



TRADE AND DEVELOPMENT BANK GROUP
GROUPE DE LA BANQUE DE COMMERCE ET DE DÉVELOPPEMENT

ENVIRONMENTAL & SOCIAL MANAGEMENT SYSTEM

TABLE OF CONTENTS

| | |
|---|-----------|
| ACRONYMS | IV |
| DEFINITIONS..... | V |
| EXECUTIVE SUMMARY | VII |
| Rationale and Context..... | vii |
| TDB’s ESMS | vii |
| SECTION 1: INTRODUCTION | 1 |
| 1.1 Background..... | 1 |
| 1.2 Rationale and Context..... | 1 |
| 1.3 Key Lessons Learnt from Implementation of Previous Policies | 2 |
| SECTION 2: THE ESMS AND POLICY FRAMEWORK | 4 |
| 2.1 Overview..... | 4 |
| 2.2 TDB’s Operating departments | 5 |
| 2.3 Applicable Environmental and Social Standards and Guidelines | 6 |
| 2.4 Project Categorization | 7 |
| 2.4.1 Category 1 | 7 |
| 2.4.2 Category 2 | 7 |
| 2.4.3 Category 3 | 8 |
| 2.4.4 Category 4 | 8 |
| SECTION 3: THE ESMS POLICY AND MANAGEMENT COMMITMENT | 9 |
| 3.1 TDB’s Environmental and Social Policy Commitment | 9 |
| 3.1.1 Overview | 9 |
| 3.1.2 Purpose of Policy | 9 |
| 3.1.3 Principles | 9 |
| 3.1.4 Broad Environmental and Social Risks Related to TDB | 10 |
| 3.1.5 Application of TDB’s Environmental and Social Policies to our Investments | 10 |
| 3.2 Organization Responsibility, Resources and Capacity | 11 |
| 3.2.1 TDB’s Internal Roles and Responsibilities | 11 |
| 3.2.2 REPORTING STRUCTURE | 14 |
| 3.2.3 Resources and capabilities | 14 |
| SECTION 4: ESMS PROCESS FLOW AND PROCEDURES..... | 15 |
| 4.1. E&S Process Flow Diagram (all Projects)..... | 18 |
| 4.2. Minimum E&S Requirements When TDB Finances Partner Financial Institutions (PFIs) | 25 |
| SECTION 5: PROJECT COMPLIANCE MONITORING AND REPORTING..... | 27 |
| 5.1 Compliance Monitoring | 27 |
| 5.1.1 Reporting on Major Incidents | 28 |
| 5.1.2 Project E&S Information Checklist | 28 |
| 5.1.3 Grievance Log | 28 |
| 5.1.4 Semi-Annual Reporting | 29 |
| 5.1.5 Annual Reporting to Investors | 29 |
| 5.1.6 Completion/Exit | 30 |
| 5.1.7 Summary of Reporting Requirements | 30 |
| SECTION 6: AWARENESS AND TRAINING | 31 |
| SECTION 7: ESMS REVIEW..... | 34 |
| SECTION 8: TDB’S CLIENT STAKEHOLDER ENGAGEMENT | 34 |
| SECTION 9: DISCLOSURE OF INFORMATION BY TDB’S CLIENTS | 34 |
| SECTION 10: GRIEVANCE PROCEDURE REQUIREMENTS OF TDB’S CLIENTS..... | 35 |
| CONCLUSION | 35 |
| APPENDICES..... | 36 |
| APPENDIX 1: EXCLUSION LIST..... | 37 |
| APPENDIX 2: CLAUSE FOR PRE-INVESTMENT AGREEMENTS..... | 38 |

| | |
|--|-----|
| APPENDIX 3: GENERAL INVESTMENT AGREEMENT CLAUSES..... | 39 |
| APPENDIX 4: TDB’S E&S CATEGORISATION GUIDELINES..... | 40 |
| APPENDIX 5: TDB’S E&S RISK RATING MATRIX..... | 49 |
| APPENDIX 6 (A): TEMPLATE FOR INITIAL EVALUATION AND SCREENING PAPER PROJECT AND INFRASTRUCTURE FINANCE DEPARTEMENT..... | 52 |
| APPENDIX 6 (B): TEMPLATE FOR INITIAL EVALUATION AND SCREENING PAPER TRADE FINANCE DEPARTEMENT | 54 |
| APPENDIX 6(C): TEMPLATE FOR FINAL EVALUATION AND SCREENING PAPER PROJECT AND INFRASTRUCTURE FINANCE & TRADE FINANCE DEPARTEMENTS | 57 |
| APPENDIX 7: GUIDE FOR DEVELOPING ESDD TERMS OF REFERENCE..... | 59 |
| APPENDIX 8: SEDD QUESTIONNAIRE | 66 |
| APPENDIX 9: SEDD REPORT FORMATS | 76 |
| APPENDIX 10: MAJOR INCIDENTS REPORTING FORM | 79 |
| APPENDIX 11: ACTION PLAN FORMAT | 81 |
| APPENDIX 12: SEMI-ANNUAL E&S MONITORING REPORT TO TDB FORMAT | 82 |
| APPENDIX 13: ANNUAL E&S PERFORMANCE MONITORING REPORT FORMAT | 91 |
| APPENDIX 14: PROJECT E&S INFORMATION CHECKLIST FOR HANDOVER TO PMD..... | 98 |
| APPENDIX 15: SAMPLE GRIEVANCE PROCEDURE (FOR TDB’S CLIENTS) | 100 |
| APPENDIX 16: PS GUIDANCE NOTES..... | 103 |
| APPENDIX 17: ESMS SELF ASSESSMENT GUIDE | 103 |
| APPENDIX 18: ENVIRONMENTAL AND SOCIAL MANAGEMENT SYSTEM (ESMS) IMPLEMENTATION HANDBOOK – GENERAL..... | 103 |
| APPENDIX 19: LIST OF E&S SPECIALISTS..... | 104 |
| APPENDIX 20: ADDENDUM TO THE ESMS-RENEWABLE ENERGY E&S MONITORING TEMPLATES | 110 |

ACRONYMS

| Abbreviation | Term |
|--------------|---|
| AFD | French Agency for Development |
| AfDB | African Development Bank |
| BII | British International Investment |
| CITES | Convention on International Trade in Endangered Species |
| COMESA | Common Market for Eastern and Southern Africa |
| DBSA | Development Bank of Southern Africa |
| DFI | Development Finance Institution |
| EAC | East African Community |
| E&S | Environmental and Social |
| ESIA | Environmental and Social Impact Assessment |
| ERM | Enterprise Risk Management |
| ESAP | Environmental and Social Action Plan |
| ESMS | Environmental and Social Management System |
| EXIM | Export Import Bank |
| FMO | Netherlands Development Finance Company |
| FI | Financial Intermediaries |
| IFC | International Finance Corporation |
| OPIC | Overseas Private Investment Corporation |
| OHS | Occupational Health and Safety |
| SADC | Southern African Development Community |
| SEDD | Social and Environmental Due Diligence |
| SEMS | Social and Environmental Management System |
| TDB | Trade and Development Bank Group |
| ToR | Terms of Reference |

DEFINITIONS

| DEFINITION | MEANING |
|---------------------------|--|
| Action Plan | A plan of action acceptable to TDB and designed by a Client to achieve compliance with TDB's environmental and social standards |
| Client/Borrower | A company that has received capital or debt directly from TDB |
| Client E&S Representative | Client appointed representatives in charge of E&S at the client premises. |
| Compliance Officer | A representative officer from the Compliance and Risk Management Department involved in project appraisal and review in line with TDB's requirements. |
| E&S Champions | TDB's departmental employees who ensure that E&S aspects are considered during all departmental activities |
| E&S Claim | means any claim, proceeding, formal notice or investigation by any person in respect of any Environmental Law or Social Law. |
| Environment | means humans, animals, plants and all other living organisms including the ecological systems of which they form part and the following media: <ul style="list-style-type: none"> • air (including, without limitation, air within natural or man-made structures, whether above or below ground); • water (including, without limitation, territorial, coastal and inland waters, water under or within land and water in drains and sewers); and • land (including, without limitation, land under water) |
| Environmental Law | means any applicable law, rule or regulation (including international treaty obligations) concerning the Environment and natural resource management. |
| E&S Expert | The social and environmental specialist responsible for undertaking the social and environmental assessment and review of a proposed investment in collaboration with other specialist(s) on the project team. The expert can also assist in E&S review, monitoring or supervision activities of portfolio of the investments |
| EHS Guidelines | World Bank Group Environmental Health and Safety Guidelines. |
| ESMS | The Environmental and Social Management System. The documented or implemented assessment and management elements that enable the client to meet the requirements of TDB, including policy and procedure, E&S assessments and implementation, organization structure, E&S Management program, technical and management capacity, training, community relationships, financial resources, E&S based on the project requirements. |
| ESIA | The process of identifying, predicting, evaluating and mitigating the biophysical, social, and other relevant effects of development proposals prior to major decisions being taken and commitments made. |
| ESAP | A plan that proposes measures to manage aspects identified in the ESDD to acceptable levels in line with TDB requirements. |
| Excluded Activity | Any business or activity listed on the Exclusion List of the ESMS (Appendix 1) |
| Lenders | Institutions that offer Lines of Credit to TDB |
| Line of Credit | Finance facilities utilised to finance operations that fulfil the institutional conditions set by the lenders and meets international best practice. |
| Project" | means a development in any sector at an identified location, which includes green field development, and/or expansion and/or upgrade of an existing operation, or any other development as may be agreed between the Borrower and the Lender |
| PFI | Partner Financial Intermediary |

| | |
|--------------|---|
| RAP | Resettlement Action Plan |
| SEDD | An assessment and analysis of social and environmental risks and opportunity associated with a project to ensure that the transaction does not carry environmental and social risks which could present a potential liability to TDB. |
| Social Laws | means any law, rule or regulation (including international treaty obligations) applicable in the jurisdiction of the Borrower concerning (i) labour, (ii) social security, (iii) the regulation of industrial relations (between government, employers and employees), (iv) the protection of occupational as well as public health and safety, (v) the regulation of public participation, (vi) the protection and regulation of ownership of land rights (both formal and traditional), immovable goods and intellectual and cultural property rights, (vii) the protection and empowerment of indigenous peoples and ethnic groups, (viii) the protection, restoration and promotion of cultural heritage, and (ix) all other laws, rules and regulations providing for the protection of employees and citizens, including the payment of wages which meet or exceed industry or legal national minima. |
| Sub-borrower | Means a private firm/entrepreneur who has obtained funding from Partner Financial Intermediary |

EXECUTIVE SUMMARY

RATIONALE AND CONTEXT

The Environmental and Social Management System (ESMS) outlines the requirements and obligations of the Group related to Environmental and Social (E&S) performance. The System is used to identify, manage and mitigate E&S risks and impact of all potential investment opportunities and to monitor the E&S performance of the current financed operations.

The ESMS addresses TDB's current and future operations by providing guidance on E&S requirements during the investment decision-making process and on-going management of existing clients. Compliance with the ESMS is a condition for all TDB financed activities.

The ESMS builds on two previous ESMS Policies-ESMS Policy (June 2005) and ESMS policy (September 2010). In addition, TDB's strategic focus emphasizes growth in infrastructure financing aimed at creating desired developmental impact for the region and in 2023, a Climate Finance Strategy was approved by the Board. This has resulted in TDB increasing investment in large ticket and complex infrastructure projects which present significant environmental and social risks. The ESMS therefore seeks to:

- Ensure that ESMS are adequate to assess and manage the risks associated with projects and transactions that are envisaged to be financed in the future.
- Ensure that ESMS is in line with internationally acceptable environmental and social standards and best practice.

TDB's ESMS

The ESMS describes the entire environmental and social management system of TDB including the policy and procedures designed to implement it. The document covers the following components:

TDB's Environmental and Social Policy and Management Commitment

The environmental and social policy seeks to integrate E&S considerations into TDB's activities. TDB is committed to developing, implementing, and continuously improving the management of E&S risks and opportunities to sustainable financing. In addition, the policy reflects specific policy commitments which include principles of caring for the environment by encouraging environmentally and socially responsible behavior, complying to national environmental legislations in the countries where it operates, adhering to international standards and best practices, regularly engaging with stakeholders and reviewing the social and environmental performance of the projects that it finances among others.

Environmental and Social Assessment and Risk Management Process

This section describes the ESMS process flow and the procedures which would apply during the investment process from deal origination through to the final loan repayment or exit. The ESMS procedures provide clear step-by-step guidance for the application of the E&S Policy, including the process for identifying E&S risks of projects, and identify relevant functions and individuals involved in the implementation process. The clear identification of roles played by the various departments in the ESMS is geared at ensuring that E&S matters are fully integrated within the investment process and ensures that there is a sense of ownership by various individuals throughout the entire process. A detailed description of each stage is included in Section 4 of the ESMS document.

Compliance Monitoring and Reporting

Compliance monitoring and reporting is an integral part of the ESMS. From disbursement and throughout the operational phase of the investments, operational departments i.e., Lending Operations (Trade Finance, Project Infrastructure) and Portfolio Management monitor performance of the investments to ensure adherence to the loan agreement, national legal requirements in the host country and that they are in line with international best practices. Action plans and mitigation measures identified during the E&S appraisal are implemented during the monitoring process and TDB further reports on post investment E & S activities in accordance with internal obligations and line of credit requirements.

Capacity Building and Awareness

The ESMS provides periodic training to create awareness on importance of E&S risks assessment and to build internal capacity in E&S assessment and regarding emerging E&S risks.

Stakeholder Engagement and Grievance Mechanism

TDB advocates stakeholder engagement with the aim of fostering cordial relationships between the client and stakeholders, especially those who are directly affected by the project activities. In this regard, a grievance procedure has been developed aimed at identifying and addressing E&S issues before they become grievances.

ESMS Review

TDB's Environmental and Social Management System (ESMS) is reviewed periodically, and such reviews are informed by lessons learned across the portfolio and as well as other good practices that TDB becomes aware of including recommendations from various stakeholders. The review tracks emerging E&S risks that may affect future business activities and ensures that they are incorporated into the ESMS.

SECTION 1: INTRODUCTION

1.1 BACKGROUND

TDB's mission is to be at the forefront of extending development capital and services to advance regional growth and integration through customer focused and innovative financing instruments. TDB's product and service offerings are primarily trade, project, and corporate finance, and to a lesser extent, equity finance and guarantees with tenures ranging from short to long term.

TDB's clientele includes private and public enterprises, in addition to financial and government institutions. Strong risk and governance structures, coupled with international best practices in investment operations also place TDB in good stead, within the right conditions, to manage and administer special purpose funds in cooperation with investors and international development partners.

TDB has at its disposal Lines of Credit and loan facilities from other international Developmental Finance Institutions (DFI's) and financial institutions. These lines of credit are utilised to finance operations that fulfil the institutional conditions set by the lenders and meet international best practice.

TDB's purpose and key objectives are as follows:

- Advance regional economic integration and growth through trade and investment;
- Promote the development of infrastructure, exports and enterprises in Member States;
- Provide debt, quasi-equity and equity financing, as well as non-financial products and services, to qualifying entities and projects in Member States;
- Render technical assistance and management services to Member States, partners, donors and relevant stakeholders, including management of special purpose funds; and
- Foster the development and deepening of financial and capital markets in Member States.

To meet these objectives, TDB has to maintain an appropriate ESMS to help manage E&S impacts of financed operations efficiently and effectively and also to ensure improved E&S stewardship of financed activities. The following benefits will be achievable through a properly implemented ESMS:

- Cost savings.
- Reduced risk.
- Increased operational efficiency.
- Positive external relations and public image.
- Improved communication.
- Greater employee stewardship.
- Improved public relations; and
- Access to reasonably priced funds from line-of-credit providers who place ESMS as a condition for lending out their funds.

1.2 RATIONALE AND CONTEXT

TDB adopted its Environmental and Social Policy in June 2005. In 2010, TDB undertook an exercise to harmonize all its policies and procedures, and the harmonized E&S policy was formally approved by the Board of Directors in September 2010. These policies provided the basis for which the environmental and social risk assessment was carried out by TDB.

In December 2012, TDB's Board of Governors adopted TDB's Fifth Corporate Plan. The Plan emphasized growth in infrastructure financing as a key priority area in the next decade if the desire to create meaningful developmental impact for the region and create value for shareholders is to be achieved.

Increased demand in investment in renewable energy (RE) projects in Sub-Saharan Africa, which is catalyzed by TDB and its financing partners has presented investment opportunities to TDB on one hand, while also opening up new challenges in assessment and management of E&S risks associated with the RE sub-sector.

Noting that increased investments in infrastructure and renewable energy among other sectors present significant environmental and social risks whose impact may have long-term consequences TDB took steps to revise its existing policy. The revised environmental policy therefore seeks to:

- Ensure that ESMS policy and procedures are adequate to assess and manage the risks associated with projects and transactions that are envisaged to be financed in the next decade.
- Ensure that ESMS is in line with local laws and internationally acceptable environmental and social standards and best practice.

1.3 KEY LESSONS LEARNT FROM IMPLEMENTATION OF PREVIOUS POLICIES

In developing the revised ESMS, the TDB considered the changing context of operating environment as discussed above, and the lessons learned from the implementation of the previous policies. Some improvements made over the last updates of the policies are as follows:

Re-aligning policy with new credit review process and enterprise-wide Risk Management: In 2012 the TDB enhanced its credit review process through the introduction of New Deal Forum (NDF) and creation of a fully-fledged Compliance and Risk Management Department (CRMD). The revised ESMS therefore seeks to address the two issues as its structure embeds ESMS throughout the credit review process and further the re-alignment takes into account the roles and responsibilities of CRMD this ensures E&S risk assessment is fully integrated into the Bank-wide Enterprise Management System (ERM).

Integration of ESMS procedures: One gap that was identified in the previous ESMS was that while there was a well-articulated policy document in place, its application in various departments varied due to lack of a single coherent document outlining procedures that were applicable across the TDB to aid its implementation. The revised ESMS sets out, in one document, clear step-by step guidelines to assist in implementing the ESMS.

Taking into account the best international practice: Whilst the previous policy was developed with input from DFIs which had already well-developed E&S risk assessment safeguards such as AfDB and FMO, there has been significant changes in the E&S space in recent years. Lack of clarity in specific standards to which TDB's policy was benchmarked posed challenges in implementing stringent E&S standards in some projects. There was therefore need for TDB to revise its policy to benchmark it with international practice.

Standardization of tools and templates: Smooth implementation of the previous policy was also affected by lack of standardized tools and templates mainly to assist officers in the categorization process, the due diligence process and reporting at the level of borrower. The revised policy has a number of tools and templates which provide clear guidelines in the assessment of E&S risk of transactions.

Clarification of roles and responsibility: The new credit review process and the introduction of a fully-fledged CRMD resulted in new officers taking new roles through the risk assessment process. The policy had to therefore be revised to harmonize the roles and responsibilities of individual officers to incorporate the specific roles in respect to environmental and social system management. The policy emphasizes the requirement of engaging E&S experts during the due diligence and monitoring phase of the projects to ensure expert advice is sought by TDB at all stages of the project in respect to E&S issues.

Provision of grievance mechanism: While the previous policy had provided for stakeholder engagement it lacked clarity on the requirement to have project proponents establish a mechanism to receive and facilitate resolutions of affected peoples' concerns, complaints, and grievances about the project's environmental and social performance. The revised policy provides guidelines and reporting templates to address this challenge.

Taking into account the new responsible finance trends and tools: The 2021 version of the ESMS introduces the requirements for E&S screening of the partner financial institutions (FIs) to ensure that FIs are meeting PS 2 requirements; It also brings adjustments on the loan E&S screening structure to include the 2019 Equator Principles and EDFI E&S Harmonized Standards/requirements.

SECTION 2: THE ESMS AND POLICY FRAMEWORK

2.1 OVERVIEW

This Environmental and Social Management System (“ESMS”) was developed to outline the requirements and obligations of The Trade and Development Bank Group (“TDB”) as they relate to Environmental and Social (“E&S”) performance. The ESMS will be used to evaluate all potential investment opportunities’ E&S performance, and to monitor the on-going E&S performance of financed operations. The ESMS will assist TDB to analyze, control and reduce the negative environmental and social impacts and improve on the positive benefits that are realized from financed operations during the financed period. The ESMS addresses TDB’s current and future operations by providing guidance on E&S requirements during the investment decision-making process and on-going management of clients. Compliance with the ESMS is a condition for all TDB financed activities.

The ESMS describes the whole environmental and social management system of the TDB including the procedures designed to manage E&S risks and impacts. This ESMS document:

- Provides the rationale for TDB’s E&S policy.
- Describe how E&S issues are considered in the investment processes and how E&S management systems are maintained that meet the requirements of the E&S policy.
- Provides a summary of the environmental and social risks and impacts, as part of project categorization guidelines associated with investments undertaken by TDB within the COMESA region.
- Details the applicable E&S requirements and procedures against which all potential investments made by TDB will be evaluated.
- Enhances E&S institutional capacity to execute the expanded mandate and increased business envisaged under the TDB’s 7th Corporate Plan and enterprise-wide risk management policy;
- Develops a structured process and tools for monitoring and recording E&S risks and impacts management in its investment processes.
- Aim to create environmental and social awareness within the TDB and its financed activities.
- Allocates roles and responsibilities to ensure that the ESMS is implemented within TDB and at Client companies.
- Ensures ongoing reporting on E&S performance and impact and incorporate E&S performance reporting in the integrated reports.
- Recommends a system for continuous tracking of the emerging Environmental and Social risks that may affect the TDBs activities in the future and ensuring they are incorporated into the ESMS.

The ESMS encompasses the aspects contained in the figure 1 below

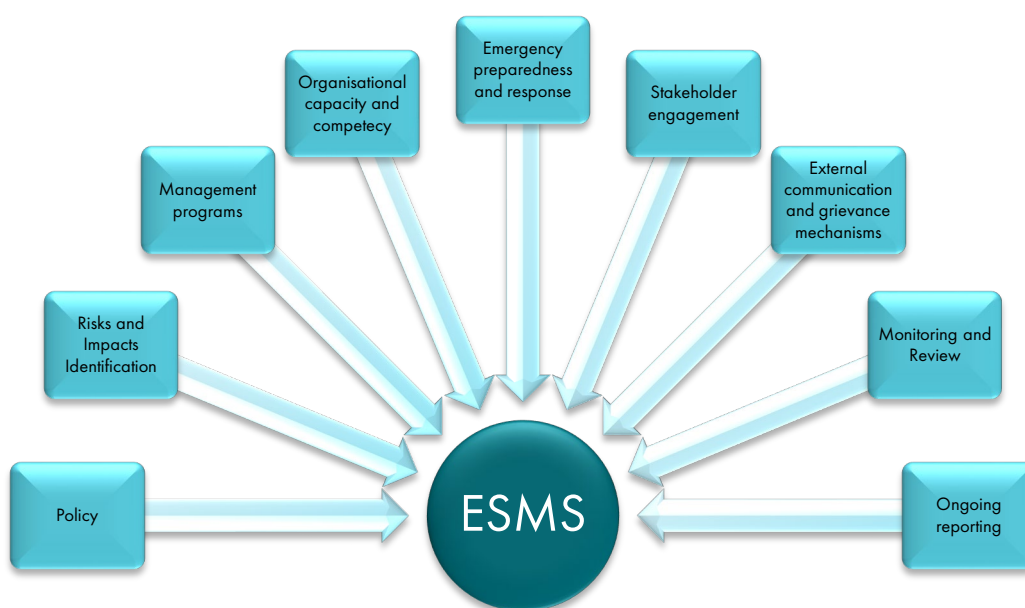


Figure 1: Contents of the ESMS

2.2 TDB'S OPERATING DEPARTMENTS

The Bank is comprised of the following departments.

| DEPARTMENT | E&S ROLE AND RESPONSIBILITY |
|--|--|
| Office of the Group President and Managing Director/ The Presidency | <ul style="list-style-type: none"> Overall responsibility for Business Principles and ESMS at the Bank; and ESMS reporting to the Board of Directors. |
| Office of the Chief Executives | <ul style="list-style-type: none"> Overall responsibility that the ESMS is implemented along various subsidiaries of the TDB Group |
| Finance | <ul style="list-style-type: none"> Responsible for budgeting and control, financial reporting and resource mobilization and management; and Allocating E&S training budget within TDB |
| Compliance & Risk Management | <ul style="list-style-type: none"> Responsible for managing and reporting of prevalent risks across TDB and monitoring of compliance with internal controls. (Governance, control and assurance department). Assessing E&S risks as part of the compliance risk management during project appraisal and during the holding period. |
| People and Organizational Development | <ul style="list-style-type: none"> Responsible for TDB's human resources and administrative support services; and Ensure where required, that the appropriate staff with the right expertise are hired to undertake the E&S roles and responsibilities within TDB. |
| Legal Affairs | <ul style="list-style-type: none"> Responsible for TDB's legal affairs including drafting agreements and covenants; and Ensure the E&S covenants and agreed action plans are incorporated into the loan agreements. |
| Corporate and Investor Relations | <ul style="list-style-type: none"> Reporting impact to investors and shareholders; and Corporate communication to third parties |

| DEPARTMENT | E&S ROLE AND RESPONSIBILITY |
|---|---|
| Project & Infrastructure Finance (PIF) | <ul style="list-style-type: none"> Responsible for developing the pipeline, appraising the projects and taking them through the documentation process up to first disbursement; and Ensuring that pipeline deals are assessed according to the TDB's ESMS from the onset. |
| Lending Operations | <ul style="list-style-type: none"> Provides trade finance facilities to support export and import trade flows from, to and within the region; and Ensuring that pipeline deals are assessed according to TDB's ESMS from the onset. |
| Trade Development Fund | <ul style="list-style-type: none"> Responsible for management of an equity closed end Infrastructure focussed fund and an open-ended debt fund predominantly focussed on investments in trade finance, structured trade finance, export finance and project finance or related obligations of companies or other entities (including sovereign entities) located primarily in or having exposure to Eastern and Southern Africa. Ensuring that all funds and equity deals comply with TDB's ESMS |
| Portfolio Management | <ul style="list-style-type: none"> Responsible for the administration and monitoring of PIF loans and investments from first disbursement of funds through project implementation to full repayment of the loan. Responsible for managing the work-out portfolio and recovery of written off accounts. Review the E&S permits and approval requirements. Ensuring that clients comply on an ongoing basis with TDB's ESMS. Co-ordination of day-to-day issues pertaining to ESMS |
| Treasury | <ul style="list-style-type: none"> Ensuring that E&S requirements are identified from the various lines of credit. Ensuring that the lines of credit E&S requirements are communicated to the finance and operational departments. |

2.3 APPLICABLE ENVIRONMENTAL AND SOCIAL STANDARDS AND GUIDELINES

TDB will ensure that all potential investment opportunities are reviewed and evaluated against the following applicable requirements and guidelines:

- National laws of an E&S nature applicable to the countries and sectors of interest.
- IFC Performance Standards 2012;
- Lines of Credit Side-letters and E&S reporting requirements (such as AfDB, BII, DBSA, FMO, AFD, EXIM Banks and other present or future Lender's) for specific portfolio financed by these entities;
- Applicable EU, UN and Office of Foreign Asset Control (OFAC) Sanction Lists, where applicable;
- TDB's E&S Categorisation Guidelines as detailed in Appendix 4;
- AfDB Operational safeguards.
- International Labour Organisation (ILO) core conventions;
- UN Guiding Principles on Business and Human Rights (UNGPR);
- OECD guideline for multinational enterprises (OECD MNE) and
- WBG EHS guidelines

Beyond the aforementioned E&S requirements, TDB is obligated to comply to specific E&S requirements of multilateral and bilateral funding agencies. These requirements may include supplementary E&S compliance measures, including a list of restricted activities. It's important to note that these supplementary compliance requirements are applicable solely to the respective project portfolio and do not extend to TDB's entire portfolio.

Similarly, as an Institutional investor, TDB has a responsibility to respect human rights in line with the UN Guiding Principles on Business in Human Rights unanimously endorsed by the United Nations (UN) Human Rights Council in 2011. All Group's operation departments will ensure the dissemination of these supplementary directives throughout the organization as they are established. These requirements will be taken into account in conjunction with the requirements detailed in this ESMS.

TDB shall, to the extent possible, ensure that its respective clients comply with all applicable laws, rules and regulations of any government, regulatory body, licensing agency, or professional association in the country of domicile where the financed operation will occur. In particular, TDB shall ensure, to the extent permitted under any domestic law, that the Client or, in the case where the transactions is structured for on-lending to specified eligible sub-borrowers, that such Client's sub-borrowers' contract to observe the relevant E&S guidelines adopted by TDB. In the event of an absence of national standards in the country where the investment will be made, or a conflict between TDB's requirements and that of the country concerned, clients must comply with the more stringent standard, whether expressed as a law, rule or regulation.

2.4 PROJECT CATEGORIZATION

Whilst TDB-financed operations are necessary for economic development within its member states, there are a number of potential E&S risks and impacts that are diverse and vary in level and degree of severity. TDB's E&S Categorization Guidelines contained in Appendix 4 were developed to identify the potential E&S risks associated with potential financed investments based on the sectors and categorize the projects based on the significance of the anticipated impacts.

Investments will fall into the following four categories listed below and examples of sector/projects within the four categories are highlighted in Annex 4:

2.4.1 Category 1

The project is likely to have significant adverse environmental and social risks or impacts that are sensitive, diverse or unprecedented. A potential impact is considered "sensitive" if it may be irreversible. A full Environmental and Social Impact Assessment (ESIA) is required.

2.4.2 Category 2

The project may result in potential limited adverse environmental and social impacts, but these impacts are site specific and few if any of them are irreversible. In most cases mitigation measures are predetermined by Performance Standards, Guidelines, or design criteria. Potential adverse environmental impacts on human populations or environmentally important areas are less adverse than those of Category 1 projects.

Apart from ESIA, ESMP is required for Category 1 and 2 projects.

2.4.3 Category 3

The project is likely to have minimal or no adverse environmental and social risks and impacts. No further environmental and social assessment is required.

2.4.4 Category 4

The project involves investment of funds through a financial intermediary in subprojects that may result in adverse environmental and social impacts, or the FI has operations which may have adverse environmental and social impacts (e.g. project finance). Verification that the project sponsor is capable of and committed to conducting environmental and social review of projects and managing relevant operations to ensure that financed projects meet certain environmental & social requirements is required.

This category is further divided into: -

FI-1:

When an FI's existing or proposed portfolio includes or is expected to include substantial financial exposure to business activities with potential significant adverse environmental or social risks or impacts that are diverse, irreversible, or unprecedented.

FI-2:

When an FI's existing or proposed portfolio is comprised of, or is expected to be comprised of, business activities that have potential limited adverse environmental or social risks or impacts that are few in number, generally site-specific, largely reversible, and readily addressed through mitigation measures; or includes a very limited number of business activities with potential significant adverse environmental or social risks or impacts that are diverse, irreversible, or unprecedented.

FI-3:

When an FI's existing or proposed portfolio includes financial exposure to business activities that predominantly have minimal or no adverse environmental or social impacts.

SECTION 3: THE ESMS POLICY AND MANAGEMENT COMMITMENT

3.1 TDB'S ENVIRONMENTAL AND SOCIAL POLICY COMMITMENT

3.1.1 Overview

The environmental and social policy seeks to integrate environmental and social (E&S) considerations into the TDB's activities, including support to TDB's clients in achieving international best practices on responsible banking. TDB is committed to developing, implementing, and continuously improving management of E&S risks and opportunities to contribute to sustainable development.

Sustainable development is core to delivering on TDB's growth objectives. Underpinning our corporate philosophy and growth path is an appreciation that our growth drivers cannot be achieved effectively without a committed focus to E&S management and sustainable development. This policy implements applicable environmental and social requirements and procedures contained within its member countries. Additionally, this policy reflects specific policy commitments that have been made by TDB with respect to environmental and social policies and procedures.

3.1.2 Purpose of Policy

The policy describes the TDB's philosophy and approach to managing E&S risks and impacts in its investments.

3.1.3 Principles

TDB commits to the following principles:

- Caring for the environment and communities by promoting environmental and social sustainable financing and encouraging environmentally responsible behaviour to conserve biodiversity and maintain ecosystem services in all TDB financed activities.
- Meeting the requirements of national legislation in all the countries in which TDB resources are to be invested.
- Undertaking its activities in line with applicable international standards and industry good practice.
- Develop and implement a robust risk management systems and procedures to identify, assess, and mitigate E&S risks associated with lending activities, including the implementation of E&S due diligence processes.
- Fostering value-driven ethical behaviour and good governance practices informed by respect for human rights.
- Implementing all reasonable precautions to protect the health and safety of employees and promote the health and safety of workers within TDB and in all TDB financed activities.
- Mitigating against the project's climate change impacts, as far as reasonably possible.
- Ensuring that affected communities are appropriately engaged on issues that could potentially affect them.
- Providing and maintaining appropriate environmental and social systems that support E&S best management practice and value addition.
- Engaging with stakeholders and regularly review environmental, social performance and continually evaluate environmental objectives and targets to achieve continuous improvement.

The E&S policy, provided as an independent document, and other elements of the ESMS shall be reviewed and updated periodically in order to ensure its continued applicability to the activities of TDB and its clients.

3.1.4 Broad Environmental and Social Risks Related to TDB

Whilst TDB financed operations are necessary for economic development within the COMESA region, there are a number of potential E&S risks and impacts that are diverse and vary in level and degree of severity.

Largely the potential E&S risk that may arise from the TDB's intervention would be sector related risks as opposed to the Country where a specific transaction is located, save for a few markets where the basic environmental and social laws are not well developed. Another important factor to consider is the extent of exposure in respect to the product lines (financing windows) i.e. Trade Finance (TF) compared to Project and Infrastructure Finance (PIF). Between the two financing windows, TDB is skewed towards Trade Finance. The predominant sectors of intervention on TDB's portfolio are Manufacturing; Agribusiness and Infrastructure (including Energy) in respect to the PIF financing window; whilst financing under TF financing window is mainly for strategic commodities (agricultural and Light petroleum products) undertaken through issuance of Letters of Credit.

While there are specific E&S risks that are likely to arise from the specific sectors or portfolio, TDB recognizes that there are a number of issues that cut across sectors which include: Land related issues; labour conditions across the value chain; use of energy efficient technologies among other. Accordingly, the policy has been developed to ensure that all emerging E&S risks are identified and adequately addressed throughout the investment cycle.

TDB also recognizes that if the existing E&S issues are not identified and mitigated, they may impact on TDB's operations, as the E&S policy is well aligned to its overall Enterprise Risk Management Framework. Some of the direct impacts that may affect TDB from the highlighted E&S issues include:

- **Collateral/Guarantee Risk: Reduction** in the value of the collateral associated with transactions/clients due to E&S problems.
- **Legal Risk:** E&S Impacts which result in any legal disputes/actions against TDB.
- **Credit/Financial Risk:** Clients unwilling or unable to fulfil contractual obligations from E&S issues e.g. civil liability, impaired solvency, settlements.
- **Funding Risk:** Poor lending practices resulting in TDB not being eligible for international development financing.
- **Liability Risk:** Foreclosure and responsible for E&S liabilities with an asset used as a guarantee, joint liability, internal assets required.
- **Reputational Risks:** Risk of negative publicity associated with TDB's lending and client activity. Reduced brand value and image

3.1.5 Application of TDB's Environmental and Social Policies to our Investments

In order to meet the above principles, TDB has set the following E&S operational requirements to its financed operations, within the constraints of the financial targets set:

Screen all investments financed by the TDB against the Exclusion List (Appendix 1). List of Restricted Activities for the World Bank will be applied for its funded Projects.

- Screen our investments for E&S impacts and benefits prior to approving any finances through a well-defined due diligence analysis and decision-making process.
- Ensure clients comply with national and international environment, social, health and safety regulations applicable to the financed operations and services.
- Ensure TDB invests mainly in socially and environmentally responsible companies;

- Require the adoption of TDB’s E&S Standards as defined in this ESMS by our clients, business partners and supply chain.
- Monitor and enforce compliance of E&S aspects/covenants of TDB’s clients in a legally acceptable manner.
- Ensure that the decision makers of the client companies and Partner Financial Intermediaries are more active in taking preventive measures that avoid potential E&S risks that ultimately could result in future liability or insurance claims. This can be achieved through providing guidance to the decision makers as well as creating commitment with them towards putting in place the adequate preventive measures.
- Identify projects that provide environmental and social benefits such as in renewable energy, energy efficiency, water sector, etc.
- Where applicable, assist client companies with E&S value add propositions as part of the action plan to improve E&S awareness and management.
- Monitor and report on our contribution to the E&S development of our clients in a transparent, credible and timeous manner to all relevant stakeholders.
- Overall, actively supporting the development of businesses within member states and supply of goods and services that meet E&S international best standards.

3.2 ORGANIZATION RESPONSIBILITY, RESOURCES AND CAPACITY

The implementation of the ESMS will be achieved by deploying the following resources:

3.2.1 TDB’s Internal Roles and Responsibilities

The table below details the roles and responsibilities for the personnel involved in the ESMS implementation.

| TITLE | RESPONSIBILITY |
|--|--|
| The Group President / MD | <ul style="list-style-type: none"> ▪ Overall responsibility for Business Principles and ESMS at TDB. ▪ ESMS reporting to the Board of Directors. |
| Group Vice President & Chief Risk Officer (CRO) | <ul style="list-style-type: none"> ▪ Responsible for managing and reporting (to Management and the Board) on Group-wide risk including the E&S Risk; ▪ Measuring and reporting on aggregated risk exposure across TDB (including E&S Risks); ▪ Coordinating the design, implementation and monitoring of business continuity and other corporate risk management plans; ▪ Monitoring of compliance with internal controls. (Governance, control and assurance department). ▪ Monitor and report on progress with implementation of Departmental based risk management plans |
| TDB CEO & Climate Champion | <ul style="list-style-type: none"> ▪ Oversee and facilitate the integration of climate change adaptation and mitigation projects financing, in a coherent manner, into relevant TDB’s new and existing policies, programmes and activities, in particular in alignment with TDB mandate and strategies, within all relevant sectors and at different levels of TDB. |
| Investment/Trade Finance Officer | <ul style="list-style-type: none"> ▪ Ensure appropriate consideration of E&S aspects at each stage of the investment process. ▪ Ensure that appropriate environmental, social representations, warranties, and covenants are incorporated in each Client agreement. ▪ Liaise with the ESMS Coordinator to ensure the correct E&S requirements are included in the investment documents and adequate resources are committed to |

| TITLE | RESPONSIBILITY |
|---------------------------|--|
| | <p>allow effective and appropriate implementation of the ESMS policy and procedures.</p> <ul style="list-style-type: none"> ▪ In consultation with E&S manager, set an appropriate term of reference and budget for the SEDD. |
| ESMS Manager | <ul style="list-style-type: none"> ▪ Ensure compliance with TDB’s E&S Policies and overall responsibility for the implementation of the ESMS at TDB and clients. ▪ Participate in pipeline meetings and other appropriate forums to contribute to the investment process. ▪ Report E&S issues/infringements to the lenders and ensure that risks are appropriately remedied. ▪ Supervising and approving all E&S reports. ▪ Answering any queries from lenders of an E&S nature. ▪ Ensuring that E&S training needs of staff are met. ▪ Management of the ESMS document and ensuring that it is reviewed on a periodic basis. |
| ESMS Coordinator | <ul style="list-style-type: none"> ▪ Ensure that resources are committed at the Client Level for E&S and OHS management processes. ▪ Evaluating environmental and social compliance of Clients activities with the applicable ESMS requirements. ▪ Participate and contribute on all SEDDs whether it is being driven by external consultants or in-house resources. ▪ Assessing E&S risks as part risk management during project appraisal and during the holding period. ▪ Work with the Client and the Investment Officer to ensure that adequate resources are committed to allow effective and appropriate implementation of the ESMS policy and procedures. ▪ Maintain on-going liaison and correspondence with the Client ESMS representative. ▪ Develop a program with the Client for the submission of E&S reports to TDB. ▪ Review E&S reports on TDBs projects. |
| E&S Specialist | <ul style="list-style-type: none"> ▪ Ensure appropriate consideration of E&S as part of the SEDD or investment monitoring process. ▪ Ensure the correct E&S requirements are included in the investment documents and adequate resources are committed to allow effective and appropriate implementation of the ESMS policy and procedures. ▪ Report local E&S issues/infringements/incidents to TDB and ensure that all emergency incidents are appropriately addressed, and risks remedied where possible. ▪ Maintaining and updating a list of potential E&S and OHS risks inherent in TDB’s evolving business portfolio; ▪ Prepare reports on local E&S issues/infringements and ensure that all serious incidents are appropriately addressed, and risks remedied where possible. ▪ Ensure that the Client is compliant with TDB’s E&S Policy. ▪ Reviews Client submissions to ensure that they comply with the applicable regulations of the host country’s regulatory regime. ▪ Review E&S monitoring reports on a periodic basis and recommend enhancements where necessary. |

| TITLE | RESPONSIBILITY |
|-----------------------------------|--|
| Environmental Analyst | <ul style="list-style-type: none"> ▪ To assist (through preliminary analysis of instruments submitted by potential borrowers) environmental and social specialists in appraising the environmental and social risks and impacts associated with TDB investments against the requirements of IFC's Performance Standards (PSs) and TDB's ESMS. ▪ Assist in defining steps required to ensure compliance with the PSs and the World Bank Group Environmental, Health and Safety Guidelines (www.ifc.org/ehsguidelines). ▪ Assist in supervising the environmental and social performance of client companies through the review of monitoring reports and site visits to supervise environmental and/or social aspects of clients' operations. ▪ Assist in providing training on environmental and social issues to TDB clients, investment staff and other specialists. ▪ Support in development of sectoral and regional portfolio reviews, in particular in developing an understanding of systematic compliance issues in the portfolio. ▪ Collect and analyze data to assist specialists in preparation of reports, such as on specific E&S issues and on TDB's portfolio. |
| Legal Officer | <ul style="list-style-type: none"> ▪ Prepare loan conditions and covenants. ▪ Ensure appropriate E&S clauses and action plan are included in the legal agreements signed with TDB's clients. ▪ Review any amendments to the loan conditions and covenants. ▪ Liaising with the ESMS manager to maintain a current E&S legal register for all the countries within which TDB operates. |
| Client (Borrower) | <ul style="list-style-type: none"> ▪ Comply with TDB's ESMS ▪ Provide project information as requested by TDB; ▪ Carry out ESIA along with feasibility studies and public consultations including disclosure of the ESIA findings to the authorities and the public. ▪ Securing appropriate E&S permits from the relevant authorities ▪ Prepare and E&S management plan and compensation schemes. ▪ Prepare appropriate agreements on impacts relating to resettlement, livelihood losses and indigenous people. ▪ Monitor implementation of E&S management plan and action plan to ensure compliance. ▪ Submit regular monitoring reports to TDB |
| Client ESMS representative | <ul style="list-style-type: none"> ▪ Engagement with the contractors and communities to ensure that E&S requirements are met. ▪ The implementation of TDB's E&S policies and ESMS at the Client level. ▪ Documenting and reporting local E&S issues/infringements to TDB's ESMS coordinator. ▪ Ensure the implementation of remedial actions on serious incidents and appropriately address risks. ▪ Monitoring the implementation of Environmental and Social Action Plans at a Client level. ▪ Training client staff on an on-going basis on E&S issues and impacts related to their activities and on the implementation of the ESMS. |

3.2.2 REPORTING STRUCTURE

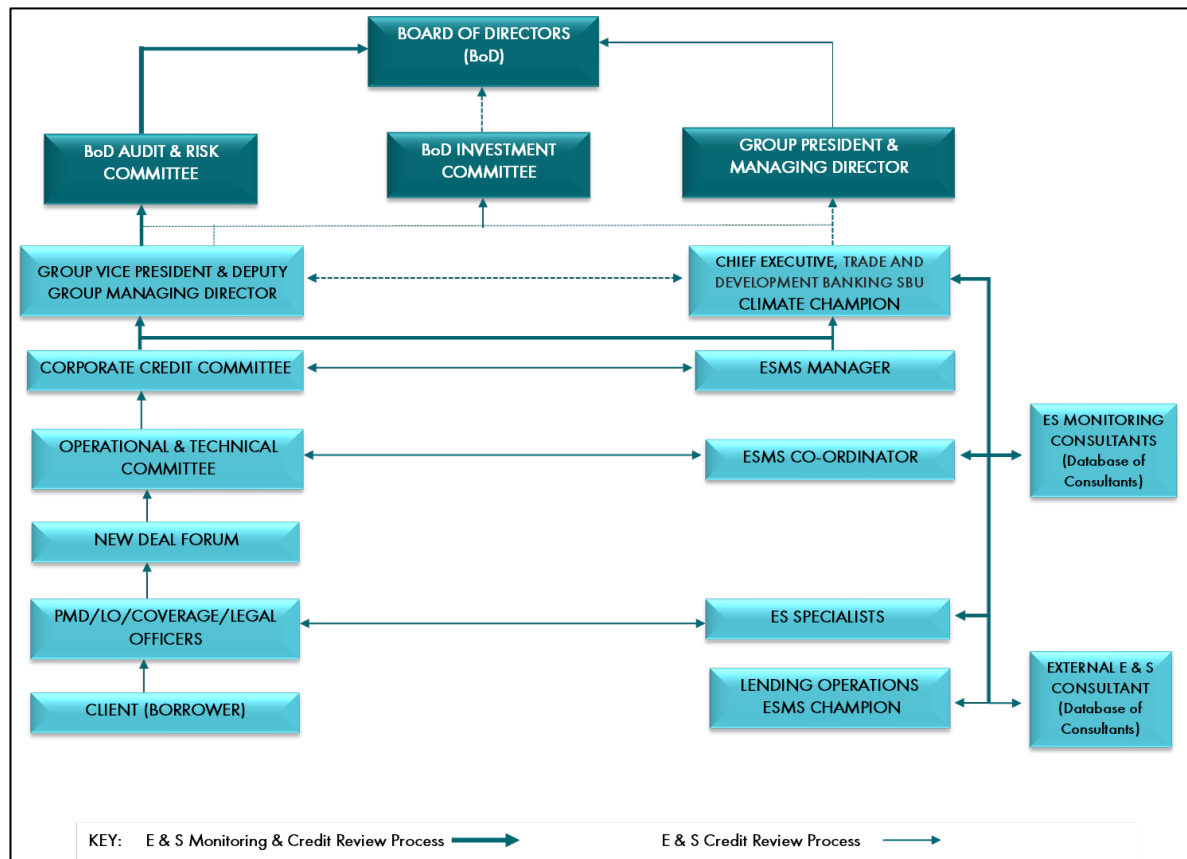


Figure 1: Reporting structure

3.2.3 Resources and capabilities

The ESMS Manager and ESMS Coordinator and Executive Lending Operations shall work with management to ensure that adequate resources have been committed to allow efficient and effective implementation of this ESMS policy and associated procedures. TDB shall maintain a pool of qualified E&S Consultants/Specialist (Appendix 19) who would be called upon to assist in conducting environmental and social reviews as appropriate.

SECTION 4: ESMS PROCESS FLOW AND PROCEDURES

This section describes the ESMS process flow and procedures which would apply during the investment process, from deal origination through to final loan repayment or exit. This section focuses on TDB's E&S requirements and commitments that are to be integrated into the overall investment management approach. The objective is for TDB to ensure that its investment complies with its E&S Standards (as detailed in 2.3) as well as the 2019 Equator Principles¹ and the Harmonized EDFI Environmental and Social Standards². As such during the transaction risk management, TDB adheres to the following Equator Principles:

- **Principle 1 - Review and Categorisation.** As mentioned in chapter 2.4, TDB has established an E&S categorisation as part of its internal environmental and social review and due diligence and produce evidence of such E&S categorisation. TDB's E&S categorisation is aligned with IFC environmental and social categorisation process.
- **Principle 2 – Environmental and Social Assessment.** TDB established adequate E&S risk assessment process to identify scale of impacts of a proposed project (investment, project-finance, project-related loans) especially for high-risk (Category 1, Category 2 where applicable), as part of its internal environmental and social due diligence processes and produces evidence of such assessment (as per Appendix 6C).
- **Principle 3 – Applicable Environmental and Social Standards.** The TDB's E&S assessment addresses at the very least minimum relevant host country laws, regulations and permits that relate to environmental and social obligations and issues; and mirroring international standards (such applicable IFC Performance Standards on Environmental and Social Sustainability, as well as World Bank General Environmental, Health and Safety Guidelines, and industry-specific Environmental, Health and Safety Guidelines).
- **Principle 4 – Environmental and Social Action Plan.** Where non-compliance is identified during the Due Diligence stage or improvements are required, TDB establishes Environmental and Social Action Plan with its clients/ portfolio companies which is to be part of the facility agreement.
- **Principle 5 – Stakeholder Engagement.** TDB requires its clients/ portfolio companies to demonstrate effective Stakeholder Engagement where relevant (affected communities, and/or any other relevant stakeholders such as Indigenous Peoples, vulnerable groups with respect to land and traditional ownership, access to natural resources, cultural heritage). Details of the Stakeholder requirements are outlined in the section 8 of this manual.
- **Principle 6 - Grievance Mechanism.** TDB requires its clients/ portfolio companies to demonstrate effective grievance mechanism and management, designed for use by Affected Communities and workers as applicable and appropriate (as detailed on Section 10).
- **Principle 7 – Independent Review.** To the extent possible ensure that for Category 1 projects and investments an Independent E&S Review is performed (including review of assessment process, stakeholder engagement process, due diligence) – sample Terms of reference for hiring of independent consultant is contained in the appendix 7. TDB also keeps a pool of E&S specialists based on its member states -Appendix 19). Where the project involves minor E&S risks, at the very least an Internal Review shall be performed by the TDB's E&S team to ensure compliance with E&S requirements.

¹ The Equator Principles are a voluntary code of conduct and a risk management framework for determining, assessing, and managing environmental and social risks in projects, and includes 10 principles (review and categorisation ; environmental and social assessment ; applicable environmental and social standards ; environmental and social management system and action plan ; stakeholder engagement ; grievance mechanism ; independent review ; covenants ; independent monitoring and reporting ; reporting and transparency).

² Harmonised EDFI Environmental and Social Standards encompass a) environmental and Social category definitions, b) requirements for Environmental and Social Due Diligence, Environmental and Social contractual requirements and monitoring, and c) an exclusion.

- **Principle 8 – Covenants.** TDB ensure inclusion of appropriate E&S covenants in the Facility Agreement (or equivalent instrument) with clients/ portfolio companies, in line with the Term Sheet and the recommendation of TDB's Committees. Such E&S covenants shall include at minimum the clauses contained in the appendix 3, including provision of any relevant applicable E&S permits and authorisations requirements, relevant Environmental and Social Action Plans, right of supervision and audit of clients/ portfolio companies, periodic E&S reporting, adequate reporting relating to E&S performance, E&S related incidents, fines or penalties.
- **Principle 9 – Independent Monitoring and Reporting.** TDB requires Category 1 projects or clients (and Category 2 where appropriate, where the relevance of E&S risks justify) an Independent Monitoring and Review (or audit) at least every two years) after Financial Close and over the life of the financial facility, except when findings from the previous project monitoring review are still within the implementation or corrective timelines – in such cases, the sponsor is required to submit the accomplishment supporting documents, and new review or follow up review dates are to be agreed between TDB and the client. The independent Monitoring and Review requirements Reporting can also be addressed as follows:
 - Where there is appointed E&S Lender Technical Advisor, TDB will accept any agreed periodically E&S performance report in replacement of Independent Monitoring and/or Review Report. Similarly, the submission frequency and content of Independent Monitoring and/or Review Reports of co-financed, or syndicated transactions are driven by special terms agreed between the lenders. In this case the agreed format will apply.
 - Specific sectors or activities (e.g. airlines, maritime transport, telecom, etc.) are allowed to share with TDB their reports based on sector international reporting best practices on Environmental, Health, Safety and Social matters. There is no requirement for direct submission to TDB if these reports are publicly available.
 - Where a project is in distress, Non-Performance Loans, and others where the relationship with the client is sour, and/or the borrower operates in region where there is social, economic and political unrest, the TDB ESMS Manager will advise the team to exempt the project of conducting or submitting the Independent Monitoring Review until the relationship or operation is normalized.
 - The exemption of independent monitoring and/or reporting also applies to Sovereign Loans, where the underlying projects are medium and low risks, under assumption that most of TDB Member States have reasonably established Environmental and Social regulatory frameworks to manage these risk categories.
 - In regard to Category 2 project the E&S Specialist will advise the ESMS coordinator on the list of category 2 projects to be reviewed based on the relevance of the E&S risks, or where there is need to discontinue the independent review.
 - For the circumstances where the loan agreement was signed before the establishment, or does not contain the requirement for the Independent Monitoring and/or Review and Reporting, the Bank will be driven by the agreed E&S terms and conditions, and explore ways to ensure that the borrower works in a safe, health and environmentally friendly manner, in alignment with the Local E&S regulatory framework.
- **Principle 10 - Reporting and transparency.** Where is practical, TDB works with its borrowers to ensure that Category 1 projects or clients (and Category 2 where appropriate) that at minimum summary information relating to any ESIA's is accessible and available online (which can include a summary of Human Rights and climate change risks when relevant), publicly reporting on an annual basis on GHG emission levels for projects/ clients emitting over 100,000 tonnes of CO2 equivalent annually, sharing of commercially non-sensitive project-specific biodiversity data with the Global Information Facility and relevant national and global data repositories where applicable.

In addition, TDB works towards compliance with the following minimum requirements for non-retail clients, in line with EDFI Harmonized Standards, as presented in the table below.

The table below summarizes the TDB's E&S Screen Process flow:

| Type of transaction | Total project cost/ Loan size | Tenor | Minimum requirements for Sub-borrowers |
|---|---|-------------|---|
| Project Finance / Project-related Corporate Loans | Facility size ≥ USD 5 m OR Total Project cost ≥ USD 10 m | ≥ 36 months | IFC Performance Standards National Law Exclusion List |
| | Facility size < USD 5 m AND Total Project cost < USD 10 m | Any tenor | National Law ILO Fundamental Conventions Exclusion List |
| | Facility size: any amount Total Project cost: any amount | < 36 months | |
| Non-Project-related Corporate Loans (e.g. working capital / revolving facilities) | Facility size ≥ USD 5 m | ≥ 36 months | IFC Performance Standards (PS1 and PS2) National Law Exclusion List |
| | Facility size < USD 5 m | Any tenor | National Law ILO Fundamental Conventions Exclusion List |
| | Facility size: any amount | < 36 months | |
| Trade Finance | Any amount | Any tenor | National Law Exclusion List |

Table 1: TDB's E&S Screen Process flow:

For WB-financed projects, IFC PSs will apply irrespective of the facility size, and the requirement will be outlined in the Facility agreement.

4.1. E&S PROCESS FLOW DIAGRAM (ALL PROJECTS)

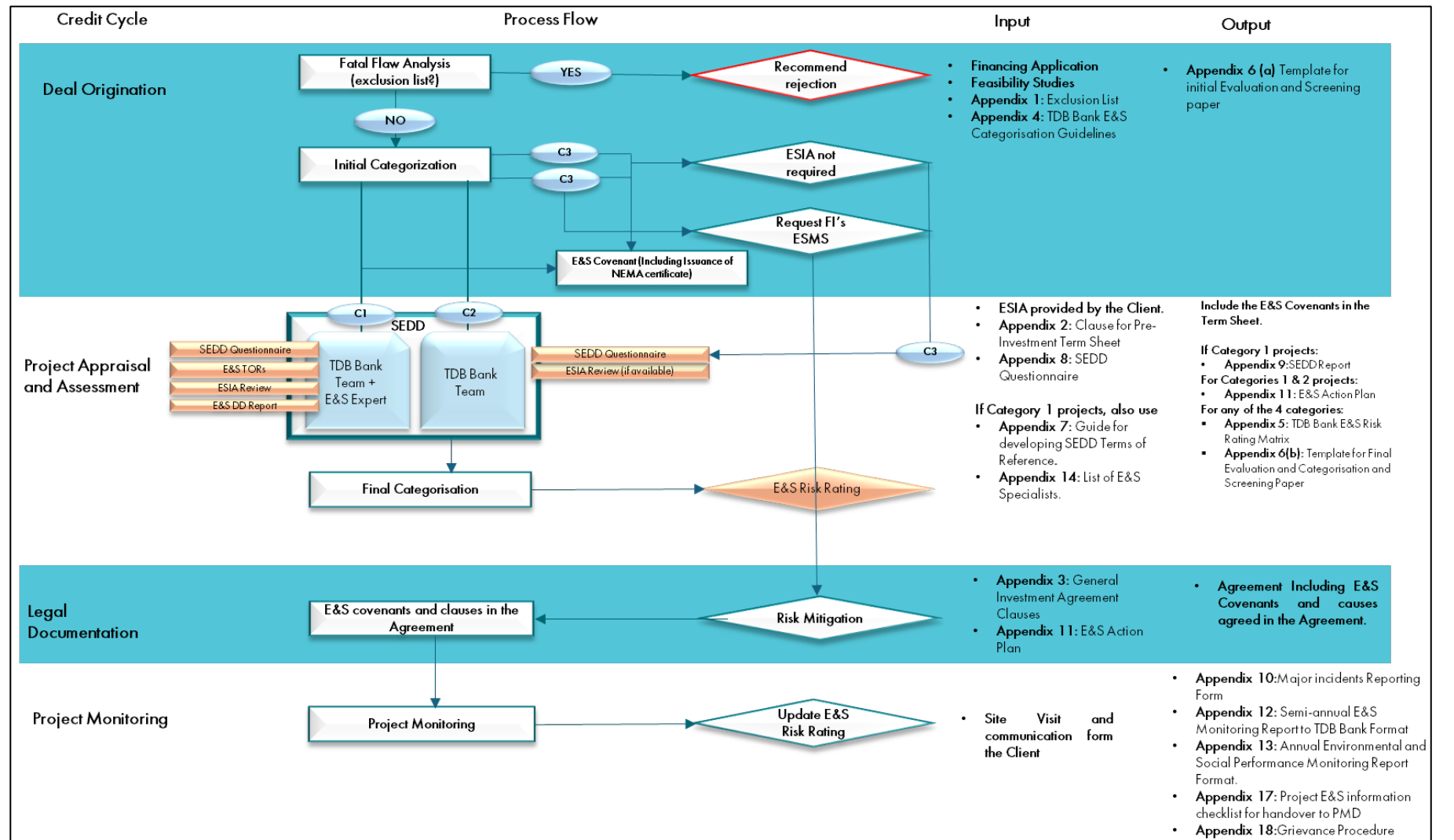


Figure 2: TDB's E&S Screen Process flow:

Please note that in the above diagram C1, C2, C3 and C4 respectively stand for Category 1, 2, 3 and 4.

The table below provides a clear step-by-step guidance for the application of the E&S Risk Assessment Process and identify relevant functions and individuals involved in the implementation:

Table 2: Step-by-step guidance for the application of the E&S Risk Assessment Process

| INVESTMENT CREDIT CYCLE | E&S RISK ASSESSMENT STAGE | E&S PROCEDURES/OUTCOME/ROLES AND RESPONSIBILITIES | TEMPLATES/TOOLS/ REPORTS |
|--------------------------------------|--|---|--|
| FATAL FLAWS ANALYSIS | Initial scrutiny: E&S Fatal Flaws Analysis | <p>Upon receipt of an application, the project will be analysed against the three main elements that form the E&S Fatal Flaws Analysis, which are:</p> <p>Exclusion sectors as per the Exclusion List in Appendix 1 and the List of Restricted Activities for the World Bank funded Projects.</p> <p>The potential that the project E&S impacts cannot be mitigated, or which poses a risk of significant reputational risk in national or local media; and</p> <p>The project history of serious negligent and non-conformance with E&S regulatory requirements in the host country.</p> <p>Trade Finance and Project & Infrastructure Finance departmental officers will provide project baseline information and prepare a project brief using the Template for Initial Evaluation and Screening Paper. In the case the project has fatal flaws, the project rejection shall be recommended.</p> <p>In the case the project has no fatal flaws, the initial project categorisation shall be done, as detailed below before submitting the project to New Deal Forum (NDF).</p> | <p>Appendix 6(a & b): Template for Initial Evaluation and Screening Paper</p> <ul style="list-style-type: none"> ▪ Appendix 1: Exclusion List |
| DEAL ORIGINATION AND NEW DEAL | Initial Project Categorisation | <p>The proposed project shall be screened to decide on the nature and extent of the E&S risks and impact for the project. The following steps will apply:</p> <ol style="list-style-type: none"> 1. If no fatal flaws are identified, A Non-Disclosure Agreement (NDA) will be signed between TDB and the client, in order to aid TDB in sourcing additional information (such as E&S Studies, Project Design, Stakeholder Mapping and Consultation Reports, Permits, etc), for the development of the Screening Paper. Upon signing of the NDA, E&S related information such as previous ESIA's, licenses, permits and audit reports will be reviewed, and E&S risks and impacts highlighted. <p>Trade Finance and Project & Infrastructure Finance departmental officers with the assistance of E&S Manager or Coordinator shall identify E&S</p> | <ul style="list-style-type: none"> ▪ TDB's E&S Categorization Guidelines ▪ Appendix 2: Clause for Pre-Investment Agreements ▪ Non-Disclosure Agreement (NDA) to be signed where applicable. |

| INVESTMENT CREDIT CYCLE | E&S RISK ASSESSMENT STAGE | E&S PROCEDURES/OUTCOME/ROLES AND RESPONSIBILITIES | TEMPLATES/TOOLS/ REPORTS |
|---------------------------------|-------------------------------------|---|---|
| | | <p>issues and risks associated with the project on a desktop review basis in order to classify the project into the appropriate initial project categorization (1, 2, 3, or 4). TDB's E&S Categorization Guidelines (Appendix 4) shall be used to facilitate the initial project categorization. The guidelines are designed to guide departmental officers in the determination of potential E&S impacts associated with the project. A brief project description, the result of the Fatal Flaws Analysis, the initial project category and the initial E&S risks and mitigation shall be summarized in a Screening Report in line with the Template for Initial Evaluation and Screening (Appendix 6(a & b)).</p> <p>2. The Initial Evaluation and Screening Report signed by the Investment Officer shall be submitted to the E&S Specialist or Coordinator for review and sign Eoff before submission to the NDF. The NDF will deliberate on the Screening Report and if the project is given the go ahead, a Term Sheet shall be prepared to be proposed to the Client. The Term Sheet will include E&S Covenants and Clauses as recommended during the NDF.</p> | |
| PROJECT APPRAISAL & ASSESSEMENT | E&S Risk Assessment (Due Diligence) | <p>The categorisation of the project depends on the type, location, sensitivity and scale of the project, as well as the nature and magnitude of its potential impacts. For this reason, the level of effort and resources applied in the E&S risk assessment has to be commensurate to the categorization:</p> <p>Category 1: for this category the project sponsor is responsible for preparing a full Environmental and Social Impact Assessment (ESIA) report and submits it to TDB for review prior to the launching of the appraisal mission. TDB's due diligence team will undertake a desktop review of the ESIA and other documents such as environmental and ESIA permits, human resources policy, E&S management plans such as resettlement action plan, stakeholder engagement plan, indigenous peoples' development plan, etc. During the due diligence, the team would focus on validating the E&S risks identified and proposed mitigation measures, in addition</p> | <ul style="list-style-type: none"> ▪ Appendix 8: SEDD Questionnaire Appendix 7: SEDD Terms of Reference. Appendix 19: List of E&S specialist Appendix 9: SEDD Report Format • Appendix 5: E&S Risk Rating Tool • Appendix 6(C): Template for Final Evaluation and Screening Paper |

| INVESTMENT CREDIT CYCLE | E&S RISK ASSESSMENT STAGE | E&S PROCEDURES/OUTCOME/ROLES AND RESPONSIBILITIES | TEMPLATES/TOOLS/REPORTS |
|-------------------------|---------------------------|---|-------------------------|
| | | <p>it would identifying any gaps that may be apparent in line with the TDB's ESMS</p> <p>For a category 1 project, an enhanced SEDD shall be required and shall consist of:</p> <p>Development of SEDD Terms of Reference (appendix 7) and share them with the List of E&S specialist (Appendix 19) to facilitate the hiring of an E&S External Expert to undertake an independent E&S risks review of the proje</p> <p>Undertaking a site visit to assess the types of E&S risks likely to be encountered. The site visit will also provide for the assessment of the institutional capacity of the client with regard to the E&S management of the project, particularly during implementation. TDB's due diligence, including its external consultant, team shall use the SEDD Questionnaire (Appendix 8) as a guide through the SEDD during a site visit. Where there is large displacement needs, the TDB may require independent RAP compliance audit</p> <p>The E&S External Expert shall review and comment on the ESIA report submitted by the client and provide TDB with an SEDD Report which shall at the minimum cover the aspects as listed in SEDD Report Format (Appendix 9).</p> <p>All ESIA Reports should at a minimum cover aspects as outlined in the SEDD Questionnaire (Appendix 8).</p> <p>Category 2: for this category the review process shall follow the same steps as category 1, however the assessment requirements are less stringent compared to Category 1 projects. Where the applicable local legislation require an ESIA to be undertaken for the project the client is responsible for preparing the ESIA report. The compiled report along with other relevant documents and reports will be made available to TDB for review prior to the launching of the appraisal mission. For category 2 projects, with the exception of such projects that are deemed environmentally sensitive, there shall be no specific requirement for an EMP, however an Action Plan shall be required for implementing any planned mitigation measures identified.</p> | |

| INVESTMENT CREDIT CYCLE | E&S RISK ASSESSMENT STAGE | E&S PROCEDURES/OUTCOME/ROLES AND RESPONSIBILITIES | TEMPLATES/TOOLS/ REPORTS |
|-------------------------|---------------------------|---|--------------------------|
| | | <p>An SEDD shall be required and shall consist of:</p> <ul style="list-style-type: none"> ▪ Reviewing the ESIA or the IEE to identify the positive and negative impacts of the project (TDB’s team) in line with TDB’s ESMS; <p>Undertaking a site visit. TDB’s due diligence team shall use the SEDD Questionnaire (appendix 8) as a guide through the SEDD during a site visit; TDB’s due diligence team to submit an SEDD Report with recommendations based on the site visit and the ESIA.</p> <p>Category 3: for this category there is no Environmental and Social Impact Assessment (ESIA) required. The SEDD shall involve the completion of the SEDD Questionnaire (Appendix 8) with the sponsor.</p> <p>Category 4: for this category which applies where TDBs invests in other financial institutions through lines of credit and/or equity, all Financial Intermediaries (FI’s) shall provide TDB with a written Environmental and Social Management System (ESMS) that will be used for E&S assessment of their subprojects.</p> <p>The findings and recommendations of the SEDD will advise on: The Final Project Categorization and E&S Risk Rating Matrix. The appropriate E&S Action Plan to be put in place so as to address identified E&S risks identified during the SEDD; The E&S covenants are to be incorporated in the Facility Agreement.</p> <p>For the more significant risk identified during the SEDD and the completion of the E&S Risk Identification Checklist (refer to Appendix 4) , its Likelihood and its Consequences are assessed and given a rating based on the Table 3 of TDB’s E&S Risk Rating Matrix (Appendix 5). The E&S Risk Rating is made up of the following steps:</p> <ol style="list-style-type: none"> 1. Likelihood Rating which is determined by the probability of the event to occur and based on past experience at the site with regards to the reported incidents as | |

| INVESTMENT CREDIT CYCLE | E&S RISK ASSESSMENT STAGE | E&S PROCEDURES/OUTCOME/ROLES AND RESPONSIBILITIES | TEMPLATES/TOOLS/ REPORTS |
|-------------------------|---------------------------|---|--|
| | | <p>detailed in Table 1 of TDB’s E&S Risk Rating Matrix;</p> <p>Consequence Rating which is determined by the severity of the likely impact and based on the assessment of residual risks on people, environment and legal compliance as per the rating Table 2 of TDB’s E&S Risk Rating Matrix.</p> <p>Risk Rating Matrix determines the significance of the identified risks by combining the Likelihood Rating with the Consequence Rating.</p> <p>The outcome of the SEDD is the Final Evaluation and Screening Report (Appendix 6(C)) that will contain the Final Project Categorization and the project E&S Risks Rating according to the E&S Risk Rating Matrix (Appendix 5).</p> <p>A Final Evaluation and Screening Report signed by the Investment Officer shall be submitted to the E&S Specialist or Coordinator for review and sign off. This document shall serve to compile the project appraisal results to be submitted to Operational and Technical Committee (OTC), the Credit Committee (CC) and the INVESCO for discussions on the findings, conclusions and recommendations of the SEDD especially the sufficiency of the proposed Environmental and Social Action Plan (ESAP).</p> <p>The different committees shall give an opinion on project appraisal process and the ability of the proposed ESAP to bring the E&S risks to a level of risk acceptable to TDB. This is defined as that level of risk which demands mitigation measures that will not materially affect the client’s ability to service debt obligations or reputation.</p> | |
| LEGAL DOCUMENTATION | E&S Clauses | <p>Trade Finance and Project & Infrastructure Finance departmental officers with the assistance of Legal officers/ES expert/Manager/Coordinator shall ensure inclusion of appropriate E&S covenants and ESAP clauses in the Facility Agreement (or equivalent instrument) in line with the Term Sheet and the recommendation of TDB’s Committees (OTC, CC, INVESTO). E&S clauses shall</p> | <ul style="list-style-type: none"> ▪ Appendix 3: Clause for General Investment Agreements ▪ Appendix 10: Major Incident Report ▪ Appendix 11: Action Plan |

| INVESTMENT CREDIT CYCLE | E&S RISK ASSESSMENT STAGE | E&S PROCEDURES/OUTCOME/ROLES AND RESPONSIBILITIES | TEMPLATES/TOOLS/ REPORTS |
|---------------------------------------|---------------------------|--|---|
| | | <p>cover E&S reporting and monitoring requirements, and actions to be taken when in breach as may be advised by the E&S expert(s).</p> <p>The Agreement shall <i>inter alia</i> include in annexure the following formats to be filled by the client when necessary: E&S Action Plan (Appendix 11);</p> <ul style="list-style-type: none"> ▪ Semi-Annual E&S Monitoring Report (Appendix 12); ▪ Major Incident Report (Appendix 10) | <ul style="list-style-type: none"> ▪ Appendix 12: Semi-Annual E&S Monitoring Report |
| PROJECT IMPLEMENTATION AND MONITORING | | <ol style="list-style-type: none"> 1. With regards to project monitoring post investment, Lending Operations and Portfolio Management departmental officers with the assistance of Legal officers and/or Compliance Officer shall make sure that: <ul style="list-style-type: none"> • Conditions precedent to the first disbursement with respect to E&S covenants are met, in particular the issuance of environmental permitting agency. • E&S requirements are included in all contracts with Client, their developers and third-party contractors. • The client has appropriate insurance policies in place. • Client’s compliance with the government and local government requirements, as well as the E&S policies. • Adequate resources are committed to allow effective and appropriate implementation of the ESMS at client level. • Appropriate action is taken on complaints, orders, directives, claims, citations or notices from any authority under any applicable law or local requirements. • On-going stakeholder engagement is performed and a grievance mechanism for effected communities is maintained and that all grievances are dealt with accordingly. 2. With regards to Reporting, Lending Operation and Portfolio Management departmental officers with the assistance of E&S Specialist and Coordinator shall ensure that, the client is adhering to the ESMS in line with covenants in the Facility | <p>Appendix 10: Major Incident Report</p> <ul style="list-style-type: none"> ▪ Appendix 11: Action Plan ▪ Appendix 12: Semi-Annual E&S Monitoring Report ▪ Appendix 13: Annual Environmental and Social Performance Report |

| INVESTMENT CREDIT CYCLE | E&S RISK ASSESSMENT STAGE | E&S PROCEDURES/OUTCOME/ROLES AND RESPONSIBILITIES | TEMPLATES/TOOLS/ REPORTS |
|-------------------------|---------------------------|--|---|
| | | <p>Agreement and submits to TDB a Semi-Annual E&S Monitoring Report (Appendix 12) to TDB. The requirement for the submission of semi-annual reports is exclusively for High and Medium E&S Risk Performing Loans and/or project in normal operation circumstances. i.e., TDB acknowledges that some factors such as social/ economical/ political unrest situations, performance or nature of the loan can affect or disrupt the report channels between the borrower and the Bank – Please refer to the section 5.1.4. for further details on Semi-annual reporting requirements.</p> <p>3. E&S Coordinator and Manager are responsible for the preparation and completion of an Annual Environmental and Social Performance Report (Appendix 13). The outcome including a summary of the impacts shall be incorporated in the TDB’s Annual Reports, where applicable. The Annual Environmental and Social Report is submitted to various Lenders and stakeholders.</p> | |
| PROJECT COMPLETION/EXIT | | <p>Investment completion reviews the performance of the investment against the loan agreement. The aim is to generate lessons learnt which find their way into a consolidated report on key learning experiences and recommendations for consideration in future interventions. The inclusion of the External E&S Expert in post-project evaluation is recommended for Category 1 and Category 2 projects.</p> | <ul style="list-style-type: none"> ▪ |

4.2. MINIMUM E&S REQUIREMENTS WHEN TDB FINANCES PARTNER FINANCIAL INSTITUTIONS (PFIs)

This section describes the E&S requirements that complement the above ESMS Process Flow when TDB finances Partner Financial Institution (PFI) and these requirements would apply prior to the lending/ investment process.

- The PFI shall establish within its E&S Policy, a statement clearly highlighting alignment with the Equator Principles, Harmonized EDFI Environmental and Social Standards and the IFC Interpretation Note for Financial Intermediaries and commitment to responsible financing.

The PFI shall establish, as part of its E&S Policy, a clear commitment specifically to the IFC Performance Standard 2 regarding Labour and Employment conditions of its staff. This includes a need for the PFI to have Human Resources policies and procedures to ensure that working conditions and terms of employment comply with local labour regulations and International Labour Organisation (ILO) requirements (including for working hours, non-discrimination and equal opportunity, retrenchment, harassment, grievance mechanism, and occupational health and safety);

The PFI shall allocate the resources required for its alignment with IFC Performance Standard 2 relating to Labour and Working Conditions within its operations.

The PFI shall establish the adequate Environmental and Social Management System (including exclusion list, E&S category definition, assessment, due diligence and monitoring processes) to identify E&S risks of borrowers/ investees in line with the Equator Principles, WBG EHS Guidelines, the Harmonised EDFI E&S Standards and the IFC Interpretation Note for Financial Intermediaries; and specifically relating to Labour and Working Conditions. A part of the system, the PFI shall establish covenants with its respective borrowers and investees to promote alignment with the Equator Principles, the Harmonised EDFI Environmental and Social Standards and the IFC Performance Standards; and including more specifically reference to applicable national labour regulations, and relevant ILO Conventions, and IFC Performance Standards 2 relating to Labour and Working Conditions.

More detailed requirements for PFIs can be found in the E&S Guidance Note for management of risks associated with lending activities done through PFIs.

SECTION 5: PROJECT COMPLIANCE MONITORING AND REPORTING

5.1 COMPLIANCE MONITORING

From the first disbursement and during the operational phase of the investment, TDB's Portfolio Management Department (PMD) and Lending Operation (LO) Department monitors the progress and performance of the investment in line with the loan agreement. Monitoring among other issues, aims to ensure that the client complies with the environmental and social (E&S) conditions stipulated in the loan agreement and ensure ongoing compliance with the national and local legal requirements within the host country and where applicable international best practices. (such as WBG EHS Guidelines). Where certain projects have-specific requisites, and for all such projects, those additional requirements will be applicable (p.e., GRIHD and ASCENT's Line of Credit Beneficiaries)

Monitoring also ensures that the ESAP and mitigation and management measures identified in the E&S appraisal are implemented and where the recommended management measures are ineffective or adequate, corrective alternatives are implemented. In addition, TDB's E&S team provide assistance in building institutional capacity of the client with regards to E&S performance of the project.

E&S conditions at the project level will be captured and monitored by the use of TDB's defined reporting tools, including the following:

Major Incidents Reporting Form (Appendix 10).

- Semi-Annual E&S Monitoring Report (Appendix 12).
- Annual Environmental and Social Performance Monitoring Report (Appendix 13).
- Annual Development Effects Report ³;
- Project E&S Information Checklist for Handover to PMD (Appendix 14); and
- Grievance Log Form (Appendix 15).
- Annual Environmental and Social audit Report based on PS Guidance Notes for PS1-PS8 - by both internal and independent external experts/specialists.
- Annual ESMS review and self-assessment (Appendix 17)- by both internal and independent external experts/specialist
- Environmental and Social Management System (ESMS) Implementation Handbook – GENERAL (Appendix 18)

The forms and reports listed above are to be completed by the Client at the project level. Together with the internal supervision reports prepared by TDB's Officers, the E&S status of TDB financed projects are compiled and to be further reported. TDB will then report on post investment ESMS activities on projects in accordance with internal obligations and the requirements of its stakeholders/lines of credit. The risk rating will be updated based on findings of the E&S monitoring reports.

³ Please note this document was not part of the Appendices of the ESMS version provided for ERM review and use

5.1.1 Reporting on Major Incidents

No later than 72 hours of their occurrence, the Client SEMS representative will be required to provide reports to TDB for further reporting to the Lenders on significant incidents which have, or could potentially have material impacts on the client's operations, the welfare of employees, contractors or members of the public, or the environment, including, but not limited to:

- Fires or explosions.
- Significant fuel/chemical spills.
- Significant pollution discharges above limits of normal operation.
- Major work-related injuries (including injured employees, contractors and members of public).
- Work-related fatalities (including deaths of employees, contractors and members of public).
- Incidents significantly affecting the health of employees, contractors or members of public).
- Regulator enforcement actions/notices.
- Major security breaches.
- Strikes or employee unrest.
- Incidents requiring operations to be substantially curtailed or shut-down; and
- Significant community unrest or public relations incidents.

Clients should use the Major Incident Reporting Form (Appendix 10) to report incidents and detail what actions have been taken to remedy the situation to TDB.

Based on the information gathered from the Major Incident Reporting Form (Appendix 10), TDB will notify the lenders (providers of that specific credit line) of the incident in writing. The initial Incident notification can be submitted through email, as long as it contains the summary information required in the Appendix 10.

5.1.2 Project E&S Information Checklist

The Lending Operation Department is required to complete a Project Information Checklist for every project prior to handover to TDB's Portfolio Management Department. The checklist consists of a brief description of the intended project, environmental and social categorization, and a list of documents in accordance to the project category required to be provided to the PMD.

A template for the Project E&S Information Checklist for Handover to PMD is attached in Appendix 14

5.1.3 Grievance Log

Following the grievance procedure established by TDB, Clients will develop a grievance procedure to ensure that all grievances raised by external stakeholder groups will be logged. External stakeholders include affected communities, local government authorities, non-governmental and other civil society organizations, local institutions and other interested or affected parties.

In accordance to the TDB's grievance procedure, all grievance shall be forwarded to the owners of the grievance procedure within the Client Company (expected to be the E&S Officer), who will log the grievance using the official Grievance Log Form and ensures that actions are taken to address the grievance. All grievances shall be resolved in the shortest time possible. The Client E&S Officer shall monitor the progress of the resolution of each grievance should be tracked in terms of timeframes, responsible parties and actions. Grievances should be monitored through follow up contact for at least 28 days following the resolution of the grievance.

The Client SEMS Officer will compile concise quarterly and annual reports of all grievances logged, results of these activities and grievances, and monitoring of the success of the stakeholder engagement and grievance resolution process. This will be made available for internal reporting to TDB's E&S Team. A template for the Grievance Log Form is attached in Appendix 15.

5.1.4 Semi-Annual Reporting

The Client's E&S representative will be responsible for compiling the semi-annual reports, which must detail all ESMS processes and changes enacted during the period. The report must also describe possible foreseeable risks and possible implementation of E&S standards during the investment. The following factors can affect or exempt the feasibility of the submission of semi-annual reports:

- Where there is appointed E&S Lender Technical Advisor, TDB will accept any agreed periodically E&S performance report in replacement of Semi-Annual Reports, with submission frequency, content and format and terms agreed between the lenders.
- Specific sectors or activities (e.g. airlines, maritime transport, telecom, etc.) are allowed to share with TDB their reports based on the international sector reporting best practices on Environmental, Health, Safety and Social matters. There is no requirement for direct submission to TDB if these reports are publicly available.
- Where a project is in distress, Non-Performance Loans, and others where the relationship with the client is sour, and/or the borrower operates in region where there is social, economic and political unrest, the TDB ESMS Manager will advise the team to exempt the project of submitting semi-annual reports until the relationship or operation is normalized.
- The exemption of submission of semi-annual reporting also applies to Sovereign Loans, where the underlying projects are medium and low risks, under assumption that most of TDB Member States have reasonably established Environmental and Social regulatory frameworks, therefore the project is only required to submit the reports as per the Permit Environmental and Social Conditionalities to the relevant regulatory authorities.
- In regard to the Trade Finance Transaction transactions the E&S Specialist will advise the ESMS coordinator on the list of projects entitled for Semi-Annual Reports based on the relevance of the sector and E&S risks, or where there is need to discontinue the E&S reporting.
- For the circumstances where the loan agreement was signed before the establishment, or does not contain the requirement for Reporting, the Bank will be driven by the agreed E&S terms and conditions, and explore ways to ensure that the borrower works in a safe, health and environmentally friendly manner, at minimum in alignment with the Local E&S regulatory framework of the jurisdiction where the project is established

A template for semi-annual reporting is attached in Appendix 12.

5.1.5 Annual Reporting to Investors

TDB will report to the lenders and shareholders through an annual E&S Performance Monitoring Report and Development Effects Report within 90 days of the end of the financial year. The above reporting steps will afford TDB an opportunity to review or adjust the E&S Policy and reporting procedures and identify areas for improving their implementation as necessary.

This will include reporting on the following:

- Implementation and operation of the ESMS.
- E&S performance of the Clients.

Status of Clients respective E&S Action Plans (if applicable).
A template for annual reporting is attached in Appendix 13.

5.1.6 Completion/Exit

Investment completion reviews the performance of the investment against the loan agreement. The aim is to generate lessons learnt which find their way into a consolidated report on key learning experiences and recommendations for consideration in future interventions.; This should also include an Action Plan with a clear timeline addressing any salient pending/ residual E&S actions. The inclusion of the environmental specialist in post-project evaluation is highly recommended for Category 1 and Category 2 projects.

5.1.7 Summary of Reporting Requirements

A summary of E&S risk assessment to be conducted and reports to be written and submitted at each stage as summarized in table 3 below:

Table 3: E&S risk assessment

| Report | Author | Stage | Purpose | Template |
|--|--|---|---|-------------|
| Reporting on Major Incidence | Client E&S Officer | Post Investment and in case of Emergency/ Incidents | Report accidents or injuries that have occurred at a project. | Appendix 10 |
| Project E&S Information Checklist | LO Officer | Prior to project handover to the PMD | E&S Instruments, and other necessary project documents. | Appendix 14 |
| Grievance Reporting procedure / Grievance Log | Client E&S Officer | Within 5 days of receipt of the grievance, if it is assessed to be Level 2 or Level 3 as per Appendix 15. | Report grievances raised by external stakeholders | Appendix 15 |
| Semi-annual Report | Client E&S Officer | Post Investment | To provide TDB with a synopsis of the project's compliance. | Appendix 12 |
| Annual Report | Client E&S Officer & TDB's E&S Coordinator | Post Investment | Evaluate annual performance on E&S compliance; provide ESG evaluation on the project. | Appendix 13 |

SECTION 6: AWARENESS AND TRAINING

The tables below show typical E&S training requirements for TDB employees. These may be amended based on the E&S requirements. Comprehensive training for employees of TDB will be undertaken on the updated ESMS and will involve key departmental employees. Training will cover the ESMS application to particular projects or investment as well as cover the content of any lines of credit investment agreements and side letters.

Table 4 General TDB Staff Training Requirements

| General TDB staff | Detailed training content | Frequency | Expected benefits (including Certificate) | Examples of training provider |
|-------------------|--|-----------|--|---|
| Internal Training | The training content should include as a minimum the following: <ul style="list-style-type: none"> ▪ TDB environmental policy ▪ TDB’s ESMS and other E&S guideline documents ▪ Environmental awareness and management ▪ Introduction to environmental legal compliance | Bi annual | <ul style="list-style-type: none"> ▪ General environmental awareness within TDB staff. ▪ E&S awareness to be included as part of the induction of new staff. | Internal (ESMS Manager and Coordinator) |

Table 5: Departmental Champions Training Requirements

| E&S Departmental Staff/Champions | Detailed training content | Frequency | Expected benefits (including Certificate) |
|-------------------------------------|--|-----------|---|
| Certificate E&S Training | Training should cover the following topics: <ul style="list-style-type: none"> ▪ Introduction to environmental assessment and management ▪ Exclusion List and specific E&S Requirements of Lenders (such as IFC PS, WBG EHS Guidelines) ▪ Introduction to environmental law ▪ Sustainable development ▪ Case studies in environmental and social issues such as: <ul style="list-style-type: none"> – Land management – Pollution – Water management – Biodiversity – Coastal and marine management – Human settlements – Environmental health – Energy – E&S technology solutions – Natural disasters and environmental performance | Annually | <ul style="list-style-type: none"> ▪ One- or two-week certificate course. ▪ Basic requirements for E&S identification and management in line with the ESMS. |

| | | | |
|----------------------------------|---|----------------------------|---|
| | <ul style="list-style-type: none"> – Gender and non-discrimination – Labour practices – Social Inclusion – ipS – Stakeholders Engagement – GRM – Procurement | | |
| E&S and ESMS training | <ul style="list-style-type: none"> ▪ Review the ESMS requirements and the tools used to ensure compliance with the ESMS. ▪ Environmental reporting | Annually after ESMS review | <ul style="list-style-type: none"> ▪ ESMS contents, operating procedures and TDB commitments with regards to E&S management. ▪ Advanced training on E&S to provide input into the implementation and management of the ESMS. ▪ Understand the lessons learnt from previous experiences and the improvements in the ESMS and way to achieve better performance. |

Table 6: E&S Manager and Coordinator Training Requirements

| ESMS Manager and Coordinator | Detailed training content | Frequency | Expected benefits (including Certificate) |
|---------------------------------------|---|-----------------|---|
| E&S Comprehensive training | <ul style="list-style-type: none"> ▪ Introduction to environmental and social management ▪ Environmental and social framework legislation and corporate governance ▪ Environmental management systems and instruments ▪ Pollution prevention, management and resource productivity ▪ Monitoring, auditing and state of the environment reporting ▪ Sustainability ▪ Certified IFC Ps Training ▪ Indigenous People Risk Management ▪ Stakeholder consultation and public participation processes ▪ Environmental impact assessments including: | Every two years | <ul style="list-style-type: none"> ▪ Comprehensive understanding of E&S issues that may impact TDB's operations. ▪ Expected outcomes include obtaining a Certificate or diploma in environmental management |

| ESMS Manager and Coordinator | Detailed training content | Frequency | Expected benefits (including Certificate) |
|------------------------------|---|-----------|---|
| | <ol style="list-style-type: none"> 1) International perspectives on Environmental Assessment (EA) 2) Legal mandate for ESIA 3) Comparative legal requirements for the region and ESIA case law 4) EIA process, cost and techniques 5) Quality and effectiveness of ESIA reports and processes. 6) EIA and the planning interface 7) EIA and decision making 8) Integrated Development Planning 9) Land Use Management 10) Project E&S Life Cycle Assessment (LCA) 11) Strategic Environmental Assessment (SEA) 12) Social Impact Assessment (SIA) <ul style="list-style-type: none"> ▪ Geographic information systems ▪ Sector specific impact assessments ▪ Climate change ▪ Development financial institutions environmental management frameworks and standards ▪ Equator Principles | | |

Table 7

| TDB Directors | Training content | Frequency | Expected benefits | Examples of training provider |
|--------------------------|--|-----------------------|---|------------------------------------|
| Internal Training | <p>The training content should include:</p> <ul style="list-style-type: none"> ▪ TDB's SEMS and other E&S guideline documents ▪ Environmental awareness and management | Once every two years. | <ul style="list-style-type: none"> ▪ General environmental awareness within TDB's Bank Directors. ▪ E&S awareness to be included as part of the induction of new Directors. | Consultant who reviews TDB's ESMS. |

SECTION 7: ESMS REVIEW

This ESMS will be reviewed periodically by TDB and will be informed by lessons learned across the portfolio as well as other good practices that TDB becomes aware of. This review will include a review of the Appendices. The review will continuously track emerging E&S risks that may affect TDBs' activities in the future and ensure they are incorporated into the ESMS.

A review of the ESMS may also be triggered by any change in the scope of the Shareholders Charter, any change in the operations which introduce or changes any material environmental, social or occupational health and safety risk, any failures of this ESMS to appropriately manage E&S risks to the satisfaction of the Lenders or change in TDB's E&S Policies.

TDB will inform the Lenders and shareholders of significant changes proposed.

SECTION 8: TDB'S CLIENT STAKEHOLDER ENGAGEMENT

Stakeholder engagement measures will work pro-actively towards developing and fostering positive relationships between the Client and stakeholders, particularly those directly affected by the project activities. Stakeholder engagement will aim to:

- Provide stakeholders with project information at appropriate times and in accessible forms;
- Communicate planned project phases, developments and changes to all stakeholders in good time (e.g. opening of new operations);
- Involve stakeholders in project decision-making that will affect/influence their lives;
- Enhance stakeholders' capacity to identify unanticipated projects impacts, and to be able to communicate these to the Client such that they can be resolved;
- Assist affected people in adapting to the social and economic changes brought about by the Project through information and participation;
- Ensure that stakeholders can report concerns and grievances easily;
- The management of impacts through stakeholder engagement can be divided into two main strategies.
- Proactive engagement where portfolio company goes out to stakeholders to elicit their involvement and to share information in order to address issues that may be of concern prior to their arising. This process is ongoing throughout the project implementation, which will be document as stakeholder plan
- Reactive engagement i.e. responding to concerns or grievances raised by stakeholders in a coherent and predetermined manner. This approach is facilitated through the establishment of a Grievance Procedure as described below.

SECTION 9: DISCLOSURE OF INFORMATION BY TDB'S CLIENTS

Disclosure of relevant project information helps Affected Communities and other stakeholders understand the risks, impacts and opportunities of the project. The client will provide Affected Communities with access to relevant information on:

- (i) The purpose, nature, and scale of the project;
- (ii) The duration of proposed project activities;
- (iii) Any risks to and potential impacts on such communities and relevant mitigation measures;
- (iv) The envisaged stakeholder engagement process; and
- (v) The grievance mechanism.

SECTION 10: GRIEVANCE PROCEDURE REQUIREMENTS OF TDB'S CLIENTS

Stakeholder engagement measures will work proactively towards identifying and addressing E&S issues before they become grievances. However, when grievances are reported they need to be addressed in a consistent and verifiable manner as part of the implementation of Project ESMS. For this reason, a Grievance Procedure needs to be followed to:

- Enable stakeholders (both internally and externally) to easily identify and report any grievance regarding the project's performance; and
- Ensure that, through a defined process and within a predictable timeframe, stakeholders receive a response and/or resolution to the grievance.

A grievance is when stakeholders report a complaint or what they perceive to be poor performance linked to an operation within a Client company, with the expectation of an explanation, or a change to the activity that has caused the grievance, or redress/compensation. This can be also associated with Labour and working conditions non-conformances.

The Grievance Procedure (Appendix 15) should be followed for all grievances relating to Client companies as a whole, as well as any issues related to any potential resettlement and rehabilitation.

CONCLUSION

TDB recognises that E&S issues should be given early consideration prior to investment (commitment). The foregoing procedures should reduce E&S risk of unexpected impacts and should assist in ensuring the following.

- Ensuring that for each potential deal, TDB is convinced that the E&S assessment and due diligence made during the pre-investment period are accurate to demonstrate the nature and level of risk to make the TDB comfortable to make a decision from an E&S perspective.
- The Client is complying with at least the local and national environmental, social and labour regulations, and with TDB'S ESMS.
- The client must be at least sensitive to the impact of the environment on sustainable development and profitability.

The implementation of this ESMS will ensure that TDB's E&S performance is safeguarded, strengthened, made more effective, brought in line with international best practice and ensure adherence to lenders requirements.

APPENDICES

APPENDIX 1: EXCLUSION LIST

TDB will not finance directly or any project, infrastructure or trade finance activity involving:

1. Production or trade in any product or activity deemed illegal under and host country laws or regulations or international conventions and agreements.
2. Production or activities involving forced labour⁴ or child labour⁵.
3. Trade in wildlife or wildlife products regulated under CITES⁶.
4. Drift net fishing in the marine environment using nets in excess of 2.5 km. in length.
5. Any activity involving or requiring destruction⁷ of Critical Habitat⁸ and any forest project under which no sustainable development and managing plan is carried out.
6. Any activity involving areas gazetted by host countries through national or international legislation and deemed to have a high biodiversity and/or cultural value or any other activities that lead to substantial destruction of the environment.
7. Production or use of or trade in hazardous materials such as unbonded asbestos fibbers (this does not apply to purchase and use of bonded asbestos cement sheeting where the asbestos content is less than 20%) and products containing PCBs⁹.
8. Production, use of or trade in pharmaceuticals, pesticides/herbicides, chemicals, ozone depleting substances¹⁰ and other hazardous substances subject to international phase-outs or bans.
9. Production or trade in alcoholic beverages (excluding beer and wine).
10. Production or trade in tobacco; ¹¹ provided, however, that a maximum of the lesser of
 - (i) US\$600 million or
 - (ii) 10% the Borrower's loan exposure in the aggregate may be related to the financing of such activity.
11. Cross-border trade in waste and waste products unless compliant to the Basel Convention and the underlying regulations.
12. Production or trade in ¹²: weapons and/or munitions; hard liquor for human consumption.
13. Gambling, casinos and any equivalent enterprises.
14. Any business relating to pornography or prostitution.
15. Production and distribution of racist, anti-democratic or with the intent to discriminate part of the population. Exploitation of diamond mines, and commercialization of diamonds, when the host country has not adhered to the Kimberley Process.
16. Production or trade in radioactive materials. This does not apply to the purchase of medical equipment, quality control (measurement) equipment and any equipment where TDB considers the radioactive source to be trivial and/or adequately shielded.
17. Commercial logging operations for use in primary tropical moist forests.

A reasonableness test will be applied when the activities of the project company would have a significant development impact but circumstances of the country require adjustment to the Exclusion List.

⁴ Forced labour means all work or service, not voluntarily performed, that is extracted from an individual under threat of force or penalty as defined by ILO conventions

⁵ persons may only be employed if they are at least 14 years old, as defined in the ILO Fundamental Human Rights Conventions (Minimum Age Convention C138, Art. 2), unless local legislation specifies compulsory school attendance or the minimum age for working. In such cases the higher age shall apply.

⁶ CITES: Convention on International Trade in Endangered Species of Wild Fauna and Flora. (Washington, 1993).

⁷ Destruction means the (1) elimination or severe diminution of the integrity of a habitat caused by a major, long-term change in land or water use; or (2) modification of a habitat in such a way that the habitat's ability to maintain its role (see footnote under) is lost.

⁸ 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 associated 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.

⁹ PCBs: Polychlorinated biphenyls - a group of highly toxic chemicals. PCBs are likely to be found in oil-filled electrical transformers, capacitors and switchgear dating from 1950-1985.

¹⁰ Ozone Depleting Substances (ODSs): Chemical compounds which react with and deplete stratospheric ozone, resulting in the widely publicized 'ozone holes'. The Montreal Protocol lists ODSs and their target reduction and phase out dates.

¹¹ This restriction does not apply to any clients of the Borrower that are not substantially involved in these activities. "Not substantially involved" means that the activity concerned is ancillary to the client's primary operations

¹² Activities excluded when representing more than 10% of the balance sheet or the financed volume and for Financial Institutions more than 10% of the portfolio volume financing

APPENDIX 2: CLAUSE FOR PRE-INVESTMENT AGREEMENTS

“When a prospective investment opportunity is proposed for financing, TDB conducts a social and environmental review as part of its overall due diligence. This review will be appropriate to the nature and scale of the investment, and commensurate with the level of social and environmental risks and impacts.

The purpose of the review is to ensure that the Client conforms to TDB’s Social and Environmental Management System. TDB’s social and environmental review which shall form an integral part of TDB’s overall appraisal of the development, including the evaluation of financial risks.

To conduct its review, TDB may request project -specific information be provided. This information will be treated as confidential in accordance with the terms of this agreement.

TDB does not finance any new business activity that cannot be expected to meet with these requirements over the life of the investment.”

APPENDIX 3: GENERAL INVESTMENT AGREEMENT CLAUSES

TDB undertakes to incorporate *inter alia*, the following terms or other terms that shall have similar effect into its investment agreements:

1. The Client has not received nor is it aware of any existing or threatened complaint, order, directive, claim, citation or notice from any authority under applicable [*specify country*]/law and local requirements which has, or could reasonably be expected to have, a material adverse effect or any material impact on the implementation or operation of the development;
2. The Client shall design, construct, operate, maintain and monitor the project in compliance with the Government of [*specify country*] and local requirements, TDB's ESMS; as well as WB Environmental and Social Standards.
3. The client must develop and implement an ESIA/ESMP, and related management plans commensurate with the E&S risks of the project
4. Where ESAP is required, the client must comply with the stipulated improvement timelines
5. The Client shall use all reasonable efforts to ensure the E&S performance of the project is in compliance with the reference framework of art.11 ;
6. The Client shall not employ or make use of forced labour; shall not employ or make use of child labour; shall not discriminate in terms of recruitment, progression, terms and conditions of work and representation on the basis of personal characteristics unrelated to inherent job requirements, including gender, race, colour, caste, disability, political opinion, sexual orientation, age, religion, social or ethnic origin, marital status, membership of workers' organisations, legal migrants, or HIV status;
7. The Client shall pay wages which meet or exceed industry or legal national minima and provides reasonable working conditions including a safe and healthy work environment, working hours that are not excessive and clearly document terms of employment; and in situation where workers are employed in remote locations for extended periods of time to ensure that such workers have access to adequate housing and basic services;
8. The Client shall adopt an open attitude towards workers' organisation and respect the right of all workers to join or form workers' organisations of their own choosing, to bargain collectively and to carry out their representative functions in the workplace.
9. The Client shall provide an appropriate grievance mechanism that is available to all workers and where appropriate other stakeholders;
10. The Client shall Implement the measures to minimize adverse risks on indigenous people.
11. Within [30] days after the end of each Financial Year/Half Year, the Client shall deliver to TDB the Annual/Semi-Annual Monitoring Report consistent with the requirements of this Agreement confirming compliance with the Action Plan, the social and environmental covenants or, as the case may be, identifying any non-compliance or failure, and the actions being taken to remedy any such deficiency;
12. Within three (3) days after its occurrence, the Client shall notify TDB of any social, labour, health and safety, security or environmental incident, accident or circumstance having, or which could reasonably be expected to have, any material impact on the implementation or operation of the project in compliance with TDB's Social and Environmental Policy or a Material Adverse Effect, specifying in each case the nature of the incident, accident, or circumstance and the impact or effect arising or likely to arise, and the measures the Client is taking or plans to take to address them and to prevent any future similar event; and keep TDB informed of the on-going implementation of those measures.
13. The client will comply with international standards and conventions for the protection of the environment and labour laws (including Occupational Health & Safety) according to the International Labor Organization (ILO), the International Finance Corporation's Performance Standards 1 to 8 and relevant World Bank EHS Guidelines) in accordance with the applicable laws and regulations of the country in which the Project is being implemented.

APPENDIX 4: TDB'S E&S CATEGORISATION GUIDELINES

INTRODUCTION

TDB as a Pan African institution that is keeping pace with the development of international best practice has developed these guidelines to assist with the appraisal of projects from an environmental and social (E&S) perspective. Globally, International Development finance institutions, such as the World Bank and its private sector arm, the IFC, have been key in driving the development of best practices with respect to E&S risk assessment and management disciplines. As a result, the different environmental assessment policies and procedures that many financial institutions apply and implement in their operations are underpinned by the same framework. However, the support mechanisms required for the implementation of the environmental assessment procedures tend to vary. These guidelines are intended to be a guiding tool for TDB to identify and address key E&S challenges when undertaking its activities. These challenges are:

- Land degradation and loss of biodiversity.
- Depletion of non-renewable resources;
- Climate change;
- Air pollution;
- Water availability and quality;
- Human rights and vulnerability;
- Employment and working conditions;
- Occupational health and safety;
- Adverse impacts on Indigenous People
- Involuntary resettlement; and
- Production and disposal of waste.

The E&S guidelines below describe the project appraisal process and in particular the categorization of projects based on potential E&S risks that can be associated with the project.

ENVIRONMENTAL AND SOCIAL APPRAISAL PROCESS

The environmental appraisal process primarily a qualitative assessment involves planning, gathering and validating information, evaluating the information, and reporting on the appraisal results in order to make the investment decision. TDB's appraisal process through which applications or requests for financial assistance are processed and products and services are rendered can be divided into six steps namely:

- New deal receipt;
- Project screening and categorization;
- Project appraisal and Investment review and decision;
- Development of covenants;
- Portfolio management; and
- Project completion/ exit.

CATEGORISATION GUIDELINES

Project categorization will start with the completion of the checklist below to identify potential E&S risks and impacts.

E&S Risk Identification Checklist

The checklist below can be used to identify E&S impacts anticipated that are associated with a project. The checklist captures temporary, permanent, short- and long-term impacts.

| Project aspects | Yes/No/N.A | Description of the issue: |
|--|------------|---------------------------|
| Is the project area in or close to - | | |
| Densely populated area | | |
| Cultural heritage site | | |
| Protected area | | |
| Wetland | | |
| Mangrove | | |
| Estuarine | | |
| Buffer zone of protected area | | |
| Special area for protection of biodiversity | | |
| Will project require temporary or permanent support facilities? | | |
| Will project cause any loss of precious ecology, ecological, and economic functions due to construction of infrastructure? | | |
| Are ecosystems related to project fragile or degraded? | | |
| Will project cause impairment of ecological opportunities? | | |
| Will project cause increase in peak and flood flows? (including from temporary or permanent waste waters) | | |
| Will project cause air, soil or water pollution? | | |
| Will project cause soil erosion and siltation? | | |
| Will project cause increased waste production? | | |
| Will project cause Hazardous Waste production? | | |
| Will project cause threat to local ecosystems due to invasive species? | | |
| Will project cause Greenhouse Gas Emissions? | | |
| Will project cause use of pesticides? | | |
| Does the project encourage the use of environmentally friendly technologies? | | |
| Other environmental issues, e.g. Noise and traffic | | |

| Project aspects | Yes/No/N.A | Description of the issue: |
|--|------------|---------------------------|
| Does the project respect internationally proclaimed human rights | | |
| Are property rights on resources such as land tenure recognized by the existing laws in affected countries? | | |
| Will the project cause social problems and conflicts related to land tenure and access to resources? | | |
| Does the project incorporate measures to allow affected stakeholders' information and consultation? | | |
| Will the project affect the state of the targeted country's institutional context? | | |
| Will the project cause change to beneficial uses of land or resources? (including loss of downstream beneficial uses (water supply or fisheries)? | | |
| Will the project cause technology or land use modification that may change present social and economic activities? | | |
| Will the project cause dislocation or involuntary resettlement of people? | | |
| Will the project cause uncontrolled in-migration (short- and long-term) with opening of roads to areas and/or possible overloading of social infrastructure? | | |
| Will the project cause increased local or regional unemployment? | | |
| Does the project include measures to avoid forced labour and/or child labour? | | |
| Does the project include measures to ensure a safe and healthy working environment for workers employed as part of the project? | | |
| Will the project cause impairment of recreational opportunities? | | |
| Will the project cause impairment of indigenous people's livelihoods or belief systems? | | |
| Will the project cause disproportionate impact to women or other disadvantaged or vulnerable groups? | | |
| Will the project involve and or be complicit in the alteration, damage or removal of any critical cultural heritage? | | |
| Does the project include measures to avoid corruption? | | |
| Does national regulation in affected country require Environmental Impact Assessment and/or Social Impact Assessment for this type of activity? | | |

| Project aspects | Yes/No/N.A | Description of the issue: |
|---|------------|---------------------------|
| Is there national capacity to ensure a sound implementation of EIA and/or SIA requirements present in affected country? | | |
| Is the project addressing issues, which are already addressed by other alternative approaches and projects? | | |
| Will the project components generate or contribute to cumulative or long-term environmental or social impacts? | | |
| Is it possible to isolate the impact from this project to monitor E&S impact? | | |

Project Categories

Investments will fall into the following any of the four categories listed below:

Category 1

The project is likely to have significant adverse environmental and social risks or impacts that are sensitive, diverse or unprecedented. A potential impact is considered "sensitive" if it may be irreversible. A full Environmental and Social Impact Assessment (ESIA) is required.

Category 2

The project may result in potential limited adverse environmental and social impacts, but these impacts are site specific and few if any of them are irreversible. In most cases mitigation measures are predetermined by Performance Standards, Guidelines, or design criteria. Potential adverse environmental impacts on human populations or environmentally important areas are less adverse than those of Category 1 projects. Apart from ESIA, ESMP is required for Category 1 and 2 projects.

Category 3

The project is likely to have minimal or no adverse environmental and social risks and impacts. No further environmental and social assessment is required.

Category 4

The project involves investment of funds through a financial intermediary in subprojects that may result in adverse environmental and social impacts, or the FI has operations which may have adverse environmental and social impacts (e.g. project finance). Verification that the project sponsor is capable of and committed to conducting environmental and social reviews of projects and managing relevant operations to ensure that financed projects meet certain environmental & social requirements is required.

This category is further divided into: -

- FI-1:

When an FI's existing or proposed portfolio includes or is expected to include substantial financial exposure to business activities with potentially significant adverse environmental or social risks or impacts that are diverse, irreversible, or unprecedented.

- FI-2:

When an FI's existing or proposed portfolio is comprised of, or is expected to be comprised of, business activities that have potential limited adverse environmental or social risks or impacts that are few in number, generally site-specific, largely reversible, and readily addressed through mitigation measures; or includes a very limited number of business activities with potential significant adverse environmental or social risks or impacts that are diverse, irreversible, or unprecedented.

- FI-3:

When an FI's existing or proposed portfolio includes financial exposure to business activities that predominantly have minimal or no adverse environmental or social impacts.

The tables below should be used to categorize a project based on the completed initial E&S identification checklist.

CATEGORY 1 REQUIREMENTS

| INITIAL SCREENING QUESTIONS | PROJECT EXAMPLES | RESPONSE | CATEGORISATION | POTENTIAL E&S RISKS |
|--|--|-------------------------|---|---|
| <p>Will the investment involve any of the following:</p> <ul style="list-style-type: none"> ▪ Highly polluting industries, such as large factories, oil and gas extraction and refineries. ▪ Activities which affect the natural environment, for example mining, large scale agribusiness, forestry and construction of new infrastructure. ▪ Resource intensive industries, including cement plants and aluminium smelters. ▪ Businesses which use low skilled workers such as textile production, mining, agribusiness and forestry, in countries with weak labor legislation. ▪ Businesses which involve workers handling hazardous substances, for example mining, large scale agribusiness and chemical factories. ▪ Businesses which can pose health and safety dangers for consumers, such as pharmaceuticals and food producers. ▪ Project that require land acquisition ▪ Adverse Impacts on Indigenous People | <ul style="list-style-type: none"> ▪ Large dams and reservoirs ▪ Forestry (large scale) ▪ Agro-industries (large scale) ▪ Industrial plants (large-scale) ▪ Major new industrial estates ▪ Extractive industries, including mining, major oil and gas ▪ Developments and major pipelines ▪ Large ferrous and non-ferrous metal operations ▪ Large port and harbor developments ▪ Developments with large resettlement components ▪ Large thermal and hydropower development ▪ Projects that include the manufacture, use or disposal of ▪ Environmentally significant quantities of pesticides or herbicides ▪ Manufacture, transportation and use of hazardous and / or toxic materials ▪ Domestic and hazardous waste disposal operations ▪ Any projects which pose serious health and safety risks ▪ Any projects which pose serious socio-economic concerns | YES | CATEGORY 1 | <ul style="list-style-type: none"> ▪ Non-compliance with local and/or international environmental legislation. ▪ Alteration and/or destruction of ecosystem ▪ Large Involuntary resettlement ▪ Lack of appropriate and commensurate compensation for resettled peoples ▪ Degradation/destruction of critical cultural heritage ▪ Lack of free prior informed consent from project effected indigenous peoples ▪ Lack of appropriate E&S risk identification and management processes ▪ Employee exposure to hazardous working conditions and lack of appropriate occupational health and safety measures ▪ Contamination of water, soil and air from storage, handling and transport of hazardous materials (e.g. petrol, diesel and damaged goods) ▪ Impact of water abstraction on surface and groundwater resources, including reduced availability and quality for other users ▪ Waste management, including waste water, hazardous wastes, and general wastes (e.g., construction spoil, waste water, spoilt/ damaged goods, packaging) ▪ Air an noise emissions ▪ In-migration and associated impacts on social dynamics, including risks, such as transmission of HIV/AIDS and pressure on existing services and resources. |
| | | NO or NOT SURE | Check category 2 requirements below. | |

CATEGORY 3 REQUIREMENTS

| INITIAL SCREENING QUESTIONS | PROJECT EXAMPLES | RESPONSE | CATEGORISATION | POTENTIAL E&S RISKS |
|--|--|----------|-------------------------------|---|
| <p>Will the investment contribute to, directly or indirectly, or facilitate, activities such as:</p> <ul style="list-style-type: none"> ▪ Trust funds, ▪ Procurement facilities ▪ Co-financing contributions ▪ Support for planning, change to regulatory frameworks, technical advice, training or applied research ▪ Health services projects ▪ Institutional development and capacity building projects ▪ Advisory assignments ▪ Technical assistance ▪ Internal reticulation at existing urban developments | <ul style="list-style-type: none"> ▪ Advisory assignments ▪ Media and information technology ▪ Life insurance companies ▪ Securities underwriters and broker / dealers ▪ Technical assistance ▪ Educational institutions | YES | CATEGORY 3 | <ul style="list-style-type: none"> ▪ Lack of designated responsibility within the organization to manage E&S risks ▪ Lack of Emergency Preparedness and Response Plans and Procedures ▪ Lack of stakeholder engagement and external communications and grievance mechanisms ▪ Lack of labour contracts ▪ Employee exposure to hazardous working conditions and lack of appropriate occupational health and safety measures ▪ Employee skills development ▪ Employment of women and gender equality |
| | | NO | Check Category 4 requirements | |

CATEGORY 4 - FINANCIAL INTERMEDIARIES

| INITIAL SCREENING QUESTIONS | PROJECT EXAMPLES | RESPONSE | CATEGORISATION |
|--|---|--|--|
| <p>The financial intermediary should address the following questions:</p> <ul style="list-style-type: none"> ▪ Has an environmental review of the proposed investment already been, or will be completed by TDB? ▪ Does this investment need to meet any national environmental standards or requirements? | <p>The level of environmental and social risk will vary greatly for different types of financial transactions and by industry sectors. It can also be determined by factors such as scale and location and magnitude of potential environmental and social impacts.</p> | <ul style="list-style-type: none"> • The financial institution should develop an E&S risk categorization system to assign an E&S risk category to every transaction in a systematic and consistent manner. A typical system includes three environmental and social risk categories, designated as high, medium and low risk (or other similar terms such as TDB categorisation 1, 2 and 3 detailed above) representing different risk levels | <ul style="list-style-type: none"> • Categorisation by the financial intermediary is dependent on the risk and impact levels. • The financial intermediary should submit an annual report to TDB addressing their exposure to environmental and social risks |

APPENDIX 5: TDB'S E&S RISK RATING MATRIX

TDB has developed the E&S risk rating matrix below to provide guidance on the requirements to ensure that project appraisals are undertaken to identify and rate inherent E&S risks that may be associated with a potential project. The matrix provides guidelines on rating impacts during the review of E&S information for the purposes of the appraisal and will assist the current staff members undertaking project appraisal and categorization to rate E&S impacts according to their anticipated significance.

E&S Risk Rating Matrix

- **Likelihood** - The likelihood variables are determined by the probability of the event to occur and were based on past experience at the site with regards to the reported incidents as detailed in Table 1 below:

Table 8: Likelihood rating

| | |
|---|--|
| A | 99% probability, or Impact is occurring now, or Could occur within "days to weeks" |
| B | >50% probability, or Balance of probability will occur, or Could occur within "weeks to months" |
| C | >20% probability, or May occur shortly but a distinct probability it won't, or Could occur within "months to years" |
| D | >5% probability, or May occur but not anticipated, or Could occur in "years to decades" |
| E | <5% probability, or Occurrence requires exceptional circumstances, or Exceptionally unlikely even in the long-term future, or Only occurs as a "100-year event" |

Consequence - The consequence variables were determined by the severity of the likely impact and are based on the assessment of residual risks on people, environment and legal compliance as per the rating Table 2 below.

Table 9: Consequence Rating Criteria

| RATING | SOCIAL | ENVIRONMENT | LEGAL AND COMPLIANCE |
|--------------------------|---|--|---|
| 5 - catastrophic | <ul style="list-style-type: none"> • Multiple fatalities or; • Significant irreversible effects to 10's of people. • Massive relocation of indigenous communities and minority groups that will irreversibly affect their livelihoods • High profile community concern raised requiring significant rectification measures. | <ul style="list-style-type: none"> • Prolonged environmental impact. • Government agency inquiry. • Environmental licenses revoked and directives issued. | <ul style="list-style-type: none"> • Major litigation costing USD1M+. • Investigation by regulatory body resulting in long term interruption to operations. • Possibility of custodial sentence. |
| 4 - major | <ul style="list-style-type: none"> • Single fatality and/or; • Severe irreversible disability to one or more persons. • Relocation of over 1000 households that will negatively and irreversibly affect their livelihoods. • High potential for complaints from stakeholders and community. | <ul style="list-style-type: none"> • Measurable environmental harm medium term recovery. • Environmental directives issued by authorities. | <ul style="list-style-type: none"> • Major breach of regulation with punitive fine. |
| 3 - moderate | <ul style="list-style-type: none"> • Extensive injuries or irreversible disability or impairment to one or more persons. • Long term negative reversible impact on the surrounding host communities. | <ul style="list-style-type: none"> • Medium term recovery, immaterial effect on environment. • Required to inform Government agency. | <ul style="list-style-type: none"> • Breach of regulation with investigation or report to authority with prosecution and/or moderate fine possible. |
| 2 - minor | <ul style="list-style-type: none"> • Medium term largely reversible disability to one or more persons. • Significant medical treatment, disabling or lost time injury <2 weeks. • Short term reversible negative impacts on the surrounding communities | <ul style="list-style-type: none"> • Short term transient environmental impact - some clean-up costs. | <ul style="list-style-type: none"> • Minor legal issues, non-compliance and breaches of regulation. |
| 1 - insignificant | <ul style="list-style-type: none"> • First aid treatment or minor medical treatment. • Minimal negative impacts on the surrounding communities. | <ul style="list-style-type: none"> • Negligible impact on the environment, little or no ecological effect and no measurable impact on human health. | <ul style="list-style-type: none"> • No breach. |

Table 10 below shows the risk rating matrix used to determine the significance of the identified risks.

Table 10: Risk rating matrix

| | | CONSEQUENCE | | | | |
|------------|---|--------------|--------------|--------------|-------------|-------------|
| | | 1 | 2 | 3 | 4 | 5 |
| LIKELIHOOD | A | High (3) | High (3) | Extreme (4) | Extreme (4) | Extreme (4) |
| | B | Moderate (2) | High (3) | High (3) | Extreme (4) | Extreme (4) |
| | C | Low (1) | Moderate (2) | High (3) | Extreme (4) | Extreme (4) |
| | D | Low (1) | Low (1) | Moderate (2) | High (3) | Extreme (4) |
| | E | Low (1) | Low (1) | Moderate (2) | High (3) | High (3) |

The outcome of E&S Risk Rating is an E&S Risk Score which ranges on a scale of 1 (Low Risk) to 4 (Extremely High Risk) as per the above Risk rating matrix combining the Likelihood Rating and the Consequence Rating of the more significant E&S Risk identified during the SEDD. The E&S Risk Score shall be reported in the Template for Final Evaluation and Screening Paper.

APPENDIX 6 (A): TEMPLATE FOR INITIAL EVALUATION AND SCREENING PAPER PROJECT AND INFRASTRUCTURE FINANCE DEPARTEMENT

(To be undertake at the Deal Origination Stage on receipt of initial project application)

NAME OF THE OFFICER:

1. PROJECT DETAILS

| | |
|----------------------------|--|
| Company Name: | |
| Sector/Type: | |
| Project Type: | |
| Brief Project Description: | |

2. FATAL FLAWS ANALYSIS

| Topic | Point of Attention | Yes | No |
|----------------------|---|---|----|
| Exclusion List | Does the project belongs to the Exclusion List | | |
| Excessive E&S risks | The potential E&S impacts cannot be mitigated reasonably | | |
| Reputational risk | poses a risk of significant reputational risk in national or local media | | |
| Past non-conformance | The project has a history of serious negligent and non-conformance with E&S regulatory requirements | | |
| Recommendation | Consider the project (All the above response are "No") | Reject the project (at least one of the above responses if "Yes") | |
| | | | |

3. INITIAL CATEGORIZATION

| Social and Environmental Category, Risks and Mitigations | |
|--|--|
| Recommended Social and Environmental Categorisation | |
| Social and Environmental Categorisation Rationale | |
| Initial determination of E&S impacts | |
| Recommended Mitigations: | |

Signature of PIF or TF Officer:

Date:

Signature of E&S Champion:

Date

APPENDIX 6 (B): TEMPLATE FOR INITIAL EVALUATION AND SCREENING PAPER TRADE FINANCE DEPARTEMENT

NAME OF THE OFFICER: _____

1. Transaction Details

| | |
|--------------------------------------|--|
| Client | |
| Brief Transaction Description | |
| Country | |
| Proposed E&S Category | |
| Sector(s) | <input type="checkbox"/> agriculture <input type="checkbox"/> infrastructure <input type="checkbox"/> manufacturing <input type="checkbox"/> mining <input type="checkbox"/> petroleum & energy <input type="checkbox"/> tourism; <input type="checkbox"/> Other (<i>please specify</i>) _____ |
| ESIA/ESMP | <input type="checkbox"/> in-place <input type="checkbox"/> in-process <input type="checkbox"/> exempted <input type="checkbox"/> expired/renewal stage |
| Environmental Permit | <input type="checkbox"/> in-place <input type="checkbox"/> in-process <input type="checkbox"/> exempted <input type="checkbox"/> expired/renewal stage |
| Other applicable Permits | |
| Financing to be Provided: | |

| Tenor | < 36 months | | ≥ 36 months | |
|----------------------|----------------------------------|--|---------------------|---|
| Facility Size | < USD 5M | ≥ USD 5M | < USD 5 M | ≥ USD 5M |
| Action Required: | Please complete sections 1 and 2 | Please complete sections 1, 2, 3 and 4 | | Please complete section 1, 2, 3 and 4 and get support from the E&S team |

2. Exclusion List Screening

Does the transaction support trade that involves an exclusionary activity? If any answer is yes, then the transaction is ineligible for TDB Support.

| Exclusionary Activities | YES | NO |
|--|--------------------------|--------------------------|
| 1. Production or trade in military arms, weapons and ammunitions | <input type="checkbox"/> | <input type="checkbox"/> |
| 2. Production or trade in any product or activity deemed or legislated as in a member state deemed or legislated as illegal (i) in that state, or (ii) under regulations or international conventions and agreements of general application, or subject to international bans, including but not limited to certain pharmaceuticals, pesticides/herbicides, ozone depleting substances and Polychlorinated Biphenyls (PCBs). | <input type="checkbox"/> | <input type="checkbox"/> |
| 3. Areas gazetted by host countries through national or international legislation and deemed to have a high biodiversity and/or cultural value, or any other activities that leads to substantial destruction of the environment. | <input type="checkbox"/> | <input type="checkbox"/> |
| 4. Production or use of or trade in hazardous materials such as radioactive materials. This does not apply to the purchase of medical equipment, quality control (measurement) equipment and any equipment where TDB considers the radioactive source to be trivial and/or adequately shielded. | <input type="checkbox"/> | <input type="checkbox"/> |
| 5. Production or trade in wildlife or wildlife products regulated under CITES | <input type="checkbox"/> | <input type="checkbox"/> |

| | | |
|---|--------------------------|--------------------------|
| 6. Gambling, casinos and equivalent enterprises. | <input type="checkbox"/> | <input type="checkbox"/> |
| 7. Production or trade in alcoholic beverages (excluding beer and wine) | <input type="checkbox"/> | <input type="checkbox"/> |
| 8. Production or trade in radioactive materials. This does not apply to the purchase of medical equipment, quality control (measurement) equipment and any equipment where IFC considers the radioactive source to be trivial and/or adequately shielded. | <input type="checkbox"/> | <input type="checkbox"/> |
| 9. Production or activities involving harmful or exploitative forms of forced labour/harmful child labour. | <input type="checkbox"/> | <input type="checkbox"/> |
| 10. Production or activities that impinge on the lands owned, or claimed under adjudication, by Indigenous Peoples, without full documented consent of such peoples | <input type="checkbox"/> | <input type="checkbox"/> |
| 11. Prostitution and/or Pornography | <input type="checkbox"/> | <input type="checkbox"/> |
| 12. Projects involved in the conversion or degradation of Critical Forest Areas | <input type="checkbox"/> | <input type="checkbox"/> |
| 13. Projects Impacting upon World Heritage sites | <input type="checkbox"/> | <input type="checkbox"/> |
| 14. Projects Impacting upon UN listed protected areas and natural parks | <input type="checkbox"/> | <input type="checkbox"/> |
| 15. Unsustainable fishing methods (e.g. Blasting and drift net fishing in marine environment using nets in excess of 2.5 km in length) | <input type="checkbox"/> | <input type="checkbox"/> |

3. Client's Track Record/Reputation

Does the client have a history of poor performance on projects not involving TDB? If Yes, consider revisiting actions taken to address previous incidents

| Issue | YES | NO |
|---|--------------------------|--------------------------|
| Has the client experienced any severe Health and Safety accidents | <input type="checkbox"/> | <input type="checkbox"/> |
| Has the client experienced any environmental or social issues associated with business activities | <input type="checkbox"/> | <input type="checkbox"/> |
| Has the client experienced any reputational event associated with its business activities | <input type="checkbox"/> | <input type="checkbox"/> |

4. Labour Conditions

| Issue | YES | NO |
|---|--------------------------|--------------------------|
| Does the client employ or make use of forced labour | <input type="checkbox"/> | <input type="checkbox"/> |
| Does the client employ or make use of child labour | <input type="checkbox"/> | <input type="checkbox"/> |
| Does the client pay wages which meet or exceed industry or legal national minima wage | <input type="checkbox"/> | <input type="checkbox"/> |
| Has the client developed HR policies or procedures, including Code of Conduct to ensure no discrimination in terms of recruitment, progression, terms and conditions of work and representation, on the basis of personal characteristics unrelated to inherent job requirements, including gender, race, colour, caste, disability, political opinion, sexual orientation, age, religion, social or ethnic origin, marital status, membership of workers' organisations, legal migrants, or HIV status | <input type="checkbox"/> | <input type="checkbox"/> |
| Has the client included commitments in the HR policies or procedures to avoid Sexual Harassment and Sexual Exploitation and Abuse | <input type="checkbox"/> | <input type="checkbox"/> |

| | | |
|---|--------------------------|--------------------------|
| Does the client adopt an open attitude towards workers' organisations and respect the right of all workers to join or form workers' organisations | <input type="checkbox"/> | <input type="checkbox"/> |
| Does the client provide reasonable working conditions including a safe and healthy work environment, working hours that are not excessive and clearly documented terms of employment; | <input type="checkbox"/> | <input type="checkbox"/> |
| Does the client provide an appropriate grievance mechanism that is available to all workers and where appropriate other stakeholders; | <input type="checkbox"/> | <input type="checkbox"/> |

Signature of TF Officer:

Date:

Signature of E&S Champion:

Date

APPENDIX 6(C): TEMPLATE FOR FINAL EVALUATION AND SCREENING PAPER PROJECT AND INFRASTRUCTURE FINANCE & TRADE FINANCE DEPARTEMENTS

(To be undertake at the Project Appraisal Stage on completion of the project appraisal process and assessment - ESAP should be attached to this along with a summary of E&S due diligence report).

NAME OF THE OFFICER:

- PROJECT DETAILS

| | |
|----------------------------|--|
| Company Name: | |
| Sector/Type: | |
| Project Type: | |
| Brief Project Description: | |

- FINAL CATEGORIZATION

| Social and Environmental Category, Risks and Mitigations | |
|--|--|
| Recommended Social and Environmental Categorisation | |
| Social and Environmental Categorisation Rationale | |
| Anticipated E&S impacts | |
| Recommended Mitigations: | |

- OVERALL E&S RISK RATING

Describe and rate the more significant risk identified by selecting the appropriate Likelihood, Consequence ratings to determine the E&S Risk Rating Score as per TDB's E&S Risk Rating Matrix (Appendix 5).

| E&S Risk Rating for significant risks | Brief description | Likelihood rating (considering recommended mitigation measures) | Consequence rating (considering recommended mitigation measures) | E&S Risk Rating Score (Low, Moderate, High, Extreme) |
|---------------------------------------|-------------------|---|--|--|
| Impact 1 | | | | |
| Impact 2 | | | | |
| Impact 3 | | | | |
| Impact 4 | | | | |
| Impact 5 | | | | |
| Impact 6 | | | | |

| Determination of overall Project E&S Risk Rating Score (considering recommended mitigation measures) | Overall project E&S rating |
|--|----------------------------|
| If the project has one or more extreme E&S impacts | 4 |
| If the project has one or more high E&S impacts but no extreme E&S risks | 3 |
| If the project has one or more medium E&S impacts but no high or extreme risks | 2 |
| If the project has only low E&S impacts | 1 |

Signature of PIF or TF Officer:

Date:

Signature of E&S
Manager/Coordinator:

Date

APPENDIX 7: GUIDE FOR DEVELOPING ESDD TERMS OF REFERENCE

| Key considerations | Comment and References |
|--|---|
| <p>Assessment and Management of Environmental and Social Risks and Impacts</p> <p>Consultant to collate and review all available planning and environmental permits and regulations in order to assess compliance. Consultant to assess company commitment, capacity and track record in assessing and managing E&S issues</p> <p>Consultants will be expected to apply their normal checklists and DD processes, but should pay particular attention to the following aspects:</p> <ol style="list-style-type: none"> 1. What policies or high-level statements of intent exist regarding E&S performance, including H&S? (TDB should expect to see a focus on labour/ employment, contract management and oversight) 2. How are E&S risks and opportunities identified by the company? 3. What procedures are in place to ensure policies are achieved and key E&S issues are managed appropriately? (I.e. documents, oversight, etc.) 4. Is there adequate capacity across the company to manage E&S issues? 5. What happens in the case of incidents or emergencies (including serious incidents)? How third-parties are involved and made aware of E&S risks? 6. What commitment to and capacity is there to engage and consult with local communities? Is there an effective grievance mechanism in place? 7. What monitoring of E&S performance is there? Does the monitoring program include pollutant source (e.g., emissions to atmosphere, wastewater effluents, solid and hazardous waste), noise, ambient water quality and quantity (both surface and groundwater), air quality, and workplace contaminant measurements? <p>The above items represent the basic building blocks of an effective ESMS.</p> <p>The consultant should give their opinion on the adequacy of the ESMS to manage the risks facing the client in the final ESMS report.</p> | <p>Consultants should be specifically tasked with assessing company capacity, commitment and track record on managing E&S topics since this is critical and often not fully covered by external SEDD consultants. E&S issues should be assessed against standards set forth by the IFC Performance Standard 1 on Assessment and Management of Environmental and Social Risks and Impacts.</p> |
| <p>Labour Practices and Conditions</p> <p>Consultants will be expected to apply their normal checklists and DD processes, but should pay particular attention to the following aspects:</p> | <p>Consultants should be encouraged to engage with employees to gain an understanding of the issues faced. Labour practices should</p> |

| Key considerations | Comment and References |
|--|--|
| <ol style="list-style-type: none"> 1. Adequacy and completeness of HR policies and procedures (specifically compliance with ILO requirements and national labour regulations, scope of application to contract workers, policies relating to forced labour, child labour, harassment and gender-based violence, discrimination, grievances, etc.) 2. What procedures are in place to ensure adequate labour and working conditions (protection of the workforce against forced labour, child labour, harassment and SH/SEA and discrimination; fair terms and conditions of work and representation; occupational health and safety, grievance mechanism, etc.)? 3. Extent to which HR requirements are extended to contractors and how these are monitored? 4. Has a health and safety officer and representative been appointed? If so do they have technical skills and experience to provide a safe work site? Are there enough Occupational Health & Safety (OHS) specialists and do they have authority to make decisions/ influence safety practices? How are staff / workers trained in OHS issues? 5. If migrant labour is used, where are they housed and under what conditions? 6. Does the staff HR manual address the following OHS aspects: non-ionizing radiation, working in elevated temperatures, noise, working in confined spaces, electrical hazards, dust and fire and explosion risks? 7. Monitoring of labour practices and reporting of key performance indicators to management and investors (including incidents/ responses; disciplinary actions and causes, staff turnover, grievances and resolutions, injury rates, occupational diseases, lost days, absenteeism and number of work-related fatalities) 8. If retrenchment is planned, what processes are in place to ensure that it is undertaken in a fair and transparent manner? 9. Any history of strikes, social unrest, labour-related protests, etc.? 10. How is the supply chain managed to ensure standards are upheld? | <p>be evaluated in accordance to standards set forth by the IFC Performance Standard 2 on Labour and Working Conditions.</p> |

| Key considerations | Comment and References |
|--|---|
| <p>Pollution and Resource Use Efficiency</p> <p>Consultants will be expected to apply their normal checklists and DD processes, but should pay particular attention to the following aspects:</p> <ol style="list-style-type: none"> 1. Selection of pollution control technology (confirm compliance with relevant IFC EHS Guidelines and national standards) 2. Air emissions (and specific GHG monitoring requirements that may be evident). Ambient emissions and cumulative impacts. 3. Noise control and abatement, including siting and noise control technologies. 4. Water use (cooling, process waters) – Consideration of the project’s water abstraction on project affected communities. 5. Assess significance and risk of impacts of water abstraction on surrounding ecosystems? Consider the risk of biota interference with intake valves and risks of alien invasive species, where possible. 6. Check that there is effective waste and hazardous material handling and disposal plan (with a duty of care for offsite disposal of materials by third parties). 7. Check whether there is a risk of contamination of the site facilities due to past activities. <p>Additional Requirements specific to Renewable Energy</p> <p>Solar:</p> <ol style="list-style-type: none"> 8. Should consider water use and waste disposal issues, particularly where the project is within an arid area 9. Provision for management of e-waste <p>Wind:</p> <ol style="list-style-type: none"> 10. Should include a focus on noise levels and impacts of this on closest sensitive receptors. <p>Biomass:</p> <ol style="list-style-type: none"> 11. A particular focus on air quality emissions, whether monitoring plans in place. Also, should consider whether ambient air concentrations of key pollutants are above local or EHS guideline levels? | <p>Consultants should identify any existing or potential pollution risks and eco efficiency opportunities. Pollution and resource management checklists and DD processes should consist of standards set forth by the IFC Performance Standard 3 on Resource Efficiency and Pollution Prevention.</p> |
| <p>Community Health, Safety and Security</p> <p>Consultants will be expected to apply their normal checklists and DD processes, but should pay particular attention to the following aspects:</p> | <p>SEDD should be conducted against standards set forth by the IFC Performance Standard 4 on Community Health, Safety and Security.</p> |

| Key considerations | Comment and References |
|--|--|
| <ol style="list-style-type: none"> 1. Infrastructure-related risks, such as fire, explosion at plant, electricity theft and electrocution (if transmission is part of scope) and contamination from process waters/ effluents. 2. Security personnel (including use of and control of third-party security companies). 3. Community engagement and grievance mechanisms (including emergency response planning in the case of incidents and capacity of local emergency response providers). 4. Issues and changes in the local social environment due to influx as a result of the client's activities, p.e. SE/SEA 5. Disease vectors including HIV and malaria. <p>Additional Requirements specific to Renewable Energy</p> <p>Wind:</p> <ol style="list-style-type: none"> 6. Should include a focus on shadow flicker effects on closest sensitive receptors <p>Hydropower:</p> <ol style="list-style-type: none"> 7. Consideration of planning for potential dam failure risks and unplanned releases, emergency planning, disclosure of these plans and procedures and capacities and systems for warnings to downstream communities. <p>Biomass:</p> <ol style="list-style-type: none"> 8. Consideration of fire and safety risks, emergency planning and response and risks to local communities. | |
| <p>Land Acquisition and Involuntary Resettlement</p> <p>If initial screening has identified that involuntary resettlement ¹³ (either physical structures, or land users) has occurred (whether or not it is the direct responsibility of the client) a review of the process should be undertaken.</p> <p>Consultants will be expected to apply their normal checklists and DD processes, but should pay particular attention to the following aspects including:</p> | <p>The review of land acquisition and any involuntary resettlement should be conducted in line with the requirements set forth by the IFC Performance Standard 5 on Land Acquisition and Involuntary Resettlement.</p> |

¹³ Please note that PS5 defines 'involuntary resettlement' as: Resettlement is considered involuntary when affected persons or communities do not have the right to refuse land acquisition or restrictions on land use that result in physical or economic displacement.

| Key considerations | Comment and References |
|---|--|
| <ol style="list-style-type: none"> 1. Adequacy and completeness of baseline socio-economic data and land-holding situation: Assess any attempts made to reduce impacts through relocation, timing etc. (where possible). 2. Assess whether it is necessary for the company to supplement government compensation to meet requirements of Performance Standard 5? 3. Compensation arrangements, processes, and the adequacy and appropriateness of compensation payments. 4. Evaluation of livelihood restoration planning, commitment and efficiency in implementing the Resettlement Action Plan. 5. Location of resettlement sites, if any (whether or not host communities have been consulted and their views incorporated etc.) 6. Stakeholder engagement and on-going commitments (adequacy, timing and completeness of engagement) 7. Company capacity and commitment to manage resettlement processes and activities. <p>Additional Requirements specific to Renewable Energy</p> <p>Hydropower:</p> <ol style="list-style-type: none"> 8. Modelling and calculation of areas of inundation for the hydropower dam/ dam wall expansion to inform resettlement planning. 9. Impact on downstream users affected by routine release. <p>Biomass:</p> <ol style="list-style-type: none"> 10. Include resettlement aspects of any new land to be converted for farming of biomass inputs, or consolidation of existing plots. | |
| <p>Biodiversity Conservation and Sustainable Management of Living Natural Resources</p> <p>Consultants will be expected to apply their normal checklists and DD processes, but should pay particular attention to the following aspects:</p> <ol style="list-style-type: none"> 1. The project's impact on types of habitat and variety of species that have been affected by the project supported by a habitat assessment in line with IFC PS6. 2. Efforts have been taken to assess, avoid, reduce, mitigate and offset biodiversity impacts. | <p>SEDD should be conducted against standards set forth by the IFC Performance Standard 6 on Biodiversity Conservation and Sustainable Management of Living Natural Resources.</p> |

| Key considerations | Comment and References |
|---|---|
| <p>3. The project's impact on ecosystem services¹⁴ (e.g. the supply of clean water)</p> <p>4. Climate change resilience and GHG aspects (including specifically water related risks associated with long term access to and demand for water)</p> <p>Additional Requirements specific to Renewable Energy</p> <p>Wind:</p> <p>5. Consideration of sufficiency of baseline bird and bat monitoring data and management plans in place.</p> <p>6. Consideration of the location of the site in relation to IBA, Ramsar sites.</p> <p>Hydropower:</p> <p>7. Particular consideration of plans for biodiversity offsets and biomass replacement.</p> <p>8. Particular consideration of downstream impacts on ecological health of affected rivers, studies undertaken to calculate minimum ecological flows and plans in place to ensure this is provided.</p> <p>Biomass:</p> <p>9. Consideration of impacts of and mitigation for reduced biodiversity in case of mono-culture planting of biomass-fuel plants</p> | |
| <p>Indigenous and other Vulnerable People</p> <p>If the project or associated facilities will affect Indigenous Peoples (IPs) specialist technical support should be included in the SEDD team. Presence of IPs may affect speed of deal processing and will require additional precautions to be implemented.</p> <p>Consultants will be expected to apply their normal checklists and DD processes, but should pay particular attention to the following aspects:</p> <p>1. Did the ESIA identify the adverse impacts to IPs and identify ways to avoid these where possible? (An Indigenous People Development Plan could be needed in compliance with IF PS7)</p> | <p>When conducting the SEDD, topics to be addressed for the assessment of the treatment of indigenous people, and vulnerable people should consist of standards set forth by the IFC Performance Standard 7 on Indigenous People.</p> |

¹⁴ Ecosystem services are the benefits that people, including businesses, derive from ecosystems. Ecosystem services are organized into four types: (i) provisioning services, which are the products people obtain from ecosystems; (ii) regulating services, which are the benefits people obtain from the regulation of ecosystem processes; (iii) cultural services, which are the nonmaterial benefits people obtain from ecosystems; and (iv) supporting services, which are the natural processes that maintain the other services.

| Key considerations | Comment and References |
|--|---|
| 2. Assess the adequacy of compensation (e.g. sharing of development benefits). 3. How is the Free, Prior and Informed Consent (FPIC) of the Affected Communities of Indigenous Peoples reached? | |
| <p>Cultural Heritage¹⁵ Consultants will be expected to apply their normal checklists and DD processes, but should pay particular attention to the following aspects:</p> <ol style="list-style-type: none"> 1. Did the ESIA identify any Cultural Heritage (CH) resources associated with the Project site, or are there reasonable grounds to suspect that CH may be present on the site or within the project area of influence? If so and there are risks of damage to these CH resources, specialist cultural heritage support will be required as part of the SEDD team. 2. Has a Chance Find Procedure been established? 3. Is an Archaeological Clerk of Works (ACW) in place for the countries and jurisdictions where this is required?¹⁶ 4. Have project plans been influenced by considerations of cultural heritage? <p>Additional Requirements specific to Renewable Energy</p> <p>Hydropower:</p> <ol style="list-style-type: none"> 5. Consideration of entire area of inundation of the hydropower dam as well as areas for potential downstream flooding due to peak flow of releases. | <p>When conducting the SEDD, topics to be addressed for the assessment of cultural heritage should consist of standards set forth by the IFC Performance Standard 8 on Cultural Heritage.</p> |

¹⁵ (i) tangible forms of cultural heritage, such as moveable or immovable objects, property, sites, structures, or groups of structures, having archaeological (prehistoric), paleontological, historical, cultural, artistic, and religious values; (ii) unique natural features or tangible objects that embody cultural values, such as sacred groves, rocks, lakes, and waterfalls; and (iii) certain instances of intangible forms of culture that are proposed to be used for commercial purposes, such as cultural knowledge, innovations, and practices of communities embodying traditional lifestyles.

¹⁶ In some regions/jurisdictions, presence of an ACW is mandatory at construction sites. And even if not mandatory, the nature of some projects (due to the presence of likely cultural heritage resources and the extent of construction activities) may require an ACW on site as good practice

APPENDIX 8: SEDD QUESTIONNAIRE

This checklist and guidance has been prepared to assist in the assessment of E&S issues for potential projects that are financed by TDB. The guidance will enable TDB to:

1. Accurately screen the transaction for key E&S issues and risks
2. Provide specific guidance and instructions to SEDD consultants
3. Assess the comprehensiveness of the SEDD undertaken by the consultants

| Project Screening Questions | |
|---|--|
| <p>These questions will provide you with a high level of understanding of the E&S issues facing a project. The information garnered from answering the below questions will help to inform the scope of an SEDD.</p> | |
| Key Aspects and Considerations | Comment and References |
| <p>Assessment and Management of Environmental and Social Risks</p> <p>Generally, an Environmental and Social Impact Assessment (ESIA) will be required, along with a range of other E&S permits and approvals for the development of the project.</p> <p>If an ESIA (or equivalent) has been conducted and been provided to you please answer the below questions:</p> <ul style="list-style-type: none"> ▪ Has the ESIA been completed and approved by the local responsible regulatory agency? ▪ Who undertook the ESIA (domestic consultancy, engineering company, international E&S consultancy, and what experience do they have of this / similar sectors) ▪ Does it reference international standards (or only domestic/ national)? ▪ Did it consider alternatives to the site or design specs of the project (and how was a decision made on final location, design and technical specifications? Did these reflect key E&S issues)? ▪ Did it include an assessment of construction-related impacts? ▪ Did it consider climate change (emissions and adaptation) (including considerations of the project longevity and resilience for a variety of climate change scenarios, e.g.. water availability)? ▪ If contractors/operators are to be used for constructing and/or operating the plant, does the ESIA reference E&S requirements for the contractors/operators? ▪ Is there any assessment of the indirect impact (i.e. impacts that the project may cause, but is not directly responsible for) and cumulative impacts caused as result of the construction and operation of the project. The latter may be an issue if there are cumulative impacts with a geographic boundary or sensitive receptors nearby. ▪ Have any historical pollution issues associated with the site been identified? ▪ Are communities in close proximity to the site listed and described in the ESIA? | <p>The focal areas identify the issues which would generally be addressed in an ESIA. If all questions can be answered with a positive then the ESIA is likely to be a good assessment covering key issues.</p> <p>Areas of uncertainty or where the answer is no, indicate areas where TDB SEDD consultants should focus attention.</p> |

The questions below and indicators should be answered through initial discussions with management of the client/company to help TDB understand the standard of the ESMS in place, as well as the competency of E&S management within the organisation. It is important to convey TDB's E&S expectations from an early stage and to work with the company to build E&S management capacity (where possible). The performance record of the client/company on its other projects (if any) can give an indication about expectations on the new project.

| | |
|---|---|
| <p>Capacity</p> <ul style="list-style-type: none"> ▪ How many staff are employed or are anticipated to be employed by the client (number and organogram)? ▪ What is senior management's familiarity with key E&S risks and has TDB been presented with evidence that the right skills and competencies are in place in terms of E&S? ▪ If the company has other assets, how are they managed with regard to E&S (request E&S policies)? | <p>These questions demonstrate the client company's ability to manage E&S risk, and its commitment to identifying E&S upside.</p> |
|---|---|

| | |
|--|--|
| <p>Commitment</p> <ul style="list-style-type: none"> ▪ Procedures and formal systems: (Is there a corporate or asset specific ESMS? If so, is it formally verified by external parties?) ▪ Is an E&S Policy in place? ▪ Does on-going stakeholder engagement take place and is there a community grievance mechanism? ▪ Has responsibility been designated for the management of E&S issues (e.g. OHS/EHS manager) ▪ Are internal and/or external E&S audits conducted on the project? | |
|--|--|

| | |
|---|--|
| <p>Track Record</p> <ul style="list-style-type: none"> ▪ Is an Incident register kept? Incidents in the last 2 years. ▪ Is a grievance log kept? Grievances in the last 2 years and their status ▪ Have any awards been received by the client regarding environmental, safety or social performance? ▪ Has the client received any fines or citations? ▪ What can you gauge from the performance of previous/other companies managed by the senior management team? <p>Please note that useful information on the client/ company's track record can often be found online in newspaper articles, industry reports and through simple internet searches.</p> | |
|---|--|

| | |
|---|--|
| <p>Labour and Working Conditions</p> <p>Does the Client have an HR department and/ or a recruitment and employment plan. If so, please answer the below:</p> <p>HR Policies and Procedures</p> <ul style="list-style-type: none"> ▪ Does the company have an HR policy, which provides information on employee rights under national labour and employment law? ▪ Does the HR policy promote equal opportunity and non-discrimination amongst the workforce? ▪ Are provisions in the HR policy in place that encourage the employment of persons from local communities? ▪ Are there specific commitments to ILO core labour standards (child, forced labour, discrimination and freedom of association) in the HR policy? | <ul style="list-style-type: none"> • TDB should pay particular attention to the treatment of workers by the client's contractors and sub-contractors in line with the standards set by the International Labour Organization (ILO). |
|---|--|

| | |
|--|---|
| <ul style="list-style-type: none"> ▪ How many construction staff are needed, where will they come from and will there be a need for worker accommodation? ▪ Will there be a contractor or other third parties who will manage contract labour? If so will they adhere to similar labour and working conditions as the client (including the ILO conventions)? ▪ Has the availability of labour and skilled construction staff been assessed (including needs for temporary / migrant construction workers)? ▪ Are procedures in place for monitoring the E&S performance of contractors/operators (including ensuring that minimum wages as per national legislation are paid and no underage persons are employed)? ▪ Is their union representation in the workforce, including amongst contractors/operators? If so, do you know the percentage of the workforce that are members of unions? ▪ Is there a history of industrial action or strikes associated with the project? ▪ Is there a training plan and log in place? ▪ Employee grievance mechanism? Sexual harassment policy? <p>OHS Management</p> <p>Does the Client have an occupational health and safety (OHS) plan in place, and what evidence is there that OHS aspects are being proactively addressed (if construction work is underway)? If an OHS policy is in place please answer the below:</p> <ul style="list-style-type: none"> • Does the Company have an H&S policy in place? • Does the plan include a personal protective equipment (PPE) policy? • Does the company have in place standard operating procedures and safe work procedures? Have these been assessed as part of the SEDD? • Is there a history of occupational incidents or accidents associated with the project? • Is there an incident/ accident register in place? • Does the company have in place a policy and procedure to monitor the labour and occupational health and safety practices of contractors? • If the investment entails an expansion will this create additional jobs? If yes, how many? <p>Retrenchment</p> <ul style="list-style-type: none"> • Does the Client anticipate retrenchment of a significant number of employees? • If yes, is there a retrenchment procedure in place and have workers been consulted appropriately? • If yes, is there an appropriate grievance mechanism in place? | |
| <p>Pollution and Resource Use Efficiency</p> <p>Does the Client’s activities result in emissions or effluent discharged to the environment and is there use of natural resources in their activities. If so, please answer the below:</p> <ul style="list-style-type: none"> ▪ Has consideration been given to whether the project will significantly affect the environmental quality in the area? | <ul style="list-style-type: none"> • To provide guidance on avoiding and minimising adverse impacts on human health and the environment by avoiding or minimising pollution from project activities. |

| | |
|---|--|
| <ul style="list-style-type: none"> ▪ Are there compliance guidelines identified in national and international standards? ▪ Are environmental, health and safety (EHS) parameters (e.g. air emission, ambient air quality, noise, electrical safety, illumination, radiological hazards, etc.) compliant with national laws or the guideline threshold limits set forth by the IFC General EHS Guidelines (whichever is more stringent)? ▪ What are the demands for resources, mainly water, during construction and operation of the project? ▪ Are there significant noise emissions, air emissions or discharges? Has quantitative modelling been done to understand the extent of the impact? ▪ Has the Project calculated their current or expected greenhouse gas contribution? <p>Waste Management Are there waste produced as part for of the client/ company’s operations. If so, please answer the below:</p> <ul style="list-style-type: none"> ▪ Is a waste management plan in place? ▪ Does it cover all the types of waste that will be generated and disposal method? <p>Additional Requirements specific to Renewable Energy</p> <p>Solar:</p> <ul style="list-style-type: none"> ▪ To consider water use and waste disposal issues, particularly where the project is within an arid area ▪ Provision for management of e-waste <p>Wind:</p> <ul style="list-style-type: none"> ▪ To include a focus on noise levels and impacts of this on closest sensitive receptors <p>Geothermal:</p> <ul style="list-style-type: none"> ▪ Special consideration on waste disposal issues <p>Biomass:</p> <ul style="list-style-type: none"> ▪ A particular focus on air quality emissions, whether monitoring plans in place. Also should consider whether ambient air concentrations of key pollutants be above local or EHS guideline levels? | <p>The guidelines should be based on national laws and/or threshold limits set forth by the IFC General EHS Guidelines.</p> |
| <p>Community Health, Safety and Security</p> <p>Are there communities affected within the Area of Influence of the Client’s activities or operations (including temporary impacts during construction and along access routes)? If so please answer the below:</p> <ul style="list-style-type: none"> ▪ What impacts are predicted to communities in the project’s area of influence (including specifically, increased vehicle traffic during construction, dust, noise and other construction and operational impacts, presence of large numbers of construction workers in the area, security staff and increased controls on the movement of people etc.) ▪ Have they been consulted about the construction / operational activities and is there a grievance mechanism in place? | <ul style="list-style-type: none"> ▪ To provide guidance on avoiding adverse impacts on the health and safety of the affected communities during a project’s life. ▪ Have designated contact persons within the organisation responsible for receiving and responding to questions, concerns or complaints raised by nearby communities or |

| | |
|---|---|
| <ul style="list-style-type: none"> ▪ Will there be an increased demand on water supply as a result of construction or operations that could affect downstream users or local communities? ▪ Is there a traffic management plan in place/proposed? ▪ What controls are in place for dust and noise suppression? ▪ How are security personnel recruited/ are they under the direct control of the company? ▪ Are security guards trained on basic human rights? ▪ Are security guards armed? ▪ Have there been any significant security incidents (e.g. theft of equipment or death or injury as a result of security guards actions). ▪ Has a community engagement process been initiated for affected communities and is this process being formally documented? ▪ Does this process ensure free, prior and informed consultation with the affected community? ▪ Please list the grievances that have been identified through the community engagement process? ▪ Have risks to local communities and employees associated with project been identified? ▪ Does the project involve a public access building that will require life & fire safety measures in line with NFPO1 – WBG EHS guidelines for buildings/ structures with public access ▪ If there are explosion and fire risks, have these risk contours been calculated and considered by the Client/ company in their layout design and emergency planning. ▪ Does the project have in place an Emergency Preparedness and Response Plan? ▪ Are emergency evacuation procedures in place for local communities? ▪ Is a noise management policy in place to limit the impacts of noise on surrounding communities and employees? ▪ Is an emergency response plan in place, which includes contractors? ▪ Has the project management team consulted with emergency authorities when developing the emergency response plan? ▪ Is access to the site by emergency response vehicles included in the project's emergency response plan? ▪ Will worker camps be constructed as part of the construction or operational phases of the project? ▪ Does the project have an employee health and welfare policy in place? ▪ Does the project have an HIV/Aids policy in place? Does it include measures to raise awareness regarding HIV/Aids amongst employees and the project receiving community? ▪ Does the project have SEA/SH management policy? ▪ In accordance with which country's building regulations will the project be constructed? ▪ For dam projects, have dam safety issues been considered <p>Additional Requirements specific to Renewable Energy</p> <p>Wind:</p> <ul style="list-style-type: none"> ▪ Should include a focus on shadow flicker effects on closest sensitive receptors <p>Biomass:</p> | <p>other stakeholders been identified?</p> <ul style="list-style-type: none"> ▪ Has the client put in place a formal documented grievance mechanism? |
|---|---|

| | |
|--|--|
| <ul style="list-style-type: none"> ▪ Include consideration of fire and safety risks, emergency planning and response and risks to local communities ▪ Include consideration of planning for potential dam failure risks and unplanned releases, emergency planning, disclosure of these plans and procedures and capacities and systems for warnings to downstream communities. | |
| <p>Community Health, Safety and Security</p> <p>Is there involuntary resettlement ¹⁷ (as defined in IFC PS5 and AfDB involuntary resettlement Policy)? If so, please answer the below:</p> <ul style="list-style-type: none"> ▪ Including associated facilities, has there been a need to relocate any people (permanent and / or temporary). If so was this through a willing buyer willing seller transaction, or were landowners or land users (whether or not they have legal rights to the land) moved against their will? ▪ If involuntary resettlement has taken place please list and describe the resettled groups? ▪ Including associated facilities has there been a need for economic displacement?¹⁸ If so, is there evidence that compensation has been agreed and paid for the loss of assets or livelihood? Is there evidence of dissatisfaction or concern about the payment of compensation to any effected parties (determined through the grievance mechanism or other avenues)? ▪ If the resettlement was performed against the occupants will, TDB need to obtain details of the resettlement process. ▪ Has the Client engaged with the displaced communities to provide opportunities to derive appropriate development benefits from the project? If yes, please provide details. ▪ Were all alternative project designs explored to avoid involuntary resettlement or minimize resettlement impacts? ▪ Were the displaced people consulted an given a chance to participate in the planning and implementation of the settlement programmes ▪ Was resettlement assistance provided to the displaced persons in order to ensure that their living standards, income generating capacity, production levels and overall livelihood improved beyond pre-project levels? ▪ Was explicit guidance provided to the borrower on conditions that needed to be met regarding involuntary resettlement issues in TDB operations to mitigate negative impacts of displacement and resettlement? ▪ Has a mechanism been set up to monitor the performance of involuntary resettlement programmes in TDB operations and how problems can be remedied when they occur | <ul style="list-style-type: none"> • To provide guidance on avoiding and mitigating the impacts of displacement. • Government managed resettlement does not mean the process has been managed in accordance with the IFC guidelines. • Consideration should be given to all land acquired for the Project, including laydown areas, construction camps, ancillary and associated facilities. • It should be noted that those without land rights should be considered and compensated. • Beware of situations where there is no or only a weak baseline assessment and there has been significant resettlement and / or economic displacement |

¹⁷ Please note that PS5 defines ‘involuntary resettlement’ as: Resettlement is considered involuntary when affected persons or communities do not have the right to refuse land acquisition or restrictions on land use that result in physical or economic displacement.

¹⁸ Economic displacement is defined as a loss of assets or access to assets that leads to loss of income sources or other means of livelihood

| | |
|---|--|
| <ul style="list-style-type: none"> ▪ Was there relocation or loss of shelter by the people residing in the project area ▪ Was there loss of assets (structures, cultural, spiritual or other assets of social importance) or restriction of access of assets, including national parks, protected areas or natural resources ▪ Was there loss of income/means of livelihood as a result of the project and were the people affected required to move. ▪ Was resettlement assistance extended to (i) those who had formal legal rights to land/other assets, recognized under the laws of the country concerned (ii) those who may not have legal rights but can prove through spiritual/ancestral ties with land and are recognized by community as customary inheritors; and (iii) those who have occupied the project area of influence for at least six months prior to cut off date established by the borrower and acceptable to TDB. <p>Additional Requirements specific to Renewable Energy</p> <p>Hydropower:</p> <ul style="list-style-type: none"> ▪ Modelling and calculation of areas of inundation for the hydropower dam/ dam wall expansion to inform resettlement planning. Consider the inclusion of downstream users affected by routine and non-routine releases. <p>Biomass:</p> <ul style="list-style-type: none"> ▪ Consider the resettlement aspects of any new land to be converted for farming of biomass inputs, or consolidation of existing plots. | |
| <p>Is there a potential for the client/companies activities to negatively affect biodiversity resources and natural habitats. If so, please answer the below:</p> <ul style="list-style-type: none"> ▪ Has the Project surveyed the area of disturbance and have this area been classified the habitat in line with IFC PS6 by a specialist. ▪ Will development of the asset result in loss or damage to critical or 19 natural²⁰ modified²¹ habitats (such as forest, pasture/ grassland, water courses or wetlands)? ▪ Are there any formally protected areas within a 5 km radius of the site? If so, are there risks of impacts to these sites (access roads, increased pressure on water resources, air emissions etc.)? ▪ Will effluent discharge have the potential to affect ecologically sensitive habitats or species? <p>Additional Requirements specific to Renewable Energy</p> <p>Wind:</p> | <ul style="list-style-type: none"> ▪ To provide guidance on protecting and conserving biodiversity, as well as managing natural resources sustainably. ▪ Both direct impacts on biodiversity as a result of the project and in-direct impacts on ecosystems as a whole related to the project should also be considered. |

¹⁹ Critical habitats are areas with high biodiversity value, including (i) habitat of significant importance to Critically Endangered and/or Endangered¹¹ species; (ii) habitat of significant importance to endemic and/or restricted-range species; (iii) habitat supporting globally significant concentrations of migratory species and/or congregatory species; (iv) highly threatened and/or unique ecosystems; and/or (v) areas associated with key evolutionary processes.

²⁰ Natural habitats are areas composed of viable assemblages of plant and/or animal species of largely native origin, and/or where human activity has not essentially modified an area's primary ecological functions and species composition.

²¹ Modified habitats are areas that may contain a large proportion of plant and/or animal species of non-native origin, and/or where human activity has substantially modified an area's primary ecological functions and species composition.⁵ Modified habitats may include areas managed for agriculture, forest plantations, reclaimed⁶ coastal zones, and reclaimed wetlands.

| | |
|--|---|
| <ul style="list-style-type: none"> ▪ Consideration of sufficiency of baseline bird and bat monitoring data and management plans in place. ▪ Consideration of the location of the site in relation to IBA, Ramsar sites. <p>Geothermal:</p> <ul style="list-style-type: none"> ▪ Consideration of impacts on biodiversity related to wastewater disposal. <p>Hydropower:</p> <ul style="list-style-type: none"> ▪ Particular consideration of plans for biodiversity offsets and biomass replacement. ▪ Particular consideration of downstream impacts on ecological health of affected rivers, studies undertaken to calculate minimum ecological flows and plans in place to ensure this minimum flow will be provided <p>Biomass:</p> <ul style="list-style-type: none"> ▪ Consideration of impacts of and mitigation for reduced biodiversity in case of mono-culture planting of biomass-fuel plants ▪ Does the project require a Biodiversity Management Plan? ▪ Does the project involve sourcing of sourcing raw materials or operating in ecosystems that are sensitive or poorly managed? | |
| <p>Indigenous people²²</p> <p>Avoidance of Adverse Impacts</p> <ul style="list-style-type: none"> ▪ Is it likely that Indigenous Peoples (IPs) will be adversely impact as a result of the project’s operations? Does the ESIA conducted by the SUB Project identify the adverse impacts to IPs and identify ways to avoid these where possible? ▪ Has the SUB Project compensated in a culturally appropriate manner consistent with the guidance provided in PS 7. ▪ Have appropriate regulatory approvals taken for the SUB project? ▪ Consultation and Informed Participation <p>Has the SUB Project established a process for Informed Participation through an FPIC process centered on mitigation measures, sharing of developmental benefits and opportunities and implementation issues as outlined in PS 7? (FPIC would be required in three scenarios as per PS 7: (i) impacts on lands and natural resources. <i>subject to traditional ownership or under customary use, (ii) if indigenous peoples were relocated from lands and natural resources subject to traditional ownership of under customary use, and/or (iii) if the project had significantly impacted indigenous peoples’ critical cultural heritage)</i></p> <p>Impacts on Traditional or Customary Lands under Use</p> | <ul style="list-style-type: none"> ▪ To provide guidance on avoiding and mitigating adverse impacts on indigenous peoples. |

²² Indigenous Peoples, are defined as social groups with identities that are distinct from mainstream groups in national societies, are often among the most marginalized and vulnerable segments of the population. In many cases, their economic, social, and legal status limits their capacity to defend their rights to, and interests in, lands and natural and cultural resources, and may restrict their ability to participate in and benefit from development.

| | |
|---|---|
| <ul style="list-style-type: none"> ▪ Has the SUB Project informed IPs of their rights according to national laws including those recognizing traditional/customary rights? ▪ Has the SUB Project offered at least compensation and due process to those with full legal title to land together with culturally appropriate development opportunities. ▪ Has the SUB Project provided land-based compensation or compensation-in-kind in lieu of cash compensation where feasible? ▪ Has the SUB Project entered in good faith negotiations with affected communities and documented their informed participation and the successful outcome? <p>Relocation of Indigenous Peoples (IPs) from Traditional or Customary Lands Has the SUB Project conducted a successful good faith negotiation, applied the requirements of the Performance Standards and, where feasible, ensured that IPs can return to their traditional or customary lands should the reason for their relocation cease to exist?</p> | |
| <p>Cultural heritage²³</p> <p>For all projects, please answer the below.</p> <ul style="list-style-type: none"> ▪ Will development of the project affect cultural heritage directly or indirectly? This may include graveyards / burial sites, religious or sacred buildings? ▪ Will the development of the project involve use of Cultural heritage such as such as historic sites, artifacts, traditional knowledge, or culturally significant landscape? Will require engagement of local communities and cultural authorities early to avoid conflicts and ensure compliance. <p>Hydropower:</p> <ul style="list-style-type: none"> ▪ Particular consideration of entire area of inundation of the hydropower dam as well as areas for potential downstream flooding due to peak flow of releases. | <ul style="list-style-type: none"> ▪ To provide guidance on protecting cultural heritage from project related adverse impacts. |
| <p>The following key E&S value drivers should also be assessed:</p> <ul style="list-style-type: none"> ▪ Energy efficiency/conversion efficiencies. ▪ Water efficiencies (in water scarce area this is particularly important) ▪ Labour practices (especially during construction – what opportunities to reduce OHS and serious incident risks) ▪ The development of corrective action plans for gaps and risks identified. <p>In terms of review of external consultants SEDD report, consideration should be given to:</p> <ul style="list-style-type: none"> ▪ To what extent did consultants visit the site? ▪ The definition of the area of influence and whether this is complete with all associated facilities | <p>Consultant to assist where possible</p> |

²³ Cultural heritage refers to (i) tangible forms of cultural heritage, such as tangible moveable or immovable objects, property, sites, structures, or groups of structures, having archaeological (prehistoric), paleontological, historical, cultural, artistic, and religious values; (ii) unique natural features or tangible objects that embody cultural values, such as sacred groves, rocks, lakes, and waterfalls; and (iii) certain instances of intangible forms of culture that are proposed to be used for commercial purposes, such as cultural knowledge, innovations, and practices of communities embodying traditional lifestyles.

- | | |
|---|--|
| <ul style="list-style-type: none">▪ Presentation by the consultant on the limitations the encountered in the SEDD, including missing information and uncertainties.▪ Does the report include an E&S action plan for resolving identified issues/risks.▪ Whether there was a materiality threshold stated for the SEDD.▪ Confirmation that SEDD consultant is independent, unbiased and not involved somehow in project itself. | |
|---|--|

APPENDIX 9: SEDD REPORT FORMATS

The Appendix presents an example of an SEDD report structure for use by an external environmental and social consultant.

Category 1 and 2 Projects

1. Project Description: (including the site and environmental and social setting, surrounding land uses).
2. Environmental and Social Categorization Rationale: specify the Category of the investment (e.g. Category 1) according to the guidelines in Appendix 4 and give the basis for the rationale.
3. Client Social and Environmental Management Systems: (the processes by which the Client manages environmental and social performance, including community engagement activities, related to IFC PS1). This includes the ways in which that Management is organized in the Client.
4. Significant Environmental and Social Impacts and Risks: (summarized according to the topics covered by the applicable IFC Performance Standards – PS2 Labour and Working Conditions; PS3 Pollution Prevention and Abatement; PS4 Community Health Safety and Security; PS5 Land Acquisition and Involuntary Resettlement; PS6 Biodiversity Conservation and Sustainable Natural Resource Management; PS7 Indigenous Peoples; and PS8 Cultural Heritage).
5. E&S related impacts and opportunities: (This includes any existing project-related positive E&S impacts, e.g. community outreach, skills development or employment equity or redress [brownfield sites]. Include recommendations for E&S value-add opportunities.)
6. Recommended Corrective Actions: (for performance gaps, recommend corrective actions corresponding schedules, indicate priorities, and advise as to how to incorporate these into the Investment Agreement as either Conditions Precedent or Management Actions). An Environmental and Social Action Plan (ESAP) should be compiled with actions identified, following the template available in Appendix 11 of the ESMS.

Category 3 Projects

1. Development Business Status: (i.e. brownfield, greenfield, construction, operation, expansion, etc.)
2. Status of ESAP Implementation
3. Environmental and Social Performance: (on-going compliance with applicable E&S laws and acceptable international best practices)
4. Significant Incidents and Other Issues

In addition to the SEDD Questionnaire, use the guidance in the table below to assess the adequacy and completeness of an SEDD undertaken for Category 1 and 2 Projects.

| Key Aspects and Considerations | Focus on |
|---|--|
| Regulations and permits | <ul style="list-style-type: none"> • Does the SEDD clarify the status and completeness of the permitting and regulatory process? • Has the project been assessed against both national and international laws and regulations? • Are there outstanding permits (if so which, and how material) • Are any of these permit's time-bound (i.e. they have a duration and expiry date). Could there be implications for deal flow and approvals? • If areas of non-compliance have been identified with national or international laws have corrective actions been proposed with timeframes attached. |
| Client company capacity, commitment and track record | <ul style="list-style-type: none"> • Does the SEDD provide sufficient clarity on the company's commitment and capacity to manage E&S risks and drive value through E&S performance? • Are concerns raised regarding the ability of the company to manage its E&S impacts? If so, are appropriate corrective actions recommended? • Does the SEDD identify any historical or legacy issues that need to be taken up with company management? |
| Assessment of Environmental and Social Risks | <ul style="list-style-type: none"> • Is it clear what the significant labour related risks are, how they have been mitigated and what outstanding issues are yet to be resolved? • Is it clear what the significant occupational health and safety related risks are, how they have been mitigated and what outstanding issues are yet to be resolved? • Was a comprehensive project ESIA undertaken? • Are the ESMP and associated management plans developed? • Have corrective actions for identified risks and impacts been proposed? • Does the SEDD action plan look credible in terms of scope (must address all key issues), timeline (realistic?) and costs? • Has it been discussed and agreed upon with the client? • Have costs associated with remediation / mitigation been fully worked through? Can they be reduced further through avoidance of end of pipe solutions (i.e. modifications to plant)? • Are the IFC EHS guideline threshold limits for effluents and emissions met? |
| Community Health, Safety and Security | <ul style="list-style-type: none"> • Does the project involve a public access building that will require life & fire safety measures in line with NFP01 – WBG EHS guidelines for buildings/ structures with public access e.g airport, market, hotels, schools, hospitals, banking hall? • Hydropower projects –Does the project include dam safety risks requirements that manage dam safety risks affecting downstream communities and infrastructure? • Public access buildings – include considerations for the principle of universal access. |
| E&S Value Drivers | <ul style="list-style-type: none"> • Are value add opportunities included in the SEDD action plan? • Does SEDD clarify whether E&S opportunities can be realised and delivered? |
| Regulations and permits | <ul style="list-style-type: none"> • Does the SEDD clarify the status and completeness of the permitting and regulatory process? |

| | |
|---|--|
| | <ul style="list-style-type: none"> • Has the project been assessed against both national and international laws and regulations? • Are there outstanding permits (if so which, and how material) • Are any of these permits time bound (i.e. they have a duration and expiry date). Could there be implications for deal flow and approvals? • If areas of non-compliance have been identified with national or international laws have corrective actions been proposed with timeframes attached. |
| Client company capacity, commitment and track record | <ul style="list-style-type: none"> • Does the SEDD provide you with sufficient clarity on the company's commitment and capacity to manage E&S risks and drive value through E&S performance? • Are concerns raised regarding the ability of the company to manage its E&S impacts? If so, are appropriate corrective actions recommended? • Does the SEDD identify any historical or legacy issues that need to be taken up with company management? |
| E&S Value Drivers | <ul style="list-style-type: none"> • Are value-added opportunities included in the SEDD action plan? • Does SEDD clarify whether E&S opportunities can be realised and delivered? |

APPENDIX 10: MAJOR INCIDENTS REPORTING FORM

This form is to be used by Clients to report to TDB any major incidents taking place within 3 days of occurrence. The following types of incidents should be reported:

- Fires or explosions;
- Significant fuel/Chemical spills;
- Significant pollution discharges above limits of normal operation;
- Major work-related injuries (including employees, contractors and/or members of public);
- Work-related fatalities (including by employees, contractors and/or members of public);
- Incidents significantly affecting the health of employees, contractors or members of public;
- Regulator enforcement actions/notices;
- Major security breaches;
- Strikes or employee unrest;
- Incidents requiring operations to be substantially curtailed or shutdown; and
- Significant community unrest or public relations incidents.

| | | | |
|--|-------------------------------------|----------------|--|
| Project name: | | | |
| Completed by: | (name) | | |
| Contact: | | Date: | |
| Type of event: | (based on list above) | | |
| Date occurred: | | Time occurred: | |
| Brief Summary | What happened? Who was involved? | | |
| Was anyone injured or killed as a result of this event? | | | |
| If "Yes" provide details: | | | |
| | | | |
| Have the regulator, local authority government or emergency services been involved in or informed of this event? | | | |
| If "Yes" provide details: | | | |
| | | | |
| Detailed Description: | | | |
| | | | |

What remedial action has been taken(Please detail them, including timelines)?

What lessons can be learnt to prevent reoccurrence?

Signed:

Date:

APPENDIX 11: ACTION PLAN FORMAT

This document should be used to record the advisory of the SEDD report and form an Action Plan for each Client. This Format should also be used to develop subsequent Action Plans.

| Client: | | | | | |
|---|---|-------------------------------------|-------------------------|--------|-------------------|
| Client Contact Details: | | | | | |
| Date: | | Date of next review: | | | |
| Aspect | Advisory (write "None" if no prescribed action has been identified) | Responsible Person and organisation | Date to be completed by | Status | Compliance status |
| Social and Environmental Assessment and Management Systems | | | | | |
| Labor and Working Conditions | | | | | |
| Pollution Prevention and Abatement | | | | | |
| Community Health, Safety and Security | | | | | |
| Land Acquisition and Involuntary Resettlement | | | | | |
| Biodiversity Conservation and Sustainable Natural Resource Management | | | | | |
| Indigenous Peoples | | | | | |
| Cultural Heritage | | | | | |

(Insert Name of Responsible Person at Client)

(Insert Name of Responsible Person at the Client)

APPENDIX 12: SEMI-ANNUAL E&S MONITORING REPORT TO TDB FORMAT

Please provide responses to the questions below. Please include additional sheets or attachments as required to provide details on questions that have been answered Yes.

| | | | |
|-------------------------------|-----|-------|--|
| Project name: | | | |
| Location: | | | |
| Completed by (name): | | | |
| Position and contact details: | | Date: | |
| Report Covering Period: | | | |
| From: | To: | | |
| | | | |

Information on Potential Environmental and Social Risks

Please list all new and existing E&S risks (please add rows as needed):

| E&S issues at approval | Current E&S status/any changes since last report |
|--|--|
| Have the conditions precedent been met? | |
| Have ESMS requirements been included in all contracts with Client, their developers and third-party contractors; Client has appropriate insurance policies in place | |
| Client's compliance with the government and local government requirements, as well as the E&S policies | |
| adequate resources are committed to allow effective and appropriate implementation of the ESMS at client level; | |
| Appropriate action is taken on complaints, orders, directives, claims, citations or notices from any authority under any applicable law or local requirements | |
| on-going stakeholder engagement is performed and that a grievance mechanism for effected communities is maintained and that all grievances are dealt with accordingly. | |

Social & Environmental Management System (ESMS) Information

| Policies & Processes | Yes/No | |
|--|--------|---|
| Have there been any updates to the Environmental and Social Policies adopted by your organization? | | If yes, please provide a copy of the updated policies, including date when it was issued and reasons for the same. |
| Has senior management signed off on the updated policy/procedure? | | If yes, please provide the date and internal communication indicating the same. |
| Has the budget for implementation of the policy/procedure been revised from the previous year? | | If yes, please provide details of the budget allocated and reasons for the change. |
| Please describe any activities for the last six months for staff training and other internal communication (including number of staff trained). | | |
| State any difficulties and/or constraints related to the implementation of E&S procedures. | | |
| Please describe how you ensure that you are operating in compliance with national laws and regulations and the IFC Performance Standards. | | |
| Do you review the E&S performance of your facilities? | | If yes, please describe the process including any environmental and social considerations if applicable. |
| Over the past six months have you continued to be in compliance with the relevant environmental, health and safety regulations of the host country? | | If yes, please describe the process. |
| In the past six months have your operations involved acquisition of land? | | If yes, please explain the extent of land acquisition and any due diligence conducted by you. |
| Have there been any updates to your Social & Environmental Management System (ESMS) in the six months? | | If yes, please explain frequency and indicate number of updates since start. |
| Monitoring | Yes/No | |
| Do you undertake any monitoring of non-financial performance? | | If yes, please describe and provide supporting documents including any environmental and social considerations if applicable. |
| Please provide details of any accidents/litigation/complaints/regulatory/ notices and fines: Any incidents of non-compliance with Applicable Requirements. Covenants/conditionality imposed upon you as a result of any non-compliance | | |
| Reporting | Yes/No | |
| Is there an internal process to report on E&S issues to senior management? | | If yes, please explain process, reporting format and frequency. |
| In the past 12 months have you prepared any environmental and social reports apart from the ones submitted to TDB. | | If yes, please provide copies of these reports. |

| Policies & Processes | Yes/No | |
|---|--------|---|
| Do you have a process to inform TDB of any material change to the business? | | |
| Have you informed TDB of any emergency incidents events during this period? | | If yes, please give the date of report. |
| Reporting Topics | Yes/No | |
| Non-compliance with national legislation and regulations | | |
| Complaints from regulatory agencies, interest groups, or local communities | | |
| Work-related fatalities or serious work-related injuries | | |
| Strikes (with or without violence) or other labour disputes | | |
| Legal action | | |
| Allegations or indications of corrupt practices | | |
| Fines, penalties or increased permit charges | | |
| Negative attention on the part of the media or NGOs (non-governmental organizations) | | |
| Other material environmental and social issues affecting your operations during the reporting period | | |
| Cost savings through process efficiency, waste minimization or other schemes, energy savings, ISO certification | | |
| Reduction of polluting emissions into the environment | | |
| Introduction/switch to raw materials or processes with lower environmental impacts | | |
| Reduction in insurance premiums, permit fees or other costs due to improved environmental performance | | |
| Improved lost time accident record and/or number of injuries | | |
| Increased diversity/gender balance in workforce and management | | |
| Higher HIV/AIDS awareness in the workplace/community | | |
| Facilitation of financing for less empowered groups | | |
| Involvement in strategic partnerships with interested and affected parties | | |
| Citations or awards | | |
| Positive media or NGO attention | | |

| Reporting Topics | Yes/No | |
|--|--------|---|
| Have you informed TDB of any reportable events during this period? | | If yes, please give the date of report. |

ESAP Update

| Aspect | Recommendation | Responsible Person and organisation | Date to be completed by | Status | Level of Compliance |
|--------|----------------|-------------------------------------|-------------------------|--------|---------------------|
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |

| Health and Safety Data | | | |
|---|------------------------|---|------------------------|
| In addition to the data filled in below, please provide H&S incidence log, including follow-up investigations and corrective action implementation. | | | |
| | Number of Incidents | Incident Rate (Nr incidents/ Nr of workers) | Comments and follow-up |
| Fatalities | | | |
| Serious Injuries | | | |
| Lost Time Incidents | | | |
| Incidents involving evacuation | | | |
| Compensation claims | | | |
| Resource Efficiency and Pollution Prevention | | | |
| Have there been any spill cases or pollution of water, soil or air? | Yes q No q | If yes, please give details including emergency response. Please provide incidence log. | |
| Has there been any event of fire, sediment loads, storm water, a flood or an earthquake? | Yes q No q | If yes, please give details and describe emergency response, if applicable: | |
| Has there been any improvement in process efficiency, waste minimization or other schemes (energy savings, ISO certification)? | Yes q No q | If yes, please elaborate: | |
| Has a Greenhouse Gas Assessment been conducted during the reporting period? | Yes q No q N/A q | If yes, please summarise the results: | |
| Environmental Monitoring Data ²⁴ - please attach data sheets as required | | | |

²⁴ Not all parameters will necessarily apply. Please complete those rows that are most relevant to the industry sector. Additional parameters can be added as necessary.

| Resource Efficiency and Pollution Prevention | | | | | |
|---|---------------------|------|---|---------------------------------|------------------------|
| Parameter ²⁵ | Value ²⁶ | Unit | Legislative limit and/ or IFC EHS guideline limit | Compliance Status ²⁷ | Comments ²⁸ |
| Waste Water | | | | | |
| Total wastewater generated | | | | | |
| BOD | | | | | |
| COD | | | | | |
| Suspended Solids | | | | | |
| Phosphorus | | | | | |
| Nitrates | | | | | |
| Heavy metals | | | | | |
| [Other] | | | | | |
| Air Emissions | | | | | |
| SO ₂ | | | | | |
| NO _x | | | | | |
| Particulates | | | | | |
| CO ₂ /CO ₂ equivalents | | | | | |
| CH ₄ | | | | | |
| N ₂ O | | | | | |
| HFCs | | | | | |
| PFCs | | | | | |
| SF ₆ | | | | | |
| [Other] | | | | | |
| Other Parameters | | | | | |
| Noise - at the project fence line | | | | | |
| Noise - at the closest sensitive receptor | | | | | |
| EMF (Electric and Magnetic Fields) – at the closest sensitive receptor | | | | | |
| [Other] | | | | | |
| Solid Waste | | | | | |
| Please provide details of the types and amounts of solid wastes generated by the project. Indicate where wastes are classified as hazardous. Indicate the final re-use, recycle or disposal method for each waste type. | | | | | |

²⁵ Not all parameters will necessarily apply. Please complete those rows that are most relevant to the industry sector. Additional parameters can be added as necessary.

²⁶ Please ensure that the units of measurement are clearly stated.

²⁷ Please report on compliance against the standards agreed with TDB for this project (typically local, EU, World Bank Group, IFC): compliant / slightly over the limit / unknown / exceeding the limit

²⁸ In addition to any other relevant comments, please indicate whether the measurements reported apply to all or only some process operations at the facility.

| | | | |
|--|--|--|-------------|
| Completed by: | (Name and Title) | (Date) | (Signature) |
| Reporting period | (Financial year) | | |
| Approved by senior management representative: | (Name and Title) | (Date) | (Signature) |
| General Information | | | |
| Total loan portfolio EUR / USD: | | | |
| Reporting currency in the financial statement: | | | |
| Exchange rate at time of reporting: | Click to choose currency = reporting currency,..... | | |
| Other Development Finance Institutions (DFIs) providing finance | <input type="checkbox"/> DEG <input type="checkbox"/> FMO <input type="checkbox"/> Proparco | <input type="checkbox"/> EBRD <input type="checkbox"/> IFC <input type="checkbox"/> Other, please specify | |
| Section 1: Environmental and Social Management System (ESMS) | | | |
| Does your institution have an E&S policy approved by Management Board? Any changes to be noted during the reporting period? | <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Yes please provide details: <input type="checkbox"/> No | | |
| Has your institution developed, upgraded or implemented an ESMS during the reporting period? | <input type="checkbox"/> Yes please provide details: <input type="checkbox"/> No, in progress please provide details: <input type="checkbox"/> No, we already have an ESMS <input type="checkbox"/> Other, please specify: | | |
| A. Environmental and Social Governance | | | |
| Please provide the name of the person with overall responsibility for E&S matters within your institution (senior management/board management). | (name, function and contact details) | | |
| Any changes to be noted during the reporting period? | <input type="checkbox"/> Yes please provide details: <input type="checkbox"/> No | | |
| Please provide the name of the person with overall responsibility for coordinating the day-to-day E&S matters within your institution (operational coordinator). | (Name, function and contact details) | | |
| Any changes to be noted during the reporting period? | <input type="checkbox"/> Yes please provide details: <input type="checkbox"/> No | | |
| Please provide details of general E&S responsibilities in the credit process within your institution. (| <input type="checkbox"/> All credit/front office staff, supported by E&S Coordinator, are expected to address any E&S risk as part of their standard processing of transactions <input type="checkbox"/> We have designated credit/front office staff to deal with any E&S issues arising in the context of transactions <input type="checkbox"/> Other, please specify: | | |
| Any changes to be noted during the reporting period? | <input type="checkbox"/> Yes please provide details: <input type="checkbox"/> No | | |
| B. Environmental and Social Training | | | |
| Did your institution provide E&S training to credit/front office staff during the reporting period? | <input type="checkbox"/> Yes, all relevant credit/front office staff received E&S training. Please provide number of staff trained: | | |

| | | |
|--|---|--|
| | <input type="checkbox"/> Only applicable staff members, including the E&S Coordinator. Please provide number of staff trained: <input type="checkbox"/> No training was provided | |
| Please provide details of who provided the E&S training. | <input type="checkbox"/> Independent Consultant <input type="checkbox"/> Another DFI or training organization. Please provide name of organization: <input type="checkbox"/> In-house training provided by the organization's own E&S Coordinator <input type="checkbox"/> Other, please specify: <input type="checkbox"/> Not applicable | |
| Does your institution have an E&S training program integrated into the bank-wide capacity building program? | <input type="checkbox"/> Yes <input type="checkbox"/> No | |
| C. Environmental and Social Procedures (refer to Appendix 1) | | |
| Has your institution made any changes during the reporting period with regards to E&S procedures? | <input type="checkbox"/> Yes, please specify: <input type="checkbox"/> No | |
| Does your institution have an Exclusion? | <input type="checkbox"/> Yes please provide details: <input type="checkbox"/> Not fully compatible please provide details: <input type="checkbox"/> No | |
| Does your institution categorize its transactions based on exposure to E&S risks sectors? | <input type="checkbox"/> Yes, please specify method used: <input type="checkbox"/> No | <input type="checkbox"/> Questionnaire <input type="checkbox"/> Checklist <input type="checkbox"/> Other, please specify: |
| Does your institution perform E&S analysis for relevant transactions to assess the identified risks? | <input type="checkbox"/> Yes, please specify method used: <input type="checkbox"/> No | <input type="checkbox"/> Questionnaire <input type="checkbox"/> Desk review of client documentation (i.e. permits etc.) <input type="checkbox"/> Site visits performed by <input type="checkbox"/> Impact assessment commissioned to a third party <input type="checkbox"/> Other, please specify: |
| Does your institution mitigate and manage the E&S risks associated with transactions? | <input type="checkbox"/> Yes, please specify method used <input type="checkbox"/> No | <input type="checkbox"/> ESMP or ESAP <input type="checkbox"/> E&S contract clauses <input type="checkbox"/> Other, please specify: |
| When identifying, assessing, mitigating and managing the E&S risks associated with transactions, what standards does your institution apply? | Standards: | Type of transactions: |
| | National standards | |
| | IFC Performance Standards | |
| | ILO Conventions | |
| | Other, please specify: | |

| | | |
|---|--|---|
| Does your institution monitor the E&S performance of your clients/financed transactions? | <input type="checkbox"/> Yes, please specify measures taken: | <input type="checkbox"/> Site visit by your institution's staff <input type="checkbox"/> Inspection by environmental/health authorities <input type="checkbox"/> Copies of updated or renewed permits <input type="checkbox"/> Reports from the client <input type="checkbox"/> Other, please specify |
| | <input type="checkbox"/> No | |
| How often had your IFC PS Triggered Transactions and high-risk clients received monitoring visits by the E&S Coordinator during the reporting period? | <input type="checkbox"/> Once a year <input type="checkbox"/> No visits <input type="checkbox"/> Other, please specify: | |
| Has your institution integrated the E&S procedures (i.e. categorization, assessment, monitoring etc.) into the credit approval process? | <input type="checkbox"/> Yes, E&S fully integrated please provide short description <input type="checkbox"/> No, E&S process is a parallel process please provide short description | |
| | <input type="checkbox"/> No | |
| Does your institution include an E&S paragraph/evaluation in the credit appraisal notes? | <input type="checkbox"/> Yes <input type="checkbox"/> No please specify where the E&S review output is formalised: | |
| Are E&S procedures integrated into the information system of your institution? | <input type="checkbox"/> Yes <input type="checkbox"/> No please specify if it is planned to integrate them: | |
| D. External Environmental and Social Monitoring | | |
| Has your institution engaged with an advisor to conduct an external ESMS implementation review during the reporting period ? | <input type="checkbox"/> Yes please share report <input type="checkbox"/> No please specify if it is planned and when: | |
| E. Stakeholder Engagement | | |
| Has your institution publicly endorsed or signed any national or international agreements or declarations concerning environmental and social issues? | <input type="checkbox"/> Yes, please specify: | <input type="checkbox"/> Equator Principles <input type="checkbox"/> United Nations Global Compact <input type="checkbox"/> United Nations Environment Programme for Financial Institutions (UNEP-FI) <input type="checkbox"/> Global Reporting Initiative <input type="checkbox"/> Carbon Disclosure Project <input type="checkbox"/> Other, please specify |
| | <input type="checkbox"/> No | |
| Does your institution report publically (e.g. in its Annual Report or in a separate E&S or CSR report etc.) on its E&S performance and client/portfolio compliance with applicable E&S legislation and standards? | <input type="checkbox"/> Yes, please specify reporting mechanism: <input type="checkbox"/> No | |
| Does your company have an official mechanism in place to address grievances/complaints of local communities and project affected people? | <input type="checkbox"/> Yes, please provide a web link or contact details for grievances/complaints: | |

| | | | |
|---|--|---|------------------------------|
| | | please specify number of complaints received per year and provide details of how they were handled: | |
| | | <input type="checkbox"/> No | |
| Section 2: ESMS related Loan Book Information | | | |
| 2.1 Loan Book Summary (Please specify reporting currency) | | | |
| Total Loan Book | Average Loan Size (non retail portfolio) | Short Term Finance % <1 year | Long Term Finance % >3 years |
| | | | |
| In case you finance SME, please provide the average loan size for this specific client segment. | | | |
| Share of IFC PS Triggered Transactions of the loan book | | % | |

APPENDIX 13: ANNUAL E&S PERFORMANCE MONITORING REPORT FORMAT

| Loan Portfolio Breakdown Analysis ²⁹ | | | | | | | |
|---|---|-------|----------------------|----------------|------------------|----------------------|-------------------------|
| Sector / Activity | Total Loans Outstanding per Industry Sector Click to choose the currency | | of which Corporate % | of which SME % | of which Micro % | of which Mortgages % | of which Other Retail % |
| | | % | | | | | |
| | | % | | | | | |
| | | % | | | | | |
| | | % | | | | | |
| | | % | | | | | |
| | | % | | | | | |
| | | % | | | | | |
| Total | | 100 % | | | | | |

| 2.3 Top 10 Clients Overview | | | |
|-----------------------------|-------------------|------------------|---|
| # | FI's client name: | Industry Sector: | High E&S risk sector? Please specify with Y/N |
| 1 | | | |
| 2 | | | |
| 3 | | | |
| 4 | | | |
| 5 | | | |
| 6 | | | |
| 7 | | | |
| 8 | | | |
| 9 | | | |
| 10 | | | |

| 2.4 Overview of IFC Performance Standards Triggered Transactions (loan size > USD 5mln or total project costs > USD 10mln; Tenor > 3 years) | | | | | | | | |
|--|-------------------|--------------------------|------------|------|---------------|-------------|-----------------|----------------------|
| Client Name | Sector / Industry | Total project size (USD) | Loan (USD) | size | Tenor (month) | Exit Date | Purpose of Loan | Relationship Officer |
| | | | | | | | | |
| | | | | | | | | |
| | | | High-risk | | | Medium-risk | | Low-risk |

²⁹ To be able to meaningfully interpret the information from this table, we kindly ask you to provide your definition of Corporates, SME's and Micro enterprises in *Annex 1* of this report.

| | | | |
|---|-------------------------|---|--|
| 2.5 E&S categorization of total loan book | (Cat. A) | (Cat. B) | (Cat. C) |
| | No | | |
| | % | | |
| 2.6 Transaction with agreed ESMP/ESAP | High-risk (Cat. A) | Medium-risk (Cat. B) | Low-risk (Cat. C) |
| | No | | |
| 2.7 Transactions approved during the reporting period that finance activities specified in the E&S Exclusion List? | | | |
| | Name (Client / Project) | Excluded activity and reason for approval | Amount |
| 1 | | | |
| 2 | | | |
| 3 | | | |
| 2.8 Transactions rejected due to E&S reasons during the reporting period: | | | |
| | Name (Client / Project) | Reason | |
| 1 | | | |
| 2 | | | |
| 3 | | | |
| 2.9 Projects/Clients with significant environmental and/or social issues and/or incidents during the reporting period (e.g. casualties, spilling, NGO campaigns, fines, strikes, non-compliance with local E&S law and/or permits, penalties) | | | |
| | Project/Client | Environmental and/or social issue(s) and/or incident(s) during the reporting period | Measure(s) taken to manage the issue and/or incident |
| 1 | | | |
| 2 | | | |
| 3 | | | |
| Section 3: Climate Change | | | |
| Climate Risk Governance | | | |
| Please provide the name of the person with overall responsibility for climate change matter (Climate Change Champion) within your institution (senior management/board management). | | (name, function and contact details) | |
| Please provide the name of the person with overall responsibility for coordinating the day-to-day climate change matters within your institution. | | (name, function and contact details) | |

| | | | | |
|--|--|--|--|----------------|
| Please provide details of general climate change (physical and transition risks ³⁰) responsibilities in the credit process within your institution. | | <input type="checkbox"/> All credit/front office staff, supported by Climate Change Champion are expected to address any climate risk as part of their standard processing of transactions <input type="checkbox"/> We have designated credit/front office staff to deal with any climate change issues arising in the context of transactions <input type="checkbox"/> Other, please specify: | | |
| Climate Risk Strategy / Procedures | | | | |
| Does your institution have a climate risk management strategy in place? | | <input type="checkbox"/> Yes please share (and associated documentation / procedures, if any). <input type="checkbox"/> No, in progress please provide details: <input type="checkbox"/> Other, please specify: | | |
| Please provide overview of actions that have been taken in the institution to implement (3.4) during the reporting period. | | | | |
| Climate Risk Related Training | | | | |
| Have employees in the institution undertaken any training on climate-related risks/impact during the reporting period? (e.g. UNEP-FI TCFD Training) | | <input type="checkbox"/> Yes please provide details: <input type="checkbox"/> No, in progress please provide details: <input type="checkbox"/> Other, please specify: | | |
| Have there been any internal training, presentations or exercises (such as heatmapping, materiality assessments) on climate risk related topics during the reporting period? | | <input type="checkbox"/> Yes please provide details: <input type="checkbox"/> No, in progress please provide details: <input type="checkbox"/> Other, please specify: | | |
| Section 4: Human Resources and Corporate Social Responsibility Management | | | | |
| 4.1 Please specify the number of employees according to: | | Permanent | Temporary | Top Management |
| | Male | | | |
| | Female | | | |
| 4.2 Please provide a rough forecast of how many jobs will be created by your company in the next 5 years. | Total: () | | | |
| 4.3 Please specify (in % of workforce) any staff reductions or additions during the reporting period: | <input type="checkbox"/> Lay-offs of workforce <input type="checkbox"/> Additions to workforce <input type="checkbox"/> None | | | |
| | <input type="checkbox"/> Yes please provide details | | (name, function and contact details) | |

³⁰ (1) physical risks from changing frequencies and intensities of weather-related peril which lead to the disruption of operations or destruction of property and (2) transition risks such as policy constraints on emissions, imposition of carbon tax, water restrictions, land use restrictions or incentives, and market demand and supply shifts.

| | | |
|--|--|--|
| 4.4 Has responsibility for human resources management in your institution changed during the reporting period? | <input type="checkbox"/> No | |
| 4.5 Has your institution made changes to the human resources policies during the reporting period? (refer to Appendix 1) | <input type="checkbox"/> Yes, please provide details: <input type="checkbox"/> No | |
| HR Policy Changes (e.g. addition of social benefits, working hours etc.) | | |
| 1 | | |
| 2 | | |
| 3 | | |
| 4 | | |
| 5 | | |
| 4.6 Has your institution implemented an HIV/AIDS Program during the reporting period? (refer to Appendix 1) | <input type="checkbox"/> Yes, please provide details and budget <input type="checkbox"/> No | |
| 4.7 Has your institution experienced labor related issues during the reporting period (grievances, strikes, court cases etc.)? | <input type="checkbox"/> Yes please provide details: <input type="checkbox"/> No | |
| 4.8 Has your institution provided non-E&S related staff training during the reporting period (e.g., corporate governance, credit risk)? | <input type="checkbox"/> Yes, please provide details and specify % of workforce trained <input type="checkbox"/> No | |
| 4.9 How much did your institution spend on staff training in the last financial year? | Click to choose the currency..... | |
| 4.10 Do you have specific anti-discrimination procedures, notably regarding gender equality? | <input type="checkbox"/> Yes, please specify <input type="checkbox"/> No | |
| 4.11 Do you have elected staff representatives? | <input type="checkbox"/> Yes, please specify <input type="checkbox"/> No | |

| | |
|---|--|
| <p>4.12 Do you have unions' representatives?</p> | <p><input type="checkbox"/> Yes, please specify</p> <p><input type="checkbox"/> No</p> |
| <p>4.13 Has your institution taken any measures to reduce its environmental footprint during the reporting period (e.g. use or production of paper, waste, energy etc.)?</p> | <p><input type="checkbox"/> Yes please provide details:</p> <p><input type="checkbox"/> No</p> |
| <p>4.14 How much did your institution spend on activities that benefit local communities (Corporate Social Responsibility) in the last financial year?</p> | <p>Click to choose the currency.....</p> |
| <p>4.15 Which type of community development did you engage in?</p> | <p><input type="checkbox"/> Health</p> <p><input type="checkbox"/> Transportation</p> <p><input type="checkbox"/> Water</p> <p><input type="checkbox"/> Education</p> <p><input type="checkbox"/> Energy</p> <p><input type="checkbox"/> Recruitment from local community</p> <p><input type="checkbox"/> Other, please specify:</p> |
| <p>4.16 Provide an estimate of the share of goods and services (specified in your financial statement) that is purchased from domestic suppliers (vs. foreign suppliers) – please specify for last financial year</p> | <p><input type="checkbox"/> 0%</p> <p><input type="checkbox"/> <20%</p> <p><input type="checkbox"/> <40%</p> <p><input type="checkbox"/> <60%</p> <p><input type="checkbox"/> <80%</p> <p><input type="checkbox"/> <100%</p> <p><input type="checkbox"/> 100%</p> |
| <p>4.17 Safeguarding</p> | |
| <p>Total number of safeguarding incidents recorded. Please also outline what has been done to address these incidents. Safeguarding refers to (1) labour rights non-compliance also identifiable by possible or strong indicators of modern slavery (see definitions and guidance), (2) gender-based violence and harassment (GBVH) and (3) child exploitation and/or abuse. If a safeguarding incident is identified, please specify the severity and/or type of safeguarding incidents it is from the 3 categories outlined. Please refer at the end of these questions for indicators used to identify strong indicators of modern slavery, as well the definition of GBVH.</p> | |
| <p>Total number of safeguarding incidents that are still open. If safeguarding incidents have occurred across more than one of the three safeguarding categories (indicator of modern slavery, GBVH, child exploitation/abuse), please provide a breakdown across these three categories and outline reason for why cases are still open.</p> | |
| <p>Total number of grievances raised in regard to safeguarding issues (indicators of modern slavery, GBVH and child exploitation and/or abuse). Please disaggregate grievances according to safeguarding categories outlined.</p> | |

| | |
|--|--|
| Please explain/provide an update on the process in place to ensure that modern slavery, GBVH and child exploitation and/or abuse violations are prohibited and addressed in your operations (including contractors)? | |
| Definitions and further guidance | |
| | Potential indicators of modern slavery include abuse of vulnerability, deception, restriction of movement, isolation, intimidation and threats, retention of identity documents, withholding of wages, debt bondage, abusive working and living conditions, excessive overtime. See list of strong and medium indicator here p. 16: https://assets.cdcgroup.com/wp-content/uploads/2018/12/03105819/Managing-Risks-Associated-with-Modern-Slavery.pdf |
| | Type of GBVH incidents include: (i) Sexual Exploitation (where someone abuses their position of relative power or trust to exploit someone through sexual relations) (ii) Sexual Abuse (where someone uses force or their position of relative power to sexually assault, rape, attempt to rape or force someone to perform oral sex) (iii) Sexual Harassment (where someone makes unwanted sexual advances, requests sexual favours, shows pornographic images or touches in an unwanted way. This includes behaviour which is not explicitly directed at one individual, but which creates a humiliating or offensive environment) (iv) Non-sexual forms of GBVH (this can include physical violence and bullying such as hitting, burning and kicking, financial abuse and the denial of resources, services, and opportunities, verbal harassment and bullying such as shouting and swearing and emotional abuse such as systematic humiliation, controlling behaviour, degrading treatment, insults, and threats) |
| | Child abuse includes physical, emotional, or sexual mistreatment, neglect, in the context of a relationship of responsibility, trust or power, or resulting in actual or potential harm to the child's physical and emotional health, survival and development. Exploitation of a child is the use of the child in work or other activities for the benefit of others and to the detriment of the child's physical or mental health, development, and education. Exploitation of a child can include child labour which is work that is mentally, physically, socially or morally dangerous and harmful to children; and/or interferes with their schooling by depriving them of the opportunity to attend school, obliging them to leave school prematurely, or requiring them to attempt to combine school attendance with excessively long and heavy work. |
| | NB: Very often, the victim and/or workers who have shared information, or are even suspected of sharing information about labour rights related abuses or GBVH, can be subject to retribution e.g. harassment etc. It is important to put in place the necessary measures to ensure that the victim and any workers who have shared information are safe and confidentiality regarding sharing of information is maintained |

| Section 5: Gender Reporting (TDB) | | |
|------------------------------------|---|--|
| Board members - Male (Headcount) | Number of male board members | |
| Board members - Female (Headcount) | Number of female board members | |
| Senior management - Male (FTEs) | Number of male full-time equivalent senior management employees, Includes C-suite or equivalent (e.g. managing directors, partners). FTE's as defined for direct employment. | |
| Senior management - Female (FTEs) | Number of female full-time equivalent senior management employees, Includes C-suite or | |

| | | |
|--|---|--|
| | equivalent (e.g. managing directors, partners). FTE's as defined for direct employment. | |
| Management - Male (FTEs) | Number of male full-time equivalent management employees, excluding senior management. FTE's as defined for direct employment. Organizations should describe how management levels are defined within their organization. For guidance see below. | |
| Management - Female (FTEs) | Number of male full-time equivalent management employees. FTE's as defined for direct employment. Organizations should describe how management levels are defined within their organization. For guidance see below. | |
| Section 6: Corporate Metrics (Reported currency) | | |
| Net interest income (reported currency) | Revenue metric for FIs. Revenue resulting from the ordinary operating activities, i.e. their interest income. This is commonly referred to as earned revenue. | |
| Operating income (reported currency) | Value of the FI's operating income before taxes, depreciation and amortization during the reporting period. Representing the FI's income post expenses. | |
| Total labour expenses/wage bill (reported currency) | Sum of compensation expenses paid to all permanent and temporary employees during last calendar year, including wages, salaries, bonuses, and benefits. Taxes and fees related to employment shall not be included. | |
| Domestic purchasing (reported currency) | Value of company's purchases of goods and services (including raw materials, security, gardening, cleaning, and marketing and research). | |
| Tax paid (reported currency) | Sum of corporate income taxes transferred to the government by the organization during last calendar year. | |
| Loans for jobs model/Net loans (reported currency) | Net loans, defined as all gross loans (as defined below) which are neither past due nor impaired. If net loans are unavailable use gross loans, noting in the appropriate column if Net or Gross loans have been used. | |
| Net interest income (reported currency) | Revenue metric for FIs. Revenue resulting from the ordinary operating activities, i.e. their interest income. This is commonly referred to as earned revenue. | |
| Section 7: Development of Financing Products and Service | | |
| How much of your financing is issued by local banks/institutions that are based in the country of your activities? | <input type="checkbox"/> 0% | |
| | <input type="checkbox"/> < 20% | |
| | <input type="checkbox"/> < 40% | |
| | <input type="checkbox"/> < 60% | |
| | <input type="checkbox"/> < 80% | |
| | <input type="checkbox"/> <100% <input type="checkbox"/> 100% | |

APPENDIX 14: PROJECT E&S INFORMATION CHECKLIST FOR HANDOVER TO PMD

1. PROJECT DETAILS

| | |
|----------------------------|--|
| Company Name: | |
| Sector/Type: | |
| Project Type: | |
| Brief Project Description: | |

2. FINAL CATEGORIZATION

| | |
|--|--|
| Social and Environmental Category, Risks and Mitigations | |
| Recommended Social and Environmental Categorisation | |
| Social and Environmental Categorisation Rationale | |
| Anticipated E&S impacts | |
| Recommended Mitigations: | |

4. PROJECT DOCUMENTATION REQUIRED BY PMD

| | |
|------------|---|
| CATEGORY 1 | <p>ESIA and EMP SEDD Action Plan Project covenant (including E&S commitments) Potential adverse impacts and risks identified, including the identification of the Affected Communities Planned mitigation and any areas of concern that need to be further addressed The process of stakeholder engagement Authority Approvals/permits</p> |
| CATEGORY 2 | <p>SEDD Action Plan Project covenant (including E&S commitments) Potential adverse impacts and risks identified, including the identification of the Affected Communities Planned mitigation and any areas of concern that need to be further addressed The process of stakeholder engagement Authority Approvals/permits</p> |
| CATEGORY 3 | <p>SEDD Action Plan Project covenant (including E&S commitments) Potential adverse impacts and risks identified, including the identification of the Affected Communities Planned mitigation and any areas of concern that need to be further addressed</p> |
| CATEGORY 4 | <p>SEDD Action Plan</p> |

| | |
|--|---|
| | Project covenant (including E&S commitments) Potential adverse impacts and risks identified, including the identification of the Affected Communities Planned mitigation and any areas of concern that need to be further addressed |
|--|---|

Signature of PIF or TF Officer:

Date:

Signature of E&S
 Manager/Coordinator:

Date

APPENDIX 15: SAMPLE GRIEVANCE PROCEDURE (FOR TDB'S CLIENTS)

This Grievance Procedure was developed in accordance with the requirements of the IFC Performance Standard 1, Guidance Note 1 on assessment and management of environmental and social risks and impacts, 2012. The focus of this procedure is on grievances raised by external stakeholder groups such as affected communities, local government authorities, non-governmental and other civil society organizations, local institutions and other interested or affected parties. The procedure does not address engagement with suppliers, contractors, distributors, or customers, because interaction with these parties is a core business function for most companies and subject to national regulations and/or established corporate policies and procedures.

The Grievance Procedure is divided into six key steps as discussed below:

STEP 1: RECEIVE AND LOG GRIEVANCE

The grievance is received by a Client representative. Regardless of who receives the grievance, it needs to be forwarded to the ESMS officer within the Client Company for attention.

The Client company ESMS officer logs the grievance using the official Grievance Log Form included below and ensures that actions are taken against the grievance.

STEP 2: ACKNOWLEDGE GRIEVANCE

The Client company ESMS officer will communicate in writing to the complainant acknowledging receipt of the grievance.

This communication will be provided within 5 days of receiving the grievance.

STEP 3: ASSESS AND PRIORITISE GRIEVANCE AND FORWARD TO RESPONSIBLE INDIVIDUAL

The Client ESMS officer will assess the grievance, and assign it a risk rating, as per the risk rating described below.

Once the grievance has been rated the grievance will be forwarded to the relevant individual to be addressed (e.g. HR, Production, Procurement etc). Repeated or continuous Level 1 or 2 complaints must be escalated to the next management level up, if the cause is not rectified within an acceptable period of time. TDB must be notified, as soon as possible and in not more than 5 days of receipt of the grievance, if it is assessed to be Level 2 or Level 3.

3.1 Grievance Rating

The following criteria will be used as a basis for the prioritization of different levels of complaints received. A Risk Level 1 complaint is one which is isolated, or "once-off" (within a given reporting period), and essentially local in nature, and has little potential to cause long term damage to stakeholder relations locally and nationally.

A Risk Level 2 complaint is one which is widespread and repeated, has resulted in attention from the media at local / regional level, and has the potential to cause damage to stakeholder relations locally and nationally.

A Risk Level 3 complaint is one which is both widespread and / or repeated and which, in addition, has resulted in a serious breach of Company policies, or the law and / or has led to negative national / international media attention, or is judged to have the potential to generate negative comment from the media, or other key stakeholders. A Risk Level 3 complaint also has the potential to cause major damage to stakeholder relations, locally, nationally and internationally.

STEP 4: INVESTIGATE AND RESOLVE GRIEVANCE

An Investigation Team (overseen by the Client company ESMS officer) will be assigned within 10 days of receipt of the grievance by the Client company ESMS officer. The team will be tasked with investigating the underlying cause of grievance and action any changes required to internal systems to prevent a recurrence of a similar grievance. An Investigation Report will be completed within 28 days.

During the 28 days of investigation, the Client company ESMS officer will co-ordinate conflict resolution activities necessary to contain and resolve any actual or potential conflicts arising from the reported grievance.

STEP 5: SIGN-OFF ON GRIEVANCE

The Client company ESMS officer will seek sign-off from the stakeholder that the grievance has been resolved.

In instances where the stakeholder is not satisfied with actions taken, the grievance will be escalated to senior management, and a decision will be taken either to implement supplementary actions or to consider initiating an additional engagement process.

Following additional engagement with the complainant, the Client company ESMS officer will again approach the stakeholder to obtain sign-off on actions implemented in accordance with agreed outcomes.

STEP 6: MONITOR

The Client company ESMS officer will monitor the satisfaction of the stakeholder and project personnel following sign-off (this will take place within 28 days of final sign-off).

REPORTING AND DOCUMENTATION

The Client company ESMS officer will compile concise quarterly and annual reports of all grievances logged, results of these activities and grievances, and monitoring of the success of the stakeholder engagement and grievance resolution process. This will be made available for internal reporting to TDB's ESMS manager and ESMS officer.

GRIEVANCE LOG FORM

| SECTION 1: COMPLAINANT DETAILS | | | | |
|---|-----------|--------------------|------------------------------|---|
| Complaint Number | Reference | Date Received | Recipient of Complaint | Manner in which Complaint was Identified / Submitted by Complainant |
| | | | | |
| Name of Complainant / Organisation Registering Complaint (if not anonymous) | | | | |
| | | | | |
| Contact Details | | Telephone Number | | Physical and/or Postal Address |
| | | | | |
| SECTION 2: DETAILS OF COMPLAINT | | | | |
| Company Manager Responsible for Addressing the Complaint | | | | |
| Time and Date Complaint Refers to | | | | |
| Description of Complaint and / or Evidence of the Issue | | | | |
| | | | | |
| SECTION 3: ACTION TAKEN / REQUIRED | | | | |
| Acknowledgement of Complaint Sent to Complainant? (Y / N) | of | Date | When Acknowledgment Provided | Date Set for Resolution of Complaint |
| | | | | |
| Description of Subsequent Action Taken (divide into Immediate Action and Subsequent Investigation, if applicable) | | | | |
| | | | | |
| Action Carried Out By Whom | | Date of Completion | | Method of feedback to Complainant |
| | | | | |
| Stakeholder Response to Action | | | | |
| | | | | |
| SECTION 4: EFFECTIVENESS REVIEW | | | | |
| How were the Actions Verified to be Effective at Resolving the Complaint? | | | | |
| | | | | |
| Approved By | | | | Date |
| | | | | |

APPENDIX 16: PS GUIDANCE NOTES

https://www.ifc.org/wps/wcm/connect/e280ef804a0256609709ffd1a5d13d27/GN_English_2012_Full-Document.pdf?MOD=AJPERES

APPENDIX 17: ESMS SELF ASSESSMENT GUIDE

<https://www.ifc.org/wps/wcm/connect/e44e08004a5a44c58a0ecf9c54e94b00/ESMS+Self+Assessment+v2.3+EN.pdf?MOD=AJPERES>

APPENDIX 18: ENVIRONMENTAL AND SOCIAL MANAGEMENT SYSTEM (ESMS) IMPLEMENTATION HANDBOOK – GENERAL

https://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/sustainability-at-ifc/publications/publications_handbook_esms-general

APPENDIX 19: LIST OF E&S SPECIALISTS

| Country | Consultants | Expertise | Contact details |
|------------------------------|----------------------------------|---|---|
| Democratic Republic of Congo | SRK Consulting Africa | Natural Resource and Development Solutions | SRK Lubumbashi 2056 Lukonzolwa Avenue, Quartier Golf Lubumbashi, Congo (DRC) Tel: +243 81 999 9775 Mobile: +243 81 870 1753 Email: smaleba@srk.co.za Web: www.srk.co.za |
| | Golder Associates | Environmental services | No 17 Okito Avenue, Lubumbashi, Katanga Province Phone Number [+24] 381 904 3399 / [+24] 399 573 8415 Website: www.golder.com |
| Egypt | Integral Environmental Solutions | Environmental Services, Climate Change, Energy | Building 2075, El Mearag City Ring Road, El-Maadi Cairo, Egypt Tel: +202 252 04515 Email: info@integral-egypt.com Website: www.integral-egypt.com |
| | Green Environment Consultants | Environmental and Social Planning and Management Services | PO Box 66 5 Ali Hassan Attia Street Mohandiseen GizaPostal Code: 12411 Telefax: +2 02 3302 1487 Website: http://www.green-group.info/ |
| Eritrea | Kagga & Partners | Engineering and Management | P. O. Box 6583, Kampala Uganda Tel:+256 414 220279 / 256 414 223692 Fax: +256 414 220208 E-mail: mail@kaggapartners.com Website: http://www.kaggapartners.com/ |
| | Universal Water Consultants | Water resources and environmental | P. O. Box 322426 Kampala-Uganda Mob: +256775903585 E mail: uwcug@yahoo.com ; Website: http://www.uwcug.com/ |
| Ethiopia | Metaferia Consulting Engineers | Environmental Management | Metaferia Consulting Engineers PLC P.O. Box 3192 Addis Ababa, Ethiopia Telephone: +251 11 551 56 47 E-mail : aym.mce@ethionet.et |
| | Addis Environmental Services | Environmental services Water services Green energy services | P.O. Box: 27067 Code 1000 Addis Ababa, Ethiopia Phone: +251-11-663 17 73, wireless: +011-860 1071 Email: info@addisenvironmental.com http://www.addisenvironmental.com |
| Kenya | Acacia Consultants Limited | Natural resource Management | Acacia Consultants Ltd. Unga House 5th Floor, Westlands |

| | | | |
|------------------|---|---|---|
| | | | P.O. Box 340, Sarit Centre - 00606, Nairobi, Kenya Telephone: 254-20 3746655 / 3747867 E-Mail: admin@acaciaconsultants.org |
| | EBS Advisory Kenya Limited | Environmental, Social and Governance Services | Box 14082 – 00800 Westlands, Nairobi, Kenya Telephone: +254 20 434 3360 or +254 702 056 570 Email: Samuel@ebsadvisory.com Website: www.ebsadvisory.com |
| | IBIS Consulting | Environmental, Social and Governance Services | 5 th Floor, Western Heights Karuna Road, Westlands Nairobi, Kenya Telephone: +254 796 088 132 Email: teddy@ibisconsulting.com |
| | Fichtner | Environmental, Governance and Financial Advisory Services | 70013 Stuttgart Road P.O. Box 101454 +254786647931 Kabengele.bredt@fichtner.de |
| | Green Eco Consultants Limited | Environmental Services | P.O. Box 2777-00506 Nairobi, Kenya Tel. (+ 254)0202017349/0202066688 Email: info@greeneco.co.ke |
| | KPMG Advisory Group | Environmental, Governance and Financial Advisory Services | 8 th Floor ABC Tower info@kpmg.co.ke +254202215695 |
| | Log Associates | Environmental <u>Services</u> | Block B, N8, Wailaki Way, Opposite Lion Place info@logassociates.com |
| Malawi | Mlambe Consulting Firm | Environmental and Social Audits | P.O. Box 90016 Blantyre 9 Malawi Telephone: +265 999 955 977 / +265 888 955 977 Email: mlambe@africa-online.net http://www.mlambe.com/index.htm |
| | Water Waste and Environment Consultants | Environment Management and Impact Assessment | Teptek Building (Area 3) Opposite Area 3 Total Filling Station Second Floor, Room No. 1 P.O. Box 31271 Lilongwe 3 Telephone: +265 1 750 094 Email: kentkafatia@gmail.com or kafatiakent@yahoo.co.uk |
| Mauritius | Build-Green Consulting | Green building | Morc. New Town, Mauritius, Indian Ocean Email: contact@buildgreen.mu |
| | Ecosis Limited | Sustainability consultants | commerson avenue Quatre bornes MAURITIUS Tel +(230) 464 0455 Email: info@ecosisltd.com |

| | | | |
|-------------------|--|---|---|
| | | | Website: www.ecosisltd.com/ |
| Mozambique | COWI | LTA ESMS, Mining, Construction and Infrastructure, Manufacturing, Agribusiness | Ave. Zedequias Manganhela 11st Floor, PO. Box 2242, Tel : +25821358300 joce@cowi.co.mz |
| | Impacto | Environmental and Social Services | Rua Kassuende 296 +25821499636 impacto@impacto.co.mz |
| | EIA & Services | Environmental and Social Services | Avenida Karl Marx, 799, 2° Andar, Flat 3 Tel: +258840135830 E-mail: eiaserviceslimitada@gmail.com Maputo |
| Rwanda | ESF Consultants | Environmental Services | P.O Box 453 Kigali, Rwanda Tel: (+250) 55110222 Email : info@esfconsultants.org |
| | Eco-Excellence Consultant | Environmental Services | P.O. Box 3418 Kigali, Rwanda Tel. (+250) 0788356191/0788507656 |
| | NET Environment Consult | Environmental Services | P.O. Box 902 Kigali-Rwanda E-mail : nec_ltd2002@yahoo.co.uk Tel. 0783172112/0750501494 |
| Seychelles | Nature Seychelles | Environmental Services | P.O. Box 1310 The Centre for Environment & Education, The Sanctuary Roche Caiman, Mahe Republic of Seychelles Tel: (+248) 460 1100 Email: nature@seychelles.net Website: www.natureseychelles.org |
| Sudan | Sudanese Centre for Engineering and Environmental Studies | Environmental Services | Phone. +249-155143134 Mobile. +249 - 911036735 - +249 - 9999036735 Fax. +249-183520919 Email. info@scees Website: http://www.scees.org/ |
| Swaziland | Dlamini GIBB Swaziland | Engineering an environmental service | The Gables Office Number 2 MR 103 Street P O Box 109 Eveni Swaziland Tel: +268 241 61660 Cell: +268 760 20071 |
| Uganda | Cowi | LTA ESIA /EMS Strategic Environmental Services | Crusader House, 2 nd Floor, Plot No3 P.O. Box 10591 Tel: +25641343045 frgo@cowi.com |

| | | | |
|----------|---|---|---|
| | | Mining and Waste Management Consulting Services | |
| | Eco & Partner Consult | Environmental management | P.O Box 23989, Kampala Uganda Tel: 256- 077669601 Email: Eddies@post.com or ecopart@africamail.com |
| | Makerere University/Institute of Environment and Natural Resources | Environmental management | Makerere University/Institute of Environment and Natural Resources P.O. BOX 7062 Kampala, Uganda Website: http://muienr.mak.ac.ug/ |
| | GMT Consults LTD | Environmental and Social Management | Plot 112 Bukoto Street - Kamwokya, Kampala E-mail: alozius@gmtconsults.com with a copy to bwmatovu@gmail.com & gmt@gmtconsults.com |
| | JBN Consults and Planners Limited | Environmental and Social Management | Plot 577 & 578, Block 219, Dr. Asea Road, Kigowa - Ntinda P.O. Box 101649, Kampala, Uganda www.jbn.co.ug Tel: +256200901224/+256772458903 E-mail (where permitted) : nelsonmagor@gmail.com / info@jbn.co.ug |
| Zambia | Envirocare International Limited | Environmental Services Environmental Audits Environmental Monitoring | Lusaka, Zambia Phone: +260 21 127 2531 Cell: +260 77 773 78 |
| | Status Hi-Tech (Z) Limited | Environmental Services | PO Box 11757, Chingola Main, Chingola, Zambia Phone: +260 21 231 3783, +260 21 231 3532, +260 21 231 4606 Email: sales@statushitech.co.zm Web: http://www.statushitech.com.zm |
| Zimbabwe | Harare Institute of Technology - Environmental Management, Renewable Energy and Climate Change Research Centre (EMRECCRC) | Waste management, environmental rehabilitation, safety and health management, pollution prevention, integrated water resources management, food security, chemical processes, biodiversity and land and air quality management. | Harare Institute of Technology P. O. Box BE 277, Belvedere, Harare Zimbabwe Telephone +263 4 741 422-36 Email: communications@hit.ac.zw Website: http://www.hit.ac.zw/index.html |

| | | | |
|---------------------|---|---|---|
| | Black Crystal Environmental Consultants | Environmental Services | 1 Fairbairn Drive Mt Pleasant, Harare Zimbabwe Tel: +263 4 2915265 and 334361 Cell: + 263 712 765 748 Email: infor@blackcrystal.co.zw |
| | SRK Consulting | Natural Resource and Development Solutions: SRK Africa | SRK Harare 28 Kennedy Drive Greendale, Harare PO Box GD 773 Greendale, Harare Tel: +263 4 49 6182/49 5689 Email: harare@srk.co.zw Web: www.srk.com |
| Tanzania | Environmental Association of Tanzania (ENATA Ltd) | Environmental Impact Assessment Environmental Audit Reports Environmental Monitoring studies | Regent Estate, Mikocheni, Next to Shoppers Plaza Old Bagamoyo Rd Plot/Block No. 493 First floor P.O. Box 13585 Dar es salaam, Tanzania Cell: +255 713 503 603 Email: info@enataltd.co.tz |
| | Envision Consulting | ESIA | Postal Address: 4699 Dar es Salaam, Tanzania Email: info@envision.co.tz Phone: +255 73 7209889 Mobile: +255 71 3634888 http://www.envision.co.tz |
| | COSEP Company Limited | Environment Planning and Management Environmental Impact Assessment (EIA) Environmental Auditing (EA) Health and Safety issues Water Supply and Sanitation Water Resources Management Poverty Alleviation research and projects Natural Resources Management | COSEP Company Limited P.O. Box 71940 Sam Nujoma road, Plot No. 112, Mwenge Dar Es Salaam Tanzania Tel: +255 222 773 441 E-mail: cosep@cosep.co.tz or director@cosep.co.tz or cosep_ltd@yahoo.com Website: www.cosep.co.tz |
| South Africa | Assured Turnkey Solutions | Environmental, Social and Governance Services | 18 Maple Drive, Northworld, Randburg 2188 +27731372382 info@assuredts.co.za www.assuredts.co.za |
| | Environmental Impact Management Services | ESIA EMS | Block 5, Fernridge Office Park. 5 Hunter Road P.O. Box 2083 Pinegowrie 2123 South Africa Ferndale Randburg, Johannesburg 2123 |

| | | | |
|--|---|---|--|
| | | Strategic Environmental Services Mining and Waste Management Consulting Services | South Africa Phone: +27 (11) 789 7170 Fax: +27 (11) 787 3059 http://www.eims.co.za/ |
| | EBS Advisory Pty Limited | Environmental, Social and Governance Services | Pine Place Office Suites Cnr Dalmerly & Windeena Rd Randburg Gauteng 2194 Contact Number: +27 11 888 6043 Mobile Number: +27 82 492 0625 Email Address: info@envirobiz.co.za |
| | Golder Associates, | Environmental services | Golder Associates Africa (Pty) Ltd PO Box 6001, Halfway House, 1685 Building 1, Golder House, Magwa Crescent West, Maxwell Office Park, Cnr Allandale Road and Maxwell Drive, Waterfall City, Midrand, South Africa Phone Number [+27] (11) 254 4800 |
| | IBIS Consulting | Environmental, Social and Governance Services | 1 st Floor, Acacia Building The Avenues Office Park 45 Homestead Road Rivonia Telephone: +27 10 020 7343 Email: jeremy@ibisconsulting.com |
| | Environmental Resources Management (ERM), | Environmental services | Building 32, 1st Floor, The Woodlands Office Park Woodlands Drive, Woodmead Sandton Johannesburg Gauteng 2148 South Africa Tel: +27 11 798 4300 |

APPENDIX 20: ADDENDUM TO THE ESMS-RENEWABLE ENERGY E&S MONITORING TEMPLATES

This addendum to the ESMS is aimed at making some amendments to the ESMS to include some explicit reference to renewable energy expertise, as well as a list of management programme requirements for specific renewable energy project types.

The monitoring templates cover the following sub-sectors within the Renewable Energy Sector:

- (i) Geothermal
- (ii) Wind
- (iii) Biomass
- (iv) Hydropower
- (v) Solar

Environmental & Social Indicators for Monitoring of TDB’s Renewable Energies Projects

GEOHERMAL

To be filled out by the party responsible for Environmental, Social, Health and Safety Risks. Please return the filled-out questionnaire to TDB.

Please use as much space as you need, the field height should not be a limit.

Attach any relevant documents to this questionnaire and indicate a cross reference.

| Details on the Borrower | | | |
|---|------|------------------|---------------|
| Institution Name: | | | |
| Completed by (Name): | | | |
| Name of Portfolio/Credit Line: | | | |
| Country: | | | |
| City/Location: | | | |
| Company authorized representative I certify that the data contained in this report completely and accurately represents the current status of knowledge of the investment. Signature: | | | |
| Title: | | City/Date: | |
| Contact details of responsible persons completing this questionnaire (executive board member, environment, social, health & safety, HR, legal), if assigned: | | | |
| Position | Name | Telephone Number | Email Address |
| | | | |
| | | | |

| Details on the Project | | | |
|---|------|----------------------------|---------------|
| Borrower Name: | | | |
| Borrower Address: | | | |
| Country: | | | |
| City/Location: | | | |
| Project Name: | | | |
| Project Category: | | | |
| Contact Person: | | | |
| Contact details of responsible persons (executive board member, environment, social, health & safety, HR, legal), if assigned | | | |
| Position | Name | Telephone Number | Email Address |
| | | | |
| | | | |
| Project Status: <input type="checkbox"/> Design <input type="checkbox"/> Construction <input type="checkbox"/> Expansion <input type="checkbox"/> Commissioning <input type="checkbox"/> Operation <input type="checkbox"/> Closure <input type="checkbox"/> other; please specify: | | | |
| Current reporting period: | | Previous reporting period: | |
| When was the last site visit? Date: | | By whom: | |
| When is the next site visit planned? Date: | | | |

| General |
|--|
| Permits |
| List the permits that are needed and if they have been already granted or applied for: |
| Permit: Granted <input type="checkbox"/> Applied for <input type="checkbox"/> Permit Conditions: |
| Permit: Granted <input type="checkbox"/> Applied for <input type="checkbox"/> Permit Conditions: |
| Permit: Granted <input type="checkbox"/> Applied for <input type="checkbox"/> Permit Conditions: |
| Permit: Granted <input type="checkbox"/> Applied for <input type="checkbox"/> Permit Conditions: |
| Permit: Granted <input type="checkbox"/> Applied for <input type="checkbox"/> Permit Conditions: |

PS 1 - Assessment and Management of Environmental and Social Risks and Impacts

E&S Action and Monitoring / Management System

| | | |
|--|---------------|--|
| Do you have a documented Environmental and Social Management System (ESMS)? | Yes q No q | |
| Have there been any changes in the Management System or the Management Plans? | Yes q No q | If yes, please describe: |
| Have there been any updates to the Environmental and Social Policies adopted by your organization? | Yes q No q | If yes, please provide a copy of the updated policies, including date when it was issued and reasons for the same. |

Please summarize any staff training concerning this project (including number of staff trained) during the reporting period. Please provide a copy of the training plans and training records.

| | | |
|---|---------------|---|
| Have there been any changes in the Environmental and Social Action Plan (ESAP)? | Yes q No q | If yes, please provide ESAP change log and copy of new ESAP. |
| Have there been any accidents or environmental or social incidents (during this reporting period) that have caused damage, brought about injuries or fatalities, affected project labour or local communities, affected cultural property, or created liabilities for the company? Please provide incident logs. | Yes q No q | If yes, please describe, including details of actions to repair and prevent reoccurrence: |
| Is the project materially compliant with all applicable environmental and social laws and regulations? | Yes q No q | If no, please provide details of any material non-compliances: |
| How many inspections did you receive from the local environmental authorities during the reporting period? | Number: | Please provide details of these visits: |
| How many inspections did you receive from the local health and safety authorities during the reporting period? | Number: | Please provide details of these visits: |
| How many inspections did you receive from the local labour authorities during the reporting period? | Number: | Please provide details of these visits: |
| Have these visits resulted in any penalties, fines and/or corrective action plans? | Yes q No q | If yes, please describe: |
| Have any operations been reduced, temporarily suspended or closed down due to environmental, health and safety or labour reasons? | Yes q No q | If yes, please describe: |

Stakeholder Engagement

Please provide the name and contact details for your external relations or community engagement manager:

PS 1 - Assessment and Management of Environmental and Social Risks and Impacts

| | | |
|---|---------------|---|
| Have there been any changes to the Stakeholder Engagement Plan (SEP)? | Yes q No q | If yes, please provide SEP change log and copy of new SEP. Please also provide updated stakeholder list, if applicable. |
|---|---------------|---|

How many complaints or grievances did the project receive from members of the public or civil society organisations during the reporting period? Please split by stakeholder group. Summarise any issues raised in the complaints or grievances and explain how they were resolved. Please also provide copies of the grievance log and received grievances.

Please summarise meetings held with members of the public or public organisations during the reporting period. Please provide meeting minutes

Please summarise any information provided to members of the public and other stakeholders during the report period relating to environmental, social or safety issues. Please provide copies of disclosure notices and other correspondence with stakeholders.

Please summarise any on-going social or community development initiatives undertaken during the reporting period. Please provide details on spending during the reporting period and a copy of the updated Community Development Plan or similar documentation.

PS 2 - Labor and Working Conditions

Human Resources Management

| Number of permanent employees for this project: | Number of temporary employees for this project: | Number of contractor staff on site: |
|--|---|-------------------------------------|
| Have there been any changes to policies or terms and conditions concerning non-discrimination and equal opportunity during the reporting period? | Yes q No q | If yes, please give details: |
| Have there been any changes to policies or terms and conditions concerning underage (18) employment during the reporting period? | Yes q No q | If yes, please give details: |
| Have there been any changes to policies or terms and conditions concerning wages (wage level, normal, overtime etc.) or working hours during the reporting period? | Yes q No q | If yes, please give details: |
| Have there been any changes to policies or terms and conditions concerning union recognition or negotiation during the reporting period? | Yes q No q | If yes, please give details: |
| Have there been any changes to the health and safety policies during the reporting period? | Yes q No q | If yes, please give details: |

PS 2 - Labor and Working Conditions

How many complaints or grievances did the project receive from workers during the reporting period? Summarise any issues raised in the complaints or grievances and explain how they were resolved. Please also provide copies of the grievance log and received grievances.

| | | |
|---|---------------|--|
| Were there any collective redundancies during the reporting period? | Yes q No q | If yes, please describe including number of workers involved, reasons, consultation undertaken and how they were selected: |
| Are there any planned redundancies or additions to the workforce in the next year? | Yes q No q | If yes, please provide redundancy plan, including number of workers involved and consultation process: |
| Have there been any disputes related to labour and working conditions in the reporting period? | Yes q No q | If yes, please summarize below and provide copies of lodged disputes. |
| Have there been any other significant labour issues or grievances raised during the reporting period (including court cases or complaints from trade unions or non-governmental organizations)? | Yes q No q | If yes, please describe: |

Health and Safety Data

In addition to the data filled in below, please provide H&S incidence log, including follow up investigations and corrective action implementation.

| | | | |
|---|---------|---|---------|
| Fatalities ³¹ : | Number: | Total Lost Time Accidents (including vehicular) ³² : | Number: |
| Total number of lost workdays ³³ resulting from incidents: | Number: | Total man-hours worked this reporting period: | Number: |
| Incidence ³⁴ during this reporting period: | Number: | Incidence during the previous reporting period: | Number: |

Please summarise any health and safety training that has been provided for company personnel during the report period. Please provide the training records.

Please summarise any emergency prevention and response training that has been provided for company personnel during the report period. Please provide the training records.

³¹ If you have not already done so, please provide a separate report detailing the circumstances of each fatality.

³² Incapacity to work for at least one full workday beyond the day on which the accident or illness occurred.

³³ Lost workdays are the number of workdays (consecutive or not) beyond the date of injury or onset of illness that the employee was away from work or limited to restricted work activity because of an occupational injury or illness.

³⁴ Incidence = total lost workdays / total hours worked

PS 3 - Resource Efficiency and Pollution Prevention

| | | |
|--|------------------------|---|
| Have there been any spill cases or pollution of water, soil or air? | Yes q No q | If yes, please give details including emergency response. Please provide incidence log. |
| Has there been any event of fire, sediment loads, storm water, a flood or an earthquake? | Yes q No q | If yes, please give details and describe emergency response, if applicable: |
| Has there been any improvement in process efficiency, waste minimization or other schemes (energy savings, ISO certification)? | Yes q No q | If yes, please elaborate: |
| Has a Greenhouse Gas Assessment been conducted during the reporting period? | Yes q No q N/A q | If yes, please summarise the results: |

Environmental Monitoring Data³⁵ - please attach data sheets as required

| Parameter ³⁶ | Value ³⁷ | Unit | Legislative limit and/ or IFC EHS guideline limit | Compliance Status ³⁸ | Comments ³⁹ |
|--|---------------------|------|---|---------------------------------|------------------------|
| Waste Water | | | | | |
| Total waste water generated | | | | | |
| BOD | | | | | |
| COD | | | | | |
| Suspended Solids | | | | | |
| Phosphorus | | | | | |
| Nitrates | | | | | |
| Heavy metals | | | | | |
| [Other] | | | | | |
| Air Emissions | | | | | |
| SO ₂ | | | | | |
| NO _x | | | | | |
| Particulates | | | | | |
| CO ₂ /CO ₂ equivalents | | | | | |
| CH ₄ | | | | | |
| N ₂ O | | | | | |
| HFCs | | | | | |
| PFCs | | | | | |
| SF ₆ | | | | | |
| [Other] | | | | | |

³⁵ Not all parameters will necessarily apply. Please complete those rows that are most relevant to the industry sector. Additional parameters can be added as necessary.
³⁶ Not all parameters will necessarily apply. Please complete those rows that are most relevant to the industry sector. Additional parameters can be added as necessary.
³⁷ Please ensure that the units of measurement are clearly stated.
³⁸ Please report on compliance against the standards agreed with TDB for this project (typically local, EU, World Bank Group, IFC): compliant / slightly over the limit / unknown / exceeding the limit
³⁹ In addition to any other relevant comments, please indicate whether the measurements reported apply to all or only some process operations at the facility.

PS 3 - Resource Efficiency and Pollution Prevention

| | | | | | |
|--|--|--|--|--|--|
| Other Parameters | | | | | |
| Noise - at the project fence line | | | | | |
| Noise - at the closest sensitive receptor | | | | | |
| EMF (Electric and Magnetic Fields) - at the closest sensitive receptor | | | | | |
| [Other] | | | | | |
| Solid Waste | | | | | |

Please provide details of the types and amounts of solid wastes generated by the project. Indicate where wastes are classified as hazardous. Indicate the final re-use, recycle or disposal method for each waste type.

PS 4 - Community Health, Safety, and Security

| | | |
|---|---------------|--|
| Has there been any work or traffic at night? | Yes q No q | If yes, please give details: |
| Have there been any traffic incidents involving project vehicles outside of the site? | Yes q No q | If yes, please summarize and provide traffic incident log, |

Please summarize any training or awareness raising activities that have been undertaken during the reporting period:

PS 5 - Land Acquisition and Involuntary Resettlement

If Applicable, please summarize any progress made during the reporting period in the implementation of the Resettlement Action Plan (RAP) or Livelihood Restoration Framework (LRF). Please provide copy of updated RAF/LRF.

| | | |
|--|---------------|---|
| Have all the affected persons been fully compensated for their physical displacement and, if applicable, any economic losses resulting from the project? | Yes q No q | If no, specify how many compensation payments are still outstanding (in terms of number and percentage of recipients and payment amounts) and state when this payment will be made: |
|--|---------------|---|

Please provide a status update of the implementation of livelihood restoration activities as stipulated within the RAP.

| | | |
|--|---------------|--|
| Has there been any new land acquired during the reporting period for this project? | Yes q No q | If yes, explain the extent of the land acquisition and any due diligence conducted. Please provide copy of RAF/LRF, including compensation summary and details on compensation rates. |
|--|---------------|--|

| PS 6 - Biodiversity Conservation and Sustainable Management of Living Natural Resources | | |
|---|------------------------|--|
| Has there been any vegetation clearing during the breeding season during this reporting period? | Yes q No q | If yes, please give details: |
| Has site clearing been minimised in accordance with the Construction Site Management Plan? | Yes q No q | If no, please explain and give reasons: |
| Is soil erosion or landslides visible within the project area? | Yes q No q | If yes, please describe measures for mitigation: |
| Please summarize status of renaturation and re-planting of vegetation (plant status, progress in plant growth): | | |
| Has a bird monitoring been conducted for the transmission line component during the reporting period? | Yes q No q N/A q | If yes, please summarize the results: |
| PS 7 - Indigenous Peoples | | |
| Have there been any changes to the Indigenous Peoples Plan (IPP) or Framework (IPF)? | Yes q No q N/A q | If yes, please summarize and provide a copy of the updated IPP or IPF. |
| Please highlight which stakeholder engagement activities detailed above related specifically to indigenous peoples. | | |
| PS 8 – Cultural Heritage | | |
| Has there been a chance find during the report period? | Yes q No q | If yes, please give details. Please provide reports/records and follow on actions. |
| Please summarise any training on chance find that has been provided for personnel during the report period: | | |

Environmental & Social Indicators for Monitoring of TDB's Renewable Energies Projects

WIND

To be filled out by the responsible party for Environmental, Social, Health and Safety Risks. Please return the filled out questionnaire to TDB.

Please use as much space as you need, the field height should not be a limit.

Attach any relevant documents to this questionnaire and indicate a cross reference.

| Details on the Borrower | |
|---|------------|
| Institution Name: | |
| Completed by (Name): | |
| Name of Portfolio/Credit Line: | |
| Country: | |
| City/Location: | |
| Company authorized representative I certify that the data contained in this report completely and accurately represents the current status of knowledge of the investment. | |
| Signature: | |
| Title: | City/Date: |

| Details on the Borrower | | | |
|---|------|----------------------------|---------------|
| Contact details of responsible persons completing this questionnaire (executive board member, environment, social, health & safety, HR, legal), if assigned: | | | |
| Position | Name | Telephone Number | Email Address |
| | | | |
| | | | |
| Details on the Project | | | |
| Borrower Name: | | | |
| Borrower Address: | | | |
| Country: | | | |
| City/Location: | | | |
| Project Name: | | | |
| Project Category: | | | |
| Contact Person: | | | |
| Contact details of responsible persons (executive board member, environment, social, health & safety, HR, legal), if assigned | | | |
| Position | Name | Telephone Number | Email Address |
| | | | |
| | | | |
| Project Status: <input type="checkbox"/> Design <input type="checkbox"/> Construction <input type="checkbox"/> Expansion <input type="checkbox"/> Commissioning <input type="checkbox"/> Operation <input type="checkbox"/> Closure <input type="checkbox"/> other; please specify: | | | |
| Current reporting period: | | Previous reporting period: | |
| When was the last site visit? Date: | | By whom: | |
| When is the next site visit planned? Date: | | | |
| General | | | |
| Permits | | | |
| List the permits that are needed and if they have been already granted or applied for: | | | |
| Permit: Granted <input type="checkbox"/> Applied for <input type="checkbox"/> Permit Conditions: | | | |
| Permit: Granted <input type="checkbox"/> Applied for <input type="checkbox"/> Permit Conditions: | | | |
| Permit: Granted <input type="checkbox"/> Applied for <input type="checkbox"/> Permit Conditions: | | | |
| Permit: Granted <input type="checkbox"/> Applied for <input type="checkbox"/> Permit Conditions: | | | |
| Permit: Granted <input type="checkbox"/> Applied for <input type="checkbox"/> Permit Conditions: | | | |

PS 1 - Assessment and Management of Environmental and Social Risks and Impacts

E&S Action and Monitoring / Management System

| | | |
|---|---------------|--|
| Do you have a documented Environmental and Social Management System (ESMS)? | Yes q No q | |
| Have there been any changes in the Management System or the Management Plans? | Yes q No q | If yes, please describe: |
| Have there been any updates to the Environmental and Social Policies adopted by your organization? | Yes q No q | If yes, please provide a copy of the updated policies, including date when it was issued and reasons for the same. |
| Please summarize any staff training concerning this project (including number of staff trained) during the reporting period. Please provide a copy of the training plans and training records. | | |
| Have there been any changes in the Environmental and Social Action Plan (ESAP)? | Yes q No q | If yes, please provide ESAP change log and copy of new ESAP. |
| Have there been any accidents or environmental or social incidents (during this reporting period) that have caused damage, brought about injuries or fatalities, affected project labour or local communities, affected cultural property, or created liabilities for the company? Please provide incident logs. | Yes q No q | If yes, please describe, including details of actions to repair and prevent reoccurrence: 070721470950 |
| Is the project materially compliant with all applicable environmental and social laws and regulations? | Yes q No q | If no, please provide details of any material non-compliances: |
| How many inspections did you receive from the local environmental authorities during the reporting period? | Number: | Please provide details of these visits: |
| How many inspections did you receive from the local health and safety authorities during the reporting period? | Number: | Please provide details of these visits: |
| How many inspections did you receive from the local labour authorities during the reporting period? | Number: | Please provide details of these visits: |
| Have these visits resulted in any penalties, fines and/or corrective action plans? | Yes q No q | If yes, please describe: |
| Have any operations been reduced, temporarily suspended or closed down due to environmental, health and safety or labour reasons? | Yes q No q | If yes, please describe: |

Stakeholder Engagement

Please provide the name and contact details for your external relations or community engagement manager:

| | | |
|---|---------------|---|
| Have there been any changes to the Stakeholder Engagement Plan (SEP)? | Yes q No q | If yes, please provide SEP change log and copy of new SEP. Please also provide updated stakeholder list, if applicable. |
|---|---------------|---|

How many complaints or grievances did the project receive from members of the public or civil society organisations during the reporting period? Please split by stakeholder group. Summarise any issues raised in the complaints or grievances and explain how they were resolved. Please also provide copies of the grievance log and received grievances.

Please summarise meetings held with members of the public or public organisations during the reporting period. Please provide meeting minutes

Please summarise any information provided to members of the public and other stakeholders during the report period relating to environmental, social or safety issues. Please provide copies of disclosure notices and other correspondence with stakeholders.

Please summarise any on-going social or community development initiatives undertaken during the reporting period. Please provide details on spending during the reporting period and a copy of the updated Community Development Plan or similar documentation.

PS 2 - Labor and Working Conditions

Human Resources Management

| | | |
|---|---|-------------------------------------|
| Number of permanent employees for this project: | Number of temporary employees for this project: | Number of contractor staff on site: |
|---|---|-------------------------------------|

| | | |
|--|---------------|------------------------------|
| Have there been any changes to policies or terms and conditions concerning non-discrimination and equal opportunity during the reporting period? | Yes q No q | If yes, please give details: |
|--|---------------|------------------------------|

| | | |
|---|---------------|------------------------------|
| Have there been any changes to policies or terms and conditions concerning under age (18) employment during the reporting period? | Yes q No q | If yes, please give details: |
|---|---------------|------------------------------|

| | | |
|--|---------------|------------------------------|
| Have there been any changes to policies or terms and conditions concerning wages (wage level, normal, overtime etc.) or working hours during the reporting period? | Yes q No q | If yes, please give details: |
|--|---------------|------------------------------|

| | | |
|--|---------------|------------------------------|
| Have there been any changes to the health and safety policies during the reporting period? | Yes q No q | If yes, please give details: |
|--|---------------|------------------------------|

PS 2 - Labor and Working Conditions

How many complaints or grievances did the project receive from workers during the reporting period? Summarise any issues raised in the complaints or grievances and explain how they were resolved. Please also provide copies of the grievance log and received grievances.

| | | |
|---|---------------|--|
| Were there any collective redundancies during the reporting period? | Yes q No q | If yes, please describe including number of workers involved, reasons, consultation undertaken and how they were selected: |
| Are there any planned redundancies or additions to the workforce in the next year? | Yes q No q | If yes, please provide redundancy plan, including number of workers involved and consultation process: |
| Have there been any disputes related to labour and working conditions in the reporting period? | Yes q No q | If yes, please summarize below and provide copies of lodged disputes. |
| Have there been any other significant labour issues or grievances raised during the reporting period (including court cases or complaints from trade unions or non-governmental organizations)? | Yes q No q | If yes, please describe: |

Health and Safety Data

In addition to the data filled in below, please provide H&S incidence log, including follow up investigations and corrective action implementation.

| | | | |
|---|---------|---|---------|
| Fatalities ⁴⁰ : | Number: | Total Lost Time Accidents (including vehicular) ⁴¹ : | Number: |
| Total number of lost workdays ⁴² resulting from incidents: | Number: | Total man-hours worked this reporting period: | Number: |
| Incidence ⁴³ during this reporting period: | Number: | Incidence during the previous reporting period: | Number: |

Please summarise any health and safety training that has been provided for company personnel during the report period. Please provide the training records.

Please summarise any emergency prevention and response training that has been provided for company personnel during the report period. Please provide the training records.

⁴⁰ If you have not already done so, please provide a separate report detailing the circumstances of each fatality.

⁴¹ Incapacity to work for at least one full workday beyond the day on which the accident or illness occurred.

⁴² Lost workdays are the number of workdays (consecutive or not) beyond the date of injury or onset of illness that the employee was away from work or limited to restricted work activity because of an occupational injury or illness.

⁴³ Incidence = total lost workdays / total hours worked

| PS 3 - Resource Efficiency and Pollution Prevention | | | | | |
|---|------------------------|---|---|---------------------------------|------------------------|
| Have there been any spill cases or pollution of water, soil or air? | Yes q No q | If yes, please give details including emergency response. Please provide incidence log. | | | |
| Has there been any event of fire, sediment loads, storm water, a flood or an earthquake? | Yes q No q | If yes, please give details and describe emergency response, if applicable: | | | |
| Has there been any improvement in process efficiency, waste minimization or other schemes (energy savings, ISO certification)? | Yes q No q | If yes, please elaborate: | | | |
| Has a Greenhouse Gas Assessment been conducted during the reporting period? | Yes q No q N/A q | If yes, please summarise the results: | | | |
| Environmental Monitoring Data ⁴⁴ - please attach data sheets as required | | | | | |
| Parameter ⁴⁵ | Value ⁴⁶ | Unit | Legislative limit and/ or IFC EHS guideline limit | Compliance Status ⁴⁷ | Comments ⁴⁸ |
| Noise / EMF | | | | | |
| Noise - at the project fence line | | | | | |
| Noise - at the closest sensitive receptor | | | | | |
| EMF (Electric and Magnetic Fields) – at the closest sensitive receptor | | | | | |
| [Other] | | | | | |
| Solid Waste | | | | | |
| Please provide details of the types and amounts of solid wastes generated by the project. Indicate where wastes are classified as hazardous. Indicate the final re-use, recycle or disposal method for each waste type. | | | | | |

⁴⁴ Not all parameters will necessarily apply. Please complete those rows that are most relevant to the industry sector. Additional parameters can be added as necessary.

⁴⁵ Not all parameters will necessarily apply. Please complete those rows that are most relevant to the industry sector. Additional parameters can be added as necessary.

⁴⁶ Please ensure that the units of measurement are clearly stated.

⁴⁷ Please report on compliance against the standards agreed with TDB for this project (typically local, EU, World Bank Group, IFC): compliant / slightly over the limit / unknown / exceeding the limit

⁴⁸ In addition to any other relevant comments, please indicate whether the measurements reported apply to all or only some process operations at the facility.

| PS 4 - Community Health, Safety, and Security | | |
|--|---------------|--|
| Has there been any work or traffic at night? | Yes q No q | If yes, please give details: |
| Have there been any traffic incidents involving project vehicles outside of the site? | Yes q No q | If yes, please summarize and provide traffic incident log, |
| Please summarize any training or awareness raising activities that have been undertaken during the reporting period: | | |

| PS 5 - Land Acquisition and Involuntary Resettlement | | |
|--|---------------|--|
| <i>If Applicable</i> , please summarize any progress made during the reporting period in the implementation of the Resettlement Action Plan (RAP) or Livelihood Restoration Framework (LRF). Please provide copy of updated RAF/LRF. | | |
| Have all the affected persons been fully compensated for their physical displacement and, if applicable, any economic losses resulting from the project? | Yes q No q | If no, specify how many compensation payments are still outstanding (in terms of number and percentage of recipients and payment amounts) and state when this payment will be made: |
| Please provide a status update of the implementation of livelihood restoration activities as stipulated within the RAP. | | |
| Has there been any new land acquired during the reporting period for this project? | Yes q No q | If yes, explain the extent of the land acquisition and any due diligence conducted. Please provide copy of RAF/LRF, including compensation summary and details on compensation rates. |

| PS 6 - Biodiversity Conservation and Sustainable Management of Living Natural Resources | | |
|---|------------------------|--|
| Has there been any vegetation clearing during the breeding season during this reporting period? | Yes q No q | If yes, please give details: |
| Has site clearing been minimised in accordance with the Construction Site Management Plan? | Yes q No q | If no, please explain and give reasons: |
| Is soil erosion or landslides visible within the project area? | Yes q No q | If yes, please describe measures for mitigation: |
| Please summarize status of renaturation and re-planting of vegetation (plant status, progress in plant growth): | | |
| Has a bird monitoring been conducted during the reporting period? | Yes q No q N/A q | If yes, please summarize the results: |

PS 6 - Biodiversity Conservation and Sustainable Management of Living Natural Resources

| | | |
|--|------------------------|---------------------------------------|
| Has a bat monitoring been conducted during the reporting period? | Yes q No q N/A q | If yes, please summarize the results: |
|--|------------------------|---------------------------------------|

PS 7 - Indigenous Peoples

| | | |
|--|------------------------|--|
| Have there been any changes to the Indigenous Peoples Plan (IPP) or Framework (IPF)? | Yes q No q N/A q | If yes, please summarize and provide a copy of the updated IPP or IPF. |
|--|------------------------|--|

Please highlight which stakeholder engagement activities detailed above related specifically to indigenous peoples.

PS 8 – Cultural Heritage

| | | |
|--|---------------|--|
| Has there been a chance find during the report period? | Yes q No q | If yes, please give details. Please provide reports/records and follow on actions. |
|--|---------------|--|

Please summarise any training on chance find that has been provided for personnel during the report period:

Environmental & Social Indicators for Monitoring of TDB’s Renewable Energies Projects

SOLAR

To be filled out by the party responsible for Environmental, Social, Health and Safety Risks. Please return the filled-out questionnaire to TDB.

Please use as much space as you need, the field height should not be a limit.

Attach any relevant documents to this questionnaire and indicate a cross reference.

Details on the Borrower

| | | | |
|--|------|------------------|---------------|
| Institution Name: | | | |
| Completed by (Name): | | | |
| Name of Portfolio/Credit Line: | | | |
| Country: | | | |
| City/Location: | | | |
| Company authorized representative. I certify that the data contained in this report completely and accurately represents the current status of knowledge of the investment. Signature: | | | |
| Title: | | City/Date: | |
| Contact details of responsible persons completing this questionnaire (executive board member, environment, social, health & safety, HR, legal), if assigned: | | | |
| Position | Name | Telephone Number | Email Address |
| | | | |
| | | | |

| Details on the Project | | | |
|---|------|----------------------------|---------------|
| Borrower Name: | | | |
| Borrower Address: | | | |
| Country: | | | |
| City/Location: | | | |
| Project Name: | | | |
| Project Category: | | | |
| Contact Person: | | | |
| Contact details of responsible persons (executive board member, environment, social, health & safety, HR, legal), if assigned | | | |
| Position | Name | Telephone Number | Email Address |
| | | | |
| | | | |
| Project Status: <input type="checkbox"/> Design <input type="checkbox"/> Construction <input type="checkbox"/> Expansion <input type="checkbox"/> Commissioning <input type="checkbox"/> Operation <input type="checkbox"/> Closure <input type="checkbox"/> other; please specify: | | | |
| Current reporting period: | | Previous reporting period: | |
| When was the last site visit? Date: | | By whom: | |
| When is the next site visit planned? Date: | | | |

| General | |
|--|---------|
| Permits | |
| List the permits that are needed and if they have been already granted or applied for: | |
| Permit: <input type="checkbox"/> Applied for <input type="checkbox"/> Permit Conditions: | Granted |
| Permit: <input type="checkbox"/> Applied for <input type="checkbox"/> Permit Conditions: | Granted |
| Permit: <input type="checkbox"/> Applied for <input type="checkbox"/> Permit Conditions: | Granted |
| Permit: <input type="checkbox"/> Applied for <input type="checkbox"/> Permit Conditions: | Granted |
| Permit: <input type="checkbox"/> Applied for <input type="checkbox"/> Permit Conditions: | Granted |

PS 1 - Assessment and Management of Environmental and Social Risks and Impacts

E&S Action and Monitoring / Management System

| | | |
|---|---------------|--|
| Do you have a documented Environmental and Social Management System (ESMS)? | Yes q No q | |
| Have there been any changes in the Management System or the Management Plans? | Yes q No q | If yes, please describe: |
| Have there been any updates to the Environmental and Social Policies adopted by your organization? | Yes q No q | If yes, please provide a copy of the updated policies, including date when it was issued and reasons for the same. |
| Please summarize any staff training concerning this project (including number of staff trained) during the reporting period. Please provide a copy of the training plans and training records. | | |
| Have there been any changes in the Environmental and Social Action Plan (ESAP)? | Yes q No q | If yes, please provide ESAP change log and copy of new ESAP. |
| Have there been any accidents or environmental or social incidents (during this reporting period) that have caused damage, brought about injuries or fatalities, affected project labour or local communities, affected cultural property, or created liabilities for the company? Please provide incident logs. | Yes q No q | If yes, please describe, including details of actions to repair and prevent reoccurrence: |
| Is the project materially compliant with all applicable environmental and social laws and regulations? | Yes q No q | If no, please provide details of any material non-compliances: |
| How many inspections did you receive from the local environmental authorities during the reporting period? | Number: | Please provide details of these visits: |
| How many inspections did you receive from the local health and safety authorities during the reporting period? | Number: | Please provide details of these visits: |
| How many inspections did you receive from the local labour authorities during the reporting period? | Number: | Please provide details of these visits: |
| Have these visits resulted in any penalties, fines and/or corrective action plans? | Yes q No q | If yes, please describe: |
| Have any operations been reduced, temporarily suspended or closed down due to environmental, health and safety or labour reasons? | Yes q No q | If yes, please describe: |

PS 1 - Assessment and Management of Environmental and Social Risks and Impacts

Please describe any EHS or labour initiatives undertaken during the reporting period:

Stakeholder Engagement

Please provide the name and contact details for your external relations or community engagement manager:

| | | |
|---|---------------|---|
| Have there been any changes to the Stakeholder Engagement Plan (SEP)? | Yes q No q | If yes, please provide SEP change log and copy of new SEP. Please also provide updated stakeholder list, if applicable. |
|---|---------------|---|

How many complaints or grievances did the project receive from members of the public or civil society organisations during the reporting period? Please split by stakeholder group. Summarise any issues raised in the complaints or grievances and explain how they were resolved. Please also provide copies of the grievance log and received grievances.

Please summarise meetings held with members of the public or public organisations during the reporting period. Please provide meeting minutes

Please summarise any information provided to members of the public and other stakeholders during the report period relating to environmental, social or safety issues. Please provide copies of disclosure notices and other correspondence with stakeholders.

Please summarise any on-going social or community development initiatives undertaken during the reporting period. Please provide details on spending during the reporting period and a copy of the updated Community Development Plan or similar documentation.

PS 2 - Labor and Working Conditions

Human Resources Management

| | | |
|---|---|-------------------------------------|
| Number of permanent employees for this project: | Number of temporary employees for this project: | Number of contractor staff on site: |
|---|---|-------------------------------------|

| | | |
|--|---------------|------------------------------|
| Have there been any changes to policies or terms and conditions concerning non-discrimination and equal opportunity during the reporting period? | Yes q No q | If yes, please give details: |
|--|---------------|------------------------------|

| | | |
|--|---------------|------------------------------|
| Have there been any changes to policies or terms and conditions concerning underage (18) employment during the reporting period? | Yes q No q | If yes, please give details: |
|--|---------------|------------------------------|

| | | |
|--|---------------|------------------------------|
| Have there been any changes to policies or terms and conditions concerning wages (wage level, normal, overtime etc.) or working hours during the reporting period? | Yes q No q | If yes, please give details: |
|--|---------------|------------------------------|

| | | |
|--|---------------|------------------------------|
| Have there been any changes to policies or terms and conditions concerning union | Yes q No q | If yes, please give details: |
|--|---------------|------------------------------|

PS 1 - Assessment and Management of Environmental and Social Risks and Impacts

| | | |
|--|---------------|--|
| recognition or negotiation during the reporting period? | | |
| Have there been any changes to the health and safety policies during the reporting period? | Yes q No q | If yes, please give details: |
| How many complaints or grievances did the project receive from workers during the reporting period? Summarise any issues raised in the complaints or grievances and explain how they were resolved. Please also provide copies of the grievance log and received grievances. | | |
| Were there any collective redundancies during the reporting period? | Yes q No q | If yes, please describe including number of workers involved, reasons, consultation undertaken and how they were selected: |
| Are there any planned redundancies or additions to the workforce in the next year? | Yes q No q | If yes, please provide redundancy plan, including number of workers involved and consultation process: |
| Have there been any disputes related to labour and working conditions in the reporting period? | Yes q No q | If yes, please summarize below and provide copies of lodged disputes. |
| Have there been any other significant labour issues or grievances raised during the reporting period (including court cases or complaints from trade unions or non-governmental organizations)? | Yes q No q | If yes, please describe: |
| Health and Safety Data | | |
| In addition to the data filled in below, please provide H&S incidence log, including follow up investigations and corrective action implementation. | | |
| Fatalities ⁴⁹ : | Number: | Total Lost Time Accidents (including vehicular) ⁵⁰ : |
| | | |
| Total number of lost workdays ⁵¹ resulting from incidents: | Number: | Total man-hours worked this reporting period: |
| | | |
| Incidence ⁵² during this reporting period: | Number: | Incidence during the previous reporting period: |
| | | |

⁴⁹ If you have not already done so, please provide a separate report detailing the circumstances of each fatality.

⁵⁰ Incapacity to work for at least one full workday beyond the day on which the accident or illness occurred.

⁵¹ Lost workdays are the number of workdays (consecutive or not) beyond the date of injury or onset of illness that the employee was away from work or limited to restricted work activity because of an occupational injury or illness.

⁵² Incidence = total lost workdays / total hours worked

PS 1 - Assessment and Management of Environmental and Social Risks and Impacts

Please summarise any health and safety training that has been provided for company personnel during the report period. Please provide the training records.

Please summarise any emergency prevention and response training that has been provided for company personnel during the report period. Please provide the training records.

PS 3 - Resource Efficiency and Pollution Prevention

| | | |
|--|------------------------|---|
| Have there been any spill cases or pollution of water, soil or air? | Yes q No q | If yes, please give details including emergency response. Please provide incidence log. |
| Has there been any event of fire, sediment loads, storm water, a flood or an earthquake? | Yes q No q | If yes, please give details and describe emergency response, if applicable: |
| Has there been any improvement in process efficiency, waste minimization or other schemes (energy savings, ISO certification)? | Yes q No q | If yes, please elaborate: |
| Has a Greenhouse Gas Assessment been conducted during the reporting period? | Yes q No q N/A q | If yes, please summarise the results: |

Environmental Monitoring Data⁵³ - please attach data sheets as required

| Parameter ⁵⁴ | Value ⁵⁵ | Unit | Legislative limit and/ or IFC EHS guideline limit | Compliance Status ⁵⁶ | Comments ⁵⁷ |
|--|---------------------|------|---|---------------------------------|------------------------|
| Noise / EMF | | | | | |
| Noise - at the project fence line | | | | | |
| Noise - at the closest sensitive receptor | | | | | |
| EMF (Electric and Magnetic Fields) – at the closest sensitive receptor | | | | | |
| [Other] | | | | | |
| Solid Waste | | | | | |

Please provide details of the types and amounts of solid wastes generated by the project. Indicate where wastes are classified as hazardous. Indicate the final re-use, recycle or disposal method for each waste type

⁵³ Not all parameters will necessarily apply. Please complete those rows that are most relevant to the industry sector. Additional parameters can be added as necessary.

⁵⁴ Not all parameters will necessarily apply. Please complete those rows that are most relevant to the industry sector. Additional parameters can be added as necessary.

⁵⁵ Please ensure that the units of measurement are clearly stated.

⁵⁶ Please report on compliance against the standards agreed with TDB for this project (typically local, EU, World Bank Group, IFC): compliant / slightly over the limit / unknown / exceeding the limit

⁵⁷ In addition to any other relevant comments, please indicate whether the measurements reported apply to all or only some process operations at the facility.

| PS 4 - Community Health, Safety, and Security | | |
|--|------------------------|--|
| Has there been any work or traffic at night? | Yes q No q | If yes, please give details: |
| Have there been any traffic incidents involving project vehicles outside of the site? | Yes q No q | If yes, please summarize and provide traffic incident log, |
| Please summarize any training or awareness raising activities that have been undertaken during the reporting period: | | |
| PS 5 - Land Acquisition and Involuntary Resettlement | | |
| <i>If Applicable</i> , please summarize any progress made during the reporting period in the implementation of the Resettlement Action Plan (RAP) or Livelihood Restoration Framework (LRF). Please provide copy of updated RAF/LRF. | | |
| Have all the affected persons been fully compensated for their physical displacement and, if applicable, any economic losses resulting from the project? | Yes q No q | If no, specify how many compensation payments are still outstanding (in terms of number and percentage of recipients and payment amounts) and state when this payment will be made: |
| Please provide a status update of the implementation of livelihood restoration activities as stipulated within the RAP. | | |
| Has there been any new land acquired during the reporting period for this project? | Yes q No q | If yes, explain the extent of the land acquisition and any due diligence conducted. Please provide copy of RAF/LRF, including compensation summary and details on compensation rates. |
| PS 6 - Biodiversity Conservation and Sustainable Management of Living Natural Resources | | |
| Has there been any vegetation clearing during the breeding season during this reporting period? | Yes q No q | If yes, please give details: |
| Has site clearing been minimised in accordance with the Construction Site Management Plan? | Yes q No q | If no, please explain and give reasons: |
| Is soil erosion or landslides visible within the project area? | Yes q No q | If yes, please describe measures for mitigation: |
| Please summarize status of renaturation and re-planting of vegetation (plant status, progress in plant growth): | | |
| Has a bird monitoring been conducted for the transmission line component during the reporting period? | Yes q No q N/A q | If yes, please summarize the results: |

| PS 7 - Indigenous Peoples | | |
|---|------------------------|--|
| Have there been any changes to the Indigenous Peoples Plan (IPP) or Framework (IPF)? | Yes q No q N/A q | If yes, please summarize and provide a copy of the updated IPP or IPF. |
| Please highlight which stakeholder engagement activities detailed above related specifically to indigenous peoples. | | |
| PS 8 – Cultural Heritage | | |
| Has there been a chance find during the report period? | Yes q No q | If yes, please give details. Please provide reports/records and follow on actions. |
| Please summarise any training on chance find that has been provided for personnel during the report period: | | |

Environmental & Social Indicators for Monitoring of TDB’s Renewable Energies Projects

BIOMASS

To be filled out by the party responsible for Environmental, Social, Health and Safety Risks. Please return the filled-out questionnaire to TDB.

Please use as much space as you need, the field height should not be a limit.

Attach any relevant documents to this questionnaire and indicate a cross reference.

| Details on the Borrower | | | |
|---|------|------------------|---------------|
| Institution Name: | | | |
| Completed by (Name): | | | |
| Name of Portfolio/Credit Line: | | | |
| Country: | | | |
| City/Location: | | | |
| Company authorized representative I certify that the data contained in this report completely and accurately represents the current status of knowledge of the investment. Signature: | | | |
| Title: | | City/Date: | |
| Contact details of responsible persons completing this questionnaire (executive board member, environment, social, health & safety, HR, legal), if assigned: | | | |
| Position | Name | Telephone Number | Email Address |
| | | | |

| Details on the Project | | | |
|---|------|----------------------------|---------------|
| Borrower Name: | | | |
| Borrower Address: | | | |
| Country: | | | |
| City/Location: | | | |
| Project Name: | | | |
| Project Category: | | | |
| Contact Person: | | | |
| Contact details of responsible persons (executive board member, environment, social, health & safety, HR, legal), if assigned | | | |
| Position | Name | Telephone Number | Email Address |
| | | | |
| Project Status: <input type="checkbox"/> Design <input type="checkbox"/> Construction <input type="checkbox"/> Expansion <input type="checkbox"/> Commissioning <input type="checkbox"/> Operation <input type="checkbox"/> Closure <input type="checkbox"/> other; please specify: | | | |
| Current reporting period: | | Previous reporting period: | |
| When was the last site visit? Date: | | By whom: | |
| When is the next site visit planned? Date: | | | |

| General | |
|--|--|
| Permits | |
| List the permits that are needed and if they have been already granted or applied for: | |
| Permit: Granted <input type="checkbox"/> Applied for <input type="checkbox"/> Permit Conditions: | |
| Permit: <input type="checkbox"/> Applied for <input type="checkbox"/> Permit Conditions: | Granted |
| Permit: Granted <input type="checkbox"/> Applied for <input type="checkbox"/> Permit Conditions: | |
| Permit: <input type="checkbox"/> Applied for <input type="checkbox"/> Permit Conditions: | Granted |
| Permit: for <input type="checkbox"/> Permit Conditions: | Granted <input type="checkbox"/> Applied |

PS 1 - Assessment and Management of Environmental and Social Risks and Impacts

E&S Action and Monitoring / Management System

| | | |
|---|---------------|--|
| Do you have a documented Environmental and Social Management System (ESMS)? | Yes q No q | |
| Have there been any changes in the Management System or the Management Plans? | Yes q No q | If yes, please describe: |
| Have there been any updates to the Environmental and Social Policies adopted by your organization? | Yes q No q | If yes, please provide a copy of the updated policies, including date when it was issued and reasons for the same. |
| Please summarize any staff training concerning this project (including number of staff trained) during the reporting period. Please provide a copy of the training plans and training records. | | |
| Have there been any changes in the Environmental and Social Action Plan (ESAP)? | Yes q No q | If yes, please provide ESAP change log and copy of new ESAP. |
| Have there been any accidents or environmental or social incidents (during this reporting period) that have caused damage, brought about injuries or fatalities, affected project labour or local communities, affected cultural property, or created liabilities for the company? Please provide incident logs. | Yes q No q | If yes, please describe, including details of actions to repair and prevent reoccurrence: |
| Is the project materially compliant with all applicable environmental and social laws and regulations? | Yes q No q | If no, please provide details of any material non-compliances: |
| How many inspections did you receive from the local environmental authorities during the reporting period? | Number: | Please provide details of these visits: |
| How many inspections did you receive from the local health and safety authorities during the reporting period? | Number: | Please provide details of these visits: |
| How many inspections did you receive from the local labour authorities during the reporting period? | Number: | Please provide details of these visits: |
| Have these visits resulted in any penalties, fines and/or corrective action plans? | Yes q No q | If yes, please describe: |
| Have any operations been reduced, temporarily suspended or closed down due to environmental, health and safety or labour reasons? | Yes q No q | If yes, please describe: |
| Please describe any EHS or labour initiatives undertaken during the reporting period: | | |

PS 1 - Assessment and Management of Environmental and Social Risks and Impacts

Stakeholder Engagement

Please provide the name and contact details for your external relations or community engagement manager:

| | | |
|---|---------------|--|
| Have there been any changes to the Stakeholder Engagement Plan (SEP)? | Yes q No q | If yes, please provide SEP change log and copy of new SEP. Please also provide an updated stakeholder list, if applicable. |
|---|---------------|--|

How many complaints or grievances did the project receive from members of the public or civil society organisations during the reporting period? Please split by stakeholder group. Summarise any issues raised in the complaints or grievances and explain how they were resolved. Please also provide copies of the grievance log and received grievances.

Please summarise meetings held with members of the public or public organisations during the reporting period. Please provide meeting minutes

Please summarise any information provided to members of the public and other stakeholders during the report period relating to environmental, social or safety issues. Please provide copies of disclosure notices and other correspondence with stakeholders.

Please summarise any on-going social or community development initiatives undertaken during the reporting period. Please provide details on spending during the reporting period and a copy of the updated Community Development Plan or similar documentation.

PS 2 - Labor and Working Conditions

Human Resources Management

| | | |
|---|---|-------------------------------------|
| Number of permanent employees for this project: | Number of temporary employees for this project: | Number of contractor staff on site: |
|---|---|-------------------------------------|

| | | |
|--|---------------|------------------------------|
| Have there been any changes to policies or terms and conditions concerning non-discrimination and equal opportunity during the reporting period? | Yes q No q | If yes, please give details: |
|--|---------------|------------------------------|

| | | |
|---|---------------|------------------------------|
| Have there been any changes to policies or terms and conditions concerning under age (18) employment during the reporting period? | Yes q No q | If yes, please give details: |
|---|---------------|------------------------------|

| | | |
|--|---------------|------------------------------|
| Have there been any changes to policies or terms and conditions concerning wages (wage level, normal, overtime etc.) or working hours during the reporting period? | Yes q No q | If yes, please give details: |
|--|---------------|------------------------------|

| | | |
|--|---------------|------------------------------|
| Have there been any changes to policies or terms and conditions concerning union | Yes q No q | If yes, please give details: |
|--|---------------|------------------------------|

| PS 2 - Labor and Working Conditions | | | |
|--|---------------|--|---------|
| recognition or negotiation during the reporting period? | | | |
| Have there been any changes to the health and safety policies during the reporting period? | Yes q No q | If yes, please give details: | |
| How many complaints or grievances did the project receive from workers during the reporting period? Summarise any issues raised in the complaints or grievances and explain how they were resolved. Please also provide copies of the grievance log and received grievances. | | | |
| Were there any collective redundancies during the reporting period? | Yes q No q | If yes, please describe including number of workers involved, reasons, consultation undertaken and how they were selected: | |
| Are there any planned redundancies or additions to the workforce in the next year? | Yes q No q | If yes, please provide redundancy plan, including number of workers involved and consultation process: | |
| Have there been any disputes related to labour and working conditions in the reporting period? | Yes q No q | If yes, please summarize below and provide copies of lodged disputes. | |
| Have there been any other significant labour issues or grievances raised during the reporting period (including court cases or complaints from trade unions or non-governmental organizations)? | Yes q No q | If yes, please describe: | |
| Health and Safety Data | | | |
| In addition to the data filled in below, please provide H&S incidence log, including follow up investigations and corrective action implementation. | | | |
| Fatalities ⁵⁸ : | Number: | Total Lost Time Accidents (including vehicular) ⁵⁹ : | Number: |
| Total number of lost workdays ⁶⁰ resulting from incidents: | Number: | Total man-hours worked this reporting period: | Number: |
| Incidence ⁶¹ during this reporting period: | Number: | Incidence during the previous reporting period: | Number: |
| Please summarise any health and safety training that has been provided for company personnel during the report period. Please provide the training records. | | | |

⁵⁸ If you have not already done so, please provide a separate report detailing the circumstances of each fatality.

⁵⁹ Incapacity to work for at least one full workday beyond the day on which the accident or illness occurred.

⁶⁰ Lost workdays are the number of workdays (consecutive or not) beyond the date of injury or onset of illness that the employee was away from work or limited to restricted work activity because of an occupational injury or illness.

⁶¹ Incidence = total lost workdays / total hours worked

PS 2 - Labor and Working Conditions

Please summarise any emergency prevention and response training that has been provided for company personnel during the report period. Please provide the training records.

PS 3 - Resource Efficiency and Pollution Prevention

| | | |
|--|------------------------|---|
| Have there been any spill cases or pollution of water, soil or air? | Yes q No q | If yes, please give details including emergency response. Please provide incidence log. |
| Has there been any event of fire, sediment loads, storm water, a flood or an earthquake? | Yes q No q | If yes, please give details and describe emergency response, if applicable: |
| Has there been any improvement in process efficiency, waste minimization or other schemes (energy savings, ISO certification)? | Yes q No q | If yes, please elaborate: |
| Has a Greenhouse Gas Assessment been conducted during the reporting period? | Yes q No q N/A q | If yes, please summarise the results: |

Environmental Monitoring Data⁶² - please attach data sheets as required

| Parameter ⁶³ | Value ⁶⁴ | Unit | Legislative limit and/ or IFC EHS guideline limit | Compliance Status ⁶⁵ | Comments ⁶⁶ |
|-----------------------------|---------------------|------|---|---------------------------------|------------------------|
| Waste Water | | | | | |
| Total waste water generated | | | | | |
| BOD | | | | | |
| COD | | | | | |
| Suspended Solids | | | | | |
| Phosphorus | | | | | |
| Nitrates | | | | | |
| Heavy metals | | | | | |
| [Other] | | | | | |
| Air Emissions | | | | | |
| SO ₂ | | | | | |
| NO _x | | | | | |

⁶² Not all parameters will necessarily apply. Please complete those rows that are most relevant to the industry sector. Additional parameters can be added as necessary.

⁶³ Not all parameters will necessarily apply. Please complete those rows that are most relevant to the industry sector. Additional parameters can be added as necessary.

⁶⁴ Please ensure that the units of measurement are clearly stated.

⁶⁵ Please report on compliance against the standards agreed with TDB for this project (typically local, EU, World Bank Group, IFC): compliant / slightly over the limit / unknown / exceeding the limit

⁶⁶ In addition to any other relevant comments, please indicate whether the measurements reported apply to all or only some process operations at the facility.

| PS 3 - Resource Efficiency and Pollution Prevention | | | | | |
|---|--|--|--|--|--|
| Particulates | | | | | |
| CO ₂ /CO ₂ equivalents | | | | | |
| CH ₄ | | | | | |
| N ₂ O | | | | | |
| HFCs | | | | | |
| PFCs | | | | | |
| SF ₆ | | | | | |
| [Other] | | | | | |
| Other Parameters | | | | | |
| Noise - at the project fence line | | | | | |
| Noise - at the closest sensitive receptor | | | | | |
| EMF (Electric and Magnetic Fields) – at the closest sensitive receptor | | | | | |
| [Other] | | | | | |
| Solid Waste | | | | | |
| Please provide details of the types and amounts of solid wastes generated by the project. Indicate where wastes are classified as hazardous. Indicate the final re-use, recycle or disposal method for each waste type. | | | | | |

| PS 4 - Community Health, Safety, and Security | | |
|--|---------------|--|
| Has there been any work or traffic at night? | Yes q No q | If yes, please give details: |
| Have there been any traffic incidents involving project vehicles outside of the site? | Yes q No q | If yes, please summarize and provide traffic incident log, |
| Please summarize any training or awareness raising activities that have been undertaken during the reporting period: | | |

PS 5 - Land Acquisition and Involuntary Resettlement

If Applicable, please summarize any progress made during the reporting period in the implementation of the Resettlement Action Plan (RAP) or Livelihood Restoration Framework (LRF). Please provide copy of updated RAF/LRF.

Have all the affected persons been fully compensated for their physical displacement and, if applicable, any economic losses resulting from the project?

Yes q
No q

If no, specify how many compensation payments are still outstanding (in terms of number and percentage of recipients and payment amounts) and state when these payment will be made:

Please provide a status update of the implementation of livelihood restoration activities as stipulated within the RAP.

Has there been any new land acquired during the reporting period for this project?

Yes q
No q

If yes, explain the extent of the land acquisition and any due diligence conducted.

Please provide copy of RAF/LRF, including compensation summary and details on compensation rates.

PS 6 - Biodiversity Conservation and Sustainable Management of Living Natural Resources

Has there been any vegetation clearing during the breeding season during this reporting period?

Yes q
No q

If yes, please give details:

Has site clearing been minimised in accordance with the Construction Site Management Plan?

Yes q
No q

If no, please explain and give reasons:

Is soil erosion or landslides visible within the project area?

Yes q
No q

If yes, please describe measures for mitigation:

Please summarize status of renaturation and re-planting of vegetation (plant status, progress in plant growth):

Has a bird monitoring been conducted for the transmission line component during the reporting period?

Yes q
No q
N/A q

If yes, please summarize the results:

PS 7 - Indigenous Peoples

Have there been any changes to the Indigenous Peoples Plan (IPP) or Framework (IPF)?

Yes q
No q
N/A q

If yes, please summarize and provide a copy of the updated IPP or IPF.

Please highlight which stakeholder engagement activities detailed above related specifically to indigenous peoples.

| PS 8 – Cultural Heritage | | |
|---|---|--|
| Has there been a chance find during the report period? | Yes <input type="checkbox"/> No <input type="checkbox"/> | If yes, please give details. Please provide reports/records and follow on actions. |
| Please summarise any training on chance find that has been provided for personnel during the report period: | | |

Environmental & Social Indicators for Monitoring of TDB’s Renewable Energies Projects

HYDROPOWER

To be filled out by the party responsible for Environmental, Social, Health and Safety Risks. Please return the filled-out questionnaire to TDB.

Please use as much space as you need, the field height should not be a limit. Attach any relevant documents to this questionnaire and indicate a cross reference.

| Details on the Borrower | | | |
|--|------|------------------|---------------|
| Institution Name: | | | |
| Completed by (Name): | | | |
| Name of Portfolio/Credit Line: | | | |
| Country: | | | |
| City/Location: | | | |
| Company authorized representative | | | |
| I certify that the data contained in this report completely and accurately represents the current status of knowledge of the investment. | | | |
| Signature: | | | |
| Title: | | City/Date: | |
| Contact details of responsible persons completing this questionnaire (executive board member, environment, social, health & safety, HR, legal), if assigned: | | | |
| Position | Name | Telephone Number | Email Address |
| | | | |
| | | | |

| Details on the Project | |
|------------------------|--|
| Borrower Name: | |
| Borrower Address: | |
| Country: | |
| City/Location: | |
| Project Name: | |
| Project Category: | |
| Contact Person: | |

| Details on the Project | | | |
|---|------|----------------------------|---------------|
| Contact details of responsible persons (executive board member, environment, social, health & safety, HR, legal), if assigned | | | |
| Position | Name | Telephone Number | Email Address |
| | | | |
| | | | |
| Project Status: <input type="checkbox"/> Design <input type="checkbox"/> Construction <input type="checkbox"/> Expansion <input type="checkbox"/> Commissioning <input type="checkbox"/> Operation <input type="checkbox"/> Closure <input type="checkbox"/> other; please specify: | | | |
| Current reporting period: | | Previous reporting period: | |
| When was the last site visit? Date: | | By whom: | |
| When is the next site visit planned? Date: | | | |

| General |
|---|
| Permits |
| List the permits that are needed and if they have been already granted or applied for: |
| Permit: Granted <input type="checkbox"/> Applied for <input type="checkbox"/> Permit Conditions: |
| Permit: Granted <input type="checkbox"/> Applied for <input type="checkbox"/> Permit Conditions: |
| Permit: Granted <input type="checkbox"/> Applied for <input type="checkbox"/> Permit Conditions: |
| Permit: Granted <input type="checkbox"/> Applied for <input type="checkbox"/> Permit Conditions: |
| Permit: Granted <input type="checkbox"/> Applied for <input type="checkbox"/> Permit Conditions: |

PS 1 - Assessment and Management of Environmental and Social Risks and Impacts

E&S Action and Monitoring / Management System

| | | |
|---|---------------|--|
| Do you have a documented Environmental and Social Management System (ESMS)? | Yes q No q | |
| Have there been any changes in the Management System or the Management Plans? | Yes q No q | If yes, please describe: |
| Have there been any updates to the Environmental and Social Policies adopted by your organization? | Yes q No q | If yes, please provide a copy of the updated policies, including date when it was issued and reasons for the same. |
| Please summarize any staff training concerning this project (including number of staff trained) during the reporting period. Please provide a copy of the training plans and training records. | | |
| Have there been any changes in the Environmental and Social Action Plan (ESAP)? | Yes q No q | If yes, please provide ESAP change log and copy of new ESAP. |
| Have there been any accidents or environmental or social incidents (during this reporting period) that have caused damage, brought about injuries or fatalities, affected project labour or local communities, affected cultural property, or created liabilities for the company? Please provide incident logs. | Yes q No q | If yes, please describe, including details of actions to repair and prevent reoccurrence: |
| Is the project materially compliant with all applicable environmental and social laws and regulations? | Yes q No q | If no, please provide details of any material non-compliances: |
| How many inspections did you receive from the local environmental authorities during the reporting period? | Number: | Please provide details of these visits: |
| How many inspections did you receive from the local health and safety authorities during the reporting period? | Number: | Please provide details of these visits: |
| How many inspections did you receive from the local labour authorities during the reporting period? | Number: | Please provide details of these visits: |
| Have these visits resulted in any penalties, fines and/or corrective action plans? | Yes q No q | If yes, please describe: |
| Have any operations been reduced, temporarily suspended or closed down due to environmental, health and safety or labour reasons? | Yes q No q | If yes, please describe: |

PS 1 - Assessment and Management of Environmental and Social Risks and Impacts

Please describe any EHS or labour initiatives undertaken during the reporting period:

Stakeholder Engagement

Please provide the name and contact details for your external relations or community engagement manager:

| | | |
|---|---------------|---|
| Have there been any changes to the Stakeholder Engagement Plan (SEP)? | Yes q No q | If yes, please provide SEP change log and copy of new SEP. Please also provide updated stakeholder list, if applicable. |
|---|---------------|---|

How many complaints or grievances did the project receive from members of the public or civil society organisations during the reporting period? Please split by stakeholder group. Summarise any issues raised in the complaints or grievances and explain how they were resolved. Please also provide copies of the grievance log and received grievances.

Please summarise meetings held with members of the public or public organisations during the reporting period. Please provide meeting minutes

Please summarise any information provided to members of the public and other stakeholders during the report period relating to environmental, social or safety issues. Please provide copies of disclosure notices and other correspondence with stakeholders.

Please summarise any on-going social or community development initiatives undertaken during the reporting period. Please provide details on spending during the reporting period and a copy of the updated Community Development Plan or similar documentation.

PS 2 - Labor and Working Conditions

Human Resources Management

| | | |
|---|---|-------------------------------------|
| Number of permanent employees for this project: | Number of temporary employees for this project: | Number of contractor staff on site: |
|---|---|-------------------------------------|

| | | |
|--|---------------|------------------------------|
| Have there been any changes to policies or terms and conditions concerning non-discrimination and equal opportunity during the reporting period? | Yes q No q | If yes, please give details: |
|--|---------------|------------------------------|

| | | |
|---|---------------|------------------------------|
| Have there been any changes to policies or terms and conditions concerning under age (18) employment during the reporting period? | Yes q No q | If yes, please give details: |
|---|---------------|------------------------------|

| | | |
|--|---------------|------------------------------|
| Have there been any changes to policies or terms and conditions concerning wages (wage level, normal, overtime etc.) or working hours during the reporting period? | Yes q No q | If yes, please give details: |
|--|---------------|------------------------------|

| PS 2 - Labor and Working Conditions | | | |
|--|---------------|--|---------|
| Have there been any changes to policies or terms and conditions concerning union recognition or negotiation during the reporting period? | Yes q No q | If yes, please give details: | |
| Have there been any changes to the health and safety policies during the reporting period? | Yes q No q | If yes, please give details: | |
| How many complaints or grievances did the project receive from workers during the reporting period? Summarise any issues raised in the complaints or grievances and explain how they were resolved. Please also provide copies of the grievance log and received grievances. | | | |
| Were there any collective redundancies during the reporting period? | Yes q No q | If yes, please describe including number of workers involved, reasons, consultation undertaken and how they were selected: | |
| Are there any planned redundancies or additions to the workforce in the next year? | Yes q No q | If yes, please provide redundancy plan, including number of workers involved and consultation process: | |
| Have there been any disputes related to labour and working conditions in the reporting period? | Yes q No q | If yes, please summarize below and provide copies of lodged disputes. | |
| Have there been any other significant labour issues or grievances raised during the reporting period (including court cases or complaints from trade unions or non-governmental organizations)? | Yes q No q | If yes, please describe: | |
| Health and Safety Data | | | |
| In addition to the data filled in below, please provide H&S incidence log, including follow up investigations and corrective action implementation. | | | |
| Fatalities ⁶⁷ : | Number: | Total Lost Time Accidents (including vehicular) ⁶⁸ : | Number: |
| Total number of lost workdays ⁶⁹ resulting from incidents: | Number: | Total man-hours worked this reporting period: | Number: |
| Incidence ⁷⁰ during this reporting period: | Number: | Incidence during the previous reporting period: | Number: |

⁶⁷ If you have not already done so, please provide a separate report detailing the circumstances of each fatality.

⁶⁸ Incapacity to work for at least one full workday beyond the day on which the accident or illness occurred.

⁶⁹ Lost workdays are the number of workdays (consecutive or not) beyond the date of injury or onset of illness that the employee was away from work or limited to restricted work activity because of an occupational injury or illness.

⁷⁰ Incidence = total lost workdays / total hours worked

PS 2 - Labor and Working Conditions

Please summarise any health and safety training that has been provided for company personnel during the report period. Please provide the training records.

Please summarise any emergency prevention and response training that has been provided for company personnel during the report period. Please provide the training records.

PS 3 - Resource Efficiency and Pollution Prevention

| | | |
|--|------------------------|---|
| Have there been any spill cases or pollution of water, soil or air? | Yes q No q | If yes, please give details including emergency response. Please provide incidence log. |
| Has there been any event of fire, sediment loads, storm water, a flood or an earthquake? | Yes q No q | If yes, please give details and describe emergency response, if applicable: |
| Has there been any improvement in process efficiency, waste minimization or other schemes (energy savings, ISO certification)? | Yes q No q | If yes, please elaborate: |
| Has a Greenhouse Gas Assessment been conducted during the reporting period? | Yes q No q N/A q | If yes, please summarise the results: |

Environmental Monitoring Data⁷¹ - please attach data sheets as required

| Parameter ⁷² | Value ⁷³ | Unit | Legislative limit and/ or IFC EHS guideline limit | Compliance Status ⁷⁴ | Comments ⁷⁵ |
|--|---------------------|------|---|---------------------------------|------------------------|
| Waste Water | | | | | |
| Total waste water generated | | | | | |
| [Other] | | | | | |
| Other Parameters | | | | | |
| Noise - at the project fence line | | | | | |
| Noise - at the closest sensitive receptor | | | | | |
| EMF (Electric and Magnetic Fields) - at the closest sensitive receptor | | | | | |

⁷¹ Not all parameters will necessarily apply. Please complete those rows that are most relevant to the industry sector. Additional parameters can be added as necessary.

⁷² Not all parameters will necessarily apply. Please complete those rows that are most relevant to the industry sector. Additional parameters can be added as necessary.

⁷³ Please ensure that the units of measurement are clearly stated.

⁷⁴ Please report on compliance against the standards agreed with TDB for this project (typically local, EU, World Bank Group, IFC): compliant / slightly over the limit / unknown / exceeding the limit

⁷⁵ In addition to any other relevant comments, please indicate whether the measurements reported apply to all or only some process operations at the facility.

PS 3 - Resource Efficiency and Pollution Prevention

| | | | | | |
|---|--|--|--|--|--|
| [Other] | | | | | |
| Solid Waste | | | | | |
| Please provide details of the types and amounts of solid wastes generated by the project. Indicate where wastes are classified as hazardous. Indicate the final re-use, recycle or disposal method for each waste type. | | | | | |

PS 4 - Community Health, Safety, and Security

| | | |
|--|---------------|--|
| Has there been any work or traffic at night? | Yes q No q | If yes, please give details: |
| Have there been any traffic incidents involving project vehicles outside of the site? | Yes q No q | If yes, please summarize and provide traffic incident log, |
| Please summarize any training or awareness raising activities that have been undertaken during the reporting period: | | |

PS 5 - Land Acquisition and Involuntary Resettlement

| | | |
|--|---------------|--|
| <i>If Applicable</i> , please summarize any progress made during the reporting period in the implementation of the Resettlement Action Plan (RAP) or Livelihood Restoration Framework (LRF). Please provide copy of updated RAF/LRF. | | |
| Have all the affected persons been fully compensated for their physical displacement and, if applicable, any economic losses resulting from the project? | Yes q No q | If no, specify how many compensation payments are still outstanding (in terms of number and percentage of recipients and payment amounts) and state when these payment will be made: |
| Please provide a status update of the implementation of livelihood restoration activities as stipulated within the RAP. | | |
| Has there been any new land acquired during the reporting period for this project? | Yes q No q | If yes, explain the extent of the land acquisition and any due diligence conducted. Please provide copy of RAF/LRF, including compensation summary and details on compensation rates. |

| PS 6 - Biodiversity Conservation and Sustainable Management of Living Natural Resources | | |
|---|------------------------|--|
| Has there been any vegetation clearing during the breeding season during this reporting period? | Yes q No q | If yes, please give details: |
| Please summarise observations on fish communities and acceptance of the fish passage during the report period: | | |
| Has site clearing been minimised in accordance with the Construction Site Management Plan? | Yes q No q | If no, please explain and give reasons: |
| Is soil erosion or landslides visible within the project area? | Yes q No q | If yes, please describe measures for mitigation: |
| Please summarize status of renaturation and re-planting of vegetation (plant status, progress in plant growth): | | |
| Has a bird monitoring been conducted for the transmission line component during the reporting period? | Yes q No q N/A q | If yes, please summarize the results: |

| PS 7 - Indigenous Peoples | | |
|---|------------------------|--|
| Have there been any changes to the Indigenous Peoples Plan (IPP) or Framework (IPF)? | Yes q No q N/A q | If yes, please summarize and provide a copy of the updated IPP or IPF. |
| Please highlight which stakeholder engagement activities detailed above related specifically to indigenous peoples. | | |

| PS 8 – Cultural Heritage | | |
|---|---------------|---|
| Has there been a chance to find during the report period? | Yes q No q | If yes, please give details. Please provide reports/records and follow actions. |
| Please summarize any training on chance find that has been provided for personnel during the report period: | | |

Environmental & Social Indicators for Monitoring of TDB’s Renewable Energies Projects

SOLAR

To be filled out by the party responsible for Environmental, Social, Health and Safety Risks. Please return the filled-out questionnaire to TDB.

Please use as much space as you need, the field height should not be a limit.

Attach any relevant documents to this questionnaire and indicate a cross reference.

| Details on the Borrower | | | |
|---|------|------------------|---------------|
| Institution Name: | | | |
| Completed by (Name): | | | |
| Name of Portfolio/Credit Line: | | | |
| Country: | | | |
| City/Location: | | | |
| Company authorized representative I certify that the data contained in this report completely and accurately represents the current status of knowledge of the investment. Signature: | | | |
| Title: | | City/Date: | |
| Contact details of responsible persons completing this questionnaire (executive board member, environment, social, health & safety, HR, legal), if assigned: | | | |
| Position | Name | Telephone Number | Email Address |
| | | | |
| | | | |

| Details on the Project | | | |
|---|------|----------------------------|---------------|
| Borrower Name: | | | |
| Borrower Address: | | | |
| Country: | | | |
| City/Location: | | | |
| Project Name: | | | |
| Project Category: | | | |
| Contact Person: | | | |
| Contact details of responsible persons (executive board member, environment, social, health & safety, HR, legal), if assigned | | | |
| Position | Name | Telephone Number | Email Address |
| | | | |
| | | | |
| Project Status: <input type="checkbox"/> Design <input type="checkbox"/> Construction <input type="checkbox"/> Expansion <input type="checkbox"/> Commissioning <input type="checkbox"/> Operation <input type="checkbox"/> Closure <input type="checkbox"/> other; please specify: | | | |
| Current reporting period: | | Previous reporting period: | |
| When was the last site visit? Date: | | By whom: | |
| When is the next site visit planned? Date: | | | |

| General | |
|--|---------|
| Permits | |
| List the permits that are needed and if they have been already granted or applied for: | |
| Permit: <input type="checkbox"/> Applied for <input type="checkbox"/> Permit Conditions: | Granted |
| Permit: <input type="checkbox"/> Applied for <input type="checkbox"/> Permit Conditions: | Granted |
| Permit: <input type="checkbox"/> Applied for <input type="checkbox"/> Permit Conditions: | Granted |
| Permit: <input type="checkbox"/> Applied for <input type="checkbox"/> Permit Conditions: | Granted |
| Permit: <input type="checkbox"/> Applied for <input type="checkbox"/> Permit Conditions: | Granted |

| PS 1 - Assessment and Management of Environmental and Social Risks and Impacts | | |
|--|---------------|--|
| E&S Action and Monitoring / Management System | | |
| Do you have a documented Environmental and Social Management System (ESMS)? | Yes q No q | |
| Have there been any changes in the Management System or the Management Plans? | Yes q No q | If yes, please describe: |
| Have there been any updates to the Environmental and Social Policies adopted by your organization? | Yes q No q | If yes, please provide a copy of the updated policies, including date when it was issued and reasons for the same. |
| Please summarize any staff training concerning this project (including number of staff trained) during the reporting period. Please provide a copy of the training plans and training records. | | |
| Have there been any changes in the Environmental and Social Action Plan (ESAP)? | Yes q No q | If yes, please provide ESAP change log and copy of new ESAP. |

PS 1 - Assessment and Management of Environmental and Social Risks and Impacts

| | | |
|---|---------------|---|
| Have there been any accidents or environmental or social incidents (during this reporting period) that have caused damage, brought about injuries or fatalities, affected project labour or local communities, affected cultural property, or created liabilities for the company? Please provide incident logs. | Yes q No q | If yes, please describe, including details of actions to repair and prevent reoccurrence: |
| Is the project materially compliant with all applicable environmental and social laws and regulations? | Yes q No q | If no, please provide details of any material non-compliances: |
| How many inspections did you receive from the local environmental authorities during the reporting period? | Number: | Please provide details of these visits: |
| How many inspections did you receive from the local health and safety authorities during the reporting period? | Number: | Please provide details of these visits: |
| How many inspections did you receive from the local labour authorities during the reporting period? | Number: | Please provide details of these visits: |
| Have these visits resulted in any penalties, fines and/or corrective action plans? | Yes q No q | If yes, please describe: |
| Have any operations been reduced, temporarily suspended or closed down due to environmental, health and safety or labour reasons? | Yes q No q | If yes, please describe: |

Please describe any EHS or labour initiatives undertaken during the reporting period:

Stakeholder Engagement

Please provide the name and contact details for your external relations or community engagement manager:

| | | |
|---|---------------|---|
| Have there been any changes to the Stakeholder Engagement Plan (SEP)? | Yes q No q | If yes, please provide SEP change log and copy of new SEP. Please also provide updated stakeholder list, if applicable. |
|---|---------------|---|

How many complaints or grievances did the project receive from members of the public or civil society organisations during the reporting period? Please split by stakeholder group. Summarise any issues raised in the complaints or grievances and explain how they were resolved. Please also provide copies of the grievance log and received grievances.

PS 1 - Assessment and Management of Environmental and Social Risks and Impacts

Please summarise meetings held with members of the public or public organisations during the reporting period. Please provide meeting minutes

Please summarise any information provided to members of the public and other stakeholders during the report period relating to environmental, social or safety issues. Please provide copies of disclosure notices and other correspondence with stakeholders.

Please summarise any on-going social or community development initiatives undertaken during the reporting period. Please provide details on spending during the reporting period and a copy of the updated Community Development Plan or similar documentation.

PS 2 - Labor and Working Conditions

Human Resources Management

| | | |
|---|---|-------------------------------------|
| Number of permanent employees for this project: | Number of temporary employees for this project: | Number of contractor staff on site: |
|---|---|-------------------------------------|

| | | |
|--|---------------|------------------------------|
| Have there been any changes to policies or terms and conditions concerning non-discrimination and equal opportunity during the reporting period? | Yes q No q | If yes, please give details: |
|--|---------------|------------------------------|

| | | |
|--|---------------|------------------------------|
| Have there been any changes to policies or terms and conditions concerning underage (18) employment during the reporting period? | Yes q No q | If yes, please give details: |
|--|---------------|------------------------------|

| | | |
|--|---------------|------------------------------|
| Have there been any changes to policies or terms and conditions concerning wages (wage level, normal, overtime etc.) or working hours during the reporting period? | Yes q No q | If yes, please give details: |
|--|---------------|------------------------------|

| | | |
|--|---------------|------------------------------|
| Have there been any changes to policies or terms and conditions concerning union recognition or negotiation during the reporting period? | Yes q No q | If yes, please give details: |
|--|---------------|------------------------------|

| | | |
|--|---------------|------------------------------|
| Have there been any changes to the health and safety policies during the reporting period? | Yes q No q | If yes, please give details: |
|--|---------------|------------------------------|

How many complaints or grievances did the project receive from workers during the reporting period? Summarise any issues raised in the complaints or grievances and explain how they were resolved. Please also provide copies of the grievance log and received grievances.

| | | |
|---|---------------|--|
| Were there any collective redundancies during the reporting period? | Yes q No q | If yes, please describe including number of workers involved, reasons, consultation undertaken and how they were selected: |
|---|---------------|--|

| PS 2 - Labor and Working Conditions | | | |
|---|---------------|--|---------|
| Are there any planned redundancies or additions to the workforce in the next year? | Yes q No q | If yes, please provide redundancy plan, including number of workers involved and consultation process: | |
| Have there been any disputes related to labour and working conditions in the reporting period? | Yes q No q | If yes, please summarize below and provide copies of lodged disputes. | |
| Have there been any other significant labour issues or grievances raised during the reporting period (including court cases or complaints from trade unions or non-governmental organizations)? | Yes q No q | If yes, please describe: | |
| Health and Safety Data | | | |
| In addition to the data filled in below, please provide H&S incidence log, including follow up investigations and corrective action implementation. | | | |
| Fatalities ⁷⁶ : | Number: | Total Lost Time Accidents (including vehicular) ⁷⁷ : | Number: |
| Total number of lost workdays ⁷⁸ resulting from incidents: | Number: | Total man-hours worked this reporting period: | Number: |
| Incidence ⁷⁹ during this reporting period: | Number: | Incidence during the previous reporting period: | Number: |
| Please summarise any health and safety training that has been provided for company personnel during the report period. Please provide the training records. | | | |
| Please summarise any emergency prevention and response training that has been provided for company personnel during the report period. Please provide the training records. | | | |

⁷⁶ If you have not already done so, please provide a separate report detailing the circumstances of each fatality.

⁷⁷ Incapacity to work for at least one full workday beyond the day on which the accident or illness occurred.

⁷⁸ Lost workdays are the number of workdays (consecutive or not) beyond the date of injury or onset of illness that the employee was away from work or limited to restricted work activity because of an occupational injury or illness.

⁷⁹ Incidence = total lost workdays / total hours worked

| PS 3 - Resource Efficiency and Pollution Prevention | | | | | |
|---|------------------------|---|---|---------------------------------|------------------------|
| Have there been any spill cases or pollution of water, soil or air? | Yes q No q | If yes, please give details including emergency response. Please provide incidence log. | | | |
| Has there been any event of fire, sediment loads, storm water, a flood or an earthquake? | Yes q No q | If yes, please give details and describe emergency response, if applicable: | | | |
| Has there been any improvement in process efficiency, waste minimization or other schemes (energy savings, ISO certification)? | Yes q No q | If yes, please elaborate: | | | |
| Has a Greenhouse Gas Assessment been conducted during the reporting period? | Yes q No q N/A q | If yes, please summarise the results: | | | |
| Environmental Monitoring Data ⁸⁰ - please attach data sheets as required | | | | | |
| Parameter ⁸¹ | Value ⁸² | Unit | Legislative limit and/ or IFC EHS guideline limit | Compliance Status ⁸³ | Comments ⁸⁴ |
| Noise / EMF | | | | | |
| Noise - at the project fence line | | | | | |
| Noise - at the closest sensitive receptor | | | | | |
| EMF (Electric and Magnetic Fields) – at the closest sensitive receptor | | | | | |
| [Other] | | | | | |
| Solid Waste | | | | | |
| Please provide details of the types and amounts of solid wastes generated by the project. Indicate where wastes are classified as hazardous. Indicate the final re-use, recycle or disposal method for each waste type. | | | | | |

⁸⁰ Not all parameters will necessarily apply. Please complete those rows that are most relevant to the industry sector. Additional parameters can be added as necessary.

⁸¹ Not all parameters will necessarily apply. Please complete those rows that are most relevant to the industry sector. Additional parameters can be added as necessary.

⁸² Please ensure that the units of measurement are clearly stated.

⁸³ Please report on compliance against the standards agreed with TDB for this project (typically local, EU, World Bank Group, IFC): compliant / slightly over the limit / unknown / exceeding the limit

⁸⁴ In addition to any other relevant comments, please indicate whether the measurements reported apply to all or only some process operations at the facility.

| PS 4 - Community Health, Safety, and Security | | |
|--|---------------|--|
| Has there been any work or traffic at night? | Yes q No q | If yes, please give details: |
| Have there been any traffic incidents involving project vehicles outside of the site? | Yes q No q | If yes, please summarize and provide traffic incident log, |
| Please summarize any training or awareness raising activities that have been undertaken during the reporting period: | | |
| PS 5 - Land Acquisition and Involuntary Resettlement | | |
| <i>If Applicable</i> , please summarize any progress made during the reporting period in the implementation of the Resettlement Action Plan (RAP) or Livelihood Restoration Framework (LRF). Please provide copy of updated RAF/LRF. | | |
| Have all the affected persons been fully compensated for their physical displacement and, if applicable, any economic losses resulting from the project? | Yes q No q | If no, specify how many compensation payments are still outstanding (in terms of number and percentage of recipients and payment amounts) and state when this payment will be made: |
| Please provide a status update of the implementation of livelihood restoration activities as stipulated within the RAP. | | |
| Has there been any new land acquired during the reporting period for this project? | Yes q No q | If yes, explain the extent of the land acquisition and any due diligence conducted. Please provide copy of RAF/LRF, including compensation summary and details on compensation rates. |
| PS 6 - Biodiversity Conservation and Sustainable Management of Living Natural Resources | | |
| Has there been any vegetation clearing during the breeding season during this reporting period? | Yes q No q | If yes, please give details: |
| Has site clearing been minimised in accordance with the Construction Site Management Plan? | Yes q No q | If no, please explain and give reasons: |
| Is soil erosion or landslides visible within the project area? | Yes q No q | If yes, please describe measures for mitigation: |
| Please summarize status of renaturation and re-planting of vegetation (plant status, progress in plant growth): | | |
| Has a bird monitoring been conducted for the transmission line | Yes q No q | If yes, please summarize the results: |

| PS 4 - Community Health, Safety, and Security | | |
|---|------------------------|--|
| component during the reporting period? | N/A q | |
| PS 7 - Indigenous Peoples | | |
| Have there been any changes to the Indigenous Peoples Plan (IPP) or Framework (IPF)? | Yes q No q N/A q | If yes, please summarize and provide a copy of the updated IPP or IPF. |
| Please highlight which stakeholder engagement activities detailed above related specifically to indigenous peoples. | | |
| PS 8 – Cultural Heritage | | |
| Has there been a chance find during the report period? | Yes q No q | If yes, please give details. Please provide reports/records and follow on actions. |
| Please summarise any training on chance find that has been provided for personnel during the report period: | | |
