and the U.K. Bribery Act, as well as relevant national anti-corruption laws

Prior to all investments, the Company will assess whether the Project Companies and Projects are compliant and structured to comply with the Compliance Framework. In cases where gaps are identified, a corrective action plan with a reasonably acceptable timeframe will be established.

We will seek continual improvement of our policies and supporting processes and we will review it on a systematic basis. We will monitor the performance of our Project Companies in upholding our commitments and will report monthly, quarterly and annually back to the corporate management of Neo Themis. Company policies will be communicated to the Investors, Governments, Project Companies and to all employees involved in Projects.

Neelke Z. Huisman

2. ESG Compliance Framework

2.1 Compliance requirements

The Projects financed by the Company and the Project Companies in which the Company is, indirectly or directly, a shareholder must at all times comply with:

- The national and international laws, regulations, treaties or conventions applicable in the country where the Project;
- The IFC 2012 Performance Standards;
- The EIB 2013 Environmental and Social Handbook;
- The AfDB's 2013 Integrated Safeguards System - Policy Statement and Operational Safeguards
- The ILO core labour standards;
- The UN Voluntary Principles on Security and Human Rights.

2.2 Reference documents

The Projects financed by the Company and the Project Companies in which the Company is, directly or indirectly, a shareholder must be operated in line with Good International Industry Practices (GIIP). The following documents, not limited to, shall be referred to as GIP:

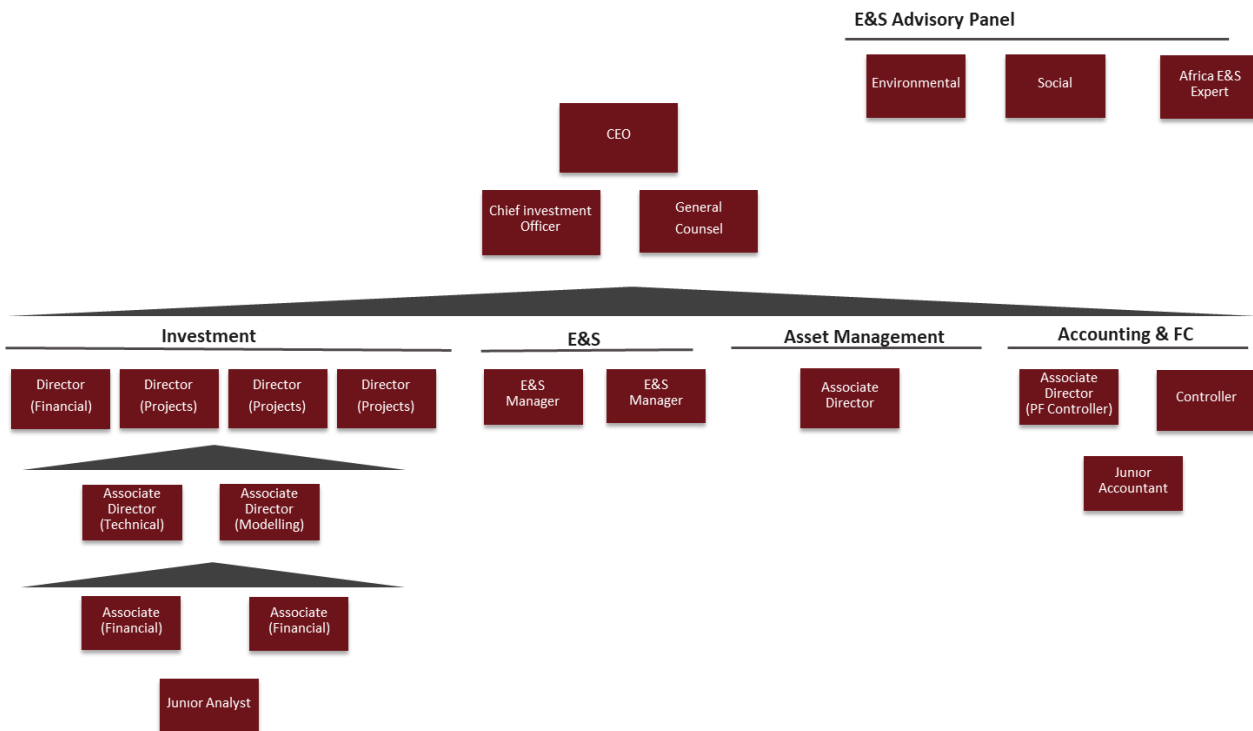
- The IFC/ World Bank Environmental, Health and Safety Guidelines dated April 2007;
- The IFC/EBRD Workers accommodation guidelines;
- The IFC Good Practice Handbook on Cumulative Impact Assessment and Management: Guidance for the Private Sector in Emerging Markets;
- The EIB Environmental, Climate and Social Guideline on Hydropower Development;
- The EBRD Environmental and Social Guidance Note for Hydropower Projects;
- The IFC Good Practice Handbook on the Use of Security Forces: Assessing and Managing Risks and Impacts;
- IFC's Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Emerging Markets;
- IFC's Workers Accommodation Guidelines
- The IADB Technical Note on Gender and Renewable Energy;
- The UN Guiding Principles on Business and Human Rights;

3. Organization and Responsibilities

3.1 Neo Themis ESG roles and responsibilities

Neo Themis recognize that a well-implemented ESMS requires commitment from senior management and a properly organized, well-trained team. The following defines the roles, responsibilities and authority to implement the ESMS. While Neo Themis Management is ultimately responsible for managing E&S risk, the day-to-day implementation of the ESMS is the responsibility of the ESG team of Neo Themis (referred to as “Company” throughout the document).

Figure 1: Organizational Structure



3.1.1 Neo Themis Management

Neo Themis Management is responsible for:

- Overall oversight of the Policy and ESMS implementation
- Ensuring that adequate resources are provided for the ESMS implementation

3.1.2 Investment and Asset Management Teams

The Investment and Asset Management Teams are responsible for:

- Supporting the E&S Manager in obtaining the necessary information from prospective and actual Projects to enable due diligence and monitoring.
- Supporting the E&S Manager in monitoring the implementation of the ESAP

3.1.3 E&S Manager

The E&S Manager is responsible for:

- Ensuring implementation of the present ESMS.
- Reviewing and, if necessary, updating the ESMS on an annual basis.
- Training Neo Themis staff and provide internal guidance on ESG matters.
- Organizing and conducting ESDD of Proposed Projects, with the support of specialized consultants where necessary.
- Organizing and conducting monitoring of Active Projects, with the support of specialized consultants where necessary.
- Providing guidance to Project Companies in the implementation of Project ESMS, ESMP, ESAP and more generally on all ESG matters.
- Collecting Key Performance Indicators from Project Companies.
- Reporting to Neo Themis management on any significant environmental, social, labour or health and safety incident, accident or circumstance.
- Producing the annual ESG report to management

3.1.4 E&S Advisory Panel

The E&S Advisory Panel is responsible for:

- At the request of Neo Themis Management or the E&S Manager, reviewing documents or providing E&S advice or assessments.
- Advising or assisting the E&S Manager and/or Neo Themis Management on addressing key E&S issues raised by third parties.
- Providing strategic ESG guidance to the E&S Manager and Neo Themis Management.

3.2 Project Companies' ESG roles and responsibilities

3.2.1 Project Company Management

Each Project Company will be governed by a board of directors which includes a Company representative (i.e., a senior manager from Neo Themis). The Project Company Management will report to the Project Company Board, and will be responsible for:

- Defining the ESG Policy of the Project Company, aligned on the Compliance Framework defined within this ESMS
- Making resources available for the ESG compliance of the Project with the Compliance Framework.
- Approving the regular ESG reports to the Company

3.2.2 ESHS Officer

Each Project Company will be fully responsible to identify and manage its E&S risks in accordance with the Company's Responsible. Each Project Company will appoint an ESHS Officer who will be responsible for preparing and implementing the Company's ESMS and reporting to Neo Themis' E&S Manager and to management.

Any change of a Project Company ESHS Officer shall be subject to the approval of the Company.

3.2.3 ESHS resources

The Company requires its Project Companies to mobilize the necessary resources to carry out develop, construct and operate Projects in compliance with the Compliance Framework.

4. Identification of Environmental and Social Risks and Opportunities

4.1 Overview of Potential Adverse Impacts

Potential E&S risks and impacts associated with the Projects cover a wide range of issues, related to the technical nature of the Project, or to the social and natural environment where it is located. Due to the nature of energy projects, E&S impacts and risks are expected to be significantly different during construction and during operation. Decommissioning is not expected, at least at an entire Project level. The Company's investment mandate covers both brownfield of greenfield Projects.

A description of Projects at least at conceptual level forms the basis for an assessment of their potential E&S impacts and risks.

This Project description should include:

- A description of all the Project's permanent components, including a description of the Associated Facilities, i.e. facilities that are not funded as part of the Project and that would not have been constructed or expanded if the Project did not exist and without which the project would not be viable (e.g. transmission lines, sub-stations).
- A description of the Project's temporary components needed for its construction.
- A description of the Project's operation and maintenance.

4.1.1 Potential Adverse Impacts (All Projects)

The section below gives an overview of key cross-cutting environmental and social risks and impacts which may apply to all Projects and which the Company will evaluate during the Project's Environmental and Social Due Diligence (ESDD).

4.1.1.1 Biodiversity Conservation

Due to their geographical location, Projects (and their ancillary services such as transmission lines and roads) may present potential threats to biodiversity as a result of habitat destruction, fragmentation and degradation by the conversion of natural habitats such as forests, wetlands and grasslands.

The ESDD process will identify the risks and impacts to biodiversity and ecosystems. The conversion of natural habitats should be avoided unless there are no other alternatives. In cases of conversion or degradation, Projects need to implement appropriate mitigation measures and identify opportunities to enhance habitat and protect biodiversity. Where biodiversity impacts have been identified in the ESDD process, appropriate management plans such as Biodiversity Action Plans should be implemented.

The Company will not fund projects that result in the destruction of Natural Habitats or Critical Habitats (as defined by the IFC) without justification and appropriate mitigation measures following the mitigation hierarchy being put in place to ensure a net gain or, at least, no net loss of biodiversity.

4.1.1.2 Labour Standards and Occupational Health and Safety

The construction of Projects may require an important labour force and workers' rights need to be respected in accordance to IFC PS2 and the principles of ILO Core Convention. This is particularly relevant where the national legal framework for labour is poor or poorly applied. Risks include discrimination and unfair treatment at work, poor working conditions and terms of employment, no freedom of association and

collective bargaining, no functioning grievance mechanism for labourers and the use of child labour, forced and bonded labour.

Contractors and suppliers will be required to apply the same labour standards and practices as followed the Project Companies (ILO Core Labour Standards and ILO Basic Terms and Conditions of Work). Minimum age requirements in accordance with ILO Convention no.138 will be applicable, unless the national standards and requirements are more stringent.

Project Companies will need to ensure that all work of persons under the age of 18 is subject to appropriate risk assessment and regular monitoring of health, working conditions and hours of work. Project Companies and contractors cannot employ persons, who are under the age of 15 and appropriate measures need to be implemented to verify the age of employees.

Occupational health and safety risks will also be greatest during the construction phase of a project. Project Companies will need to assess the labour policies and practices of suppliers and contractors and their Occupational Health and Safety (OHS) systems as this will be an essential component of risk management. Where necessary, Project Companies may need to implement additional measures to ensure that their contractors uphold good labour standards. OHS policies and procedures need to also be implemented for the operation phase.

Emergency Preparedness and Response Plans (EPRP) need to also be implemented in the event of accidents or hazards that could result in workers injury or damage the environment.

4.1.1.3 Community Health, Safety and Security

Projects can present environmental and social risks and impacts on local communities' health, safety and security. Incidents and accidents can arise due to increased traffic and the movement of heavy vehicles during the construction phase of a project. Other risks may result from the presence of migrant workers and camps, security risks (from security personnel) and structural failures of a Project during operation. Where a Project's activities create material direct and indirect risks to local communities it is important that the Project Company addresses these risks in its EPRP. The EPRP described above should be developed in collaboration with the Affected Communities. A stakeholder engagement plan, including a grievance mechanism, must be prepared for each Project and must cover the construction and operation phases.

4.1.1.4 Land Acquisition and Involuntary Resettlement

Involuntary resettlement refers to both physical displacement (relocation and/or loss of home) and economic displacement (loss of access to resources from income generation or means of livelihood) due to land acquisition and use by the Project. Involuntary resettlement should be avoided for example through amicable land purchase procedures, and in cases where it is unavoidable, it should be minimized and appropriate measures to minimize the impacts on individuals and communities should be carefully and sensitively implemented. Where land acquisition and resettlement is managed by local/ national government agencies, Project Companies, to the extent permitted, should ensure that the outcomes are consistent with the IFC Performance Standards. In the case where land acquisition and resettlement is required, a Land / Resettlement Action Plan (including Livelihood Restoration Plan) have to be prepared and implemented for Projects that affect communities or part of a community.

4.1.1.5 Indigenous Peoples

It is critical that Project Companies establish a constructive ongoing relationship with the Affected Communities, including Indigenous Peoples. In some geographies, 'indigenous ethnic minorities', 'hill tribes', 'minority nationals' and other groups are not recognized to be Indigenous Peoples under national policies or regulations, or can even be discriminated. The presence among the Project Affected People

(PAP) of groups that meet the criteria for Indigenous Peoples under IFC PS7 criteria shall be identified at the Project level.

Adverse impacts on affected communities of Indigenous Peoples should be avoided, where possible. Where adverse impacts on Indigenous Peoples are unavoidable, Project Companies should minimize, restore and or/compensate for these impacts in a culturally appropriate manner. The Project Company should establish a formal consultation process from the early stages of project development and gain the Free Prior Informed Consent (FPIC) of the groups that meet the Indigenous Peoples criteria, to get a clear endorsement (or rejection) by their representatives and a statement of all accompanying mitigating and remedial measures and benefit-sharing agreements. It is highly likely that Project Companies will need expert assistance to run such a consultation process. Any relocation of Indigenous Peoples should comply with IFC PS 5, and given the vulnerability of these people, these communities will potentially need more assistance in the relocation process.

4.1.1.6 Social Inclusion and diversity

The Company considers social inclusiveness and diversity as fundamental feature of a modern, well-functioning Project.

During the ESDD, Project Companies will identify individuals and groups that may be differentially or disproportionately affected by the Project, or might not have access to the Project benefits, because of their disadvantaged or vulnerable status and identify whether these individuals or any other stakeholder groups are likely to be excluded from, or unable to participate in, the mainstream consultation process or would require specific measures and/or assistance to do so.

The Project's developers will notably identify any potential ethnic- or gender-specific risks, and will develop mitigation measures to reduce these. This will include promoting equality of opportunity and socio-economic empowerment.

Where Projects are located in an area with populations that include a significant proportion of vulnerable persons from the following categories, specific measures will be sought to ensure long-term benefits for these populations in the area of influence of the Project:

- people living below the poverty line and landless people;
- refugees, internally displaced people and migrants;
- ethnic minorities known to be discriminated.

4.1.1.7 Cultural Heritage

Projects may not be located in areas where they would be visible or would impact formally protected cultural heritage (e.g. by the UNESCO World Heritage Site), without a formal consent from the authority in charge of such cultural heritage site. For example, sites of religious significance (including graves and burial sites) or sites which have a natural feature, such as a sacred stone, may be located in an area where a Project is proposed to be developed. The Project's developers need to proactively engage with local communities to understand the nature of the cultural heritage and the value placed on it by the community.

A 'Chance Finds' Procedure should also be implemented in the eventuality that tangible cultural heritage becomes apparent during construction. In sensitive areas, earthworks should be monitored by a competent archaeologist.

4.1.1.8 Cumulative Impacts

Cumulative impacts may arise as the development of a project with similar impacts in the same geographical area or affecting the same resource (e.g. watershed). Whilst the environmental and social impacts of the individual Project may not be considered significant, the impacts may become significant when added to existing and potential effects from similar projects in the area.

Where a Project has cumulative environmental and social impacts, Project Companies should have mechanisms for identifying the magnitude and significance of its contribution to those impacts and risks, and should define appropriate mitigation measures during the ESDD. Cumulative impacts should be included in the ESIA process.

4.1.1.9 Human Rights

The abuse of Human Rights in the context of Projects is not tolerated. The risk for such abuse should therefore be assessed systematically in order to mitigate the business and reputational risks for the Company. Examples of risks and consequences include project delays due to ongoing conflict with stakeholders arising from a flawed government-led land acquisition process that negatively impacts the basic livelihoods of local communities, risks posed by security providers, risks from poor working conditions of contractors and their sub-contractors (relating to wages, worker health and safety, etc) or withholding workers' identity documents (for example, where migrant workers are engaged).

Contractors and suppliers should be assessed for human rights risks and impacts. The importance of a meaningful stakeholder engagement process will help identify human risks and impacts, including an approach of prioritizing those most at risk.

4.1.2 Potential Adverse Impacts (Specific projects)

4.1.2.1 Hydropower projects

Hydropower projects can provide renewable energy, but they are also associated with a number of key environmental and social risks and impacts that must be considered. These include the associated flooding of the area upstream of a dam to provide a constant water supply for the powerhouse. The loss of this area may result in loss of critical habitats or agricultural areas, changes to the hydrology of watercourses downstream, emissions of pollutants and greenhouse gases from decomposition of flooded vegetation, and disrupt of movement from aquatic and terrestrial fauna. Social impacts may include physical and economic resettlement, as well as altering resources to artisanal fisheries. The References for Hydropower Projects in Appendix 4 summarizes key environmental and social impacts for hydropower projects, receptors and resources they affect and options for mitigation.

If a hydropower project is a "high-risk" (Category A) project and includes material safety, reputational, social or environmental risks and is likely to create material and ongoing grievances and complaints from multiple stakeholders which may cause reputational and financial risk, a MDB needs to be a lead lender. The MDB should be one of the following: AfDB, DFC (former OPIC), CDC, DEG, EBRD, EIB, IaDB, IFC, or World Bank (only in the new Environmental and Social Framework is applied).

4.1.2.2 Solar energy projects

Similarly to hydropower projects, solar projects generate renewable energy enhancing economic and social growth. The construction of solar projects however generates environmental and social impacts and risks. This can include loss of habitats and biodiversity, economic and physical displacement, and land issues. It can be expected that large solar power projects will have more significant environmental and social impacts.

The References for Solar Projects in Appendix 4 summarizes key environmental and social impacts for solar energy projects, receptors and resources they affect and options for mitigation.

4.1.2.3 Wind energy projects

The Company will only consider investments in onshore wind energy projects (not offshore). As with the other renewables, wind energy projects generate renewable energy with zero or minimal carbon emissions. Environmental and social impacts during the construction of wind energy projects may include loss of habitats and biodiversity, impact on migration routes or permanent habitat of birds and bats, or access roads and excavations affecting soils and watercourses.

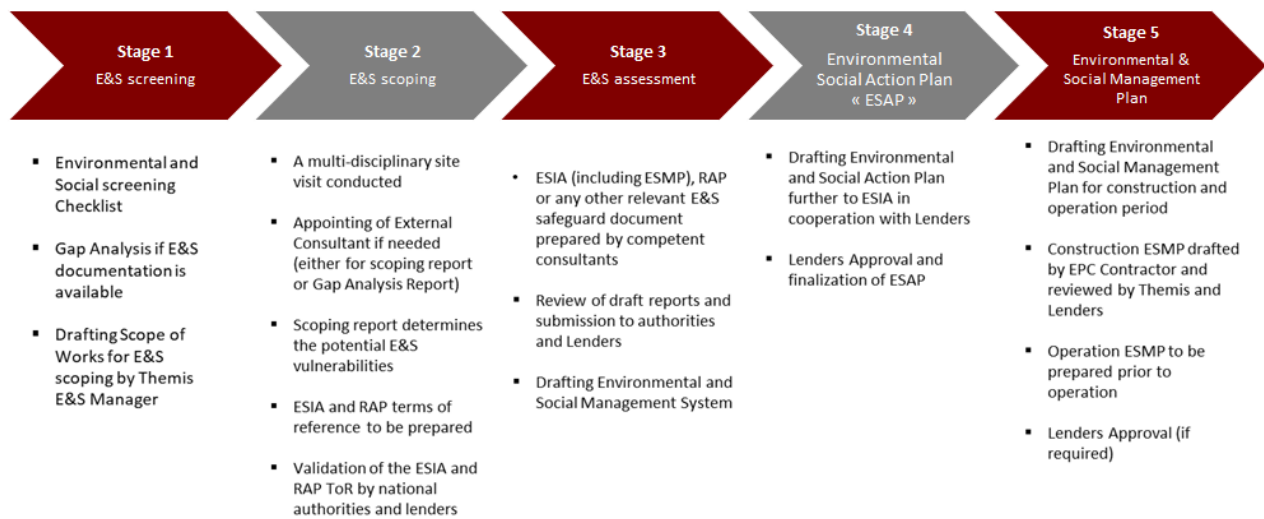
Impacts during the operational phase include visual impacts, noise and impacts on birds and bats. The References for Wind Energy Projects in Appendix 11 summarizes key environmental and social impacts for wind energy projects, receptors and resources they affect and options for mitigation.

4.2 E&S Process

An overview of the E&S Process is illustrated below :

Figure 2: Themis E&S process

Themis Energy will ensure that all projects are reviewed and evaluated against (i) local regulation (ii) minimum IFC Performance Standard and (iii) minimum requirement of AfDB or other major regional DFIs.



4.2.1 Stage 1 – E&S Screening

The E&S screening step is required prior to seeking the first Investment Committee approval for development capital.

The E&S Manager will use the Project Screening Checklist (Appendix 2) and undertake an initial desktop assessment, if required with the assistance of a qualified consultant, to verify the following and issue a Screening Report:

- Check against the exclusion list and restriction list (Appendix 1)
- Media search of publicly available information
- Project Categorization

- d) E&S risks and IFC Performance Standards likely to be triggered by the project
- e) Opportunities to “do good”
- f) Initial gap analysis, if available
- g) Preliminary scope of assessments

4.2.1.1 Exclusion List

At the Project Screening and Categorization phase, the E&S Manager will check that the project does not fall under the Exclusion or Restriction List (Appendix 1). If a proposed investment violates the Exclusion or Restriction Lists, it will not be pursued.

4.2.1.2 Media search of publicly available information

The E&S Manager will search information available in the public domain regarding any campaign or publication related to the Proposed Project, claims of adverse impact on local communities or the environment or past adverse E&S performance. The search will also identify the vicinity of the Project with protected areas or internationally recognized areas, notably:

- Key biodiversity areas
- Ramsar sites
- Emerald Sites
- UNESCO World Heritage sites

4.2.1.3 Project Categorization

The E&S Manager of the Company will provide a preliminary categorization for the Project as a Category A or B project using the Categorization Tool in Appendix 3. The categorization reflects the magnitude of environmental and social risks and impacts.

Category A projects: A Category A project is one with potential significant adverse environmental or social impacts which are diverse, irreversible or unprecedented. In other words, the project is a “high risk” project.

Category B projects: A Category B project is one with limited adverse environmental or social impacts that are few in number, generally site-specific, largely reversible and readily addressed through mitigation measures.

Category C projects (with minimal or no adverse environmental or social impacts) are unlikely to be developed by the Company, and this category should therefore not be used.

4.2.1.4 E&S risks and IFC Performance Standards likely to be triggered

This stage will enable the E&S Manager to identify any immediate red-flags and IFC Performance Standards applicable to a project.

4.2.1.5 Opportunities to “do good”

A preliminary assessment can identify potential suggestions for community related projects or other.

4.2.1.6 Gap analysis

The E&S Manager will conduct a gap analysis of the Proposed Project:

- Sufficiency of the technical information available about the project;
- E&S assessment gaps against the Compliance Framework;
- Existing Project Company (if any) E&S gaps against the Compliance Framework.

4.2.1.7 Preliminary scope of E&S Assessment

The E&S Manager will preliminarily define the scope of assessments to be prepared for the Proposed Project including, but not limited to:

for all projects	a comprehensive description of the Project, including temporary and permanent facilities and activities, associated facilities and activities, construction schedule and techniques, and operation mode.
	a Stakeholder Engagement Plan
for category A Projects	a detailed (supplementary) Environmental and Social Impact Assessment, covering PS1 to PS8 (where a PS is triggered) and structured to meet, but not limited to, the requirements of the EU EIA Directive.
for category B Projects	a simplified Environmental and Social Impact Assessment, proportionate to the Project E&S risks, covering PS1 to PS8 (except PS7 if not triggered)
for projects with significant economic resettlement	a Land Acquisition and Livelihood Restoration Plan (a Framework is acceptable for linear infrastructures across sparsely inhabited regions);
for projects with significant physical resettlement	a Resettlement Action Plan / Framework (a Framework is acceptable for linear infrastructures across sparsely inhabited regions)
for projects with significant adverse impacts on natural or critical habitats	a Biodiversity Action Plan
for projects with potential visual impacts on significant cultural heritage or touristic sites	a Visual Impacts Assessment
for all projects	an Environmental and Social Management Plan
	an Environmental and Social Action Plan

4.2.1.8 Informing the Board: E&S Risks of a Project

The E&S Manager of the Company will prepare a Screening Report for Management, including the factors above. A template is provided in Appendix 4.

4.2.2 Stage 2 - E&S Scoping

Stage 2 is launched after the E&S Manager receives a formal notification from Neo Themis management to start Stage 2, following the terms of the Screening Report.

Based on the preliminary scope (see chapter 4.2.1.6), the E&S Manager will organize the necessary site visit and documents collection in order to define the detailed scope of the E&S Assessment required for the Proposed Project to meet the Compliance Framework.

The stage 2 is therefore composed of the following steps:

- A multi-disciplinary site visit conducted;
- Appointing of External Consultant if needed (either for scoping report or Gap Analysis Report);
- Scoping report determines the potential E&S vulnerabilities;
- ESIA and RAP Terms of Reference to be prepared;
- Validation of the ESIA and RAP Terms of Reference by national authorities and lenders.

4.2.3 Stage 3 - E&S Assessment

Based on the scope defined under Stage 2, the assessment of environmental and social risks and impacts should be conducted by third party experts or in-house (to the discretion of the E&S Manager) to review existing available environmental and social information related to a Proposed Project. This should include a desk-top review, a site visit to the project, and an assessment of the stakeholder engagement process.

4.2.3.1 E&S Impact Assessment

The ESIA step is required prior to seeking Investment Committee approval for construction equity.

The type, scale, development stage and location of the project will determine the type of assessment necessary. A detailed environmental and social impact assessment will be carried out for category A projects.

Where appropriate, specific human rights due diligence will be conducted as part of this process. In addition, where third party plans, studies or assessment have been prepared by government authorities or other parties, this process will take into account the findings and conclusions from those assessments. The Company will identify individuals or groups that may be directly and disproportionately affected by the project because of their vulnerable or disadvantaged status. The Company will identify differentiated measures so that adverse impacts do not fall disproportionately on them.

The ESIA should consider:

- Project Components: such as roads, quarries, construction camps
- Associated facilities: Facilities that are not funded as part of the project and that would not have been constructed or expanded if the project did not exist and without which the project would not be viable (e.g. captive power plants, transmission lines, warehouses)

- Cumulative impacts: that result from the incremental impact of the project when added to other existing, planned and reasonably predictable future projects and developments
- Human rights: where human rights have been identified as an issue during project screening, they should be addressed in the ESIA.

ESIAs should be completed by competent experts and must conform to the requirements of host country and should be developed following the principles of the IFC Performance Standards.

E&S Assessment must, as defined at stage 2, include all the relevant documents listed in 4.2.1.7.

The Company will appoint a third-party consultant for ESIA of all category A projects. A Terms of Reference for Environmental and Social Impact Assessment is provided in the Appendix 5.

For Category B projects a simplified ESIA will be prepared to identify the main risks and impacts, and to evaluate performance against the IFC Performance Standards and regulatory compliance. The process should also identify additional corrective actions required to ensure compliance.

4.2.3.2 E&S Report for Investment Committee information

At the end of Stage 3, the E&S Manager issues an E&S Report (a template is provided in Appendix 7), aimed at informing the Investment Committee in view of the Project approval process. The reports produced under stage 3 are attached to the E&S Report.

4.2.4 Stage 4 - Environmental and Social Action Plan (ESAP)

As a project progresses from the development stage towards financial close, the Investment Committee will be provided with updated versions of the E&S report, especially as other investors or lenders' E&S due diligence processes progress.

Before financial close:

- The E&S Manager will, through coordination with other investors or lenders' E&S officers, make the best effort to ensure a single set of E&S requirements (preferably a single ESAP) applies to the Proposed Project. If this cannot be achieved, the E&S Manager will check that no contradictory E&S requirements apply to the Project.
- The E&S Manager will confirm that the project has in place arrangements that align fully with the IFC Performance Standards.

A final E&S Report including the ESAP will be shared with the Investment Committee.

The E&S Manager will, during the approval stage, answer any question raised by Neo Themis Investment Committee.

4.2.5 Stage 5 - Environmental and Social Management Plan (ESMP)

Once the E&S assessments and due diligence processes of all involved parties are completed, the E&S Manager will organize the preparation of an ESMP.

The ESMP will:

- Summarize all the E&S actions and requirements applicable to the Project, as defined across the E&S documents prepared for the Project.

- Allocate the responsibility to implement these actions and requirements to the relevant parties, typically including the Project developer and the contractors.
- Define a schedule and budget for the implementation and monitoring of these E&S actions and requirements.

The ESMP will be communicated by the E&S Manager to the parties responsible for its implementation. The E&S Manager will verify that the monitoring requirements applicable to the Project are consistent with the Company's own monitoring requirements.

5. E&S Training

5.1 Neo Themis

To ensure that Neo Themis team has sufficient knowledge of the ESMS, the E&S Manager will run annual training for Neo Themis employees. All ESG training will be documented, as per Appendix 12. The training session will address:

- The Compliance Framework;
- The E&S status and key risks of the Proposed and Active Projects;
- The ESG roles and responsibilities of Neo Themis staff;
- Annual ESG report key indicators review.

5.2 Between Neo Themis and Project Companies

The E&S Manager will provide guidance to the Project Company's ESHS Officer to put in place training, management plans and practices to comply with the Company's Responsible Investment Policy. The E&S Manager will be in regular contact with the ESHS Officer of the Project Companies and will keep the ESHS Officer of the Project Company informed or updated on new ESG tools, reports and other information relevant to the Project Company. It will also assess the need for further training on a periodic basis.

5.3 Project Companies

The Company requires its Project Companies at corporate and project level to have arrangements in place for establishing and managing the competency, training and awareness of employees and non-employees in relation to health, safety, E&S matters. This includes employees hired by contractors and service providers involved in the Projects development, construction or operation. All personnel must be competent to perform their role on the basis of appropriate education, training or experience, as applicable.

Training must be based on role, risk, and responsibilities; and must be an ongoing and iterative process. A training program must be developed that seeks to achieve competency and quality outcomes rather than only training attendance and should be focused on the needs of the audience. This may mean that different learning methods must be adopted to cater for differing needs.

Project Companies must establish a competency framework that identifies the knowledge, skills and behaviours required for each job function, taking into consideration associated risks and activities, legal and regulatory requirements and leadership level and responsibilities. It should reflect the different competency requirements of different employee groups for each subject area. Using the competency framework, a training needs analysis shall be prepared for each individual employee and, where gaps are identified, these must be addressed through a defined training plan stating the required training, the competency level, and who will provide this training. The Training Needs Analysis should be completed at the start of employment and updated on an annual basis or when there is a significant change (e.g. in job function, in the work environment, as a result of legal requirements, etc.). Training programs must be developed and delivered based on the outcome of the Training Needs Analysis and may be delivered in-house and/or through external training providers.

The ESHS Officers of Project Companies are required to:

- Provide an ESG training session to contractors to inform them of their ESG requirements.
- Require contractors to submit for approval an ESG training plan including induction of all workers, commensurate to the ESG risks associated with the activities carried out by the contractor and meeting the ESG requirements and management objectives of the Project.
- Approve and monitor the effective implementation by the contractor of its training plan.

Project Companies should record these training sessions in a similar format to that provided in Appendix 122.

6. E&S Management Procedures

6.1 Compliance with Legal and International Standards and GIIP

The Company will seek to make continuous improvements with respect to management of E&S matters and work through the time to apply relevant international best practice standards with appropriate targets and timetables for achieving them.

All Investment Agreements will contain appropriate environmental representations, warranties, and covenants requiring that Project Companies and Projects are in compliance in all material aspects with host country environmental, health, safety and social requirements and the Company's Compliance Framework. A Template for E&S Conditions and Provisions is provided in the Appendix 13.

The ESAP should be included in the Investment Agreement and it is the responsibility of the Project Company to communicate and include the ESAP as part of the Service Agreements with third-parties.

The Investment Agreement should also specify that Project Companies are required to report on a quarterly and annual basis, and report on incidents of significant non-compliance, enforcement actions, work stoppages due to E&S issues, and significant workplace accidents within 24 hours. A Serious Incident Reporting Template is provided in the Appendix 19.

6.2 Project Companies

Each Project Company will develop a corporate ESMS in accordance to the requirements of this ESMS and will nominate an ESHS Officer with the necessary skills and expertise to implement the ESMS. Management should ensure that adequate human and financial resources are provided on an ongoing basis.

The Company will cause each Project Company to develop an ESMS for each project. The ESHS Officer of the Project Company is responsible for ensuring its implementation.

6.3 Managing Contractors and other third-parties

Project Companies are responsible for managing environmental and social risks of Projects and therefore must proactively monitor the environmental and social performance of contractors and sub-contractors.

Project Companies should consider EPC ability to manage ESG risks, management commitment, capacity and track-record, including relevant certification (e.g. ISO 14001, ISO 45001 (former OHSAS 18001)) prior to their appointment. A Sample Questionnaire to use during contractors selection is provided in Appendix 14.

The Project Company should require all contractors to operate in accordance with both local and national regulations and Good International Practice (GIP), and implement construction and operational phase Environment, Health and Safety and Security (EHSS) management plans.

These plans should cover aspects such as labour and working conditions, occupational health and safety, resource sourcing and use, and pollution prevention. Project Companies should ensure that Contractors employ qualified environmental and social personnel to oversee environmental and social performance.

E&S Specifications for Contractors are found in Appendix 15, and should be used from the request for proposals to the negotiation stage.

Standard E&S contract conditions for contractors can be found in Appendix 16.

Suppliers' principles can be found in Appendix 17. They should be attached to the contractor's request for proposal and contract. Contractors should attach it to the contractual documents with their sub-contractors and suppliers.

7. Communications and Reporting

7.1 Reporting to Management

7.1.1 Quarterly ESG Reporting

The Company will prepare and present an E&S Performance Report on a quarterly basis to its management in accordance with the quarterly reporting template found in Appendix 18.

7.1.2 Annual ESG Reporting

Within 45 days after the end of each Fiscal Year, the Company will prepare and present the E&S Annual Report to its management, in accordance with the template Annual E&S Report provided in Appendix 18.

7.1.3 Serious Incident Reporting

The E&S Manager will within 24 hours after becoming aware of any occurrence, notify the Management about any environmental or social incident relating to any Project, which has or could reasonably be expected to have a material adverse effect on the business and/or operations of a Project, including details thereof and of the measure being taken in respect of such incident. Parallel reporting shall be followed referring to each Project's Loan Agreements with the lenders as well as ensuring the satisfaction of the local regulatory requirements of the country.

A Serious Incident Reporting Template is provided in Appendix 19.

7.2 Project Companies Reporting to Affected Communities

Each Project Company is expected to provide periodic reports to the Affected Communities that describe progress with implementation of the project ESAP on issues that involve ongoing risk to or impacts on Affected Communities and on issues that the consultation process or grievance mechanism have identified as a concern to the Affected Communities. If there are material changes in or additions to the mitigation measures or actions described in the ESAP on issues of concern to the Affected Communities, the updated relevant mitigation measures or actions will be communicated to them. The frequency of these reports will be proportionate to the concerns of the Affected Communities, but not less than annually.

Reporting to Affected Communities will, together with other engagement activities, be included in the Stakeholder Engagement Plan that each Project Company has to prepare and implement for each Project.

A template for Stakeholder Engagement Plan is provided in Appendix 20.

7.3 Communication and reporting by Project companies to the Company

7.3.1 Monthly/Quarterly ESG Reporting

Project Companies will provide the Company an update on the Project ESAP and key ESG indicators on a monthly basis during construction and on a quarterly basis during operation.

The key ESG indicators will be consistent with those collected by the Project Company from contractors, typically:

Leading indicators

- Number of training courses delivered on Environmental, Social, Health and Safety topics
- Number of positive safety interventions
- Number of stakeholder/ community engagement meetings
- Number of near misses

Lagging indicators

- Number and severity of injuries (first aid cases, medical treatment cases, lost time incidents)
- Number of incidents that triggered the Emergency Preparedness and Response Plan
- Lost time injury frequency rate
- Number of grievances received from external stakeholders
- Number of spills to the environment
- Number of compliance breaches

7.3.2 Annual ESG Reporting

Each Project Company will provide the Company with an E&S Annual Report within 15 days of the end of the Fiscal Year. A Template of the Annual E&S Report is provided in Appendix 18.

7.3.3 Serious Incident Reporting

Each Project Company will within 24 hours after becoming aware of any occurrence, notify the Company of any environmental or social incident relating to any Project which has or could reasonably be expected to have a material adverse effect on the business and/ or operations of a Project, including details thereof and of the measure being taken in respect of such incident.

A Serious Incident Reporting Template is provided in Appendix 19.

8. Monitoring and Reviewing

8.1 Monitoring of Projects

Project Companies are required to monitor the E&S performance of a Project throughout the lifecycle of the Project (i.e. construction, operation and decommissioning). The ESAP is to be used as the basis for monitoring a Project.

During the construction phase of Category A projects, the E&S Manager is expected to visit the site at least once every six months to monitor the implementation of the ESAP.

During the operation phase of Category A and Category B projects, the E&S Manager is expected to conduct a site visit on an annual basis to monitor the performance of a Project and review the implementation of the Environmental and Social Monitoring Plan for the operational phase.

Neo Themis will establish with Project Companies a set of KPIs to monitor E&S issues. These are to be included in the Contractor E&S Requirements, as per the template in Appendix 15.

Neo Themis is to provide an update on the ESAP and E&S items during quarterly Board Meetings.

On an annual basis, Neo Themis will be required to complete an Annual E&S report using the template provided in Appendix 18. Monitoring of Project Companies

The Company will review the progress made with regards to the implementation of the Project Company's ESMS on a regular basis.

During site visits to Projects, the E&S Manager will monitor the implementation of the ESMS by Project Companies. Monitoring outcomes and any new identified corrective actions will be documented and the Company will work with Project Companies to ensure that corrective actions are implemented.

9. Stakeholder Engagement and Grievance Mechanism

The Company, Project Companies and Projects will each implement and maintain a procedure for stakeholder engagement that includes methods to:

1. Engage with Projects stakeholders
2. Screen and assess the issues raised to determine how to address them;
3. Provide, track and document responses (if any)
4. Adjust the management program (as appropriate)

9.1 Neo Themis

9.1.1 External Communications

Neo Themis via its website will disclose the list of Projects it is involved in, and can receive external communications related to these Projects. All communications pertaining to E&S issues will be forwarded by the administrator of the website to the E&S Manager who will follow up as appropriate and file all communications.

Queries received from a stakeholder through the website must be systematically answered by the E&S Manager, provided they are eligible, i.e. (i) they are related to a Project in which Neo Themis is involved, (ii) they are related to an ESG compliance issue, and (iii) the stakeholder in question already addressed the Project Company.

9.1.2 Grievance Mechanism

Neo Themis has established a Grievance Mechanism aimed at bringing an amicable resolution to any eligible issue raised by a stakeholder in relation with a Project in which Neo Themis is involved. Neo Themis Grievance Mechanism is provided in Appendix 21.

9.2 Project Companies

9.2.1 Stakeholder Engagement

All Project Companies are expected to establish a Stakeholder Engagement Plan (SEP) for each Project. The SEP should be designed in accordance to the IFC Performance Standards and taking into account vulnerable groups and Indigenous Peoples. Stakeholder engagement should be scheduled for the scoping phase of the ESIA (or similar), for the presentation of the draft ESIA report, and periodically during project construction and operation.

The SEP for each project should be scaled to fit the needs of the project and include:

- Stakeholder analysis, identifying and prioritizing key stakeholder groups, focusing on Affected Communities
- A program and timetable for sharing information and consulting with each of these groups
- A description of resources and responsibilities for implementing stakeholder engagement activities
- The establishment of a Grievance Mechanism in accordance to the IFC Performance Standards

- The implementation of effective monitoring of stakeholder engagement activities and reporting back to stakeholders
- A description of how stakeholder engagement activities will be incorporated into a company's management system.

A Template Stakeholder Engagement Plan is provided in Appendix 20. Project Companies should also refer to the following references:

- IFC's Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Emerging Markets

9.2.2 Project Companies Grievance Mechanism

Each Project Company is expected to establish a formal grievance mechanism to receive and facilitate resolution of grievances about the company's E&S performance in line with Neo Themis Grievance Mechanism. Project Companies must establish project grievance mechanisms from the outset of the project design and maintain a grievance mechanism throughout the project lifecycle.

Queries received from a stakeholder through the website must be systematically answered by the ESHS Officer, provided they are eligible, i.e. (i) they are related to the Project, and (ii) they are related to an ESG compliance issue.

Project Companies can use the Grievance Mechanism template provided in Appendix 21.

Employees of Project Companies should also have a grievance mechanism which is transparent and prevents retribution.

Contractors and sub-contractors will also be required to establish a grievance mechanism aligned to the Project Company and Neo Themis Grievance Mechanism. Workers hired by contractors and sub-contractors can use their company's or the Project Company's grievance mechanism.

10. Non-Compliance Management

10.1 Non-Compliances

The E&S Manager should report any non-compliance to the Company through Regular Reporting or Incident Reporting. Non-compliances that can be readily addressed are treated using the following procedure:

- Non-Compliance categorization:

Consequences	Health & Safety	incident without time loss risk	accident or risk of accident with time loss	fatality risk
	Environmental	Pollution or damage readily remediable	Pollution or damage difficult (long / expensive) to remedy	Non remediable pollution or damage
Probability of occurrence	ongoing or imminent	Category 2	Category 3	Category 3
	likely	Category 1	Category 2	Category 3
	possible but not likely	Category 1	Category 1	Category 2

- Non-Compliance treatment by category

Non-Compliance category	Action
Category 1	<ul style="list-style-type: none"> • Verbal notification of the Non-Compliance. • Verbal notification of the corrective action. • Written record of the Non-Compliance and corrective action, and written reporting to the Project Company management and to the direct line manager of the person who caused the Non-Compliance. • Report through Regular Reporting
Category 2	<ul style="list-style-type: none"> • Verbal notification of the Non-Compliance. • Verbal notification of the corrective action. • Immediate verbal notification to the direct line manager of the person who caused the Non-Compliance. • Written record of the Non-Compliance and corrective action, and written reporting to the Project Company management and to the direct line manager of the person who caused the Non-Compliance. • Report through Regular Reporting
Category 3	<ul style="list-style-type: none"> • Verbal notification of the Non-Compliance. • Verbal instruction to stop the activity. • Immediate verbal notification to the Project Company management and the direct line manager of the person who caused the Non-Compliance. • Meeting with the parties involved and their direct line managers to decide corrective actions before the activity resumes. • Report through Incident Reporting.

In case a Non-Compliance cannot be readily closed, or in case of disagreement between the E&S Manager and the Project Company ESHS Officer regarding a Non-Compliance, the E&S Manager can request the Project Company to contract at the Project Company expense an independent consultant to qualify and

quantify the Non-Compliance and, if necessary, define corrective actions to be undertaken by the Project Company.

A Non-Compliance that was notified and repeats without having been addressed as requested by the E&S Manager is systematically escalated to the upper category.

10.2 Repeated Non-Compliances

If the Project repeatedly does not comply with the Applicable Rules, at the first request of the Company, the following persons will be replaced:

- The ESHS officer.
- One or several members of the Project Company management.
- Any other staff of the Project Company or of a company contracted by the Project Company, directly involved in the non-compliance.

Appendix 1. Company Exclusion and Restriction Lists

The Company will not (directly or indirectly) finance any activity, production, use of, trade in, distribution of or involving:

Exclusion List:

1. Production or activities involving harmful or exploitative forms of forced labour¹/harmful child labour²;
2. Production or trade in any product or activity deemed illegal under host country laws or regulations or international conventions and agreements ratified by the host country;
3. Any business not related to the development, financing, construction and operation of conventional and renewable energy projects in Africa;
4. Production or trade in wildlife or wildlife products regulated under the Convention on International Trade in Endangered Species or Wild Fauna and Flora (CITES);
5. Production or use of or trade in hazardous materials such as radioactive materials, unbounded asbestos fibres and products containing PCBs;
6. Production, use of or trade in pesticides/herbicides, chemicals, ozone depleting substances³ and any hazardous substances subject to international phase-outs or bans;
7. Destruction of Natural or Critical Habitats⁴ (as defined by the IFC) without appropriate mitigations measures being put in place to ensure a net gain or, at least, no net loss of biodiversity;
8. Offshore wind projects.

Restriction List

- Oil pipelines, other than as part of an eligible power generation project.
- Gas pipelines other than as part of an eligible power generation project.
- Large hydro-power that are high-risk (i.e. impacts on natural habitats or physical resettlement and with reputational risk) may only be carried out if an MDB is a lead lender
- Any conventional / hybrid power project (both greenfield and plant refurbishment) which does not comply with the EIB's Emission Performance Standard (EPS) of 550 g CO₂/kWh, it being agreed

¹ "Forced labour" means all work or service, not voluntarily performed, that is extracted from an individual under threat of force or penalty.

² "Harmful child labour" means the employment of children that is economically exploitive, or is likely to be hazardous to, or to interfere with, the child's education, or to be harmful to the child's health, or physical, mental, moral or social development. In addition, any labour that is performed by a person which has not yet reached the age of 15 is considered to be harmful, unless the local legislation specifies compulsory school attendance or the minimum age for working to be higher; in such cases, the higher age will be applied for defining harmful child labour.

³ "Ozone Depleting Substances" (ODS): Chemical compounds, which react with and delete stratospheric ozone, resulting in "holes in the ozone layer". The Montreal Protocol lists ODS and their target reduction and phase-out dates.

⁴ "Critical Habitat" is a subset of both natural and modified habitat that deserves particular attention. Critical Habitat includes areas with high biodiversity value that meet the criteria of the World Conservation Union ("IUCN") classification, including habitat required for the survival of critically endangered or endangered species as defined by the IUCN Red List of Threatened Species or as defined in any national legislation; areas having special significance for endemic or restricted-range species; sites that are critical for the survival of migratory species; areas supporting globally significant concentrations or numbers of individuals of congregatory species; areas with unique assemblages of species or which are affiliated with key evolutionary processes or provide key ecosystem services; and areas having biodiversity of significant social, economic or cultural importance to local communities. Primary forest or forests of high conservation value shall be considered Critical Habitats.

that any such project that uses fuel oil or similar in a transitory fashion shall be acceptable providing the foregoing EPS is met.

- Thermal power plants or projects using geothermal energy with planned greenhouse gas emissions above the country/grid average emission factor (expressed in CO₂/kWh) or above 550gCO₂/kWh shall not be accepted.
- Hydropower schemes with a large reservoir which, during the first ten years of operation, would not emit significantly less than a thermal powerplant with the same installed capacity, or with planned greenhouse gas emissions above the country/grid average emission factor (expressed in CO₂/kWh) shall not be accepted.

Appendix 2. Project Screening Checklist

Screening Questions	Yes	No	Comments
Exclusion list			
1. Is the Project in the exclusion list ?			
2. Is the Project in the restriction list ?			
Eligibility			
3. Does the Project fulfil the Requirements for Eligible Sectors?			
4. Compatibility with Company's E&S Policy			
Reputation risks			
5. Are there any reputational issues with related parties (project sponsors, investors, contractors, sub-contractors or other third parties) related to the Project?			
6. Are there any known or potential human rights issues in the country?			
7. What is the track record of related parties in terms of human rights?			
8. What opportunities are there to “do good” (e.g. community related projects, employment, etc.)			
PS1 - Legal compliance			
9. What assessment (if any) has been completed to assess environmental and social impacts?			
10. Has the Project an environmental permit delivered by the competent authority?			
11. What is outstanding? What is the timeline for obtaining outstanding permits and licenses?			
12. Is the environmental permit being contested formally at the national or international level?			

Screening Questions	Yes	No	Comments
13. Has the Project been fined or sentenced over the last five years for a breach of national legislation related to (i) environment protection, (ii) labour, (iii) pollution, (iv) workers or public health & safety, (v) land use or ownership, or (vi) cultural heritage.			
PS1 – E&S commitment and capacity			
14. Is the Project developer willing and committed to meet IFC and EIB E&S standards?			
15. Does the Project have an experienced staff responsible for environmental, health & safety and social compliance?			
PS2 – Labor and working conditions			
16. From where will labor be sourced (local/ migrant)?			
17. What is the minimum age in the country?			
18. Is the Project in a country or sector where child labor is a risk, directly or through the supply chain?			
19. Has a contractor been identified to build the project? What is their reputation in terms of labor issues? Do they have any previous history of poor labor practices (e.g. injury/ fatalities/ child labor)			
PS3 – Pollution control			
20. Does the history of the site suggest that the site may be contaminated from previous use? Has a site assessment been conducted to assess contamination?			
PS4 - Health and safety			
21. Over the last five years, has a worker or a member of the public been killed or severely injured in relation to the Project?			

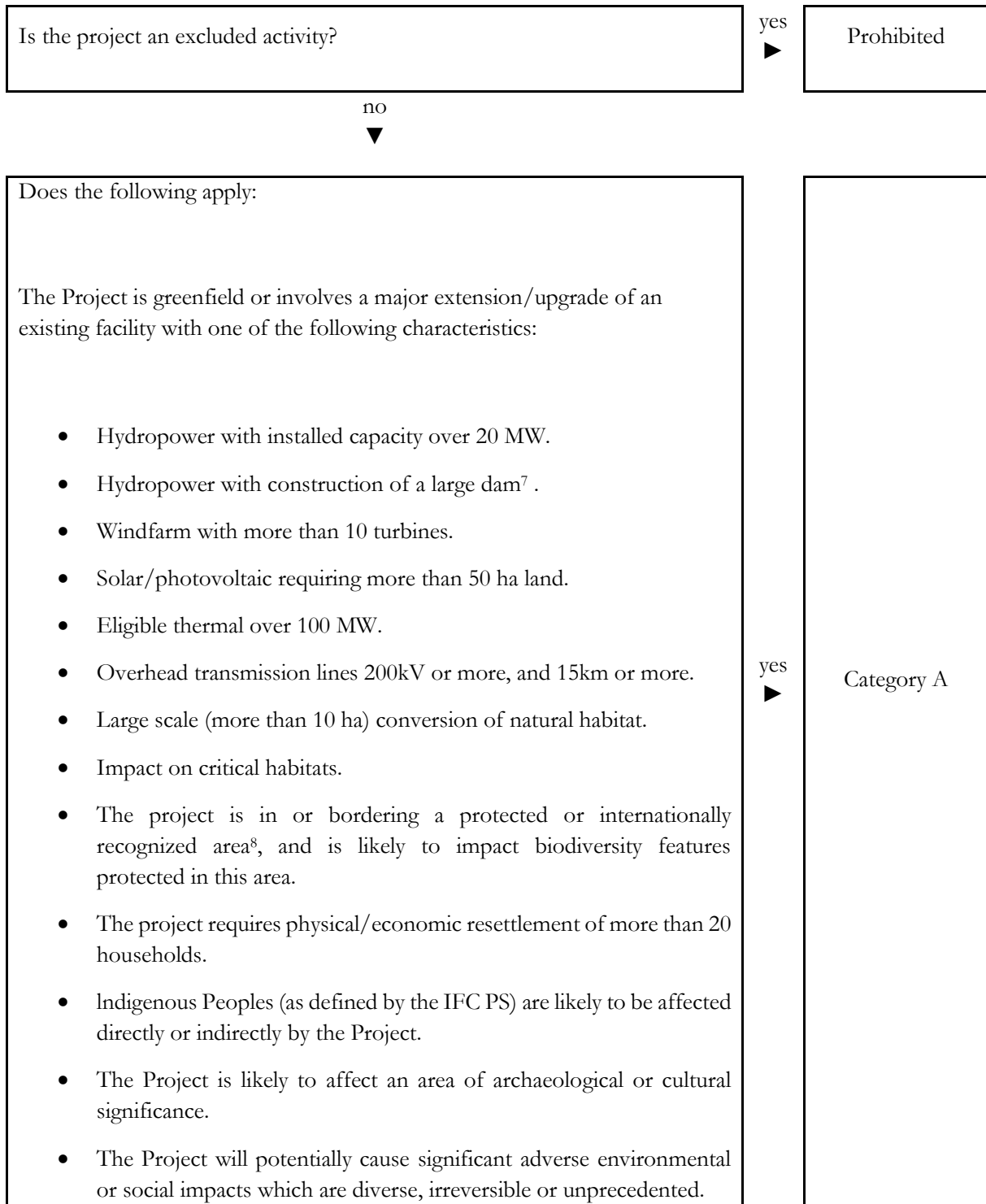
Screening Questions	Yes	No	Comments
22. Has a contractor been identified to build the project? What is their reputation in terms of Health and Safety management? Do they have an Occupational, Health and Safety policy?			
23. Is the Project site in an area or location that could be affected by flooding, seismic activity, cyclones or other natural occurring hazards?			
PS5 – Land use & Resettlement			
24. Does the Project require involuntary resettlement through an expropriation procedure?			
25. Will (Has) the Project use (used) public land of importance for local communities livelihoods?			
26. Has the Project recently or historically been subject to trials or court cases in relation with involuntary resettlement or expropriation?			
27. Does the Project encroach with land permanently, occasionally or seasonally used by indigenous people ?			
PS6 – Biodiversity conservation			
28. Is the Project located close to, upstream or inside an existing or planned legally protected area or internationally recognized ⁵ area?			
29. Is the Project site known to host endangered or critically endangered species (at the national or international level) that will be impacted by the Project?			
PS8 – Cultural heritage			

⁵ Check against
the Emerald Network list: <https://www.coe.int/en/web/bern-convention/emerald-viewer>
the Ramsar sites list: <https://rsis.ramsar.org/>
the World Database of key biodiversity areas: <http://www.keybiodiversityareas.org/site/mapsearch>

Screening Questions	Yes	No	Comments
30. Is any of the Project components close to or visible from a cultural heritage site of national or international ⁶ importance?			
31. Will the Project construction or operation (change of flow regime) affect a natural or cultural site of national or international importance?			

⁶ Check against the Unesco World heritage sites list: <https://whc.unesco.org/en/list/>

Appendix 3. Categorization of Projects



⁷ A dam with a height of 15 metres or greater from lowest foundation to crest or a dam between 5 metres and 15 metres impounding more than 3 million cubic metres.

⁸ This includes: being less than 1km from a Ramsar site or from an Important Bird Area for a windfarm, and being upstream from protected or internationally recognized area for hydropower schemes.

no



The project is expected to have limited adverse environmental or social impacts that are few in number, generally site-specific, largely reversible and can be readily addressed through mitigation measures

yes
▶

Category B

Appendix 4. Template - Screening Report for Board Information

Preliminary Assessment of a Project:

[The following is to be prepared for the Board by the E&S Manager, following the screening of a Project. This is also a budget request to assess specific or general E&S risks and impacts.]

A preliminary assessment on E&S issues suggests the following:

- The Project is not an Excluded Activity and fulfils the Requirements of Eligible Sectors
- The Project is a Category [A, B] investment
- To date [the following/no] E&S work has been completed [expand, for example include permits obtained, assessments completed, etc.]
- IFC Performance Standards likely to be triggered by an investment in this Project include [XX]
- The following gaps have been identified: [X]
- The main E&S risks include [X]
- Next steps are [X]. A budget of [\$X] is required.

Appendix 5. Terms of Reference for Contracting Consultants in Preparing an ESIA

[This template can be used as a guide for developing a Terms of Reference (ToR) for a Consultant to perform environmental and social due diligence of a prospective project].

DIPF Africa Limited (the “Client”) requires the services of an independent environmental and social consultant (“a Consultant”) to complete an environmental and social impact assessment (“ESIA”) of [description of the project (the “Project”)].

Description of Project

[Insert a detailed description of the Project including the geographical location, stage of project development, project components (transmission line, access roads, etc) and schedule. If any preliminary environmental and social assessments have been completed, they should be mentioned here. Any limitations around site access either from a health and safety or land access perspective should be included. Describe the available documentation]

Standards for the ESIA

The ESIA Report should be completed to local, national and international standards (IFC Performance Standards and European Investment Bank Environmental and Social standards).

Executive Summary – Non-Technical Summary

Chapter 1 – Introduction

This section will include the following:

- Purpose of the ToR
- Project description
- Alternatives considered
- Explain the executing arrangements for the ESIA
- Project current status and timetable
- Identify associated projects
- Summary of the general scope of the ESIA

Chapter 2 – Policy, Legal and Administrative Framework

This section will provide an overview of the pertinent regulations and standards governing environmental, health and safety, protection of sensitive areas, siting, etc at local, national and international standards.

Chapter 3 – Description of the Proposed Project

This section will include a description of the project, including maps, etc. and project components. This will include:

- a description of the different phases of the project (preconstruction, construction, demolition –if any-, operation and maintenance);
- the project schedule and lifespan;
- the land-use requirements during the construction and operational phases;
- a description of the main characteristics of the operational phase of the project (in particular the production process), for instance, energy demand and energy used, nature and quantity of the materials and natural resources (including water, land, soil and biodiversity) used;
- an estimate, by type and quantity, of expected residues and emissions (such as water, air, soil and subsoil pollution, noise, vibration, light, heat, radiation) and quantities and types of waste produced during the construction and operation phases.

Chapter 4 – Description of the Environment and Social Context

This section will evaluate data on the relevant environmental and social characteristics of the project areas. It will include information on any changes anticipated before the project commences, including the physical, biological and socio-cultural environment (i.e. the baseline environment).

It will notably provide:

- A description of the relevant aspects of the current state of the environment (baseline scenario) and an outline of the likely evolution thereof without implementation of the project as far as natural changes from the baseline scenario can be assessed with reasonable effort on the basis of the availability of environmental information and scientific knowledge.
- A description of the factors likely to be significantly affected by the project: population, human health, biodiversity (for example fauna and flora), land (for example land take), soil (for example organic matter, erosion, compaction, sealing), water (for example hydromorphological changes, quantity and quality), air, climate (for example greenhouse gas emissions, impacts relevant to adaptation), material assets, cultural heritage, including architectural and archaeological aspects, and landscape.

Chapter 5- Analysis of Alternatives

This section will describe the reasonable alternatives (for example in terms of project design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project (i.e. which could achieve the same objectives). and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects.

Chapter 6 – Environmental and Social Impact Assessment

This section will include a description of the significant positive and negative environmental impacts during the construction and operation phases against PS1 to PS 8. This should include:

- The construction and existence of the project, including, where relevant, demolition works;
- The use of natural resources, in particular land, soil, water and biodiversity, considering as far as possible the sustainable availability of these resources;

- The emission of pollutants, dust, noise, vibration, light, heat and radiation, the creation of nuisances, and the disposal and recovery of waste;
- The risks to human health, cultural heritage or the environment (for example due to accidents or disasters);
- An identification of vulnerable or disadvantaged groups and the collection of disaggregated data on vulnerable or disadvantaged groups to identify any differentiated impacts;
- Human Rights risks and issues;
- The cumulation of effects with other existing and/or approved projects, taking into account any existing environmental problems relating to areas of particular environmental importance likely to be affected or the use of natural resources;
- The impact of the project on climate (for example the nature and magnitude of greenhouse gas emissions) and the vulnerability of the project to climate change;
- The technologies and the substances used.

The description of the likely significant effects on the factors specified in Article 3(1) should cover the direct effects and any indirect, secondary, cumulative, transboundary, short-term, medium-term and long-term, permanent and temporary, positive and negative effects of the project. This description should take into account the environmental or social protection objectives of protected or internationally recognized areas which are relevant to the project.

A description of the forecasting methods or evidence, used to identify and assess the significant effects on the environment, including details of difficulties (for example technical deficiencies or lack of knowledge) encountered compiling the required information and the main uncertainties involved.

Chapter 7 – Mitigation of Environmental and Social Impacts

This section should include a proposal for specific mitigation measures during design, construction and operation. Compensation for affected parties should be included in this section.

Chapter 8 – Environmental and Social Management Plan

This section will provide details on the measures to be implemented during both construction and operation phases of the project. The ESMP for mitigation and monitoring will be presented as follows:

Mitigation:

Source Impact	Potential Impacts	Proposed Mitigation Measures	Means of Verification	Timing and Frequency	Responsibility of Mitigation	Reporting Requirements

Monitoring:

Impact	Monitoring Indicators	Frequency	Recording and Reporting	Responsibility	Reference

Chapter 9 – Consultation

This section will describe the process that will describe the public consultation process, including:

- First Public Consultation to discuss and finalize the scope of the ESIA
- Second Public Consultation after the ESIA report is prepared.
- Ongoing facility for public consultation and disclosure

Chapter 10 – References and Appendices

Team

The assignment should be carried out by a team of suitably qualified independent environmental and social experts, with appropriate background and experience in the IFC Performance Standards, this sector and country. The Proposal should provide the name of team members and any sub-contractors, and a brief description of their role within the team as well as their qualifications. Qualifications should include relevant technical capabilities, specific previous project experience similar to this Project, specific in-country experience and knowledge, specific language skills.

Schedule

The Consultant is expected to commence the ESIA process on [X] and complete the assignment by [X].

Estimated Costs

A total lump sum cost estimate (not to be exceeded), in US Dollars, must be provided for the required scope of work. A breakdown of the estimated costs by task must also be presented (i.e. tabular format) and should include Direct Labour Costs (number of hours or days per staff and their associated unit costs) and Indirect Labour Costs (i.e. travel, per diem, sub-contractors, etc.). All reasonable project-related expenses will be reimbursed by the Client ‘at cost’ (i.e. without mark-up) following provision of receipts. If necessary, the final project costs may be revised and agreed with the Client following initial discussions with the Company and finalization of the scope of work; however, any assumptions related to the estimated costs presented in the fee proposal must be clearly stated.

Conflicts of interest:

As part of the proposal, the Consultant shall also confirm that they do not have a conflict of interest and that they are able in a position to provide an adequate, accurate and objective review.

Appendix 6. Terms of Reference for Category B ESDD

[This template can be used as a guide for developing a Terms of Reference (ToR) for a Consultant to perform environmental and social due diligence of a category B Proposed Project].

DIPF Africa Limited (the “Client”) requires the services of an independent environmental and social consultant (a “Consultant”) to perform an environmental and social due diligence (“ESDD”) assessment of a proposed investment in [description of the project (the “Project”)]. The purpose of this Terms of Reference is to ensure that the Consultant performs the environmental and social review of the Project according to the Client’s Responsible Investment Policy (see attached).

Description of Project

[Insert a detailed description of the Project including the geographical location, stage of project development, project components (transmission line, access roads, etc.) and schedule. If any environmental and social assessments have been completed, they should be mentioned here. Any limitations around site access either from a health and safety or land access perspective should be included.]

Scope of Work

Consistent with the Client’s Responsible Investment Policy, the Consultant will conduct the following tasks:

1. Preliminary Review: Review all available information and documentation related to project environmental and social impacts and risks, including [ESIAs, E&S Audits, etc.]. Prepare a list of additional information and/or questions that will be needed to continue the appraisal.
2. Site Visit and Further Review: Conduct site inspections and interview key staff, including both sponsor personnel and relevant stakeholders (regulatory officials, community leaders, contractors).
3. Project Categorization: The Consultant will confirm and sign off the Project category B, or will liaise with the Client if unanticipated E&S issues require a re-categorization of the Project to "A".
4. E&S Performance Gaps and Necessary Corrective Action Plans: Analyze project environmental and social performance in relation to the Client’s Responsible Investment Policy. Identify these gaps and any corresponding corrective actions that will be necessary. Prioritize these and recommend acceptable and justified implementation schedules. A template for the Corrective Action Plan is provided in Appendix 8.

Team

The assignment should be carried out by a team of suitably qualified independent environmental and social experts, with appropriate background and experience in the IFC Performance Standards, this sector and country. The Proposal should provide the name of team members and any sub-contractors, and a brief description of their role within the team as well as their qualifications. Qualifications should include relevant technical capabilities, specific previous project experience similar to this Project, specific in-country experience and knowledge, specific language skills.

Schedule

The Consultant is expected to commence ESDD on [X] and complete the assignment by [X]. Meetings with the Project Sponsor are expected to take place [X] followed by the site visit. The Site visit is expected to take place [X and are expected to take [X] days]. A call will be scheduled between the ESG Manager and

the Consultant to discuss the principal findings following the site visit. The Consultant shall then submit a draft Due Diligence Report

Estimated Costs

A total lump sum cost estimate (not to be exceeded), in US Dollars, must be provided for the required scope of work. A breakdown of the estimated costs by task must also be presented (i.e. tabular format) and should include Direct Labour Costs (number of hours or days per staff and their associated unit costs) and Indirect Labour Costs (i.e. travel, per diem, sub-contractors, etc.). All reasonable project-related expenses will be reimbursed by the Client 'at cost' (i.e. without mark-up) following provision of receipts. If necessary, the final project costs may be revised and agreed with the Client following initial discussions with the Company and finalization of the scope of work; however, any assumptions related to the estimated costs presented in the fee proposal must be clearly stated.

Conflicts of interest:

As part of the proposal, the Consultant shall also confirm that they do not have a conflict of interest and that they are able in a position to provide an adequate, accurate and objective review.

Appendix 7. Template – E&S Report for Informing the Investment Committee

[The following is to be prepared by the E&S Manager for the Investment Committee following the completion of Stage 3 of a Project.]

- Confirmation that the proposed investment does not fall under the Exclusion List
- Confirmation on the E&S risk categorization of the proposed investment (A, B)
- Key findings from ESIA or other completed reports
- Confirmation by the E&S Manager that the investment is structured to meet the Compliance Framework requirements.

Appendix 8. Template – Environmental & Social Action Plan

ENVIRONMENT AND SOCIAL ACTION PLAN (ESAP)			
The ESAP provides an explicit, transparent record of responsibilities, actions required, and progress achieved toward managing the E&S risks and opportunities identified in the E&S Due Diligence.			
Project Name:			
Project Location (Country):			
Sector:			
Contact persons in the Company:			
		General Manager:	
		E&S Manager:	
Action	Implementation Responsibility	Required Outcome	Schedule
PS1: Assessment and Management of Environmental and Social Impacts			
[X]			
PS2: Labor and Working Conditions			
[X]			
PS3: Resource Efficiency and Pollution Prevention			
[X]			
PS4: Community Health, Safety and Security			
[X]			
PS5: Land Acquisition and Involuntary Resettlement			
[X]			
PS6: Biodiversity Conservation and Sustainable Management of Natural Living Resources			
[X]			
PS7: Indigenous Peoples			
[X]			
PS8: Cultural Heritage			
[X]			

Appendix 9. References for Hydropower Projects

Key E&S risks

Issues that require careful consideration in determining whether a project is Category A or B for hydroelectric projects include the following:

- Potential for significant greenhouse gas emissions in case the Project includes a reservoir that will flood a densely vegetated area.
- Potential for significant socio-cultural impacts including economic or physical displacement and impacts on cultural heritage that cannot easily be mitigated.
- Potential for impacts on lands and natural resources subject to tradition ownership or customary use by Indigenous People and elaborate status of FPIC (Free Prior and Informed Consent) process in accordance to the IFC PS.
- Potential for trans-boundary impacts.
- Potential for impacts on natural or critical habitats.
- Potential for significant reductions or increase in river flow, water quality, sediments transport or river morphodynamics, that result in adverse impacts on downstream ecosystems or on other river or water users.
- Public safety risks.
- Potential for induced seismicity.
- Significant public opposition as a result of lack of participatory consultation or transparency.
- Significant adverse cumulative impacts
- Significant adverse impacts form the construction of associated facilities (e.g. roads, transmission lines).
- Climate change impacts.

Categorization

A hydroelectric project may be screened as Category B if:

- It does not include the construction of a large dam (dam with a height of 15 metres or greater from lowest foundation to crest or a dam between 5 metres and 15 metres impounding more than 3 million cubic metres.) and is less than 20 MW.
- Potential E&S impacts are avoided or, are local and short duration and can be readily mitigated, and there is no significant opposition to the project by local stakeholders.
- It consists in retro-fitting or upgrading of existing facilities, or small additions to capacity at existing facilities

Reference documents

Hydropower Projects E&S risks/impacts assessments and management plans should be checked against the following reference documents:

- AfDB Integrated Safeguards System Guidance Materials – Volume 3 - Energy / electricity sector: hydroelectric power projects
- EBRD's E&S guidance note for Hydropower Projects
- EIB's (draft) Environmental, Climate and Social Guideline on Hydropower Development
- ICOLD's bulletins

Appendix 10. References for Solar Projects

Key E&S risks

Issues that require careful consideration in determining whether a project is Category A or B for solar projects include the following:

- Land use for socio-economic activities or access to such activities.
- Terrestrial seasonal migration routes.
- Vicinity of an important bird area or a Ramsar site, impacts on migrating birds and wide span species.
- Potential for impacts on lands and natural resources subject to tradition ownership or customary use by Indigenous People and elaborate status of FPIC (Free Prior and Informed Consent) process in accordance to the IFC PS.
- Potential for impacts on natural or critical habitats.
- Visual impacts on cultural heritage sites, landscapes or tourism developments.
- Water consumption in water scarce regions.
- Soil contamination in case of spill in thermal power plant (as for example the Heat Transfer Fluid).
- Significant public opposition as a result of lack of participatory consultation or transparency.

Categorization

A solar project may be screened as Category B if:

- It occupies less than 50 ha of land (equivalent to 25 MW).
- Potential E&S impacts are avoided or, are local and short duration and can be readily mitigated, and there is no significant opposition to the project by local stakeholders.
- It consists in retro-fitting or upgrading of existing facilities, or small additions to capacity at existing facilities

Reference documents

Solar Projects E&S risks/impacts assessments and management plans should be checked against the following reference documents:

- AfDB Integrated Safeguards System Guidance Materials – Volume 3 - Energy / electricity sector: solar power

Appendix 11. References for Windpower Projects

Key E&S risks

Issues that require careful consideration in determining whether a project is Category A or B for windpower projects include the following:

- Potential for significant socio-cultural impacts including economic or physical displacement and impacts on cultural heritage that cannot easily be mitigated.
- Potential for impacts on lands and natural resources subject to tradition ownership or customary use by Indigenous People and elaborate status of FPIC (Free Prior and Informed Consent) process in accordance to the IFC PS.
- Potential for impacts on natural or critical habitats.
- Visual impacts on cultural heritage sites, landscapes or tourism developments.
- Significant public opposition as a result of lack of participatory consultation or transparency.
- Significant adverse cumulative impacts with other wind farms
- Significant adverse impacts form the construction of associated facilities (e.g. roads, transmission lines).

Categorization

A windpower project may be screened as Category B if:

- It involves the construction of less than 10 wind turbines (equivalent to 35-40 MW).
- Potential E&S impacts are avoided or, are local and short duration and can be readily mitigated, and there is no significant opposition to the project by local stakeholders.
- It consists in retro-fitting or upgrading of existing facilities, or small additions to capacity at existing facilities

Reference documents

Windpower Projects E&S risks/impacts assessments and management plans should be checked against the following reference documents:

- AfDB Integrated Safeguards System Guidance Materials – Volume 3 - Energy / electricity sector: wind power
- IFC Environmental, Health, And Safety Guidelines For Wind Energy

Appendix 12. Documentation of ESG Training

Date:

Company:

Topics covered:

Presentation given by:

Presentation attached:

List of Attendees	Signature

Appendix 13. Standard E&S Conditions and Provisions for Project Companies

Applicable E&S Rules

The Project Company shall ensure that the Project complies at all time of its development, construction and operation with the applicable requirements of the local and national legislation (including the ESIA and the environmental permit requirements), with the ESG policy of its shareholders (including the Company's Responsible Investment Policy), with the ESAP, with the IFC performance standards, and with the EIB Environmental and Social Standards.

ESHS Officer

The Project Company management will appoint, maintain at all time and provide the necessary means and resources to a suitably qualified ESHS officer who (i) will have a direct reporting line to the Project Company management and shareholders, and (ii) will be responsible for organizing, managing and controlling the Environmental, Social and Health & Safety compliance of the Project, including all Project related activities carried out by the Project Company or by companies directly or indirectly contracted by the Project Company. The ESHS officer proposed by the Project Company will be appointed only after non-objection of the selected candidate by all shareholders.

Regular Reporting

The ESHS officer will report monthly during construction and quarterly during operation to the Project Company management and shareholders, using a reporting format agreeable to the shareholders.

Serious Incident Reporting

The ESHS officer will report within 48h to the Project Company management and shareholders any serious incident or accident including:

- Penalties or fines received by the Project or by the Project staff (recruited by the Project Company or by contractors) from a state body for non-compliance with a regulation related to the environmental, social and health & safety performance of the Project or of the Project activities.
- Any severe non-compliance with the Applicable E&S Rules.
- Any violation of local or national environment or biodiversity protection regulations caused by the Project, the Project activities or the Project staff (recruited by the Project Company or by contractors) during working hours.
- Any incident or accident that (i) affected a staff or a member of the public, (ii) would not have occurred in the absence of the Project, and (iii) resulted in a fatality or in an inability to work of three days or more.

E&S Management System

The ESHS officer will be responsible for the preparation (possibly with service provider's support) and implementation of the Project's E&S Management System. The E&S Management System for construction and operation periods will be designed so that the Project meets at all time the Applicable E&S Rules, and

delivers Regular and Incident Reporting. The E&S Management System for Project under operation will be structured and certified iso9001, iso14001 and iso45001.

ESG Monitoring Visit

The Project Company shareholders or their E&S Managers can together or individually and at any time conduct at their own cost an ESG Monitoring Visit to the Project Company and to the Project. The ESHS officer shall during such monitoring visit share all the documents and information he/she has access to.

Non-Compliances

The ESHS officer should report any non-compliance to the Project Company management and shareholders through Regular Reporting or Incident Reporting. Non-compliances can also be notified by any shareholder E&S Manager during a Monitoring Visit. Non-compliances that can be readily addressed are treated using the following procedure:

- o Non-Compliance categorization:

Consequences	Health & Safety	incident without time loss risk	accident or risk of accident with time loss	fatality risk
	Environmental	Pollution or damage readily remediable	Pollution or damage difficult (long / expensive) to remedy	Non remediable pollution or damage
Probability of occurrence	ongoing or imminent	Category 2	Category 3	Category 3
	likely	Category 1	Category 2	Category 3
	possible but not likely	Category 1	Category 1	Category 2

- o Non-Compliance treatment by category

Non-Compliance category	Action
Category 1	<ul style="list-style-type: none"> • Verbal notification of the Non-Compliance. • Verbal notification of the corrective action. • Written record of the Non-Compliance and corrective action, and written reporting to the Project Company management and to the direct line manager of the person who caused the Non-Compliance. • Report through Regular Reporting
Category 2	<ul style="list-style-type: none"> • Verbal notification of the Non-Compliance. • Verbal notification of the corrective action. • Immediate verbal notification to the direct line manager of the person who caused the Non-Compliance. • Written record of the Non-Compliance and corrective action, and written reporting to the Project Company management and to the direct line manager of the person who caused the Non-Compliance. • Report through Regular Reporting
Category 3	<ul style="list-style-type: none"> • Verbal notification of the Non-Compliance. • Verbal instruction to stop the activity.

	<ul style="list-style-type: none">• Immediate verbal notification to the Project Company management and the direct line manager of the person who caused the Non-Compliance.• Meeting with the parties involved and their direct line managers to decide corrective actions before the activity resumes.• Report through Incident Reporting.
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In case a Non-Compliance cannot be readily closed, the shareholder E&S Manager can request the Project Company to contract at the Project Company expense an independent consultant to qualify and quantify the Non-Compliance and, if necessary, define corrective actions to be undertaken by the Project Company.

A Non-Compliance that was notified and repeats without having been addressed as requested by the E&S Manager/Manager is systematically escalated to the upper category.

Repeated Non-Compliances

If the Project repeatedly does not comply with the Applicable Rules, at the first request of any shareholder, the following persons will be replaced:

- The ESHS officer.
- One or several members of the Project Company management.
- Any other staff of the Project Company or of a company contracted by the Project Company, directly involved in the non-compliance.

Appendix 14. Questionnaire to screen Contractors

[Derived from IFC “Managing Contractors E&S Performance”]

Issue	Requested information
PS1 Assessment and management of environmental and social risks and impacts	
	Please provide a copy of the company’s environmental, social, and health and safety policies.
	Please provide information on both: 1. The company’s corporate ESMS 2. The project ESMS that the company would typically implement at the site.
	Please provide details of any accreditations such as ISO 14001/OSHAS 18001, held by the company, and/or alignment with ISO 26000, GRI, United Nations Global Compact, World Business Council for Sustainable Development, and/or other social responsibility standards/guidelines/ formal initiatives.
	Please provide a typical organization chart that shows how safety and health, environmental, social (including stakeholder engagement and grievances), and labor issues are managed at the site level, including management and monitoring of subcontractors and their performance.
	Please provide appropriate E&S metrics for the past three calendar years, including spills, releases to the environment, number of environmental fines or regulatory administrative processes, number of registered stakeholder grievances (disaggregated by gender), and number of registered labor grievances (disaggregated by gender).
Subcontractors	Please provide detailed information on how the company selects and manages its subcontractors (local or other), particularly in determining whether they have systems in place to follow the necessary environmental, social, and health and safety requirements of the project.
Subcontractors	Please provide information on how the company monitors subcontractors’ environmental, social, and health and safety compliance and performance.
	Please confirm that the company has read and understood the ESIA, with particular attention to the commitments register and the ESHS management plans for the project.
Supply chain	The client requires that goods and services are procured locally, as far as possible, when available at equivalent quality and price. Please demonstrate how the company might achieve this, illustrating with examples from other projects if appropriate.
PS2 Labor and working conditions	
	Please provide a copy of the company’s safety policy.
	Please provide a representative copy of a Health and Safety Site Management Plan.

Issue	Requested information
	Please provide appropriate health and safety metrics for the past three calendar years, including (i) worked hours for the period, (ii) total recordable fatalities, (iii) total recordable injury frequency rate, and (iv) total recordable disease frequency rate (based, for example, on ICMM definitions).
	Please describe in detail how the company trains for and implements safe working practices among its workforce.
	Please describe how the company plans to safeguard the health and safety of its workers while on site. What are the anticipated OHS risks and how will they be addressed?
	Please provide a copy of the company's HR policies and grievance mechanism, and describe how these will be communicated to all workers on-site.
	Please provide details on how the company will comply with national labor and employment law. Please provide details how the company will manage equal opportunities and nondiscrimination, sexual harassment issues, migrant labor, and retrenchment among its workforce.
	Please describe how the above issues will be managed by the company at the subcontractor level, including monitoring and reporting systems.
	The client requires that as much local labor as possible be used during the construction phase.
	Please describe how the company would approach this to avoid importing third country nationals or expatriate labor, as far as possible, and to leave a useful legacy of skills in the area. (It is acknowledged that a proportion of skilled labor will have to be brought in to fulfill project needs.)
	The client requires that contractors have cognizance of the minimum standards for worker facilities at the site, including sanitation, access to drinking water, and accommodation set out in the IFC and EBRD Guidance Note, Workers Accommodation, Processes and Standards, and International Labour Organization requirements. Please describe how the company will incorporate these requirements into the project.
	Please describe how the company typically manages solid waste, both hazardous and nonhazardous, generated by its activities at a construction site, including reduce, reuse, and recycle initiatives.
	Please describe how the company typically manages wastewater (for example, in camps, process) generated by its activities at a construction site, including reduce, reuse, and recycle initiatives.
	Please describe how the company typically manages storm water flow generated by its activities at a construction site.
	Please describe how the company typically manages the transportation and storage of hazardous substances and materials at the company's sites.
	Please describe how the company typically manages soil removal and storage (for later reuse).

Issue	Requested information
	Please describe how the company typically manages the control of erosion and sedimentation at the company's sites.
	Please describe how the company typically manages air quality at its sites.
	Please describe how the company typically manages nuisance noise at its sites.
	Please provide examples of environmental monitoring programs that the company has carried out on other jobs.
	Please describe how the company typically manages and uses fresh water at the company's sites.
	Please describe how energy efficiency is typically built into the company's activities.
	Please describe how greenhouse gas emissions will be accounted for and reported.
	Please describe other resource efficiency practices at the company's sites.
PS4 Community health, safety, and security	
	Please describe how the company prepares for emergencies at its sites, including those that may affect nearby communities, such as an explosion or accident or a spill or release into a local water course.
	Please describe how the company trains for and implements good driving practices among its workforce to avoid or minimize impacts to the communities.
	Please provide a code of conduct describing expectations for the behaviour of direct and subcontract employees when outside the work site and in the host community.
	The code of conduct should include specific provisions to prevent SEA and GBV.
	Please provide details of how the company typically manages community engagement and community relations to respect the client's existing relationship with communities and contributes to this.
	Please provide details of the company's physical and personnel security measures and how security is typically implemented at its sites.
	Please provide details of the company's policy for the adequate management of security measures and protection of human rights of local communities.
PS6 Biodiversity conservation and sustainable management of living natural resources	
	The client has several requirements relating to the conservation of biological diversity (biodiversity) including terrestrial and aquatic ecosystems. Please describe any previous projects that the company has undertaken where this was also a significant issue and how the company contributed to this effort.
	If the company has not been involved in projects where biodiversity has been a significant issue, please describe how the company would plan to address and support the client regarding the conservation of biodiversity for this project.
PS8 Cultural heritage	

Issue	Requested information
	Please describe how the company typically addresses the finding of archaeological or cultural heritage items during execution of its work.
Corporate social responsibility	
	The client has requirements relating to social responsibility for this project. Please provide examples of social responsibility initiatives that the company has contributed to at other sites or projects, and suggest ways that the company might contribute to this project, in discussion and coordination with the client.

Appendix 15. E&S Specifications for Contractors

[The Portfolio Company should ensure that all contractors operate in accordance with both local regulations and Good International Practice (GIP) and implement construction and operational phase Environment, Health and Safety (EHS) management plans. These plans should cover aspects such as labor and working conditions, occupational health and safety, resource sourcing and use, and pollution prevention.

The following provides E&S specifications to be used by Portfolio Companies when requesting proposals and negotiating contracts for EPC/ O&M. E&S specifications must notably be inserted in requests for proposals together with the technical specifications when selecting a contractor].

1. E&S Policy, Management System and Organisational Chart

The contractor shall provide:

- the contractor's E&S policy;
- copies of the certifications the contractor owns regarding its E&S Management System (e.g. ISO 9001, ISO 14001, OHSAS 18001 or ISO 45001), indicating which parts of its activities are covered by this ESMS;
- the name and contact of the person in charge of E&S for the Project;
- an organization chart illustrating the proposed reporting lines on E&S to the Project Company.

2. E&S Standards

Contractors must adhere (and should ensure that all of his subcontractors adhere) to national laws and regulations, GIP such as the IFC Performance Standards, World Bank Environmental, Health and Safety guidelines, ILO Labour Conventions and other guidance notes including the IFC Guidance on Workers Accommodation.

Contractors must have all required permits, licenses, consents and approvals prior to undertaking activities being permitted.

3. ESIA and ESMP

The available E&S documentation should be provided to the contractor as soon as available, and should be included as an appendix to the contract.

The contractor must be informed from the beginning that compliance with international standards in the context of the Project is an obligation, not a wish.

The Contractor must commit to mobilize appropriate E&S resources to integrate E&S requirements into his work plan as they become available.

4. E&S Plans to be developed by the contractor

List in the E&S conditions of the contract all E&S management plans and associated documentation to be prepared or refined and implemented by the contractor, and require that these documents are submitted for client review and approval within an agreed timeline relative to the project schedule, contractor mobilization

and commencement of work. The E&S Plans to be developed by the contractor should be proportionate to the E&S risks involved, and should involve as a minimum:

- Register of the EHS risks
- EHS organization of the Company:
 - EHS policy
 - Human resources policy and code of conduct
 - EHS roles and responsibilities
 - EHS procedures
 - EHS induction and training of staff
 - Enforcement of EHS rules by sub-contractors
 - EHS monitoring
 - Non-compliances management
- Specific management plans for:
 - Local recruitment
 - Workers health and safety
 - First aid and emergencies
 - Workers accommodation
 - Pollution control
 - Waste management
 - Noise and dust control
 - Erosion and sediment control
 - Top soil management and reinstatement
 - Traffic management
 - Grievances mechanism
 - Natural hazards

These plans, after they have been approved by the Project Company, will be implemented and monitored by the contractor. Plans will be updated if they appear to be insufficient to actually cover the EHS obligations or risks of the activities under the contractor's control.

5. Provision of E&S personnel and resources allocated to the contract

Appropriate resources and key E&S personnel must be appointed as part of the contract during the period in which the contractor is engaged, starting from contract negotiations. Any replacement of key personnel should be acceptable to the Project Company's ESHS Officer. Inductions and regular training programs, must be implemented by the contractor to ensure all staff are aware of E&S commitments.

6. Employment

The Contractors are obliged to implement a Human Resources Policy adhering to IFC Performance Standard 2: Labor and Working Conditions and ILO's Core Conventions. This includes i) a commitment not to make employment decisions on the basis of personal characteristics unrelated to inherent job requirements (such as age, ethnicity, gender, sexuality or physical attributes), but rather on the principles of equal opportunity, fair treatment and suitability for the role; ii) documenting and communicating to all employees, workers and contract workers their working conditions and terms of employment; and iii) where

permitted by law, contractors should grant employees the right to associate freely and bargain collectively by forming and joining workers' organisations or through alternative means.

Contractors must include in their proposal a local employment plan, describing their approach to assess local capabilities and maximize the employment of local workers in the context of the Project.

Contractors are to implement a grievance mechanism for workers (including subcontract workers) in line with the Terms of References for Designing a Grievance Mechanism in lines with IFC's Good Practice Note for Addressing Grievances from Project-Affected Communities. Contractors should inform the Company of any grievances made within a reasonable timeframe.

7. Occupational Health and Safety

Contractors are obliged to implement all reasonable precautions to protect the health and safety of workers. All Contractors will be required to have a stand-alone Health and Safety Management System and associated procedures which will as a minimum adhere to the IFC general EHS guidelines and ensure the health and safety of all workers employed during the construction [and operation] phase of the project.

As a minimum the Health and Safety Management System will contain i) identification of potential hazards to workers, particularly those that may be life threatening; ii) provisions of preventative and protective measures, including modification, substitution, or elimination of hazardous conditions or substances; iii) programme of training of workers about health and safety; iv) identification and provision of required personnel and protective equipment; v) documentation and reporting of occupational accidents, diseases, and incidents; and vi) emergency preparedness and response arrangements. Mitigation measures as identified in the ESIA should be adhered to.

In addition to stand alone Health and Safety Management System, all Contractors should develop Parallel plans and Policies which specifically address working conditions and worker relationship.

8. Community health, safety and security

Contractors are obliged to implement risk management strategies to protect the community from i) physical, chemical, or other hazards associated with sites under construction [and operation], ii) hazards associated with increased traffic, iii) communicable and vector-borne diseases associated with the population of workers. Contractors should implement Parallel Plans and Policies to implement specific mitigation measures identified in the ESIA. These should include, and are not limited to, i) community grievance mechanism; ii) traffic management plan; iii) Emergency Preparedness and Response Plan.

Other requirements as per the Company's stakeholder engagement program to be supported by the Contractor should be included.

9. Pollution prevention and resource efficiency

Contractors are obliged to implement Parallel Plans and Policies to implement specific mitigation measures relating to pollution prevention and resource efficiency identified in the ESIA. These should include, and are not limited to management plans to deal with air emissions, water and waste management and resource use.

10. Biodiversity and ecosystem services

Contractors are obliged to implement Parallel Plans and Policies to implement specific mitigation measures identified in the ESIA with respect to biodiversity and/or ecosystem services. Where relevant, Contractors will be required to implement a Biodiversity Action Plan.

11. Security Personnel

Where Security Personnel are required, Contractors should prepare and implement a Security Management Plan with reference to IFC's Good Practice Handbook on Use of Security Forces: Assessing and Managing Risks and Impacts⁹

12. Monitoring

The Contractors should employ specialized environmental, health and safety staff to monitor the effective implementation of environmental, health and safety actions as described in the plans the contractor prepared. The Contractors will prepare and maintain records of their inspections and ensure that corrective actions are taken when necessary and to track environmental performance. The frequency of EHS reports to the Project Company will be monthly.

13. Demobilization

When demobilizing, the contractor must ensure that all sites are reinstated, including waste and polluted soils removal.

This should include reinstatement of all temporary sites with (i) landscaping and engineering to control surface water flows and prevent erosion, and (ii) topsoil/mulch/hay spreading to ease vegetation regrowth.

14. Penalties/ Incentives

Describe penalties/incentives relating to E&S performance of contractors and subcontractors, e.g. a 5 to 10% retention money to be paid to the contractor after all sites have been reinstated satisfactorily.

15. Contractor's failure to meet the E&S requirements

The contract statement that on the Contractor's failure to meet the E&S requirements in such a way as to prevent significant impacts to workers, local communities and/or individuals , and/or environmental resources, and on the contractor's failure to correct such deficiencies upon receiving proper notice, the Company has the right to appoint and pay another party to repair damages or otherwise remedy the impacts and reduce payment to the contractor in the amount paid to the third party.

16. Bill of Quantities

Bill of Quantities should include adequate costs and timelines for expenditure to effectively implement the commitments related to EHS performance. The bill of quantities should define milestone and final

⁹ http://www.ifc.org/wps/wcm/connect/ab19adc0-290e-4930-966f22c119d95cda/p_handbook_SecurityForces_2017.pdf?MOD=AJPERES

payments for completion or partial completion of work, to include satisfactory performance of related EHS requirements.

17. E&S Performance Meetings

The Company should set this up with Contractors on a regular basis (weekly during construction).

18. Review and approval of Contractor E&S Plans

The Contractor should submit all Plans to the Company for review prior to mobilization.

19. Reporting:

The Company should require Contractors to report on an agreed frequency their EHS performance and metrics (including data from sub-contractors). The Company should establish KPIs with the Contractor, such as the following:

Leading indicators

- Number of training courses delivered on Environmental, Social, Health and Safety topics
- Number of positive safety interventions
- Number of stakeholder/ community engagement meetings
- Number of near misses

Lagging indicators

- Number and severity of injuries (first aid cases, medical treatment cases, lost time incidents)
- Number of incidents that triggered the Emergency Preparedness and Response Plan
- Lost time injury frequency rate
- Number of grievances received from external stakeholders
- Number of spills to the environment
- Number of compliance breaches

Appendix 16. E&S Contract Conditions for Contractor

Applicable E&S Rules

The Contractor shall ensure that its activities, and the activities of all of all its sub-contractors, comply at all time with the applicable requirements of the local and national legislation (including the ESIA requirements applicable to the Contractor's activities) and with the ESG policy of the Project Company (including compliance with the ESAP, and the DFI's requirement including but not limited to IFC performance standards, EIB Environmental and Social Standards, . All activities under the control or responsibility of the Contractor shall notably meet the requirements of the IFC EHS guidelines and of the IFC guidelines for workers accommodation.

Environmental, Health & Safety (EHS) Officer

The Contractor shall appoint a suitably qualified ESHS officer who (i) will have a direct reporting line to the Contractor's management and (ii) will be responsible for organizing, managing and controlling the Environmental, Social and Health & Safety compliance of the Contractor's activities as described in the present clause.

Health & Safety and Environment Management Plan

The ESHS officer will, before construction activities start, prepare an Health & Safety and Environment Management Plan (HSEMP) that will be subject to the Project Company review and to the Project Company shareholders' approval: based on a register of the risks associated with the construction activities, this HSEMP will define the organization, responsibilities, training, resources, procedures, and control put in place to ensure compliance at all time of the activities under its direct and indirect control with the Applicable E&S rules. The HSEMP will include, but not be limited to:

- Register of the EHS risks
- EHS organization of the Company:
 - EHS policy
 - Human resources policy and code of conduct
 - EHS roles and responsibilities
 - EHS procedures
 - EHS induction and training of staff
 - Enforcement of EHS rules by sub-contractors
 - EHS monitoring
 - Non-compliances management
- Specific management plans for:
 - Local recruitment
 - Workers health and safety
 - First aid and emergencies
 - Workers accommodation
 - Pollution control
 - Waste management
 - Noise and dust control

- Erosion and sediment control
- Top soil management and reinstatement
- Traffic management
- Grievances mechanism
- Natural hazards

Regular Reporting

The ESHS officer will hold weekly meetings and will report monthly to the Company E&S Manager, using a reporting format agreeable to the Company E&S Manager.

Serious Incident Reporting

The ESHS officer will report within 24h to the Company E&S Manager and management any serious incident or accident including:

- Penalties or fines received by the Project or by the Project staff (recruited by the Contractor or by any sub-contractor) from a state body for non-compliance with a regulation related to the environmental, social and health & safety performance of the Project or of the Project activities.
- Any severe non-compliance with the Applicable E&S Rules.
- Any violation of local or national environment or biodiversity protection regulations caused by the Contractor's staff or activities under the agreement between the Contractor and the Project Company.
- Any incident or accident that (i) affected a staff or a member of the public, (ii) would not have occurred in the absence of the Project, and (iii) resulted in a fatality or in an inability to work of three days or more.

EHS Management System

The Contractor will prepare and implement an EHS Management System that will be designed so that the Contractor activities under the present agreement meet at all time the Applicable E&S Rules, including Regular and Incident Reporting.

Monitoring Visit

The Project Company shareholders or staff can at any time conduct at their own cost a Monitoring Visit of the Contractor activities under the present agreement. The ESHS officer shall during such monitoring visit share all the documents and information he has access to.

Non-Compliances

The ESHS officer should report any non-compliance to the Project Company and to the Contractor's management through Regular Reporting or Incident Reporting. Non-compliances can also be notified by the Project Company during a Monitoring Visit. Non-compliances that can be readily addressed are treated using the following procedure:

o Non-Compliance categorization:

Consequences	Health & Safety	incident without time loss risk	accident or risk of accident with time loss	fatality risk
	Environmental	Pollution or damage readily remediable	Pollution or damage difficult (long / expensive) to remedy	Non remediable pollution or damage
Probability of occurrence	ongoing or imminent	Category 2	Category 3	Category 3
	likely	Category 1	Category 2	Category 3
	possible but not likely	Category 1	Category 1	Category 2

o Non-Compliance treatment by category

Non-Compliance category	Action
Category 1	<ul style="list-style-type: none"> • Verbal notification of the Non-Compliance. • Verbal notification of the corrective action. • Written record of the Non-Compliance and corrective action, and written reporting to the Project Company management and to the direct line manager of the person who caused the Non-Compliance. • Report through Regular Reporting
Category 2	<ul style="list-style-type: none"> • Verbal notification of the Non-Compliance. • Verbal notification of the corrective action. • Immediate verbal notification to the direct line manager of the person who caused the Non-Compliance. • Written record of the Non-Compliance and corrective action, and written reporting to the Project Company management and to the direct line manager of the person who caused the Non-Compliance. • Report through Regular Reporting
Category 3	<ul style="list-style-type: none"> • Verbal notification of the Non-Compliance. • Verbal instruction to stop the activity. • Immediate verbal notification to the Project Company management and the direct line manager of the person who caused the Non-Compliance. • Meeting with the parties involved and their direct line managers to decide corrective actions before the activity resumes. • Report through Incident Reporting.

In case a Non-Compliance cannot be readily closed, or in case of disagreement between the Contractor and Project Company regarding a Non-Compliance, the Project Company can request the Contractor to procure at the Contractor's expense services from an independent consultant (agreeable to the Project Company) to qualify and quantify the Non-Compliance and, if necessary, define corrective actions to be undertaken by the Contractor.

A Non-Compliance that was notified and repeats without having been addressed as requested by the ESHS officer shall systematically be escalated to the upper category.

Repeated Non-Compliances

If the Project repeatedly does not comply with the Applicable Rules, at the first request of the Project Company, the following persons will be replaced:

- The ESHS officer.
- One or several members of the Contractor's on-site management team.
- Any other staff of the Contractor or of a company contracted by the Contractor, directly involved in the non-compliance.

Failure to meet the E&S requirements

In case of the Contractor's failure to meet the EHS requirements and notably to prevent significant impacts/risks to workers, local communities, individuals, biodiversity or environmental resources, and if the Contractor fails to correct such deficiencies upon receiving proper notice, the Company has the right to appoint and pay another party to repair damages or otherwise remedy the impacts and reduce payment to the Contractor in the amount paid to the third party.

Appendix 17. Suppliers principles

[The Company should share these Supplier Principles with a Contractor and attach them to any documentation]

1. Business Integrity

Contractors and suppliers comply with all applicable laws and regulations. Contractors and suppliers must ensure that all their Project related activities are aligned on IFC Performance Standards.

Contractors and suppliers should not tolerate, permit or engage in bribery, corruption, or unethical practices.

Contractors and suppliers support fair completion. Conflicts of interest are avoided.

2. Health, Safety, Security and Environment

Contractors and suppliers have a systematic approach to HSSE management, designed to ensure compliance with all applicable laws and regulations and to achieve continuous improvement.

Contractors and suppliers:

- are committed to protect the environment in compliance with all applicable environmental laws and regulations.
- use energy and natural resources efficiently.
- continually look for ways to minimize waste, emissions and discharge of their operations, products and services.

3. Social Performance

Contractors and suppliers respect their neighbours and contribute to the societies in which they operate.

4. Labour and Human Rights

Contractors and suppliers conduct their activities in a manner that respects human rights as set out in the UN Universal Declaration of Human Rights and the core conventions of the International Labor Organization (ILO) such as:

Contractors and suppliers:

- should not use child labour;
- should not use forced, prison or compulsory labour;
- comply with all applicable laws and regulation on freedom of association and collective bargaining;
- should not tolerate discrimination, harassment or retaliation and should provide a safe, secure and healthy workplace;
- should provide wages and benefits that meet or exceed the national legal standards and should comply with all applicable laws and regulations on working hours.

Appendix 18. Template – Quarterly and Annual E&S Reporting

1. Quarterly ESG Reporting – Project info

Project overview	
Technology	
MW	
Project Status	
COD	
Country	
Category	
ESIA status	
Any changes in management procedures to existing systems for E&S?	
Provide update on Environmental and Social Action Plan (ESAP) (can be attached separately)	
For operational projects, kWh sold	
Employment numbers	
Male peak employment (direct employees)	
Female peak employment (direct employees)	
% of direct employment which is local	
Male peak employment (indirect employees)	
Female peak employment (indirect employees)	
% of indirect employment which is local	
Injuries/ Grievances	
Any recorded labour grievance during this reporting grievance. If yes, please describe grievance and resolution.	
Fatalities ¹⁰	
Serious Injuries ¹¹	
Lost Time Accidents ¹²	
Incidents involving evacuation ¹³	
Incidents occurred while driving	
Community	
Stakeholder Engagement: Provide information on any stakeholder meetings that took place during this period	
Any recorded community grievance during this reporting grievance. If yes, please describe grievance and resolution.	
Update on any community engagement projects during reporting period. Please provide photos (where possible)	

¹⁰ Provide details, including how the accident happened, the cause of death, any follow-up (investigation, compensation, prevention of re-occurrence)

¹¹ Serious injuries are those requiring emergency or hospital treatment. Please provide details, including how the accident happened, the nature of the injury and any follow-up (treatment, investigation, compensation, prevention of re-occurrence)

¹² Lost time accidents are those where employees are required more than one day off to recover, but the injury was more temporary in nature (e.g. sprains and cuts)

¹³ Detail any fires, spillages or other emergencies that required total or partial evacuation of the site, as well as any follow-up (emergency response, remediation measures, prevention of re-occurrence)

2. Annual ESG Reporting – Company information

(Company to its Management, and the Project Company for reports to Neo Themis)

Topic	Response
Name of responsible E&S Manager	
Status/ changes in ESMS	
Difficulties and/or constraints related to the implementation of the ESMS	
Overview of current pipeline, status and expected categorization	
E&S trainings undertaken/ planned	
Any certification of relevant management systems, such as ISO 45001 (former OSHAS 18001) and ISO 14001) or other	
If retrenchment (either 10% of workforce or more than 50 employees) has taken place during reporting period, attach a copy of the retrenchment plan.	

3. Annual ESG Reporting on Projects

(one sheet for each Project)

Topic	Response
Name of Project	
Sector	
Country	
Project Stage (development, construction, operation)	
E&S categorization	
E&S Compliance	
The Project is not an Excluded Activity	
The Project is in compliance with national environmental, health and safety or labor laws and regulations	
The Project is materially in compliance with IFC Performance Standards or World Bank Environmental, Health and Safety guidelines	
The Project is materially in compliance with covenants or other legal agreements	
The Project is materially in compliance with an agreed ESAP	
The Project has had no fatalities or serious injury	

The Project has not had strikes (with or without violence) and other labor disputes	
No legal action has been taken on the Project	
The Project has not had fines, penalties or increased permit charges	
The Project has not received any negative attention on the part of the media or non-governmental organizations	
The Project has not received any complaints from regulatory agencies, interest groups of local communities	
E&S Risks and Management	
Main E&S risks of the Project	
How have these risks been dealt with?	
Which IFC PS have been triggered by this Project?	
Has an ESIA / E&S Audit been completed?	
What is the status of the ESMP?	
What stakeholder engagement/ public consultation has occurred over the last year?	
Women involved in stakeholder engagement meetings (number, %)	
Have any grievances been made? If so, provide detail?	
Date of last site visit for E&S purposes	
E&S Performance Indicators (annual)	
kWh of clean energy produced	
MW of power installed	
CO2 emissions avoided	
CO2 emissions produced	
Number of stakeholder/ community engagement meetings	
Number of grievances from external stakeholders	
Number of spills to the environment	
Labor - Corporate	
Number of training courses on environment, social, health and safety	
Direct employment male (permanent)	
Direct employment female (permanent)	
Direct employment male (temporary)	
Direct employment female (temporary)	
Women on the Board (number, %)	
Women in senior management (number, %)	
Labor - Contractors	

Average number of employees during construction (male), half-day=0.5, full day=1	
Average number of employees during construction (female), half-day=0.5, full day=1	
Average number of employees during operations and maintenance (male), half-day=0.5, full day=1	
Average number of employees during operations and maintenance (female), half-day=0.5, full day=1	
Number of near misses	
Number of serious injuries	
Number of fatalities	
Lost time injury frequency	
Training provided to women (number, %)	
Community related projects	
List of community related projects	
Community related projects targeting women (number, %)	

Appendix 19. Serious Incident Reporting Template

The Template below should be used to report any ESG incident or issues which has occurred in the Company or in a Project developed by the Company.

Company/Project	
Date of Report	
Date of Incident	
Name of person reporting incident	
Contact details	
Description of issue	<ul style="list-style-type: none"> ○ Type of incident, fatality, accident, environmental issues, community issues, fraud, (other) ○ Narrative and contextual information ○ People or stakeholders involved ○ Status of incident ○ Status of investigation ○ Parties involved in investigation (e.g. policy, community leader, other)
Next steps	Next steps expected
Conclusion	

Appendix 20. Template - Stakeholder Engagement Plan

[This template for designing a SEP is based on Stakeholder Engagement Plan from IFC's Guidance Note for IFC Performance Standard 1].

The SEP should:

- Describe the company and project
- Identify and prioritize key stakeholder groups, focusing on Affected Communities
- Provide a strategy and timetable for implementing stakeholder engagement activities
- Describe how stakeholder engagement activities will be incorporated into a Project ESMS.

1. Introduction

Briefly describe the project including design, location (including maps) and potential environmental and social issues. Include information on key project stakeholders. This should include persons or groups who:

- Are directly and/ or indirectly affected by the project
- Have “interests” in the project or parent company that determine them as stakeholders
- Have the potential to influence project outcomes (examples include Affected Communities, local government, and national environmental and social public sector agencies).

2. Regulations and Requirements

Summarize any legal, regulatory or company requirements pertaining to stakeholder engagement applicable to the project. This may involve public consultation and disclosure requirements related to the environmental and social assessment process.

3. Summary of Previous Stakeholder Engagement Activities

Provide information on any previous stakeholder engagement activities to date, including:

- Type of information disclosed, in what forms (e.g. oral, brochure, reports, posters, radio, etc.) and how it was disseminated.
- The locations and dates of any meetings undertaken to date.
- Individuals, groups, and/or organizations that have been consulted.
- Key issues disclosed and key concerns raised.
- Company response to issues raised, including any commitments or follow-up actions.
- Process undertaken for documenting these activities and reporting back to stakeholders.

4. Stakeholder Engagement Plan

Summarize the purpose and goals of the program

- Briefly describe what information will be disclosed, in what formats, and the types of methods that will be used to communicate this information to each of the stakeholder groups identified in section 1 above. Examples may include newspapers, posters, radio, information centres, and brochures.
- Briefly describe the methods that will be used to consult with each of the identified stakeholder groups. Methods used may vary according to the target audience, e.g. interviews with stakeholder representatives and key informants, surveys, questionnaires, public meetings, workshops, other traditional measures for consultation and decision making.
- Describe how the views of women, vulnerable or disadvantaged groups will be taken into account during the process.
- Describe any other engagement activities that will be undertaken, including participatory processes, joint decision-making, and/ or partnerships undertaken with local communities, NGOs or other project stakeholders. Examples include benefit-sharing programs, stakeholder's development initiatives, resettlement and development programs and/or training programs.

5. Timetable

Provide a schedule outlining dates/periodicity and locations where various stakeholder engagement activities, including consultation, disclosure and partnerships will take place and the date by which such activities will be incorporated into the company's management system.

6. Resources and Responsibilities

- Indicate what staff and resources will be devoted to managing and implementing the company's SEP.
- Who within the company will be responsible for carrying out these activities? What budget has been allocated toward these activities?
- For projects with significant or diverse impacts and multiple stakeholder groups, it is good practice for a company to hire a qualified Stakeholders Liaison Officer(s) to arrange and facilitate these activities at the project level. Integration of the stakeholders liaison function with other core business functions is also important, as is management involvement and oversight.

7. Grievance Mechanism

Describe the process by which people affected by the project can bring their grievances to the company for consideration and redress. Who will receive grievances, how and by whom will they be resolved, and how will the response be communicated back to the complainant?

8. Monitoring and Reporting

- Describe any plans to involve project stakeholders (including Affected Communities) or third-party monitors in the monitoring of project impacts and mitigation programs.
- Describe how and when the results of stakeholder engagement activities will be reported back to Affected Communities as well as broader stakeholder groups.
- Examples include environmental and social assessment reports, company annual report and company newsletters.

9. Management Functions

How will stakeholder engagement activities be integrated into the company's ESMS and with other core business functions?

- Who will have management oversight for the program?
- What are the plans for hiring, training, and deploying staff to undertake stakeholder engagement work?
- What will be the reporting lines between stakeholder liaison staff and senior management?
- How will the company's stakeholder engagement strategy be communicated internally?
- What management tools will be used to document, track and manage the process (e.g., stakeholder database, commitments, register, etc.)?
- For projects or company operations involving contractors, how will the interaction between contractors and local stakeholders be managed to ensure good relations?

Sample of Stakeholder Log

Date/ Place	Company Staff in Attendance	Contact Persons/ Organization	Meeting Summary/ Key Issues Raised	Follow-up Actions

Appendix 21. Grievance Mechanism

