



Environmental and Social Management Framework

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Document control record

Summary of changes made to this Environmental and Social Management Framework is found below:

Plan/Section:	Version:	Changes made:	Date of update:	Approved by:	Date
	1	-		Camco Board of Directors	23 October 2024
	2	Appendix P added, Figure 2 updated. None material changes.	8 November 2024	Camco Managing Director	15 November 2024

List of Acronyms

BMP	Biodiversity Management Plan
CHSSP	Community Health, Safety and Security Plan
CFP	Chance Find Procedure
CIA	Cumulative Impact Assessments
CITES	Convention on International Trade in Endangered Species of Wild Fauna and Flora
EA	Environmental Audit
EIA	Environmental Impact Assessment
EIS	Environmental Impact Statement
E&S	Environmental and Social
ESAP	Environmental and Social Action Plan
ESIA	Environmental and Social Impact Assessment
ESS	Environmental and Social Standard
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
ESMS	Environmental and Social Management System
EPRP	Emergency Preparedness and Response Plan
FPIC	Free, Prior and Informed Consent
GBVH	Gender-based Violence and Harassment
GCF	Green Climate Fund
GHG	Greenhouse Gas
GRM	Grievance Redress Mechanism
HSE	Health Safety and Environment
IFC	International Finance Corporation
IFC PS	International Finance Corporation Performance Standard
ILO	International Labour Organization
ISO	International Organisation for Standardisation
IUCN	International Union for Conservation of Nature
IP	Indigenous People
IPP	Indigenous People Policy
LAP	Land Acquisition Plan
LDC	Least Developed Countries
LMP	Labour Management Plan
LRP	Livelihood Restoration Plan
OHS	Occupational Health and Safety
PPE	Personal Protective Equipment
PSEAH	Prevention of Sexual Exploitation, Abuse and Harassment Policy
RAP	Resettlement Action Plan

REPP 2	Renewable Energy Performance Platform 2
SEAH	Sexual Exploitation, Abuse and Harassment
SEP	Stakeholder Engagement Plan
SHS	Solar Home Systems
SCPP	Supply Chain Procurement Plan
UN	United Nations
UNFCC	United Nations Framework Convention on Climate Change
VECs	Valued Environmental and Social Components

1 Management System

1.1 Executive Summary

Inherent to the success of Camco is the effective management of environmental and social (E&S) risks, and the realisation of sustainable community development and responsible impact.

Camco engages in responsible investment that incorporates environmental, social and governance (ESG) factors into investment decisions to better manage risk and generate sustainable, long-term returns for all investors.

This document outlines and provides the requirements, processes and arrangements required to comply with Camco's Environmental and Social Safeguards Policy (E&S Policy), as well as uphold the commitments set out in the Policy, while delivering positive and lasting impacts that benefit local communities. The framework describes the E&S management system (ESMS) implemented by Camco as the Fund Manager to manage impacts and risks associated with the investments under its management, as well as describe how the arrangements are embedded into each fund's investment cycle. The framework ensures the investee comprehensively addresses key areas of E&S risk management.

A significant focus here is on (a) ensuring that investees apply the appropriate policies and processes themselves to ensure E&S safeguarding and (b) that we maintain appropriate levels of risk management. Camco will only invest in projects that are categorised as medium or low risk (IFC risk categories B+, B or C respectively). Category A projects are excluded.

The following chapters present each of the ESMS components:

- Chapter 1 presents an overview of Camco's E&S management structure, investment framework and legal framework in host countries, as well as key E&S risks.
- Chapters 2 to 13 present key considerations to be included by the investee in developing each individual management plan in alignment with Camco's funding principles and standards.
- Appendices A and B present supplementary and overarching Camco policies.
- Appendices C to O present key documentation in comprehensively analysing the E&S risk associated with each potential investment against each International Finance Corporation Performance Standard (IFC PS).

1.2 Purpose of this Document

The purpose of this document is to outline the Environmental and Social Management Framework (ESMF or Framework) for all Camco-managed funds and provide the methodology by which the impacts and risks of funded projects will be measured and managed. The Framework describes the requirements, processes and arrangements required to comply with the Camco Environmental and Social Policy and Procedures (E&S Policy), which is provided in Appendix A. The E&S Policy therefore forms the basis of this Framework.

This document covers the Framework's objectives and the standards and principles applied, as well as the processes and related responsibilities for compliance with the Framework. Matters relating to corporate governance, including anti-bribery and corruption, are described separately in Camco's MiFID Investment Firm Policies and Procedures and Camco's Know Your Client (KYC) Policy and are not included in the scope of this Framework.

1.3 Objectives

This Framework seeks to identify environmental and social (E&S) considerations early in the decision-making process to:

- Avoid, and where avoidance is impossible, mitigate adverse impacts to people and the environment within a reasonable time period, and
- Give due consideration to vulnerable populations, groups and individuals, described as those who are at a higher risk of being unable to anticipate, cope with, resist and/or recover from project-related risks and/or adverse impacts. As per UN guidance, the following people are considered as vulnerable: 1) women; 2) children; 3) refugees; 4) internally displaced persons; 5) stateless persons; 6) national minorities; 7) Indigenous peoples 8) migrant workers; 9) disabled persons; 10) elderly persons; 11) HIV-positive persons, AIDS victims and victims of other contractable threatening diseases; 12) Roma/Sinti; and 13) any individual based on ethnicity, beliefs, identify, gender or sexual orientation. A person's vulnerability should be defined, within reason, taking into consideration the project context, host country regulations and its specific circumstances.

1.4 Standards

In line with Camco's E&S Policy, all activities financed by any investment managed by Camco shall meet the following standards:

- Host country environmental and labour legislation
- International Finance Corporation (IFC)'s Environmental and Social Performance Standards
- Sustainability principles advocated by the United Nations (UN) Global Compact
- UN Guiding Principles on Business and Human Rights
- Green Climate Fund (GCF)'s Revised Environmental and Social Policy
- GCF Indigenous Peoples Policy
- International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work
- ILO Basic Terms and Conditions of Employment
- International Bill of Human Rights
- UN Declaration on the Rights of Indigenous Peoples, and where relevant
- Sustainable Finance Directive Regulation (EU) (2019/2088).
- At the Fund level, additional standards or restrictions may apply. These are identified in the Fund Investment Policy or equivalent.

1.5 Principles

- **Sustainability:** This Framework and the Environmental Social Management System (ESMS) that all investees are required to establish will provide an opportunity to incorporate E&S considerations to ensure the sustainability of a project's design.
- **Do No Harm:** Any activity financed by a Camco-managed fund must not cause harm to any of the following objectives: climate change mitigation, climate change adaptation, sustainable use and protection of water and marine resources, transition to a circular economy, pollution prevention and control, and protection and restoration of biodiversity and ecosystems. This ESMF works to ensure that E&S risks arising from project development and implementation are sufficiently assessed and the necessary policies and procedures are in place to mitigate and manage potential negative effects on the social fabric and the environment.
- **The IFC's mitigation hierarchy is adopted:** As a first step, fund investees should aim to anticipate and avoid any negative impacts to workers, affected communities and the environment. Where avoidance is not possible, steps should be taken to minimise or mitigate these impacts. Where residual impacts remain, investees should compensate for or/offset them.
- **Fit for purpose:** Fund investees will adopt a risk-based approach to ensure that E&S requirements and processes are commensurate with the level of risk and nature of their projects.

- **Gender equality:** A gender-sensitive approach will be adopted as part of identifying social risks and impacts, which will link the corresponding gender risk management measures to activity-level gender action plans submitted by investees.
- All investees must design and implement projects and programmes in a manner that will **promote, protect and fulfil universal human rights** as recognised by the UN, as well as respect workers' rights in line with the ILO Declaration on Fundamental Principles and Rights at Work, which prohibits forced, compulsory and child labour, including within the investee's supply chain.
- The design and implementation of activities will be guided by the rights and responsibilities set forth in the UN Declaration on the **Rights of Indigenous Peoples** and the **GCF Indigenous Peoples Policy**.
- All funds managed by Camco have **zero tolerance of Sexual Exploitation, Sexual Abuse and Sexual Harassment (SEAH)**. To ensure this, all fund investees will need to implement zero-tolerance SEAH policies and ensure required training and an inclusive and a survivor-centered grievance mechanism.

1.6 Policy, Legal and Institutional Framework

The policy, legal, regulatory and institutional framework for environmental management, protection and assessment applies to all investments made in Camco-managed fund target countries. These investments must comply with the following sectors and associated permits and licenses in the host country:

- Environmental laws and regulations pertaining to environmental impact management.
- Land regulations pertaining to granted ownership, land acquisition, expropriation, land donation, inheritance.
- Forestry and wildlife regulations pertaining to conservatory or protection restrictions, deforestation or reforestation obligations and resource management restrictions.
- Water regulations stipulating natural resource management, community consumption requirements and abstraction limitations.
- Labour codes, employment acts and regulations pertaining to workplace conditions and management.
- Health and safety regulations pertaining to health and safety practices as well as support measures provisioned by the government.
- Waste management regulations, allowances and capacity for safe disposal and recycling resources provided by the government.
- Institutional structures and agencies governing the approvals of permits or licences and auditing practices used to verify E&S risks associated with the project.
- Relevant national departments and government authorities mandated with overall strategic direction for cultivating investment growth in the country associated with key E&S risks.
- International agreements and conventions signed up to by the host country and pertaining to international commitments to conservation of specific E&S risks.

International best practice standards, as stipulated in Section 1.5, will be applied across the various relevant sectors to ensure compliance regardless of whether the host country has adopted the standards or not. This is particularly true of IFC Performance Standards and the World Bank Group's general and sector-specific EHS Guidelines.

The above areas should be addressed by the investee companies, completed by an independent third-party service provider in developing the Environmental and Social Impact Assessment (ESIA), providing reference to how the project triggers each host country regulation or law and the necessary licenses and permits applicable. As a mandatory requirement for investees, an ESHS permit and licence tracker will need to be established. Refer to the Appendix J for the template. Refer to fund specific policy, legal and institutional frameworks outlined for target countries in Appendix O.

1.7 Organisational Capacity and Competency

Camco's approach to governance is grounded in our commitment to integrity, accountability and transparency and in our commitment to ethical conduct. By upholding our principles, we strive to maintain the highest levels of governance excellence, driving sustainable growth and value creation for all our stakeholders.

Camco is responsible for the implementation and operation of the E&S Policy and this Framework and for sufficiently assessing and putting in controls for individual investment's E&S risks, as well as signing off on due diligence, E&S risk identification and the approval of disbursements. Drawing from this, and supported by investment performance and evaluations, Camco will inform and update this ESMF from time to time to align with renewed E&S standards and international best practice. The below describes the overarching framework of responsibilities to effectively manage all E&S risks. Figure 1 provides an illustrative representation of Camco's ESG hierarchy.

Camco Board

The Camco Board has the mandate of setting the overarching impact strategy in adapting and improving on Camco's approach to effectively manage arising E&S risks. The Camco Board reviews the strategy's implementation, including climate and impact-related opportunities, environmental, social and governance (ESG), and the impact performance of Camco's contractual obligations. The Board has the following standing subcommittees:

- The **Sustainable Business Committee** (SBC) monitors the social, ethical and sustainability performance of Camco and its subsidiaries and funds under management. The SBC also ensures disclosure is aligned with UN Global Compact and the Task Force on Climate-Related Financial Disclosures (TCFD) and reviews Camco's impact reporting.
- The **Audit and Risk Committee** oversees and reports to the Board on all of Camco's audit and risk matters, including climate risk.
- The **Culture, People and Remuneration Committee** reviews and makes recommendations in relation to Camco's culture and personnel management.

Camco Investment Committee

The Camco Investment Committee (IC) has the responsibility of evaluating and ultimately deciding on investment proposals, ensuring compliance with each of Camco's policies and managed funds' investment strategies, and provides supervisory guidance on an implementable approach. The IC is also responsible for ensuring all avenues of risk have been effectively assessed prior to any investment decision and overseeing the monitoring of the performance of projects, investments and the portfolio as a whole. All investment papers are signed off by function heads, including the Head of Impact, the Head of Risk and Compliance and the General Counsel, before submission to the IC.

Market Development Committee

The Market Development Committee (MDC) will be responsible for evaluating and ultimately deciding on technical assistance proposals, and the approval of service providers. A member of the Camco Investment Committee will stand on the MDC, to ensure coordination and cohesion between the fund and the technical assistance facility. In addition, MDC must have a member with experience in ESG risk management.

Impact Team

The impact team oversees and implements this Framework across the entire investment portfolio. The commitments and responsibilities in upholding the above ESG standards and principles at the fund and investment levels is the impact team's mandate. For potential funding proposals, the impact team assessed and analyses the E&S documentation put forward by the investee to ensure the proposed project meets with the initial E&S screening

criteria, is eligible for funding according to the IFC PS risk categorisation and the GCF Revised Environmental and Social Policy, as well as conforming to IFC PS. The impact team works with investees to ensure project-level ESIA and ESMSs are done to the necessary standard and sufficiently cover all risks and mitigation measures. Furthermore, the impact team is in regular engagement with investees to ensure consistent alignment in the implementation of their ESMS during construction and operational phases, as well as to ensure monitoring and reporting mechanisms are active and consistent in the relevant fund's way of reporting.

Appendix P details Camco's organisational capacity and competencies. Figure 2, presented in section 1.8, elaborates on the decision-making process regarding E&S eligibility and compliance.

External Advisors

Where relevant, external advisors are procured to support Camco with due diligence, on-site audits, specialist studies and ongoing monitoring. This support is defined, facilitated and monitored by the Impact Manager and commissioned through defined terms of reference.

Fund Investees

The fund investees (Investees) will be responsible for the development and implementation of a project-level ESIA, project level ESMS and where relevant a corporate ESMS, which will be compliant with Camco policies and this Framework.

- All investees must comply with the above-mentioned standards and employ or contract an E&S Manager/HSE Officer to implement and manage the following accordingly:
- Assess E&S impacts in the form of an ESIA, ESMP, resettlement action plan (RAP) in accordance with PS 5, if relevant, an additional Indigenous Peoples Plan (IPP) in accordance with PS 7, if relevant.
- Establish, implement and maintain an ESMS, including the requisite organisational capacity.
- Ensure that the requirements of the ESMS are followed faithfully and transparently, and make any corrections required by Camco in line with this policy.
- Comply with and monitor project performance against the ESIA, ESMP, ESMS and Key Performance Indicators (KPIs).
- Report ongoing compliance and activity transparently to Camco on a periodic basis based on frequency agreed with each investee.
- Notify Camco immediately if there are major changes in the activity design and execution, regulatory setting, unanticipated environmental risks and impacts, or other circumstances that may affect the risk categorisation of the activity.

Camco, in its review and due diligence, will ensure that the requirements of this Framework are applied through the following actions:

- Carrying out E&S risk screening and due diligence on investees prior to funding.
- Ensuring that ESIA for projects fulfil the required standards (incl. gender equality) by reviewing the ESIA and ESMP.
- Ensuring that investees establish and implement an ESMS and monitor its implementation.
- Confirming that all information related to the E&S safeguards of project and programme activities are appropriately disclosed.

Each investee is to provide the required information and data to Camco on a periodic basis, so that Camco can monitor the performance and impacts driven by the investment, as per its monitoring and reporting obligations defined in the Support Agreement.

The impact team will, if necessary, assist the investee in recruiting appropriately trained and qualified personnel. Qualifications and requirements for an E&S Manager are set out in Appendix G. A site-specific Project Health, Safety and Environment (HSE) Manager, Community Liaison Officer (CLO) (requirements set out in Appendix H) and/or a corporate E&S Manager will be required to fulfil the duties laid out in the ESMF, subject to the appropriateness of the project size, nature, scale and impacts. Typically, the investee project HSE Manager will be responsible for managing day-to-day on-site E&S risks, while the investee CLO will manage day-to-day community engagement to build trust between the community and the investee. The investee’s corporate-level E&S Manager will ensure alignment with the funding and reporting requirements of each respective fund. The CLO and E&S Manager positions should be part of the investee workforce and not contracted through the EPC. The impact team will regularly oversee the management of E&S aspects at the project level and ensure compliance with requirements of this ESMF and all other corporate E&S requirements. Resourcing expectations in accordance with the IFC risk categorisation can be found in Table 7 in Section 1.8.3 below.

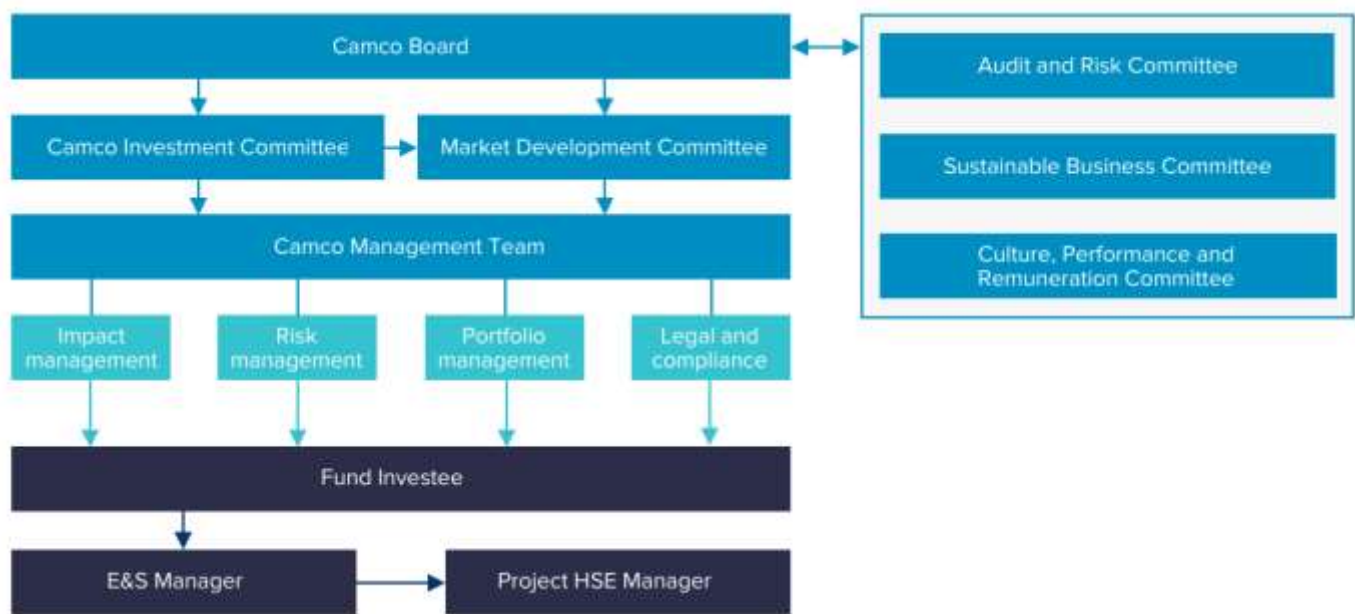


Figure 1: Camco ESG Hierarchy

1.8 E&S Risk Management

The impact team manages implementation, monitoring and reporting on E&S and KPI development throughout the investment. Camco may reserve the right to extend such monitoring rights beyond Camco's investment in the investee to suppliers, third-party service providers, contractors and sub-contractors.

The impact team guides investees from the E&S screening stage through to ESMS implementation and monitors KPI progress and reporting once the ESMS has been implemented. The impact team continues to monitor ESMS implementation (on a need basis given the stage of development per investment and/or if there have been any noticeable changes) to ensure all operational shifts, circumstantial occurrences and changes are comprehensively mitigated and the ESMS structure is adapted to reflect changes in risk management. Mitigation measures are defined through the impact assessment process and tailored for each project. The impact team consistently meets with the investee throughout the investment period to ensure compliance is maintained.

All Camco staff are trained on Camco E&S Policy, key content of this ESMF and any updates to the implementation of this ESMF in compliance with the standards noted above.

The E&S impact for each eligible investment varies due to various factors (e.g., project size, project type, location, baseline E&S context and affected communities etc.). Risk for each project is assessed prior to any investment decision. Table 2 summarises likely adverse crosscutting impacts of investments funded under Camco-managed

funds and is intended to be used as a guide for this Framework. Actual impacts are assessed in detail for each investment specific to their selected technology and sites in the project-specific ESIA and management plans established accordingly. The ESIA and related plans are reviewed by Camco's IC and Camco prior to each investment.

The risk level of potential impact is assessed based on likelihood of an adverse impact occurring and the potential magnitude of the damage caused (i.e. severity of the damage for people, planet and profit). Magnitude of the project-related E&S risk is reflective of the below categorisation and the likelihood of E&S risk is reflective of the factors as presented below in Table 1. The potential magnitude and likelihood of typical project specific E&S risk is further depicted in Table 2.

Table 1: Categorisation of magnitude and likelihood of risk

Magnitude	Category
High	<p>Risks not aligned with international standards and best practices and would have major financial implications to mitigate.</p> <p>Risks may have reputational risks for funds managed by Camco and/or its assets and could lead to conflict with communities/external stakeholders.</p> <p>Risks that may result in regulatory non-compliance leading to fines, significant business interruption and potential criminal proceedings in extreme scenarios.</p> <p>A larger establishment will have a proportionally higher negative effect (size of activity). Proximity to sensitive natural resources or to densely populated areas will increase effects (location of activity).</p>
Medium	<p>Risks not aligned with international standards and best practices and would have moderate financial implication to mitigate.</p> <p>Risks may result in business interruption in the short-term but will not result in long-term implications for the project.</p> <p>Risks may result in a non-compliance and/or enforcement action, but will can be easily remedied and will not result in long-term implications for the project.</p>
Low	<p>Risks are not aligned with IFC Performance Standards and/or good international industry practice but can be readily addressed at minimal cost and will not attract adverse stakeholder/media/NGO attention.</p>
Likelihood	Frequency
Low	Occurs in projects between 0.1% - 25% of the time
Medium	Occurs in projects between 26% - 75% of the time
High	Occurs in projects between 76% - 100% of the time
Factors contributing towards quantifying likelihood	
<p>Environment: Uncontrollable external factors such as extreme weather changes can play a role in whether an event occurs.</p>	
<p>People: Reliability of the workforce to adhere to health and safety practices for the betterment of the project and community plays a role in the likelihood of an event occurring.</p>	
<p>Processes: How a task is carried out can increase or decrease the likelihood of an event occurring.</p>	
<p>Event history: The number of times an event has occurred in the past within the same environment provides some indication of how likely it is to occur in the future.</p>	

Table 2: Summary of crosscutting adverse impacts anticipated for Camco-funded projects

Topic	Potential impact	Likelihood	Magnitude	Applicability	Mitigation measures	IFC PS
Land use	Loss of land to be used for agriculture, livestock or other productive uses.	High	High	Renewable energy technologies; infrastructure, agricultural activities	<ul style="list-style-type: none"> - Assessment of the initial value of the land and compensation and support for resettlement. - Mitigation of any negative impact by site selection. - Assessment of the initial value of the land (economic activities, land use activities, access to natural resources) and agreed compensation methodology and support for resettlement through the establishment of a Land Use and Compensation Plan. A specialist will need to be contracted to ensure the evaluation meets with legal (national and international) regulations and social acceptance. - Development of a Resettlement Action Plan, which aligns with host country land use and approval structures, regulations or laws (integrating legacy land use entitlement factors, current traditional social structures and newer legal entitlements), land ownership (integrating legacy land ownership and entitlement factors, current traditional social structures and newer legal entitlements) and compensation process and compensation evaluation methodologies applied. - Establish a Grievance Redress Mechanism and continuous disclosure through the Stakeholder Engagement Plan to persons affected. - Development of Conflict-Sensitivity Assessment, which evaluates the need for implementation of gender-sensitive mechanisms. This can be contracted to an E&S consultant to ensure training programs and support mechanisms are effectively implemented. - Assessment and evaluation of possible security threats or risks to the community's well-being in the development of a Security Risk Assessment 	PS 1, PS 4, PS 5
	Loss of land from community to be used for commercial purposes.	Medium	Medium			
	Theft of land from agricultural plot owners and users.	Medium	Medium			
Soil run-off, flooding, sedimentation	Interruption of drainage patterns and lack of water table replenishment because of ground clearance and earthworks.	Low	Medium	Renewable energy technologies, agricultural activities	<ul style="list-style-type: none"> - Minimisation of cleared areas and soil disturbance, with revegetation with native species as soon as feasible. - Covering of cleared areas with geotextiles or mulching until areas are revegetated or covered by the facility. - Early installation and regular maintenance of drainage and diversion structures, including drainage outlets to discharge into vegetated areas if possible; vegetation along watercourses and drainage lines to be retained if possible. - Avoidance of areas liable to flooding, slope instability, and water crossings where possible. - Retention of topsoil for restoration (including tilling and revegetation) as soon as practicable. - Establishment of a Biodiversity Management Plan and a Drainage Plan. 	PS 1, PS 6
	Downstream sedimentation and	Medium	Medium	Renewable energy technologies, infrastructure; agricultural activities		

Topic	Potential impact	Likelihood	Magnitude	Applicability	Mitigation measures	IFC PS
	siltation during construction. This can affect both the quality of water for aquatic life and that fetched for domestic purposes.				downstream watercourses.	
Pollution of soil and water	Release of hazardous substances during construction or operation (e.g., oil spills) leading to soil, surface or groundwater contamination.	Medium	Medium	Renewable energy technologies; infrastructure, agricultural activities	Establishment of a Pollution Prevention Plan , including: <ul style="list-style-type: none"> - Materials handling, storage and control procedures - Control of construction vehicle movements through the development of a Traffic Management Plan and prohibition of vehicle washing in watercourses, and similar practices - Creation of Emergency Preparedness and Response Plans and respective training protocols in preventative measures for landslides/mudslides, flooding, fire, hazardous spills, earthquakes, medical emergencies, terrorist threats, civil unrest, etc. during construction and operation, and - Safe removal of liquid effluent and/or development of a sanitation or wash station system on-site, included in the Water Management Plan. Management of water flows and allocations across all regional and concerned stakeholders (municipal, provincial, district, federal, communities, etc.) 	PS 3
	Pollution of watercourses through discharge of construction site/camp sewage effluent.	Medium	Medium			
Air quality	Negative impact on human health and/or wildlife as a result of dust and other emissions caused during construction and/or operation.	Low	Medium	Renewable energy technologies; infrastructure, agricultural activities	Establishment of Pollution Prevention Plan , including: <ul style="list-style-type: none"> - Sensitive siting of construction facilities - Dust control and suppression measures, including creation of Dust Management Plan - Undertaking of necessary combustion (from generators, fires, etc.) in a wide-open space, protected from the community. Personal protective equipment (PPE) must always be worn while operating generators or stoking fires - Establishment of an Occupational Health and Safety Plan, Emergency Preparedness and Response Plan, and - Carrying out of hygiene surveys, stack emission monitoring and stack emission testing. 	PS 1 and PS 3
	Potential GHG emission from construction site and running of camp diesel gensets.	Low	Medium			

Topic	Potential impact	Likelihood	Magnitude	Applicability	Mitigation measures	IFC PS
Noise and vibration	Disturbance to humans and wildlife caused by noise and vibration from equipment, traffic and other activities during construction at sites and associated facilities.	Low	Medium	Renewable energy technologies; infrastructure, agricultural activities	Establishment of a Pollution Prevention Plan , including: <ul style="list-style-type: none"> - Sensitive siting of construction facilities - Use of modern equipment fitted with abatement devices (e.g., ear muffers, noise enclosures) and implementation of a good maintenance regime, as per the Occupational Health and Safety Plan - Strict controls of timing of activities (e.g., high noise activities are prohibited at night) - Establishment of a Stakeholder Engagement Plan and Grievance Redress Mechanism to discuss noise impacts with the community and agree on a time schedule - Observance of seasonal sensitivities (e.g., breeding seasons), and - Speed controls and other traffic management measures to prevent excessive speed around settlements to ensure safety. 	PS 1 and PS 3
Water resources	Impact on surface and groundwater supplies of communities and ecosystems as a result of water demands during construction and operation. (Water requirements may be high for larger projects.)	Medium	High	Renewable energy technologies; infrastructure, agricultural activities	Establishment of a Water Management Plan in water sensitive areas, including: <ul style="list-style-type: none"> - Water study to demonstrate where substantial need is required, inclusive of engagement with the community and prior to any abstraction. Study must take into consideration domestic use, subsistence farming, fishing and local business needs, as well as seasonal and climate change-related periods of drought and catering for community, project and project staff needs - No allocated abstraction without prior approval of relevant authorities, and - Promotion of water efficiency (including leak detection and preventative maintenance of equipment) and water recycling. <p>In case of rivers, consider the impact for downstream water users in a Cumulative Impact Assessment.</p>	PS 3, PS 4 and PS 6
Pollution prevention (Hazardous waste, E waste and pesticides)	Excess materials consumption and generation of waste emissions due to inefficient waste management during construction and maintenance. Generation of electrical and electronic waste (e-waste) and hazardous waste	Medium	Medium	Renewable energy technologies; infrastructure, agricultural activities	Establishment of Waste Management Plan , including: <ul style="list-style-type: none"> - Waste hierarchy of prevent, reduce, reuse, recycle and recover. - Identification of key waste streams generated during construction, operation and decommissioning phases (e.g., general, domestic, hazardous, recyclable, etc) - Development of a hazardous waste collection and storage strategy, where waste is stored in safe and secure manner and only disposed of at licensed and fit-for-purpose facilities, and - Staff training. - Training on the use of pesticides, prohibited exposure to pregnant women, provision of SDS, testing of effluent discharge from the farms and establishment of Effluent Discharge Plants. 	PS 3
		Medium	Medium			

Topic	Potential impact	Likelihood	Magnitude	Applicability	Mitigation measures	IFC PS
	through the projects, especially when hazardous project components are not disposed of correctly when they reach their end of life, leading to contamination. Pesticides from nearby farm activities.					
Loss and degradation of habitat (animal migration routes and pathways)	Land clearance for the project and may cause loss or fragmentation of protected areas and other areas of conservation interest.	Medium	Low	Renewable energy technologies; infrastructure	Establishment of a Biodiversity Action Plan and Critical Habitat Assessment , including: <ul style="list-style-type: none"> - Careful site selection - Wherever possible, the avoidance and/or minimisation of activity near or around ecologically sensitive areas - If unavoidable, the establishment of buffer zones around conservation areas, watercourses, and other locations is identified as ecologically sensitive. Minimisation of construction or operational activity by reducing the duration, intensity and extent of activity during phases 	PS 1 and PS 6
	Severance of terrestrial routes and watercourses used for migration or for access to feeding and breeding areas.	Low	Low	Renewable energy technologies; infrastructure, agricultural activities	<ul style="list-style-type: none"> - Rehabilitation of cleared areas with native species - Establishment of nursery for local culturally significant species - Creation of wildlife crossings for aquatic and terrestrial animals, and design of culverts/crossing structures to avoid impacts on aquatic animal movement, and - Integration of a fish pass into the plant design of hydro projects. - Should the impact require consistent management, a biodiversity specialist should be contracted to ensure alignment with the Biodiversity Action Plan and development of mitigative measures, should the Action Plan require revision and adaptation. 	
	Loss of biodiversity in crops and livestock	Medium	Low			
	Spread of monocultures and plantations	Low	Low		Establishment of an Emergency Preparedness and Response Plan : <ul style="list-style-type: none"> - Preventative measures while conducting vegetation clearance, medical emergencies, etc. 	
	Increased vulnerability to pest and diseases	Low	Low		<ul style="list-style-type: none"> - Training protocols in preventative measures during construction and operational phases - A specialist should be contracted to ensure no unnecessary harm is done to the animal, as well as effective medical attention and emergency measures are 	

Topic	Potential impact	Likelihood	Magnitude	Applicability	Mitigation measures	IFC PS
					applied to personnel affected	
Direct impacts on fauna and flora	Encounters with dangerous or poisonous animals	Low	Low			
	Clearance of vegetation may lead to loss of plant species and habitat of conservation interest.	Medium	Medium	Renewable energy technologies; infrastructure, agricultural activities	Establishment of a Biodiversity Action Plan, Critical Habitat Assessment and Security Risk Assessment , including: <ul style="list-style-type: none"> Careful site selection with advice and collaboration with biodiversity authorities/associations/wildlife specialists Establishment of security precautions and security personnel on site to ensure community and employee safety when exposed to poachers. Collaboration of on-site security personnel with police and other enforcement authorities to ensure safety precautions Careful planning of construction activities Demarcation and avoidance of areas of conservation interest (e.g., high-value species, feeding or breeding sites, migration routes, etc.), and Transplantation of endemic or critically endangered species to ensure continued survival. Should the impact require consistent management, a biodiversity specialist should be contracted to ensure alignment with the Biodiversity Action Plan and development of mitigative measures, should the Action Plan require revision and adaptation. 	PS 4 and PS 6
	Soil erosion and biological degradation	Medium	Low			
	Poaching of critically endangered/vulnerable species (hunted for bushmeat and other valuable parts)	Low	Medium			
Invasive species	Movement of plants to new areas which adversely impact fauna, flora, ecosystems, and crops.	Medium	Low	Renewable energy technologies; infrastructure, agricultural activities	<ul style="list-style-type: none"> No introduction of new invasive species. If area cleared has invasive species, establishment of an Invasive Species Management Plan to identify actions or activities in preventing and managing the spread of invasive species. 	PS 6
Soil and ground quality and conditions	Irrigation, salt pans, high water tables, unsuitable soils for enterprise	Medium	Low	Agricultural activities	Soil Fertility Management Plan <ul style="list-style-type: none"> maximises the efficiency of the agronomic use of nutrients and improving crop productivity (enteric fermentation, manure management, rice management, fertiliser application to crops, carbon sequestration on croplands, grazing requirements) 	PS 1 and PS 6
Pressure on natural resources	Overuse of land, increase in soil acidity, decreased availability of water.	Medium	Low		<ul style="list-style-type: none"> Should the impact require consistent management, a specialist should be contracted to ensure alignment with best practice for optimal growth and soil nutrition. 	

Topic	Potential impact	Likelihood	Magnitude	Applicability	Mitigation measures	IFC PS
Impact on terrestrial and aquatic ecology	Poor land restoration practices (e.g., monocultures and/or replanting of low-quality saplings)	Medium	Low			
Biological disease and pestilence	High prevalence of pest infestation e.g., locusts	Medium	Low			
Physical and economic displacement of people, property, assets and resources	<p>Disruption of economic activities, livelihoods, or use of natural resources particularly those depending on the land to be acquired for the project.</p> <p>Physical displacement of people, or loss of assets due to new infrastructure build.</p>	Low (physical displacement is avoided as far as possible in funded projects, therefore the probability of physical displacement will be low as significant displacement will not qualify)	Low	Renewable energy technologies; infrastructure	<ul style="list-style-type: none"> - Initial site selection considering original land use, preferentially selecting land of minimal value, and comparison of alternative locations. - Establishment of a Resettlement Action Plan and compensation structure to be built into land lease agreements. Compensation structure to include both socio-economic evaluation and market-related evaluation. A specialist will need to be contracted to ensure the evaluation meets with legal (national and international) regulations and social acceptance. 	PS 1, PS 4 and PS 5
Cultural heritage	Displacement or damage to cultural heritage sites that may have archaeological, paleontological, historical, cultural, artistic and religious values by	Medium	Low	Renewable energy technologies; infrastructure, agricultural activities	<ul style="list-style-type: none"> - Careful site selection. - The undertaking of community consultation to ensure cultural heritage sites are avoided and, if appropriate, specialist surveys should be contracted. - Implementation of a Chance Finds Procedure and Stakeholder Engagement Plan. 	PS 8

Topic	Potential impact	Likelihood	Magnitude	Applicability	Mitigation measures	IFC PS
	construction activities, causing harm to the setting and affecting the amenity value.					
Indigenous peoples	Displacement, discrimination or exclusion of Indigenous people in land ownership or use discussions or other project benefits.	High	Low	Renewable energy technologies, infrastructure, agricultural activities	<p>Indigenous Peoples Policy</p> <ul style="list-style-type: none"> - Ensuring acknowledgement and full respect of Indigenous peoples' human rights, dignity, aspirations, culture and natural resource-based livelihoods - Acknowledging the different challenges faced by women, girls, and other vulnerable groups within Indigenous communities and promote the participation and leadership of women in investment activities given their role as traditional custodians of cultural and spiritual heritage and values. - Establishing and maintaining an ongoing relationship, based on informed consultation and participation, with the Indigenous peoples' affected by an investment throughout its lifecycle, inclusive of recognising the principle of free, prior and informed consent (FPIC) when there are any potential impacts on cultural and/or natural resources, or land owned by or under customary use of Indigenous peoples - A specialist should be contracted to identify specific measures to comprehensively and inclusively engage with Indigenous peoples. 	PS 7
Community health, safety and security	Poor construction management practices may lead to adverse effects on safety, human health and wellbeing.	Medium	Medium	Renewable energy technologies; infrastructure	<ul style="list-style-type: none"> - Good construction site management, labour practices and site working conditions management procedures, including the creation of a Labour Policy and Occupational Health and Safety Plan; standard operating procedures; signage and restriction of site access. - Disease control measures (e.g., no pools of standing water) - Emergency response planning to consider impacts on local communities. - Adoption of a Stakeholder Engagement Plan for early and ongoing community consultations. - Implementation of a Grievance Redress Mechanism. 	PS 1, PS 2 and PS 4
	High temperatures causing unbearable working conditions for labourers and high impacts to their health and wellbeing.	Medium	Medium		<ul style="list-style-type: none"> - Establishment of a Code of Appropriate Conduct and safeguarding approach. These should include conflict resolution training applied to all workers (extended to suppliers, service providers and sub-contractors) across all phases of the project cycle (construction, operation and decommissioning), and training in acceptable behaviour with respect to the community. 	
	Real or perceived disruption to normal community	Medium	Medium		<ul style="list-style-type: none"> - Awareness training for the workforce and their dependents on HIV/AIDS and other STDs, as well as health awareness raising campaigns for communities on the same topics. 	

Topic	Potential impact	Likelihood	Magnitude	Applicability	Mitigation measures	IFC PS
	<p>life, through the physical presence of a construction workforce.</p> <p>Potential health risks associated with water-borne diseases and water-related diseases (e.g., schistosomiasis, onchocerciasis, malaria).</p>	Low	Medium		<ul style="list-style-type: none"> - Development of Conflict-Sensitivity Assessment, which evaluates the need for implementation of gender-sensitive mechanisms. - Conduction of a Security Risk Assessment, which should include an assessment and evaluation of possible security threats or risks to community well-being, sexual harassment, including the probability of security or conflict risks occurring as a result of current or upcoming political and social events. Should the project site be in an area exposed during the project's lifecycle to civil unrest and terrorist activity, a specialist in development of a viable and effective security risk assessment should be contracted to ensure the safety and security of the workforce and community, to the extent possible. <p>Mitigation measures should be integrated in Emergency Preparedness and Response Plan, Labour Policy, OHS Plan, Stakeholder Engagement Plan and a Grievance Mechanism.</p>	
	<p>Interaction between in-migrant construction workers and local communities and/or sales agents with local community households may increase occurrence of communicable diseases, including HIV/AIDS and sexually transmitted diseases.</p>	Medium	Medium			
	<p>Increased incidences of conflict resulting in, for example: sexual exploitation; human rights violations of any person within the project-affected area, resulting</p>	Medium	Medium			

Topic	Potential impact	Likelihood	Magnitude	Applicability	Mitigation measures	IFC PS
	from disputes over political or social differences; gun violence; placement of landmines; acts of terrorism; incidences of riots and protests; and social intimidation.					
Socioeconomic Impacts	Stimulation of local economy through temporary direct employment as well as demand for goods and services which will enhance livelihoods in project community. Mainly positive but can have negative impact in community relationships, which is not well managed.	Low	Medium	Renewable energy technologies; infrastructure, agriculture activities	<ul style="list-style-type: none"> - Adoption of a Stakeholder Engagement Plan for early and ongoing community consultations. - Development of Conflict-Sensitivity Assessment, which evaluates the need for implementation of gender-sensitive mechanisms. - Implementation of a Grievance Redress Mechanism. 	PS 1 and PS 4
Topographical changes and landscape scarring impacts	Project construction works are likely to result to landscape scarring and topographical changes, such as clearance of vegetation and earth movement for road construction, excavations, and installation of transmission lines that have a visual	High	Medium	Renewable energy technologies; infrastructure, agricultural activities	Environmental and Social Impact Assessment and Environmental and Social Management Plan <ul style="list-style-type: none"> - Careful site selection. - Working closely with the local communities. - Strict limitation of construction activities within footprint of development. - Plant debris should be piled along the edge of rights of way pending transfer to a suitable disposal site. - All new access roads to be constructed should be built subject to consultation with the local authority. 	PS 1

Topic	Potential impact	Likelihood	Magnitude	Applicability	Mitigation measures	IFC PS
	impact due to the development of the project.					
Employment and occupational health and safety	Issues arising from the direct employment of the local population in the construction workforce.	High	Medium	Renewable energy technologies; infrastructure, agricultural activities	<ul style="list-style-type: none"> - Development of an Employment Plan, Employee Handbook Human Resource Policy, with clear employment requirements (incl. minimum salary and working hours, zero-tolerance for SEAH) in accordance with host country labour rights. A gender specialist should be contracted to ensure gender sensitivity, consistent training, awareness raising around the community and workforce, as well as established partnerships with NGOs, organisations or associations for GBVH support and assistance. - Fair and transparent hiring and staff management procedures. - Establishment of standard operating procedures. - Establishment of safe and secure working conditions - Adoption of Stakeholder Engagement Plan and Employee Grievance Redress Mechanism to ensure employees, sub-contractors, service providers, contractors and suppliers are engaged with an appropriate and timely way with regards to E&S issues through a sustained and continuous stakeholder engagement process. - Establishment of an Occupational Health and Safety Plan outlining specific PPE requirements per construction or operational project activity. - Establishment of an Employee Grievance Redress Mechanism to build mutual trust and a mutual understanding of differing perspectives when working together. - Establishments of supplier code of conduct principles covering compliance with labour and human rights laws, including the prohibition of forced and child labour, and health and safety. Increase levels of traceability across supply chain, identifying commitments across supply chain to prohibited child and forced labour. - Development of supply chain procedures and a due diligence screening mechanism against risks of forced and child labour, to be implemented at the investee level. 	PS 1 and PS 2
	Poor construction management and occupational health and safety practices may lead to accidents, injuries and illnesses.	High	Medium			
	Poor accommodation for construction labour may create mental health issues.	High	Medium			
	Discrimination and harassment based on differences in ethnicity, religion, language, gender.	Medium	Medium			
	High risk of child labour and/or forced labour currently exists in the supply chain of renewable energy and battery equipment.	High	Medium	Activities utilising high-risk supply chains (evident during the procurement of supplies and contracting services		

Topic	Potential impact	Likelihood	Magnitude	Applicability	Mitigation measures	IFC PS
				during construction and operation phases of project development)		
Sexual exploitation abuse and harassment (SEAH)	Increased levels of SEAH by investee staff, contractors, subcontractors, or other associates of the investee to the surrounding community.	Medium	Medium	Activities requiring on-site personnel, labour camp, and all investee companies	<ul style="list-style-type: none"> - Conducting of SEAH Risk Assessment to determine the risk rating and identify the gaps. A gender specialist should be contracted to ensure gender sensitivity, consistent training, awareness raising around the community and workforce, as well as established partnerships with NGOs, organisations or associations for GBVH support and assistance. The specialist should be aware and familiar with the project site community traditions and cultural norms. - Development of a Prevention of Sexual Exploitation, Abuse and Harassment (PSEAH) Policy, which should include the organisation's commitment to PSEAH and measures that will be undertaken to realise the commitment. - Development of Conflict-Sensitivity Assessment, which evaluates the need for implementation of gender-sensitive mechanisms. - Staff training on PSEAH. - Establishment of a Code of Conduct for all staff that defines appropriate behaviour and identifies consequences for breaches. The Code of Conduct should be included in induction programmes. Obligations on all investment workers (including sub-contractors) that are suitable to address applicable health and safety requirements, use of illegal substances, non-discrimination, interactions with community members, sexual harassment, violence or exploitation, protection of children, sanitation requirements, avoidance of conflicts of interest, respecting reasonable work instructions, protection and proper use of property, duty to report violations of this Code, no retaliation against workers who report violations of the Code 	PS 1 PS 2 and PS 4
	Increased spread of sexually transmitted diseases.	Medium	Medium			
Climate change	Intensification of chronic and acute climate-related events, such as temperature increase, precipitation, drought, flooding, cyclones (Madagascar), fires, and sea level rise.	Medium	Medium	Renewable energy technologies; infrastructure, agricultural activities	<ul style="list-style-type: none"> - Include assessment on aggravation of adverse environmental and social impacts due to chronic and acute climate-related events in the ESIA (i.e. potential for drought, flooding, temperature increases), to the extent relevant for the technology, location and OHS. 	PS 1

Table 3 below presents typical renewable energy technology-specific impacts that should be considered in the project and site-specific ESIA.

Technology	Potential impact	Mitigation measure	Likelihood
Solar PV	Loss of terrestrial routes used for migration by fauna or for access to feeding and breeding areas.	Biodiversity Action Plan , including: <ul style="list-style-type: none"> Careful site selection in advice and collaboration with biodiversity authorities/associations/wildlife specialists Careful planning of construction activities Demarcation and avoidance of areas of conservation interest (e.g., high-value species, feeding or breeding sites, migration routes, etc.), and 	Medium
	Displacement of animals and disturbance of their habitats during construction and operation due to noise, light at night, and human presence.		
	High water requirements for large solar power plants (for cleaning the panels).	Water Management Plan in water sensitive areas, including: <ul style="list-style-type: none"> Water study No allocated abstraction without prior approval of relevant authorities, and Promotion of water efficiency (including leak detection and preventative maintenance of equipment) and water recycling. 	Medium
Solar PV and battery back-up	Incorrect storage and disposal of batteries and panels	Waste Management Plan , including: <ul style="list-style-type: none"> Development of a hazardous waste collection and storage strategy, where waste is stored in a secure and safe place, and only disposed of at licensed and fit-for-purpose facilities. 	Medium
Run-of-river hydropower	Changes in ecological water flow resulting in adverse impacts on fish species and severance of migration pathways, disruption of downstream economic activities particularly flood-plain agriculture and fisheries, degradation of water quality, sediment transport, and changes in flooding.	<ul style="list-style-type: none"> Careful site selection and design, including fish passage. Cumulative Impact Assessment: identification and management of existing and potential cumulative impacts, and development of possible mitigative measures. Biodiversity Management Plan, including: avoidance of construction during heavy rain, installation and regular emptying of sediment traps in surface drains, along roads and in construction areas, plantation of riparian plant species along the banks of the river or waterway to create a riparian zone (3-10m), and disposal of removed topsoil should be undertaken away from the river and downstream watercourses. 	Medium
	Restricted access to the river and riparian areas may impact livelihoods, domestic purposes, recreation, and cultural activities.		Medium
	Increased OHS risks associated with working on or over water.		Medium
	Accelerated rates of soil degradation, sedimentation, loss of species diversity, loss of ecosystem services, physical alteration of riverbed and shoreline, increased occurrences of landslides, modification of volume and seasonal patterns of river flow, changes in water temperature and water quality due to cumulative impacts.	<ul style="list-style-type: none"> Chance Finds Procedure and Stakeholder Engagement Plan Occupational Health and Safety Plan outlining specific PPE requirements, standard operating procedures, and training. 	Medium
Wind power	Disturbance of animal migration pathways, the potential for bird and bat collisions with towers and rotor blades.	Careful site selection and planning of construction activities.	Low
	Disruption to normal community life due to shadow flicker and blade glint.	Biodiversity Action Plan , including: <ul style="list-style-type: none"> collaboration with biodiversity authorities/associations/wildlife specialists shut down of turbines during peak migration, and stakeholder engagement 	Low Medium

Technology	Potential impact	Mitigation measure	Likelihood
	<p>Specific occupational health and safety risks are associated with working at height.</p> <p>Potential safety risks associated with aircraft and shipping, through direct collision or interference with radar systems.</p>	<p>Occupational Health and Safety Plan outlining specific PPE requirements, standard operating procedures, and training.</p>	Medium

Table 4 below depicts typical E&S risks and management measures to be considered for other sector projects

Sector	Potential impact	Mitigation measure	Likelihood
Agriculture (greenfield)	<p>Soil and ground quality and conditions – e.g., irrigation, salt pans, high water tables, unsuitable soils for enterprise.</p>	<p>Soil Fertility Management Plan</p> <ul style="list-style-type: none"> - Maximises the efficiency of the agronomic use of nutrients and improves crop productivity (enteric fermentation, manure management, rice management, fertiliser application to crops, carbon sequestration on croplands, grazing requirements etc.) 	Medium
	<p>Pressure on natural resources – e.g., overuse of land, increase in soil acidity, decreased availability of water.</p>		Medium
	<p>Impact on terrestrial and aquatic ecology due to poor land restoration practices (e.g., monocultures and/or replanting of low-quality saplings).</p>		Medium
	<p>Biological disease and pestilence – high prevalence of pest infestation, e.g., locusts.</p>		Medium
	<p>Habitat depletion, fragmentation and degradation – land disturbance, land instability and soil erosion potentially leading to loss of habitats, both natural and manmade (e.g., fish farms and spawning areas) due to increased siltation and disturbance to protected species and disruption of migration routes</p>	<p>Biodiversity Management and Action Plan</p> <ul style="list-style-type: none"> - Careful site selection in collaboration with authorities/associations/wildlife specialists. - Careful planning of construction activities. - Demarcation and avoidance of areas of conservation interest (e.g., high value species, feeding or breeding sites, migration routes, etc.). <p>Adopt sustainable forestry (land clearing) practices which limits disturbance to other vegetation and landforms. Avoid harvesting at critical time in life cycle of key species. Establish reserved areas for natural regeneration and protect native plant species. Establish environmental baseline to ascertain safe levels of harvesting.</p>	Medium
	<p>Bioaccumulation and contamination of water sources – e.g., use of fertilisers and pesticides leads to run-off into water sources, crop spraying (wind drift), presence of toxic heavy metals such as arsenic, lead and cadmium.</p>	<p>Water Quality Assessment and Monitoring Plan</p> <ul style="list-style-type: none"> - Consistently monitor key water quality conditions and metrics throughout operations. Include: <ul style="list-style-type: none"> - pH levels, turbidity, temperature, salinity, dissolved oxygen and carbon dioxide levels - organic contaminants (e.g., algae blooms, eutrophication) - biochemical hazards (e.g., cyanotoxins) and - biological contaminants (e.g., pathogens, bacterial counts). - Development of appropriate mitigative measures to ensure levels are within thresholds. - Adsorption, physio-biochemical, molecular and phytoremediation mechanisms can be used to reduce toxicants in the environment. <p>Biodiversity Management and Action Plan</p> <ul style="list-style-type: none"> - Careful site selection in collaboration with authorities/associations/wildlife specialists. 	Medium

Sector	Potential impact	Mitigation measure	Likelihood
		<ul style="list-style-type: none"> - Careful planning of construction activities. - Demarcation and avoidance of areas of community importance to ensure isolation of contamination. - Phytoremediation and microbe-induced treatment of arsenic-contaminated soil and water sources. <p>Soil rehabilitation plan</p> <ul style="list-style-type: none"> - Site investigation to define the nature and the extent of the contamination of the site. - Formulate and apply cleanup strategies, which can be physical and chemical treatment (solidification and stabilisation and chemical oxidation), thermal soil remediation (low temperature and incineration) or bioremediation (living organisms to degrade the soil). 	
	<p>Atmospheric emissions (i.e. from harvesting and plant vehicles): Pollutants (VOC, NOX, SOX< PM10) GHG production Dust and noise Employee health and safety – exposure to dust and harmful substances, e.g. fertilisers and pesticides, herbicides, bacterial seed inoculants and other chemicals.</p> <p>Liquid/solid waste (production and disposal) – e.g., farm slurry/manure; waste chemicals and chemical containers; disruption and pollution of surface water (hydrological) and groundwater (hydrogeological) systems and flows; fuels, lubricants and ancillary chemicals from use of heavy machinery/spillage.</p>	<p>Pollution Prevention Plan</p> <ul style="list-style-type: none"> - Ensure use of best available technology. - Establish Dust Management Plan to control and use suppression measures. - Waste Management Plan for waste management. - Conduct hygiene surveys, pollutant emission monitoring and testing to ensure atmospheric pollutants are within threshold levels. - Establish an Occupational Health and Safety Plan to ensure safety protocols are in place for community health precautions for noise and dust. - Use vegetative berms for dust control to reduce impacts on surrounding livestock or crops. <p>Waste Management Plan</p> <ul style="list-style-type: none"> - Identify key waste streams generated during project life cycle. - Develop a hazardous waste collection and storage strategy. - Train staff on waste sorting, waste handling and waste storage procedures. <p>Train staff on the use of pesticides and testing of effluent discharge.</p>	<p>Low</p> <p>Medium</p>
	<p>Bioaccumulation and contamination of the food chain – e.g., use of fertilisers and pesticides, crop spraying (wind drift)</p> <p>Landscape scarring and visual impact – e.g., clear felling, hedgerow removal.</p> <p>Natural hazards and risks – e.g., frost, drought, flooding, cyclones.</p>	<p>Soil Rehabilitation Plan</p> <ul style="list-style-type: none"> - Conduct site investigation to define the nature and the extent of the contamination of the site. <p>Formulate and apply cleanup strategies, which can be physical and chemical treatment (solidification and stabilisation and chemical oxidation), thermal soil remediation (low temperature and incineration) or bioremediation (living organisms to degrade the soil)</p>	<p>Medium</p> <p>Low</p> <p>Medium</p>
	<p>Increased levels of deforestation</p>	<p>Forest Management Plan</p> <ul style="list-style-type: none"> - Strategic vision and commitment to protect multiple forest values in the area under management. - Develop natural or direct seeding, sprouting or planting strategies specific for project site. 	<p>Low</p>

Sector	Potential impact	Mitigation measure	Likelihood
Commercial maritime activities	Community economic impacts – e.g., potential of farm operation being replaced as a critical economic generator in the area; significant acreage being lost that is important to maintaining the contiguity of farmland in the area; diversification of farmland and economic losses to specific groups (i.e. supply or service provisions for other businesses) in community; loss of community use of and support of surrounding infrastructure, such as agri-tourism, products for retail market/local food and educational benefits.	Stakeholder Engagement Plan <ul style="list-style-type: none"> - Outreach on entrepreneurial capacity building and training seminars. - Understanding the level of job opportunity capacity available within the community. Community Development Plan <ul style="list-style-type: none"> - Specified and targeted approach to improving community educational outcomes. - Explore potential capacity for infrastructural improvements. 	Medium
	Disruption and harmful alteration of maritime habitat – permanent damage to breeding habitat or surrounding underwater habitat that significantly affects breeding behaviours and growth.	Biodiversity Management and Action Plan <ul style="list-style-type: none"> - Careful site selection in collaboration with authorities/conservation associations/wildlife specialists. - Regulation of fishery populations, fish bred catch sizes in compliance with permits and licences. - Careful planning of construction activities to comply with conservation regulations. - Demarcation and avoidance of areas of conservation interest (e.g., high value or endangered species, feeding or breeding sites of other significant fish species, migration routes, etc.). - Sustainable fishery practices which limit disturbance, establish reserved areas for natural regeneration and protect native fish/seafood/shellfish species, and establish an environmental baseline to ascertain safe levels of harvesting. 	Medium
	Risk of overfishing – e.g., catch limits, fish and/or shellfish and/or seafood size limits, closed seasons, allocations.		Medium
	Underwater noise affecting reproductivity of fish and/or shellfish and/or seafood.		Low
	Increased stress on natural resource availability – e.g., natural fish and/or shellfish and/or seafood stock depletion, availability of water supply.		Medium
	Increased pressure on marine resource for commercial feed production.		Medium
	Safety issues for fishing vessels – e.g., manoeuvrability, snagging, risks and safety issues associated with seabed obstacles.	Stakeholder Engagement Plan and Grievance Redress Mechanism <ul style="list-style-type: none"> - Adoption of a Stakeholder Engagement Plan for early and ongoing community consultations to determine community involvement in fishing activities that conflict with commercial fishing development. - Discussions with community and project-affected parties to include navigation conflicts, additional impacts and risks to coastal region or riverbank impacts. Implementation of a Grievance Redress Mechanism to ensure continuous discussion and resolution.	Medium
	Interference with fishing activities – navigational conflict.		Low
	Displacement of fishing activity into other areas.		Medium
	Loss of, or restricted access to traditional fishing grounds.		Medium
Conflict and disagreement with fishing community.		Medium	
Water quality impact – e.g., construction impacts while establishing the farm, pH levels, turbidity, construction site run-off, wastewater, bacterial count, algae blooms, temperature, etc.	Water Quality Assessment and Monitoring Plan <ul style="list-style-type: none"> - Consistently monitor key water quality conditions and metrics throughout operations, including: <ul style="list-style-type: none"> - pH levels, turbidity, temperature, salinity, dissolved oxygen and carbon dioxide levels - organic contaminants - biochemical hazards (e.g., cyanotoxins) - biological contaminants (e.g., pathogens, bacterial counts). - Development of appropriate mitigative measures to ensure levels are within thresholds. 	Medium	
Waste and pollution – e.g., accumulation of uneaten fish food on floor of aquaculture facilities, bioaccumulative and toxic pollutants.		Medium	

Sector	Potential impact	Mitigation measure	Likelihood
Construction and manufacture	<p>Insufficient baseline assessment of E&S impacts – e.g., no permits or licences in place to ensure allocated water use, allowances for removing earth, allowances for breaking ground, allowances for site availability and approval from community; impacts to endangered or critically sensitive species (flora or fauna); instances of infringements on culturally significant sites or habitats; infringements on Indigenous peoples’ rights; lack of consideration of climate change impacts, etc.</p>	<p>Adsorption, physio-biochemical, molecular and phytoremediation mechanisms can be used to reduce toxicants in the environment.</p> <p>Environmental and Social Impact Assessment</p> <ul style="list-style-type: none"> - Comprehensive assessment of baseline E&S parameters that take into consideration the full extent of the IFC Performance Standards <p>Environmental and Social Management Plan</p> <ul style="list-style-type: none"> - Monitoring and measurement plan with targets for each identified E&S risk, identifying responsible parties for monitoring, documentation to be recorded and mitigative measures to ensure risks do not reach irreversible levels. 	Low
	<p>Incidents and accidents – e.g., increased lack of mitigative measures in place to effectively maintain a safe working environment; lack of awareness and training on machinery and construction activities for labourers or workforce involved to effectively undertake their work without an incident; no PPE available to conduct construction activities without harm; no calibration or maintenance of machinery or vehicles to operate without incident; infringement on working hours, etc.</p>	<p>Occupational Health and Safety Management Plan and Policy</p> <p>Refer to table above on crosscutting impacts for guidance.</p> <p>Emergency Preparedness and Response Plan</p> <p>Refer to table above on crosscutting impacts for guidance.</p> <p>Labour Policy</p> <p>Refer to table above on crosscutting impacts for guidance.</p> <p>Supply Chain Policy</p> <p>Refer to table above on crosscutting impacts for guidance.</p> <p>Employee Handbook</p> <p>Refer to table above on crosscutting impacts for guidance.</p> <p>Community Health and Safety Management Plan</p> <p>Refer to table above on crosscutting impacts for guidance.</p> <p>Stakeholder Engagement Plan and Grievance Redress Mechanism</p> <p>Refer to table above on crosscutting impacts for guidance.</p>	Medium
	<p>Contamination of soils and water sources – e.g., leakage of fossil fuels onto exposed soil or run-off into nearby water sources; leakage of heavy metals from hazardous materials (batteries, e-waste, etc) onto soil or run-off into nearby water sources.</p>	<p>Waste Management Plan</p> <ul style="list-style-type: none"> - Training on handling of hazardous waste materials is outlined with the necessary PPE. - Storage conditions are provided, including necessary lining or bunding to prevent leakage. - Safe and secure disposal by certified and approved hazardous waste disposal service providers able to issue certification for safe disposal. <p>Occupational Health and Safety</p> <ul style="list-style-type: none"> - Preventative measures to ensure leakage of any substance is avoided at all costs. 	Medium
Transport	<p>Incidents and accidents - e.g., lack of effective fleet management, no maintenance of vehicles, unsafe working conditions etc.</p>	<p>Occupational Health and Safety Management Plan</p> <ul style="list-style-type: none"> - Procedures for fleet maintenance, equipment calibration and testing. - Measures to evaluate drivers (i.e. legal age, driving competence, valid relevant licenses, driving training courses). <p>Fleet Management Plan</p> <ul style="list-style-type: none"> - Objectives and actions necessary to manage a fleet of vehicles (vehicle maintenance, equipment calibration, weight 	Medium

Sector	Potential impact	Mitigation measure	Likelihood
Tourism		measurement etc.).	
	Related incidents and accidents - e.g., lack of effective fleet management, no maintenance of vehicles, unsafe working conditions etc.	Occupational Health and Safety Management Plan <ul style="list-style-type: none"> - Procedures for fleet maintenance, equipment calibration and testing. - Measures to evaluate drivers (i.e. legal age, driving competence, valid relevant licenses, driving training courses). 	Medium
	Increased employee and customer grievances – due to, for example, continuous and stressful requirements of the job.	Stakeholder Engagement and Grievance Redress Mechanism (GRM) <ul style="list-style-type: none"> - Consistent engagement with employees to ensure mindset is able to cater to high demands of the job. 	Medium
	Increased staff turnover - e.g., seasonal job type, casual labourer status.	<ul style="list-style-type: none"> - Job types are divided into shifts to enable a consistent movement of staff across different roles. - Awareness raising of GRM across workforce (with confidential and publicly available methods for grievance submission). 	Medium
Digital economy	Increased child labour – e.g., seasonal job types do not verify age of workforce.	Labour Policy <ul style="list-style-type: none"> - Covering employee benefits, expectations of job (working hours), expectations of casual labour, workforce organisations or associations necessary to ensure sufficient human rights considerations for seasonal work, how to ensure age limits are maintained. 	Medium
	Increased power provisions for cooling and other necessary hardware – e.g., as power needs increase, more cooling is required to ensure the system does not overheat; power needs are constantly balanced.	Occupational Health and Safety and Emergency Preparedness and Response Plan <ul style="list-style-type: none"> - Procedures and preventative measures necessary for fires, electrocution, PPE usage and all predictive emergencies. 	Medium
	Increased generation of e-waste and hazardous material – e.g., electrical cables, batteries, uninterruptible power supply.	Waste Management Plan <ul style="list-style-type: none"> - Training on safe handling of hazardous waste materials is outlined with the necessary PPE. - Storage conditions are provided, including necessary lining or bunding to prevent leakage. - Safe and secure disposal by certified and approved hazardous waste disposal service providers able to issue certification for safe disposal. 	Medium
	Increased employee and customer grievances.	Stakeholder Engagement and Grievance Redress Mechanism <ul style="list-style-type: none"> - Consistent engagement with employees to ensure mindset is able to cater to high demands of the job. 	Medium
	Increased staff turnover - e.g. seasonal job type, casual labourer status,	<ul style="list-style-type: none"> - Job types are divided into shifts to enable a consistent movement of staff across different roles. - Awareness raising of GRM across workforce (confidential and publicly available methods for grievance submission). 	Low

1.8.1 Cumulative impacts

Cumulative impacts result from successive, incremental and/or combined effects of multiple developments and activities within the same area, thus competing for common natural resources. The impacts consider other adjacent projects and activities that are in existence, being developed and or planned and to what extent the combination of development impacts and natural forces fragment the site/area beyond its ecological functionality.¹

The objectives of the Cumulative Impact Assessment (CIA) should fulfil the following:

- Identify and assess impacts on valued E&S components (VECs) of proposed/existing or developing projects over time i.e., the past, present and future projects and natural external drivers that affect them.
- Determine if the identified cumulative impacts will not exceed a threshold that will compromise the sustainability or viability of VECs.
- Determine whether the feasibility of projects funded by Camco-managed funds is not limited by cumulative E&S effects.
- Ensure engagement with host country environmental governance bodies, associations and entities to effectively manage cumulative impacts at the appropriate scale (e.g., airshed, river catchment, regional landscape).
- Ensure all affected communities and stakeholders are consistently engaged in an inclusive manner, and all identified concerns (including identification of projected outcomes from cause-effect relationships) are documented and addressed.

In instances where evidence of planned or existing project developments share on-site physical features, natural processes, ecosystem services, and/or social conditions (defined above) of proposed Category B projects with an already identified biodiversity, water quality, soil quality and sedimentation sensitivity, Camco would require a CIA that is conducted by the investee. The CIA would be required as part of the due diligence process and expected site visit, to ensure cumulative impact on ecosystem services and physical features are not significant enough to recategorise the project to Category A. Specifically, investigation into the following project aspects to ensure Category B projects are not recategorised as Category A:

- Additional levels of pollutants to the environment whereby concentration levels in mediums (water, soil, air) reach an irreversible level.
- Conversion or degradation of natural and critical habitats.
- Regulation of downstream flows affect the ecological integrity of the river or water source.
- Reduction, modification and/or fragmentation of riparian and aquatic habitats causing decreased populations of species.
- Addition of wildlife population mortality, contributing towards the population decline.

The need for a CIA will be assessed by the investee E&S Manager, further guided by Camco at Step 1: E&S screening stage (refer to Appendix C) and Step 3: E&S gap analysis stage (refer to Appendix D for the Red Flag Report) of the Risk Screening Process.

1.8.2 Climate Risk

Climate change and E&S risk considerations are included in strategic, business and operational risk assessments, since climate risks have the potential to translate into financial, operational and E&S risks.

The Camco Fund Risk Management Policy and Framework defines climate risk as “a wide range of risks associated with physical changes in the climate, resulting in further impacts to people and communities, infrastructure and equipment, investment performance and the potential for reputational damage to the fund and its investors”.

The following elements are considered when addressing climate change risk.

¹ IFC, 2013. Cumulative Impact Assessment and Management: Guidance for the Private Sector in Emerging Markets. Accessed: <https://www.ifc.org/en/insights-reports/2013/publications-handbook-cumulativeimpactassessment>

E&S impacts of an investment, which may be aggravated further by climate change and result in the need for adaptation measures to strengthen the resilience of people and communities. The climate risk assessment required in an ESIA will identify all the relevant environmental and social impacts and the expected results of an exacerbation of these impacts due to the relevant potential climate change risks. In addition, the analysis will set adaptation objectives and plans to achieve these objectives, where relevant. This analysis will be undertaken by an external service provider.

In addition to the potential exacerbation of E&S impacts, the below should be considered in project design.

Negative impacts on physical infrastructure, including:

- Optimal performance characteristics, which may be compromised by changes in an average climate or climate extremes
- Damage to infrastructure due to increases in the frequency and/or severity of extreme events (e.g., fire, floods, extreme high or low temperatures), and
- Changing seasonal climate and variability, resulting in changes to resource availability (e.g., changes in average rainfall or seasonality may impact hydropower plants, rendering them unviable in extreme cases).

Increased risk of climate change-induced conflict in jurisdictions where the fund investments are located, including when critical infrastructure is destroyed, and communities are displaced.

Like any infrastructure investment, renewable energy and agricultural investments remain exposed to physical climate risk. All investments are assessed for likelihood and magnitude of climate change impacts by a third-party service provider. Correspondingly, an Environmental and Social Management Plan is developed to identify key mitigative actions and possible adaptation measures to address the risk, which will be defined in the project-specific ESIA. Camco’s expected exposure to physical climate risk is summarised in **Table 5** and **Table 6** below, for both the African region and the Pacific.

Table 5: Typical physical climate risk to infrastructure, renewable energy technology and agricultural investments in Africa

Hazard	Timeframe	Likelihood	Severity	Overall risk level	Key impacts
Temperature increase (chronic)	Short – long term	Moderate	Moderate	Moderate	Decreased solar generation capacity
Mean precipitation (chronic)	Medium – long term	High	Low	Low	Increased risk of crop damage and loss of yields
Drought (acute)	Short – long term	High	Moderate	Moderate	Increased demand for cooling and irrigation Decreased hydropower resource availability
Flooding (acute)	Short – long term	High	Moderate	Moderate	Damage to assets, loss of crops and animal stock
Tropical cyclone wind speeds (acute)	Medium – long term	Moderate	Moderate	Moderate	Increased erosion
Mean wind speed (chronic)	Medium – long term	Moderate	Low	Minor	
Fire weather conditions (acute)	Short – long term	Moderate	High	High	Damage to assets, loss of crops and animal stock

Table 6: Typical physical climate risk to infrastructure, renewable energy technology and agricultural investments in the Pacific

Hazard	Timeframe	Likelihood	Severity	Overall risk level	Key impacts
Temperature increase (chronic)	Short – long term	Moderate	Moderate	Moderate	Decreased solar generation capacity
Mean precipitation (chronic)	Medium – long term	Low	Low	Minor	Increased risk of crop damage and loss of yields
Drought (acute)	Short – long term	High	Moderate	Moderate	Increased demand for cooling and irrigation Decreased hydropower resource availability
Flooding (acute)	Short – long term	Low	Moderate	Minor	Damage to assets, loss of crops and animal stock
Tropical cyclone wind speeds (acute)	Medium – long term	Moderate	High	High	Increased erosion
Fire weather conditions (acute)	Short – long term	Moderate	High	High	Damage to assets, loss of crops and animal stock
Sea level rise (chronic)	Short – long term	High	Moderate	Moderate	
Mean wind speed (chronic)	Medium – long term	Low	Low	Minor	

1.8.3 Risk Categorisation

Each investment through a Camco-managed fund requires a risk categorisation driven by project-specific E&S risk and impacts, which provide the basis for the required ESMS elements to enable effective management of these risks by the investee. At each stage in the investment process, the fund will consider the eligibility criteria and the exclusion list on the basis of information that is gathered in the preceding stages. The exclusion list is outlined in Section 1.8.5 of the ESMF.

Throughout the approval and due diligence phases, the fund will confirm that all approved projects are characteristically limited in adverse site-specific E&S risks that are reversible through comprehensive mitigative measures and categorised as Category B+, Category B or C projects. The required elements of an investee’s ESMS are provide below in Table .

All Camco-managed funds only support projects that are categorised as low (Category C), medium-low risk (Category Bor medium-high risk (Category B+), in line with the IFC’s E&S risk categorisation of projects and depicted in Table below and based on the GCF’s Revised Environmental and Social Policy, but with further elaboration of lower and higher risk within the IFC risk Category B/l-2. The table also provides guidance on the required level of impact assessment, management plans and organisational capacity required from Camco impact team, which is also built into the E&S Red Flag Report template (Appendix D) to provide clarity, as dictated by the project categorisation.

Camco-managed funds only invest in Category B+, Category B or Category C projects since the risks and impacts are expected to be few in number, contained within the footprint of the projects activities, largely reversible, and readily mitigated through project-specific mitigation measures and good international industry practices. Therefore, the fund portfolio is expected to include financial exposure to activities with potential limited adverse E&S risks and impacts that are few in number, generally site-specific, and largely reversible through mitigation measures. As per the eligibility criteria of all Camco-managed funds, the portfolio will not include activities with potentially significant adverse E&S risks and impacts that, individually or cumulatively, are diverse, irreversible, or unprecedented (Category A). If the project category changes to that of Category A at any point during the investment period,

funding support and any or all agreements made with the project and or, if applicable, to the investee, will be terminated. This will therefore ensure that all funds managed by Camco are only invested in projects categorised as high as risk Category I2.

Table 7: Risk categorisation, in accordance with IFC risk categories

IFC risk category	Project risk category	Definition	Guidance and examples	Supported by Camco-managed funds	Required elements of ESMS	Camco impact team
Category A (high risk) OR Category I1	Category A (high risk)	Activities with potential significant adverse environmental or social risks and/or impacts that are diverse, irreversible, or unprecedented. OR When an intermediary's existing or proposed portfolio includes or is expected to include financial exposure to activities with potential significant adverse E&S risks and impacts that, individually or cumulatively, are diverse, irreversible, or unprecedented.	Projects having large geographic scale; involving large-scale infrastructure; being located in valuable ecosystems, natural and/or critical habitats defined in IFC PS 6 (paragraphs 13-19); entailing adverse impacts to the rights, resources and lands of Indigenous peoples and trigger FPIC requirements defined in IFC PS 7 (paragraphs 13-17); or entailing significant resettlement of affected peoples, defined in IFC PS 5; or entailing adverse impacts on critical cultural heritage defined in IFC PS 8 (paragraphs 13-15). Projects with significant adverse E&S impacts which are diverse, irreversible and unprecedented.	No	ESIA carried out by an independent expert (IFC PS1-8). Proof of organisational capacity and competency including Senior Management. Policy in line with IFC PS 1-8. Full ESMS covering all relevant management plans (incl. monitoring).	Project ineligible, therefore terminated.
Category B (medium-risk) OR Category I2	Category B+ (medium-high risk)	Activities with potential significant adverse social and environmental impacts that are generally beyond the site boundaries, largely reversible	Risks and impacts are considered limited, and the magnitude is expected to be moderate to high. The risks and impacts are few in number, contained outside of the footprint of	Yes	ESIA done by an independent expert (IFC PS1-8), supported by CIA, CHA and EFlow Assessment, if applicable. Proof of organisational capacity and competency	Third-party ES DD required with site visit at DD stage. Camco impact staff or external consultant to undertake site visit

IFC risk category	Project risk category	Definition	Guidance and examples	Supported by Camco-managed funds	Required elements of ESMS	Camco impact team
		and can be addressed through relevant mitigation measures.	activities, largely reversible, and readily mitigated through generally accepted relevant mitigation measures and good international industry practices. Typically, for example, small and medium-scale low emission power generation plants, and infrastructure projects.		including Senior Management, E&S Manager, HSE Manager and CLO. Policy in line with IFC PS 1-8. Full ESMS covering all relevant management plans (incl. monitoring).	during construction. Continual support to be provided throughout approval process, after agreement has been signed, and throughout funding agreement.
Category B (medium-risk) OR Category I2	Category B (medium-low risk)	Activities with potential limited adverse E&S risks and/or impacts that are few in number, generally site-specific, largely reversible, and readily addressed through mitigation measures. OR When an intermediary's existing or proposed portfolio includes, or is expected to include, substantial financial exposure to activities with potential limited adverse E&S risks and impacts that are few, generally site-specific, largely reversible, and readily addressed through mitigation measures; and includes no activities with potential significant	Risks and impacts are considered limited, and the magnitude is expected to be low to moderate. The risks and impacts are few in number, contained within the footprint of the activities, largely reversible, and readily mitigated through generally accepted relevant mitigation measures and good international industry practices. Typically, for example, small and medium-scale low emission power generation and activities to improve energy efficiency of industry.	Yes	ESIA done by an independent expert (IFC PS1-8). Proof of organisational capacity and competency including Senior Management, an E&S Manager and CLO. Policy in line with IFC PS 1-8. Full ESMS covering all relevant management plans (incl. monitoring).	Third-party ES DD required with site visit at DD stage. Continual support to be provided throughout approval process, after agreement has been signed, and throughout funding agreement.

IFC risk category	Project risk category	Definition	Guidance and examples	Supported by Camco-managed funds	Required elements of ESMS	Camco impact team
		adverse E&S risks and impacts that, individually or cumulatively, are diverse, irreversible, or unprecedented				
Category C (low risk)	Category C (low risk)	Activities with minimal or no adverse environmental or social risks and/or impacts.	Small-scale projects undertaken within an already built environment, or with minimal additional footprint (<50m2) and negative screening for PS 5-8.	Yes	Simplified assessment of impacts (screening). Staff members qualified to categorise activities by risks.	Impact staff to inform key risks to be identified during site visit at DD stage.
OR Category I3	OR Category I3	OR When an intermediary's existing or proposed portfolio includes financial exposure to activities that predominantly have minimal or negligible adverse E&S impacts.			Appointment of E&S/HSE Manager. ESMS simplified but should consider waste management (IFC PS 3), occupational health and safety (IFC PS 2), and community engagement and safety (PS 1 and 4).	Continual support to be provided throughout approval process, after agreement has been signed, and throughout funding agreement.

1.8.4 E&S Risk Due Diligence Process

Camco's E&S due diligence process is outlined below. See also Figure 2, which depicts the process in a flow diagram:

Step 1: E&S risk screening

The initial desktop E&S risk screening occurs prior to investment approval during the funding proposal stage and involves a Risk Assessment Tool (RAT) and an E&S Initial Screening Checklist to pre-define the risk category and eligibility of the project for funding. The initial screening step intends to identify any major red flags and potential for identified cumulative impacts. The E&S Initial Screening Checklist streamlines the projects put forward for funding to, firstly, meet the broader eligibility criteria and, secondly, align with the allocated E&S risk profile governed by the fund's E&S standards and policies, while refraining from conducting project activities listed in the project exclusions list, or engaging with suppliers subject to a Withholdings Release Order (<https://www.cbp.gov/trade/forced-labor/withhold-release-orders-and-findings>).

Refer to Section 1.8.5 for the projects exclusions lists and Appendix C for the E&S Initial Screening Checklist.

Step 2: E&S onboarding

An E&S onboarding call with the investee company takes place if the project is approved for further consideration and once the initial E&S risk screening has been completed to ensure the company understands the fund's E&S requirements and processes.

The investee is provided with the Camco ESMS Toolkit, developed by the impact team as an online resource to assist them in the development and establishment of the ESMS. This is supplemented with consistent engagement from the Camco impact team. The investee is also guided in their development of their Gender Action Plan and

Gender Mainstreaming efforts using the Gender Mainstreaming Toolkit, with any key considerations for ensuring gender equality and equity highlighted. The ESMS and Gender Action Plan is a mandatory requirement for all investees.

Step 3: E&S gap analysis

An E&S Red Flag Report (see Appendix D for the template) will be completed by Camco. This will entail a review of the project’s documentation (i.e., ESIA and ESMS to the extent that it is available) and confirmation of the project IFC risk categorisation. Based on the project ESIA, completed by an external service provider, the environmental, social, potentially cumulative and climate risks are presented. These risks and associated corrective measures are noted and highlighted in the E&S Red Flag Report, which forms part of the investment approval process. In case of early-stage growth and development funding, the funding may be used for the development of the ESIA or the ESMS, as part of the fund’s technical assistance facility. In this instance, the fund will assist in reviewing the Terms of Reference for ESIA/ESMS and/or GAP work and the selection of consultants. Based on early stakeholder engagement, it will also be determined if a CIA will be required. In addition, key milestones for disbursement of early-stage growth and development funding are agreed.

The results of this gap analysis are presented to the investee for revision and corrective actions to be undertaken to resolve all E&S gaps will be highlighted in the E&S Action Plan (ESAP), in compliance with Camco’s E&S Policy.

Step 4: E&S due diligence

Once the ESIA and ESMS have been finalised, the fund conducts a due diligence site visit to verify E&S risks and identify if a CIA is required, should this prove necessary during the screening and E&S gap analysis. E&S risks outlined in the ESIA, such as identification of Indigenous peoples, potential or necessary resettlement, security risks, protected biodiversity impacts, human rights assessments and risk of cumulative impact, will be highlighted in the E&S Red Flag Report, and the extent of the risk will be verified during the due diligence trip. The project risk categorisation will also be reassessed to ensure that all project activities align within their allocated category. All projects funded by Camco-managed funds will undertake a due diligence trip. The due diligence trip will also serve to assess the investee’s internal E&S resources, competence and aptitude for managing E&S risks in accordance with Camco’s E&S standards.

Any additional risks identified during the due diligence trip and E&S-related findings will be incorporated into the E&S Action Plan (see end of Appendix I), which will form part of the Investment Agreement to ensure timelines of implementation are tied to disbursement milestones. Finalisation of the mandatory ESIA and ESMS to the fund’s satisfaction are conditions precedent to disbursement of funding.

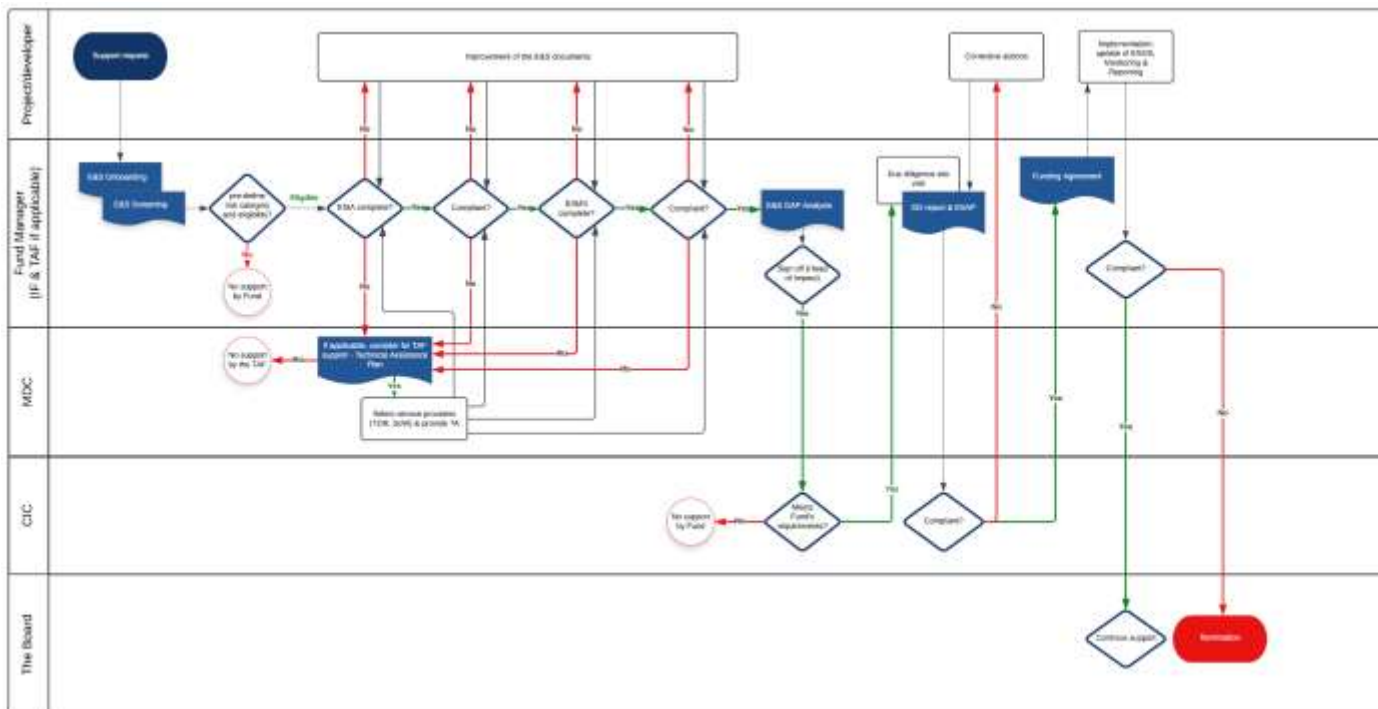


Figure 2: Camco-managed fund’s E&S decision-making process for early-stage growth and development funding

Once an ESMS has been established to the satisfaction of the fund, the investee proceeds to project implementation. The project is then monitored by the investee and the fund according to the monitoring and evaluation process as agreed in the investee’s ESMS. Figure 3 below shows the elements of an investee-specific ESMS and associated management plans.

Environmental and social management system (ESMS)



Figure 3: Key elements of an investee ESMS

1.8.5 Project Exclusions

The initial E&S screening process and the E&S gap analysis will screen out any projects identified in the below exclusion list, which includes Category A project types and any other projects and project activities for which the funding is ineligible.

Exclusions include energy activities that are not consistent with EU taxonomy Regulation (Regulation (EU) 2020/852), Commission Delegated Regulation (EU) 2020/1818, Exclusions for EU Paris-aligned Benchmarks and the Complementary Climate Delegated Act (Regulation (EU) 2022/1214), which sets the carbon content limits of

250gCO₂/kWh of the overall yearly electricity generation which is further to be reduced to 100gCO₂/kWh over the project lifetime. These activities include:

- Non-renewable fossil fuel power plant construction, extension or operation.
- Coal, lignite, oil and gas exploration, mining, export transportation, refining, manufacture, production or distribution.
- Switching from one non-renewable fossil fuel to another non-renewable fossil fuel in standalone grid-connected electricity generation plants.
- Hybrid power systems (including biomass/fossil fuel co-firing systems) except in accordance with the Camco Environmental and Social Safeguarding Policy.²
- Projects resulting in the production of nitrous oxide (except in connection with waste and biomass projects) or the production of hydrofluorocarbons) except in accordance with the Camco Environmental and Social Safeguarding Policy.
- Nuclear energy generation.
- Any activities that could reasonably be expected, at the time such support is given, to cause a significant negative overall impact on the environment and/or increase GHG.

Any kind of finance from Camco managed funds are also prohibited for any of the following activities, production, use, distribution, business or trade involved in:

- Activities that violate the United Nations Global Compact (UNGC) principles or the Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises.
- Activities involving harmful or exploitative forms of forced labour or child labour.
- Production of or trade in any product or activity deemed illegal under host country laws or regulations or international conventions and agreements or subject to international phase-outs or bans. This includes, but is not limited to, (a) pharmaceuticals, pesticides, and herbicides, (b) ozone-depleting substances, (c) polychlorinated biphenyls and other hazardous chemicals, (d) wildlife or wildlife products regulated under the convention on international trade in endangered species of wild fauna and flora, and (e) trans-boundary trade in waste or waste products.
- Production of or trade in weapons and munitions (as referred to in international treaties and conventions, UN principles and where applicable national legislation), including paramilitary materials.
- Production of or trade in alcoholic beverages, excluding beer and wine.
- Production of, cultivation or trade in tobacco.
- Gambling, casinos and equivalent enterprises.
- Production of or trade in radioactive materials, including nuclear reactors and components thereof.
- Production of, trade in, or use of un-bonded asbestos fibres.
- Biofuel projects if they are:
 - based on feedstock grown on land with high carbon content or biodiversity value, such as rainforests, wetlands, peat lands and grasslands, in reserves or on protected lands, or on lands with a high conservation value
 - using a feedstock for production of liquid biofuels, where the overall climate and development benefits would be higher by using the same feedstock unprocessed for, e.g., direct combustion in a co-generation plant
 - using solid biomass fuels from forests, planted or natural, having a carbon cycle incompatible with the Paris Agreement, and/or

² Please refer to Camco Environmental and Social Safeguards Policy, Annex A, under the specific requirement for mini- and isolated-grids section.

- first generation biofuel projects with production area over 75ha.
- Commercial logging operations or the purchase of logging equipment for use in primary tropical moist forests or old-growth forests.
- Production or trade in wood or other forestry products other than from sustainably managed forests.
- Marine and coastal fishing practices that are harmful to vulnerable and protected species in large numbers or damaging to marine biodiversity, including but not limited to large-scale pelagic drift net fishing and fine mesh net fishing.
- Biomaterials and biofuel production that use feedstock that can serve as food or compromise food security.
- Any activities relating to the deliberate release of genetically modified organisms (GMO).
- Activities involving or relating to racist and/or anti-democratic media.
- Sex trade and any related infrastructure, services and media.

Finance of any kind is prohibited for the following projects, activities, production, use, distribution, business or trade that are categorised as IFC risk Category A and/or prohibited by host country legislation:

- Projects located in a “critical habitat”, defined as:
 - highly threatened or unique ecosystems
 - habitat of significant importance to critically endangered, endangered or vulnerable species, as defined by the IUCN Red List of Threatened Species and in relevant national legislation
 - habitat important to the survival of endemic or restricted-range species or unique assemblages of species
 - habitat supporting globally significant migratory and/or congregatory species
 - biodiversity and/or ecosystems with significant social, economic or cultural importance to local communities and Indigenous peoples, and/or
 - habitat of key scientific value and/or associated with key evolutionary processes.
- Projects influencing an area which includes a critical cultural heritage site or significant artefact (e.g., objects, property, sites, structures, and unique natural features having archaeological, paleontological, historical, cultural, artistic or religious values), and
- Projects that involve significant involuntary resettlement and require the physical displacement of more than 10 households.

1.9 Monitoring of E&S Performance

All projects classified or potentially classified as Category B+ require a site visit both during the DD stage and early on in the construction phase, coupled with monitoring of activities consistently throughout the investment period.

The site visit will focus on assessing the following risks:

- PS 2 (labour and working conditions, in line with ILO standards), including labour accommodation, access to facilities, if relevant.
- Implementation of the workers’ and community grievance mechanisms.
- On-site occupational health and safety implementation and concerns.
- Stakeholder engagement to assess broad community support status for the project.
- Transport Management Plan to assess effective implementation of the plan and road safety.
- Security Management Plan implementation and security company conduct.
- Influx management and workers’ accommodation (in case of worker camps during construction period).

Other projects (Category C or B) will require a site visit at the DD stage and only during the investment period should a concern be raised. Please note, the above risks will be further elaborated on in the DD report and investment-specific ESAP.

Following this, a Monitoring Plan with all projects will be agreed between the investee and the Camco-managed fund. The purpose of this Monitoring Plan is to ensure that necessary actions and procedures are in place to monitor E&S risk and mitigation measures related to Camco-managed funds and its underlying investments. The following applies for all investments:

- Reporting of all incidents/accidents/fatalities within three (3) days of occurring. This relates specifically to occurrences:
 - requiring notification to authorities under national law
 - involving fatalities of investees or project workers or any other people
 - where multiple serious injuries have occurred and where hospitalisation is required
 - involving violence and harassment bullying, intimidation and/or exploitation (including SEAH) and any form of gender-based violence
 - involving modern slavery, forced and child labour relating to the investees, its project, third parties and any part of its supply chains that the investee becomes aware of, and/or
 - that have become or are likely to become public knowledge by whatever means.
- Monitoring of key performance indicators (KPIs).
- Monitoring of key E&S indicators to ensure project-level compliance with this Framework.
- Periodic monitoring and reporting.
- Annual investee performance reviews to assess the fitness of their ESMS.

Each investee needs to establish procedures to monitor and measure the effectiveness of their ESMS as well as compliance with any related legal and/or contractual obligations and regulatory requirements. This involves using dynamic mechanisms to compare performance against desired outcomes or benchmarks, and performance reviews to adjust operations to improve the effectiveness of the ESMS over time. The monitoring obligation in accordance with an investee's ESMS will be included in the Support Agreement between the fund and the investee. The investee will submit monitoring reports through the fund's impact data management system on a quarterly basis. Reports are reviewed by the fund and corrective action measures discussed with investee where relevant.

A Monitoring Plan shall be established as part of an investee's ESMS, which shall define:

- the key E&S indicators to be measured and monitored based on key risks and mitigation measures
- frequency of the monitoring
- methods, tools and equipment to collect and analyse samples
- corrective action, where relevant, and
- roles and responsibilities.

An example monitoring template to guide investees in the development of their Monitoring Plan is provided in Appendix N. Each underlying management plan gives further guidance on key parameters that should be considered for monitoring.

Should concerns or anomalies be raised from the reported performance of the investment, a site audit will be conducted in which E&S risks as well as compliance with the project ESMS will be interrogated.

1.10 Institutional Grievance Redress Mechanism

The Camco-managed fund's Grievance Redress Mechanism (GRM) and the GCF Independent Redress Mechanism is intended for use by stakeholders such as partners, investors, governmental bodies and investees, as well as individuals participating or involved in the funded project. The fund GRM is intended to receive, evaluate and address grievances or concerns associated with the investment funded. This is achieved through Camco's Whistleblowing Policy and E&S Information Disclosure, External Communication and Grievance Mechanism Policy and the GCF Independent Redress Mechanism (for GCF-funded activities only), which is applicable to all employees, officers, consultants, contractors, casual workers and agency workers, as well as fund-level investees and their stakeholders.

A separate Grievance Mechanism must be established and implemented by the investee at the project level for community, contractor and third-party complaints and grievances towards investees or project activities. Guidelines for development of this GRM is found in Section 11.

1.10.1 Principles

The Camco GRM is developed on the following principles:

- Transparency and fairness: Easy to understand, transparent and available at no cost to the aggrieved.
- Confidential disclosure: Every effort is made to ensure the investigation is carried out in a confidential manner, should this be requested.
- Accessibility and cultural appropriateness: Access to the Grievance Mechanism is provided via an independent service provider, with the inclusion of a whistleblowing hotline, that enables anonymous reporting.
- Recording: All grievances are registered on a grievance form, logged and monitored through to resolution and close out.
- Dialogue and site visits: All grievances warrant discussions with the complainant and a site visit may be recommended where relevant to gain a first-hand understanding of the nature, validity and severity of the grievance.
- Timely resolution: An initial response to all grievances received is usually within 14 working days, with a full response including a plan of action to address the grievance within 20 working days.

1.10.2 Approach

The below process will be documented and monitored at each step to ensure traceability and transparency.

Step 1: Identification of grievances through reporting channels. The following reporting channels exist:

Camco Grievance Redress Mechanism

The GRM is managed by an external service provider, Safecall, which provides confidentiality and anonymity where needed. Below are the contact details.

- Call whistleblowing hotline on +44 191 516 7764
- Email camco@safecall.co.uk
- Complete the online form: <https://www.safecall.co.uk/en/file-a-report/>

For investments receiving funding from GCF, ensure **GCF's Independent Redress Mechanism** is made available as part of the investee's grievance mechanism. Complete the online form: <https://qcf.i-sight.com/external/case/new/group=Complaint>

Step 2: Register and acknowledge communications involving E&S-related grievances from external stakeholders including project-affected people within 14 days. The grievances shall be recorded on the grievance register by the Compliance Officer.

Step 3: An initial meeting is set up with the aggrieved and, if necessary, consultation with a technical expert, within 14 working days to discuss the concern and how the issue can be resolved. Anonymous disclosures can be submitted; however, investigation into anonymously disclosed grievances can be difficult to conduct. Every effort will be made to ensure confidentiality is maintained and identity of the aggrieved is unknown, should this be a request.

Step 4: Once accepted by the aggrieved, the agreed resolution shall be enacted by the fund, with the collaboration of various departments within the fund, and if necessary, consultation with a technical expert will be required. A technical expert will be contracted to investigate the validity of the grievance as well as understand the full extent of risks posed.

Step 5: Input from various departments to develop a Corrective Action Plan to be conducted. The Corrective Action Plan will be agreed to and signed off internally before implementation.

Step 6: Once the investigation into the grievance has been completed, a formal response to the grievance will be communicated to the aggrieved detailing the process undertaken to investigate the grievance and conclusion to the investigation.

Step 7: Should the aggrieved feel the matter was not attended to in the proper manner, a discussion with the aggrieved and a way forward will be discussed.

2 Occupational Health and Safety Management Plan

2.1 Scope

Camco is committed to ensuring that all of the activities that it invests in as a fund manager are carried out in a safe manner and that the working conditions are appropriate for the employees of its investee companies and their subcontractors. The Occupational Health and Safety (OHS) Management Plan is a defined plan designed to prevent anticipated incidents, accidents and potentially harmful working environments throughout the project cycle.

2.2 Objectives

This OHS Management Plan elaborates on the OHS requirements stipulated in Camco's E&S Safeguard Policy. The objective of the plan is to avoid and minimise work hazards in line with national regulations and international best practice, promote safe and healthy working conditions and protect the fundamental rights of the workforces within investee companies and associated workforces through their supply chain. The plan sets the minimum expectations and requirements for all investees.

2.3 Applicable Regulations, Standards and Guidelines

- Host country environmental and labour legislation
- IFC Environmental and Social Performance Standards
- Sustainability principles advocated by the UN Global Compact
- UN Guiding Principles on Business and Human Rights
- ILO Declaration on Fundamental Principles and Rights at Work
- International Bill of Human Rights

2.4 Roles and Responsibilities

The investee has the responsibility of developing and implementing a project- and company-specific OHS Management Plan that complies with national regulations and best international practices. The investee is expected to, as far as reasonably practicable, anticipate, prevent and/or minimise all risks associated with project activities with consistent training and the provision of the right protective gear. The investee will make every effort to provide adequate facilities to sustain a safe and healthy working environment and cultivate a place of work that treats its workers fairly and in a non-discriminatory manner that provides equal opportunities to staff.

Camco also ensures that the health and safety of its own employees is covered during site visits, which may pose health and safety risks.

2.5 OHS Approach

All investees are expected to conduct an Environmental Impact and Social Assessment (ESIA) or audit to identify potential E&S risks and associated mitigation measures. The risks will vary depending on the project influence area, country of operation, type of project activities, type of the equipment used and the size of the project. As such, it is imperative that the investee fulfils the following to effectively manage OHS risks:

- Identification of all potential hazards to workers, particularly those that may be life-threatening or cause irreversible effects
- Provision of preventative and protective measures, including modification, substitution or elimination of hazardous conditions or substances
- Provision of protective gear fitted with abatement devices to ensure OHS impacts are adequately mitigated (e.g., provision of ear mufflers, masks, protective eyewear, helmets, gloves, etc.)
- Training of workers
- Documentation and reporting of occupational accidents, diseases, and incidents, and
- Emergency prevention, preparedness and response arrangements.

The following anticipated OHS risks associated with project development should be considered:

- Hot works / welding
- Fire
- Working at height
- Electrical works
- Handling and storage of hazardous substances
- Manual handling
- Heavy machinery, lifting operations and equipment and vehicle fleets, and
- Community health and safety.

Investees are expected to apply the following principles and approaches to each OHS risk:

- All staff members (inclusive of interns, part-time employees, probationary employees, sub-contractors, service providers, and suppliers) are required to demonstrate their age (refer to Section 3.5.8's definition of child labour), that they are legally permitted to work in the country and that they are willing and able to undertake the role applied for. This applies to all of the investee's operations.
- The investee shall outline and provide the relevant personal protective equipment (PPE) necessary for each and every project activity, as well as any necessary training requirements. The OHS Management Plan should be made available and accessible for all staff members (inclusive of interns, part-time employees, probationary employees, sub-contractors, and service providers).
- All staff members should be fully trained in the safe operation of any electrical, heavy and/or high heat machinery that they will be operating and/or handling. Power sources for all machinery should be diligently removed after use.
- Regarding fire, the investee will ensure all staff are aware of assembly points and evacuation routes within the project site area. Fire prevention materials should be easily accessible and serviced regularly.
- In the case of working from heights, fall prevention and protection measures will be in place for all works which might expose workers to the hazard of falling. The investee will provide anchored structural supports to ensure all staff are appropriately protected from possible harm.
- Regarding the handling and storage of hazardous substances, spill kits and washing facilities should be made available and accessible. Training on the use of these should be periodically undertaken. Storage conditions should align with the safety data sheets stipulated by national regulations.
- In the case of manual handling, the investee should reduce handling risks, by limiting the duration and frequency of manual handling, using equipment available to assist, etc.
- Regarding heavy machinery, lifting operations and equipment and vehicle fleets, all machinery and vehicles should be periodically maintained and serviced to ensure optimal functionality. Equipment should be used as intended, adhering to stipulated and regulated capacity limits. Driving permits and licenses to operate such machinery must be validated periodically and training requirements included in the training plan for employees operating company machinery and vehicles. Where necessary, a Traffic Management Plan will be

required to ensure additional risks, such as falling objects from lifting machinery, roadway surface condition during construction, load restrictions as a result of construction and public access to work areas, are effectively managed.

- The training of workers in safe work procedures.
- The documentation and reporting of occupational accidents, diseases and incidents.
- Emergency prevention, preparedness and response arrangements, including the creation of a Communication Plan.

Refer to Appendix K for comprehensive consideration of health and safety risks.

2.5.1 Risk Control

It is essential that all risks in any task to be carried out are identified and the necessary control measures put into place. Camco should ensure that investees seek to control their work activities so as to minimise the level of risk created within the organisation and thus protect the safety of workers.

Any hazard and its associated risk should be controlled either by reducing the probability of its occurrence or by reducing its effects. The means of achieving this shall be through a hierarchy of risk control, starting with the most effective to the least effective method, as provided below.

- **Eliminate.** Remove the hazard entirely (the most effective control method).
- **Substitute.** Replace the hazardous technique.
- **Reduce/modify the process.** Reduce the quantity of the hazardous item or the number of people exposed to the hazard or the time people are exposed to it.
- **Isolate.** Physically separate the hazard from personnel, equipment or the environment using mechanical guards, walls or distance.

Investees must also employ **safe work systems**, including a “permit to work” procedure, job safety analysis and toolbox talks, and ensure the availability and use of **personal protective equipment (PPE)**.

An example of risk control throughout project activities is to ensure sufficient water breaks, drinking water availability and shading is provided to workers under high temperatures.

2.5.2 Sexual Exploitation, Abuse and Harassment (SEAH)

SEAH is the term used to refer to sexual exploitation, abuse and sexual harassment that occurs within a working environment, including a programme setting or during work travel. SEAH within the workplace is a key issue that needs to be addressed in a sensitive and effective manner. Investees are required to develop a Prevention of Sexual Exploitation, Abuse and Harassment (PSEAH) Policy and a **Code of Appropriate Conduct**, which will be guided by the Camco Safeguarding Policy (Appendix B) in projects that demonstrate a high probability of SEAH risks occurring within the community and district. SEAH will not be tolerated in any and/or all business or project-related activities.

The SEAH risk assessment should be undertaken by each investee as part of the ESIA process, taking into account the host country’s cultural, traditional and regulatory controls in place. This assessment should be reviewed regularly to ensure socio-economic risks and situational circumstances are integrated and updated into the assessment. It is imperative that continuous awareness raising and capacity building on SEAH risks and how to address these risks is conducted with the staff (inclusive of interns, part-time employees, probationary employees, sub-contractors, service providers, and suppliers). It is also necessary to raise awareness of the investee’s Grievance Mechanism and advertise the methods by which a grievance can be submitted, particularly the confidential avenue of a grievance submission. Development of a project-level Gender-Based Violence and Harassment Grievance Redress Mechanism can be found in Sections 11.6, 11.7 and 11.8.

2.5.3 Labour Rights

Labour rights apply to all levels of staff members (inclusive of interns, part-time employees, probationary employees, sub-contractors, service providers, and suppliers). The investee must acknowledge the national guidelines for labour rights as well as the guidance provided in this Framework and set out **a Human Resources Policy, Employment Plan, Employee Handbook and/or Labour Policy**. The investee must ensure that these policies address the following:

- Minimum age of work (refer to Section 3.5.5).
- Rights applicable to collective agreements.
- Rights related to working hours, wages (which must meet with the “living wage” definition provided in Section 5.5), overtime, compensation and benefits, prevention of harassment, intimidation and/or exploitation.
- Allocation of accommodation to employees, where relevant, based on non-discriminatory and equal opportunity principles.
- Equal opportunity and fair treatment with regards to employment relationships within the company. This approach is to be applied across recruitment, hiring, compensation, working conditions and terms of employment, access to training, job assignment, promotion, termination, retirement and disciplinary practices.
- Retrenchment practices to transparently follow grievance records and disciplinary actions taken. A Grievance Mechanism should be in place to ensure all employees (inclusive of interns, part-time employees, local employees, sub-contractors, service providers, and suppliers) are able to raise a workplace concern in a transparent or confidential manner, with timely feedback from management.

Camco has a whistleblowing policy in place to provide an employee of an investee with an avenue to report a human rights violation anonymously and without fear of reproachment.

2.6 Training

Investees should provide both in-house and external training depending on in-country legislation, certifications and permits, and cover key risks and mitigations according to their Environmental and Social Management Plan and Hazard Identification Risk Assessment.

Other key areas that should be included in the training include roles and responsibilities, emergency response, conflict management and SEAH. Conflict management training should equip the employees at risk on how to approach the community, how to ensure their own safety while in the field or on site, and how to work with potential customers or clients, among other issues. OHS training should be provided to newly hired workers and contract workers, with refresher training courses provided periodically.

The SEAH and safeguarding training should, as a minimum, cover the below conduct and serve as a reminder of the Grievance Mechanism’s process and prohibited conduct:

- Sexual exploitation and any form of exploitation, violence or abuse
- Physical, emotional or psychological abuse
- Exchanging money, employment, goods or services for sexual activity
- Engaging in any sexual relationships with beneficiaries of assistance, and
- Engaging with sex workers.

All visitors should receive induction training upon entry to the investee project sites.

A training needs analysis should be developed to determine the type of training to be offered, and all records of OHS training kept for reference.

2.7 Monitoring and Reporting

Camco will monitor OHS performance on a quarterly and annual basis, which will be done both proactively and reactively. Investee shall, by way of writing, notify Camco of any major incidents and measures taken within two (2) working days. Records for verification of monitored data points are:

- Training attendance registers
- OHS training topics and materials, and
- Records of OHS incidents/near misses/accidents/fatalities. These should outline the circumstances, the immediate actions undertaken to ensure the worker was safe and stable, any first aid measures taken, corrective actions implemented to ensure the incident/accident does not occur again, and related necessary changes to the OHS processes and procedures.

3 Labour Management Plan

3.1 Scope

The Labour Management Plan (LMP) is intended to set out the responsibilities and the management practices associated with the management of labour during the construction and operation phases of all fund investments. The focus is to ensure that investees, their contractors, suppliers and third-party service providers, comply with the obligations of labour management and implement applicable international best practices to manage labour-related issues in an appropriate manner.

The LMP applies to all personnel involved in projects during construction and operational phases. Personnel forming the “investee workforce” includes part-time employees, probationary employees, temporary employees, seasonal employees, migrant employees, contractors and their subcontractors and their employees, and lastly the primary suppliers.

3.2 Objective

The objectives of the LMP are to:

- Promote fair and equitable labour practices for the fair treatment, non-discrimination and equal opportunity of workers, including respecting the concept of a living wage,³ which must be at minimum above the international poverty line determined by the World Bank
- Establish, manage and promote a healthy management-worker relationship
- Protect workers’ rights, including of migrant and third-party workers
- Promote healthy, safe, secure and comfortable accommodation that does not impact negatively on the communities in the surrounding area
- Address child labour and prevent the worst forms of child labour
- Prevent the use of all forms of forced labour
- Protect project workers, including vulnerable workers (such as women, persons with disabilities and migrant workers), contracted workers and primary supply workers, as appropriate, and
- Provide a Grievance Redress Mechanism (GRM) for project workers to raise their concerns.

3.3 Applicable Regulations, Standards and Guidelines

- UN Guiding Principles on Business and Human Rights
- ILO Declaration on Fundamental Principles and Rights at Work
- The sustainability principles advocated by UN Global Compact
- Host country environmental and labour legislation
- IFC Environmental and Social Performance Standards
- International Bill of Human Rights

Furthermore, the following guidelines are recommended where relevant:

- ILO’s Combating Forced Labour: A Handbook for Employers and Business (2015)
- Solar Equipment Buyers’ Guide for Supply Chain Traceability (2021)

³ A living wage is defined as the minimum income necessary for a worker to meet their basic needs. Refer to ILO Minimum Wage Policy Guide for more information.

- IFC Good Practice Handbook: Assessing and Managing Environmental and Social Risks in an Agro-Commodity Supply Chain (2013)
- ILO Indicators for Child Labour
- ILO Indicators of Forced Labour

3.4 Roles and Responsibilities

The investee will be responsible for the labour management at each site and must ensure implementation of the LMP. Camco will ensure that the LMP is implemented and demonstrate consistent reporting as agreed with the investee.

The investee will ensure that the LMP is regularly updated and that any changes or updates have been communicated to all employees, contractors, subcontractors and the primary suppliers. The LMP will be communicated once a new employee is onboarded and on an annual basis for refresher training. It is requested that all employees acknowledge the LMP and understand their responsibility in complying with the plan.

3.5 Labour Use and Management on Investments

3.5.1 Assessment of Key Potential Labour Risks

The labour risks anticipated in a funded project will be associated with health and safety risks during the construction phase. The investee will complete an ESIA to determine the magnitude and likelihood of all site-specific labour risks. An example of anticipated risks include:

- Risk of improper usage of electrical equipment
- Risk of injury when using heavy equipment
- Risk of unethical working conditions including wage, compensation and working hours
- Risk of obstructed pathways or unmarked areas
- Exposure to noise and dust
- Risk of falling objects
- Risk of injury when handling hazardous materials.

As the construction activities will involve hazardous work, persons under the age of 18 will not be employed on projects. Many workers will be exposed to occupational health and safety hazards as listed in the OHS Plan, (see Section 2).

3.5.2 Terms and Conditions of Employment

Terms and conditions of direct workers are determined by their individual contracts. All permanent project staff or any staff employed by an investee will have a mutually agreed contract (labour or service contract) in place. Gender neutral recruitment procedures will be documented and filed in accordance with host-country labour legislation and the Environmental and Social Standard on Labour and Working Conditions (ESS2). Requirements and conditions of overtime and leave entitlements are agreed as part of individual contracts. Investees will ensure that contractors are aware of, and comply with, labour, safeguarding, grievance mechanism and OHS policies and procedures outlined in this ESMF. Each contractor will be required to submit a task-based risk assessment of the activities and implement risk mitigation measures in accordance with the project site's ESMP either quarterly or annually.

All investee employees will be paid based on their performance and skills regardless of employees' characteristics, such as gender, age, race, religion, disability, nationality, political beliefs, membership of unions, ethnic origin, religious beliefs and sexual orientation. The base monthly salary shall be determined according to a wage scale and shall not be lower than the regional minimum wage.

3.5.3 Freedom of Association

All investee companies will need to recognise the freedom of its employees and those of its sub-contractors to be able to participate in collective bargaining agreements. Workers shall be allowed to establish and join work-based organisations if they wish to negotiate wages and other working conditions.

3.5.4 Equality of Treatment

The ILO conventions to be applied include the C 100-Equal Remuneration 1951 and C111-Discrimination (Employment and Occupation 1958) conventions. Discrimination means denying someone a job or training on the basis of a prejudice which does not affect their ability to perform that job. Camco-managed funds are committed to ensuring that men and women hired for work receive equal rates of pay for equal types of work and applies this ethos to all investees. The investee will not discriminate in its hiring and employment practices on any basis of sex, race, culture, religion, sexual orientation, or other aspect as per ILO conventions.

3.5.5 Age of Employment

All fund target countries have ratified both the ILO Minimum of Age Convention (C138) and the ILO Worst Forms of Child Labour Convention (C182). The minimum age of employment for a project will be 18 years due to the hazardous working conditions. To ensure compliance, all investee staff will be required to produce a form of identification as per in-country legislation that confirms their age. This shall also be applicable for contractors and their sub-contractors.

3.5.6 Occupational Health and Safety

All investees will develop an OHS Management Plan and gain the relevant certifications in alignment with international best practice, Camco E&S Standards and host-country legislation. Refer to Section 2 for guidelines on establishing the OHS Management Plan, in which the requirements and establishment of a system for regular monitoring and reporting on OHS performance, grievances, diseases and incidents is outlined. Investees will ensure effective methods are put in place for responding to identified hazards and risks, establishing priorities for taking action and evaluating outcomes.

3.5.7 Sexual Exploitation and Abuse and Sexual Harassment (SEAH)

A SEAH risk assessment should be compiled at the beginning of the project to better understand the wider context in which SEAH risks might arise, as well as ensures the findings can be used to inform the project design, implementation, monitoring and evaluation. The assessment should include the following:

- Project-affected local perspective from various wider situated communities and stakeholders without putting them at risk.
- Perspectives from local project implementers, beneficiaries and/or civil societies.
- Can be carried out as part of a broader project design needs assessment.
- Structured to evaluate the sources and dynamics of exploitation or violence in a given context, taking into account different experiences of girls, women, boys, men and non-binary people.
- Evaluate how different forms of diversity intersect with gender (ethnicity, religion, disability, age, etc.).
- Analyse the gender dimensions of key thematic issue areas needed to achieve sustainable conflict resolution.
- Formulate strategic actionable recommendations to support women's participation, protection and rights (refer to prevention strategies below).

It should also answer the following questions:

- What is the context and history of SEAH risks in the country/region?
- What political, economic, social, cultural and environmental actors, institutions and structures have shaped the SEAH risks?
- How are women, men, girls, boys, non-binary people and the most marginalised and vulnerable impacted differently by this context?
- Are there harmful gender norms that fuel conflict, exclusion and violence?
- How have the SEAH risks influenced gender norms?

All staff and representatives are responsible for preventing and responding to SEAH, and awareness of SEAH as a risk should be built into the organisational culture. Provisions to prevent SEAH will be included in the Code of Conduct for project staff and for contracted workers in line with relevant international standards and national legislation. SEAH measures to focus on organisation-wide prevention and response include:

- Developing and maintaining relevant policies and procedures.
- SEAH risk assessment and management.
- Safe recruitment and regular staff training.
- Awareness building within the organisation on understanding the challenges of SEAH.
- Building an intersectional culture that understands and challenges gender inequality, race inequality and other diversity and inequality issues.

Creating an integral grievance system in which all grievances within the investee company, across the workforce employed as a result of the project, can be depended upon to resolve (refer to Section 11).

3.5.8 Forced Labour and Child Labour

In line with ILO conventions, forced labour is defined as any work or service extracted from a person under threat or penalty, which includes penal sanctions and the loss of rights and privileges, where the person has not offered him or herself voluntarily. It includes slavery and abduction, misuses of public and prison works, forced recruitment, debt bondage and domestic workers under forced labour situations, and internal or international human trafficking.

Camco-managed funds are committed to following the requirements as emphasised in the ILO conventions, IFC PS 2, GCF Revised E&S policy and local relevant laws in terms of prohibition of forced labour in any form, including slavery and human trafficking. All Camco-managed funds take a firm stand against all forms of forced labour and expects the same of its primary suppliers, partners, contractors and subcontractors.

All funds managed by Camco will not tolerate child labour under circumstances. A clear distinction between child labour and young worker shall be established according to internationally recognised standards. Only 18 years and above will be employed on any project funded by a Camco-managed fund. These commitments will be absorbed by all investees and projects funded under any fund managed by Camco.

3.5.9 Worker Grievance Mechanism

Grievance mechanism entails a formal process for receiving, evaluating and redressing fund grievances from affected workers, communities and the general public. Typical workplace grievances include demand for employment opportunities; labour wage rates; delays of payment; disagreement over working conditions; and health and safety concerns in work environment.

Investees will establish a Grievance Redress Mechanism which shall be applicable to managing labour-related issues in all its investments. Training and awareness raising of workers, contractors, subcontractors, community, and suppliers and on the Grievance Redress Mechanism shall be done at the start of the projects. Please refer to Grievance Redress Mechanism (see Section 11).

3.5.10 Guideline on Code of Conduct

A satisfactory Code of Conduct will contain obligations on all project workers (including sub-contractors) that are suitable to address the following issues, as a minimum. Additional obligations may be added to respond to particular concerns based on the project location and the project sector or to specific project requirements.

The Code of Conduct will be written in plain language and signed by each worker to indicate that they have: received a copy of the code, had the code explained to them, acknowledged that adherence to this Code of Conduct is a condition of employment, and understood that violations of the Code can result in serious consequences, up to and including dismissal, or referral to legal authorities.

The investee and contractors will conduct awareness raising and training activities to ensure that workers abide by the Code of Conduct (such as through toolbox talks). The contractor will also ensure that local project-affected local communities are aware of the Code of Conduct and enable them to report any concerns or non-compliance.

The issues to be addressed include:

- Compliance with applicable laws, rules, and regulations of the jurisdiction.
- Compliance with applicable health and safety requirements (including wearing prescribed personal protective equipment (PPE), preventing avoidable accidents and a duty to report conditions or practices that pose a safety hazard or threaten the environment).
- The use of illegal substances.
- Non-discrimination (for example on the basis of family status, ethnicity, race, gender, religion, language, marital status, birth, age, disability, or political conviction).
- Interactions with community members (for example to convey an attitude of respect and non-discrimination).
- Sexual harassment (for example to prohibit use of language or behaviour, in particular towards women or children, that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate).
- Violence or exploitation (for example the prohibition of the exchange of money, employment, goods, or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour)
- Protection of children (including prohibitions against abuse, defilement, or otherwise unacceptable behaviour with children, limiting interactions with children, and ensuring their safety in project areas).
- Sanitation requirements (for example, to ensure workers have access to and use specified sanitary facilities provided by their employer and not open areas).
- Avoidance of conflicts of interest (such that benefits, contracts, or employment, or any sort of preferential treatment or favours, are not provided to any person with whom there is a financial, family, or personal connection).
- Respecting reasonable work instructions (including regarding E&S norms).
- Protection and proper use of property (for example, to prohibit theft, carelessness or waste).
- Duty to report violations of this Code.
- No retaliation against workers who report violations of the Code, if that report is made in good faith.

Workers are prohibited under any circumstances from engaging in any disturbance of wildlife or bushmeat hunting during the entire duration of their employment/engagement for the project.

3.5.11 Retrenchment Management

The investee should look for and implement support measures to help dismissed workers find new options for employment. As appropriate, the support measures could include assisting the workers to find information about alternative jobs and opportunities, counselling, and/or providing training in financial matters or small business development.

Best practices relating to retrenchment include:

- Prior to implementing any collective dismissals, the investee carries out an analysis of alternatives to retrenchment. If the analysis does not identify viable alternatives, a Retrenchment Plan is developed and implemented to reduce the adverse impacts of retrenchment on workers. The Retrenchment Plan should be based on the principle of non-discrimination and reflect the investee's consultation with workers, their organisations and, where appropriate, the government, and comply with collective bargaining agreements if they exist. The investee complies with all legal and contractual requirements related to the notification of public authorities and the provision of information to, and consultation with, workers and their organisations.
- Investees should ensure that all workers receive notice of dismissal and severance payments mandated by law and collective agreements in a timely manner. All outstanding back pay and social security benefits and pension contributions and benefits will be paid:
 - on or before termination of the working relationship with the workers
 - where appropriate, for the benefit of the workers, or
 - in accordance with a timeline agreed through a collective agreement. Where payments are made for the benefit of workers, workers will be provided with evidence of such payments.

Key steps in managing retrenchment:

1. Ensure retrenchment is necessary (i.e., there are no alternatives to job losses).
2. Look for alternatives to job losses. Alternatives could include a freeze to new hiring, enforcement of retirement ages, reduction in hours worked by existing staff, internal transfer and redeployment, reduction in salaries, transfer of employees to third-party organisations etc.
3. Gather preliminary information (i.e., worker rights and obligations, gender and ethnic background of workers to be retrenched vs. those to be retained).
4. Commence consultation with key stakeholders; engage with workers and their unions or other representatives. Could also include local, regional or national agencies (labour ministry).
5. Decide on the nature of retrenchment and establish a procedure; form a committee or group within the organisation to manage the process of retrenchment.
6. Implement Retrenchment Plan - i.e., prepare tools and procedures to affect the retrenchment, announce the number of dismissals, carry out interviews, make severance payments, carry out assistance programmes (e.g., training, outplacement, job assistance and economic development opportunities). In some cases, these programmes may be extended to employees' families and local community).

3.5.12 Human Immunodeficiency Virus / Acquired Immunodeficiency Syndrome (HIV/AIDS)

The risk of the spread of HIV/AIDS exists due to social interactions among migrant workers, other project workers and project-affected local communities. Risky sexual behaviour and engagement in sex by both genders is a real project risk. In order to counter the risk of spreading HIV/AIDS, the investee will develop, before project implementation begins, an HIV/AIDS strategy or policy consistent with ESS2 and ESS4 that shall spell out sensitisation and awareness-creation strategies for contractors and other employees.

3.5.13 Contractor Management

Each contractor and employee engaged by the investee to provide services will be expected to adopt the protective measures outlined in this document. The labour contracts drawn up by the investee will include provisions, measures and procedures to manage and monitor the relevant OHS risks, child labour, forced labour, transparency of fireable events, repercussions of enacted deviations from job descriptions, outline of the company grievance mechanisms,

principles of non-discrimination and other employment terms and conditions issues, based on good industry practices.

The risk of the spread of HIV/AIDS exists due to social interactions among migrant workers, other project workers and project-affected local communities. Risky sexual behaviour and engagement in sex by both genders is a real project risk. In order to counter the risk of spreading HIV/AIDS, the investee will develop, before project implementation begins, an HIV/AIDS strategy or policy consistent with ESS2 and ESS4 that shall spell out sensitisation and awareness-creation strategies for contractors and other employees.

3.5.14 Supply Chain

The investee will identify potential risks of child labour, forced labour and serious safety issues which may arise in relation to primary suppliers as part of the E&S assessment in accordance with Environmental and Social Standards (ESS2).⁴ Based on the type of projects funded under each specific fund, there is potential for child labour, forced labour and safety risks related to the hazardous nature of the equipment to be procured.

The investee will conduct a supply chain assessment appropriate to its size and circumstances and within its reasonable exercise of control on its supply chain.

Refer to Section 5 for guidance on the supply chain procurement and assessment, strategies for contractors and other employees.

3.6 Communications

The investee shall ensure that the Labour Management Plan is disclosed to its staff, contractors, subcontractors, O&M contractors and suppliers. Any grievances raised by workers shall be logged and followed up in accordance with the project-level investee Grievance Mechanism.

3.7 Monitoring

The investee shall develop processes for monitoring, assessment and auditing to document the implementation and effectiveness of management and mitigation measures, assess actual impacts against predicted impacts and demonstrate compliance with applicable legal and other requirements.

The fund will conduct both desktop and field-based inspections to confirm that specified mitigation measures are being implemented effectively and achieving the intended outcomes. SMART performance indicators, both lagging and leading, shall be developed and shared with investees.

3.8 Reporting

The investee will ensure that a periodic report is completed to address the labour risks and working conditions which are contained in this plan. Some of the key areas to be reported on include grievances lodged by the workers and community, induction training conducted, number of employees, issues raised by workers committees, any incidents or accident reported among others.

The investee shall provide a grievance report, refer to Appendix M, in which the following is specified:

- the nature of the incident, accident, or circumstance has been described
- the impact or effect arising or likely to arise thereof
- the measures, actions or plans to be undertaken, to address the grievance and prevent any future similar event, and

⁴ World Bank Group, 2018. Environmental and Social Standards: Guidance Note for Borrowers

- the ongoing implementation of measures.

3.9 Training and Awareness

A training needs analysis shall be established to determine the relevant trainings which shall be conducted. The needs analysis will be based on the requirements of this plan. It will involve a basic assessment of the knowledge, and skills of the people involved in training implementation. Key areas for training shall include access to the Grievance Mechanism and associated procedures (as per Section 11), disciplinary procedures, emergency response procedures, cultural awareness, code of conduct, regular health safety and security, SEAH awareness, human rights awareness among others.

4 Emergency Preparedness and Response Plan

4.1 Scope

Investees must anticipate and be prepared to respond to accidental and emergency situations associated with the project and mitigate any harm to people and/or the environment.

4.2 Objectives

The main objective is to provide a preparatory plan for emergencies, which will need to consider communities, vulnerable peoples and individuals that may be impacted and the necessary provision of equipment and resources.

4.3 Applicable Regulations, Standards and Guidelines

- Host country environmental and labour legislations
- IFC Environmental and Social Performance Standards
- UN Guiding Principles on Business and Human Rights

4.4 Roles and Responsibilities

The fund will ensure that all of its investees have developed an Emergency Preparedness and Response Plan (EPRP). The roles and responsibilities of the investee include:

- Development and implementation of the EPRP
- Training of all employees to ensure awareness and understanding of the EPRP
- Ensuring the First Responder identified in the EPRP has undergone the required training, and
- Ensuring the EPRP procedures are tested, and the outcomes reviewed and documented on a regular basis.

4.5 Emergency Preparedness and Response Approach

4.5.1 Risk Assessment

Investees will be required to conduct a project hazard risk assessment, which anticipates potential emergency situations and outlines the control measures needed to adequately mitigate the risks (e.g., fire-fighting, rescue equipment, etc).

The emergency situations that could arise include, but are not limited to, the following:

- Landslides/mudslides
- Flooding
- Fire
- Hazardous spills
- Earthquakes
- Medical emergencies
- Terrorist threats
- Civil unrest

Refer to Appendix K for comprehensive consideration of health and safety risks.

4.5.2 Emergency Contact Details

A list of all relevant emergency contact details should be available in the site-specific project's EPRP. These contacts should also be placed on notice boards and included in induction manuals, as well as in common areas, such as canteens, offices, etc.

4.6 Communication

Each fund-supported project should define its own site-specific EPRP. The emergency procedure should include communication and coordination plans in the event of an emergency, with the form of communication determined by the threat level per specific site. The EPRP should also include the evacuation procedures, as well as emergency numbers. These contact numbers should be posted in conspicuous areas and be reviewed periodically, with any changes communicated to staff and contractors.

All staff and site visitors should be inducted on evacuation procedures, with a refresher provided periodically. All evacuation routes should be well known by staff and marked and labelled. The routes should not pose any risks to staff.

Investees should train first aiders and fire marshals at project sites to assist in managing emergency situations until professional help arrives.

4.7 Training

Each Investees should ensure that all staff members (inclusive of interns, part-time employees, probationary employees, sub-contractors, service providers, and suppliers) and visitors, have undergone training and practice in emergency procedures.

The training should be conducted by a competent person/institution and cover:

- Individual roles and responsibilities
- Threats, hazards and protective actions
- Notification, warning and communication procedures
- Means for locating colleagues in an emergency

- Emergency response procedures
- Evacuation, shelter and accountability procedures
- Location and use of common emergency equipment, and
- Emergency shutdown procedures.

4.8 Monitoring and Reporting

Each Investee should monitor and report on any emergencies that occur, as well as review all training material from any emergency response exercise to check validity of the emergency plan in place. The reviews should check if the roles and responsibilities were well executed and propose changes where the plan was not effective. Records used to monitor performance of emergency procedures are:

- Training attendance registers
- Emergency training topics and materials, and
- Records of emergency incidents/near misses/accidents/fatalities. These should outline the circumstances, the immediate actions undertaken to ensure the worker was safe and stable, any first aid measures taken, corrective actions implemented to ensure the incident/accident does not occur again and related necessary changes to the emergency procedures.

5 Supply Chain Procurement Plan

5.1 Scope and Purpose

The guidance in this section is meant to help investees to ensure that the contractors, suppliers, sub-contractors and manufacturers of investees are committed to the avoidance of forced and child labour, including in their supply chain. The focus of the Supply Chain Procurement Plan (SCPP) is in ensuring human and labour rights concerning working conditions, terms of employment, and workers Grievance Mechanism. These guidelines apply to all funds managed by Camco and their underlying investments. The investees will need to:

- Provide information relating to their operations, contractors and suppliers as part of the due diligence
- Include forced and child labour provisions in their supply and contractor agreements
- Undertake supply chain mapping to assess supply chain risk, and
- Endeavour to ensure compliance with these guidelines.

Forced labour issues are reported frequently in construction, manufacturing and mining sectors and are therefore relevant to renewable energy projects and the underlying supply chains. All investees are required to provide information relating to their contractors and suppliers as part of a due diligence assessment and must include forced and child labour provisions in their supply and contractor agreements.

5.2 Objective

Investees should have a clear and transparent SCPP, setting out the measures taken to prevent forced and child labour. The SCPP should clarify that the policy applies to all subsidiaries of a company and their respective supply chains. It should also clarify any training needs of human resource and/or procurement personnel on how to identify forced labour in practice and seek appropriate remedies.

5.3 Applicable Regulations, Standards and Guidelines

- UN Guiding Principles on Business and Human Rights
- ILO's Declaration on Fundamental Principles and Rights at Work
- the sustainability principles advocated by UN Global Compact
- IFC Environmental and Social Performance Standards
- The following guidelines are also recommended:
- ILO's Combating Forced Labour: A Handbook for Employers and Business (2015)
- Solar Equipment Buyers' Guide for Supply Chain Traceability (2021)
- European Bank for Reconstruction and Development: Sector supply-chain guidance – batteries (2024)
- European Bank for Reconstruction and Development: Sector supply-chain guidance – wind energy (2024)
- World Bank Group Supply Chain Management: An introduction and practical toolset for procurement practitioners (2023)
- IFC Good Practice Handbook: Assessing and Managing Environmental and Social Risks in an Agro-Commodity Supply Chain (2013)
- ILO Indicators for Child Labour
- ILO indicators of Forced Labour

5.4 Roles and Responsibilities

It is the responsibility of the investee to ensure compliance with its legal obligations and establish a SCPP. The plan needs to identify the individuals with responsibility for supply chain risk management and ensure the responsibility and accountability for supply chain risk is clearly defined in their role (including for senior management and the Board). should have a clear and transparent SCPP, setting out the measures taken to prevent forced and child labour. The SCPP should clarify that the policy applies to all subsidiaries of a company and their respective supply chains. It should also clarify any training needs of human resource and/or procurement personnel on how to identify forced labour in practice and seek appropriate remedies.

5.5 Approach

Step 1: Investees should establish a policy with a clear commitment to:

- Not use or benefit from any forms of involuntary labour or debt bondage, including withholding passports or other documents of employees
- Not allow any physical, psychological, verbal or sexual harassment or abuse towards any employee
- Not employ any workers below 14 years of age or the legal national minimum age, whichever is higher (in line with the ILO Convention 138 on child labour)
- Ensure that employing young people above the minimum age but under 18 years does not jeopardise their education, health and safety or expose them to immoral behaviour
- Fully recognise employees' rights to organise, form and join a union, and bargain collectively
- Pay employees a living wage, which should at least be at the level of the national minimum wage, and
- Allow employees to freely enter and leave their workplace and any housing provided.

Step 2: Map out the supply chain and encourage tier one suppliers to engage with those further down the chain. Apply optimum effort to comply with any internationally recognised traceability protocol that reflects best international industry practice. The following key aspects should also be considered by investees:

- What percentage of your supply chain operates in high-risk countries for each tier?
- What is the length of the direct supplier's contract with your company?
- Have contractual audit or cancellation rights been included in the supplier's contract?
- Are you able to switch suppliers?
- How do you rectify issues if minor breaches are identified?
- What is the amount (in USD) of goods or services procured from the supplier?
- Has the supplier adopted a public-facing policy including 1) an ethical sourcing code of conduct, 2) specific references to the Bill of Rights and ILO and prohibiting forced and child labour, and 3) OHS policy?
- Does the supplier have certifications in place for 1) ISO 45000 on OSH, 2) ISO 26000 on social responsibility, 3) ISO 20400 on sustainable procurement; and 4) SA 8000 on social performance?
- Does the supplier subscribe to the Responsible Minerals Initiative or conduct OECD-guided due diligence on its supply chains?
- Does the supplier have safeguarding policies and measures to protect employees?
- Do the supplier's commitments apply to underlying subcontractors and suppliers, and other business partners throughout the supply value chain?
- How do you audit your supply chain (e.g., desk-based review, phone interviews, in-person interviews, on-site audits)?
- What percentage of your direct suppliers have you audited and how do you determine which suppliers to audit?

- Do you make use of publicly available databases such as Business and Human Rights’ database, Human Rights Defenders and Civic Freedoms Programme, and/or Responsible Minerals Initiative to map compliance?

Step 3: Include legal provisions in contracts with contractors, subcontractors, suppliers and manufacturers in order to:

- Prevent forced and child labour of staff and any other person employed or engaged by them, and
- Prevent forced and child labour in all contracts that they execute with their suppliers or manufacturers.
- These legal provisions should be enforced by:
- The investee monitoring subcontractors, suppliers and manufacturers on their obligations to prevent forced and child labour among staff and any other person employed or engaged by them
- The supplier committing to promptly inform the investee and the fund if it receives information that the representation is false and of any new risks or incidents of forced and child labour in the supply chain that has been identified – and take appropriate steps to remedy the situation, and
- In the case of previously identified labour issues with a contractor or supplier, requesting that contractors and suppliers provide evidence of improved capacity and their commitment to comply with the prohibition of forced and child labour and warrant that they are not using forced or child labour.

Step 4: Establish a confidential Grievance Mechanism so that contractors, subcontractors, suppliers and manufacturers can voice any suspected breaches anonymously or in a formal manner (refer to Section 11 for the full GRM procedure).

5.6 Training

Investees should identify the individuals with responsibility for supply chain risk management and procurement and ensure they have the required understanding of supply chain risk, with specific focus on labour and human rights. Investees should provide the Grievance Redress Mechanism, the supplier Code of Conduct and labour policy to suppliers upon contracting to ensure the compliance of suppliers. Further training and guidance on these procedures and policies is necessary upon contracting the supplier.

5.7 Monitoring and Reporting

Establish a plan to monitor contractors, subcontractors, suppliers and manufacturers on the implementation of their obligations to prevent forced and child labour among the staff and any other person employed or engaged by them. Records used to monitor performance of the supply chain procurement plan are:

- Supply chain due diligence, and
- Grievances raised and resolved.

6 Pollution Prevention Plan

6.1 Scope and Purpose

All potential pollutants that could arise from fund-supported projects require careful management to avoid negative impacts on human health and the environment, such as on groundwater, soils, air quality, surface water and ecology. Respective management plans, such as Waste Management Plan, Water Management Plan, Wastewater Management Plan, Traffic Management Plan, Dust and Noise Management Plan, and Hazardous Waste and E-Waste Management Plan should be established by the investee to the extent relevant. This Pollution Prevention Plan provides a guideline on how the fund will assess investees' respective management plans. It therefore sets out the requirements and expectations on the investee in terms of pollution prevention throughout the project development cycle.

6.2 Objectives

Investees should make every effort to avoid or minimise adverse impacts on human health and the environment by avoiding or minimising pollution from all project activities. The Pollution Prevention Plan intends to promote more sustainable use of resources, including energy and water, and to reduce project-related GHG emissions.

6.3 Applicable Regulations, Standards and Guidelines

- Host country environmental and labour legislation
- IFC Environmental and Social Performance Standards
- Sustainability principles advocated by the UN Global Compact

6.4 Roles and Responsibilities

Investees have responsibility for developing and implementing a project-specific Pollution Prevention Plan, which should align with in-country laws and regulations and international best practices.

6.5 Pollution Prevention Approach

Investees shall establish the following plans under the Pollution Prevention Plan, encompassing the management of pollution exposed to soil, air and water.

6.5.1 Waste Management Plan

The purpose of the Waste Management Plan is to describe the principles, procedures and management of the waste generated by the fund investment projects. The investee is expected to identify waste types generated from the sub-project activities, from construction until the decommissioning phase.

The plan shall include specific processes and procedures to outline the:

- Identification of various waste types generated during the project life
- Collection, sorting and storage of each waste type in designated areas, with reduced exposure to climatic conditions
- Training on hazardous waste handling and types of PPE to be used

- Safe and secure disposal of hazardous waste by a certified disposal facility
- Collection and disposal of recyclable waste types at a recycling facility
- Proposed measures on divert to landfill strategies
- Disposal of all construction-related waste and its management prior to the start of the operational phase, and
- A Monitoring Plan to record and report disposed waste quantities.

6.5.2 Water Management Plan

Investees shall establish a Water Management Plan which will provide guidance for any impacts to surface- and groundwater quality and supply during the project life cycle. The Plan will outline measures to manage the different water sources (surface water runoff, groundwater, freshwater supply, and grey water) in ensuring:

- Water quality is unaffected by project activities
- Water pools or sources are not created during project activities that might encourage the proliferation of water-borne parasites and increase the probability of associated diseases
- Water volumes used for project activities (consumption for workforce, sanitary purposes and construction) are monitored and do not impede community consumption and purpose-use levels
- Potable water sources are protected and meet with or exceed applicable national acceptability standards, or in their absence the current edition of the WHO's guidelines for drinking water quality
- Water abstraction volumes are aligned with permitting approved by the host country
- The improvement of water quality and water supply as a result of climate change impacts and to maintain or improve ecosystem services
- The possible need for drainage systems
- Liquid effluents are the sole responsibility of the investee to be disposed of in a safe and secure manner, removed from any water sources, and
- Training in the handling of liquid effluent in a safe and secure manner, with guidance on sanitary measures.

6.5.3 Traffic Management Plan

The investee shall be required to establish a Traffic Management Plan, which will guide the flow of vehicles and people within the project site and nearby roads to protect the safety of all community and project site members. The plan shall outline:

- Procedures outlining specific entrance points and storage points for heavy or abnormally large equipment, how materials will be delivered on site (over land), as well as road access points and indications of which roads have been reinforced to handle high tonnages.
- Monitoring and reporting of non-compliance, incidents and accidents, equipment quantities and tonnages allowable for transport along project site roads without impediment and impact on road infrastructure, usage of PPE worn, safety sign visibility and usage of channelising devices (e.g., cones, tubular markers, vertical panels, barricades and barriers).
- Designated pedestrian pathways and routes throughout the project site and leading into the project site.
- Security measures for visitor and project personnel entry into the project site.
- Security and speed reduction measures around transport routes within the project site, as well as time shifts of working hours and project activity.
- Driver rules and regulations whilst on site as well as while transporting equipment.
- Project-site vehicle maintenance and licensing requirements.
- Dust, pollution and debris management.

- Training in driving manoeuvres, vehicle inspection checks, PPE necessary for driving, site traffic rules and regulations, and emergency vehicle procedures and drills for the project site and all personnel directing traffic on the project site.
- Training of the Traffic Management Plan and awareness raising for the surrounding community to ensure traffic safety rules are well-acknowledged and adhered to.

6.5.4 Dust and Noise Management Plan

The investee shall establish a Dust and Noise Management Plan which shall guide procedures to reduce and manage dust emissions and noise management. The aim of the plan should be to:

- Encourage the use of electrical construction equipment, where possible
- Conduct the plan in agreement with community and nearby project-affected persons to establish hours for approved construction activity
- Engage procedures in place for equipment shut down and operational periods
- Engage equipment procedures and monitoring protocols to comply with dust and noise limits as per the local legislations
- Establish equipment maintenance schedules to ensure ease of operation
- Ensure all visitors and project site vehicles adhere to traffic speed limits
- Make use of dust-suppression methods and technologies
- Ensure allotted water levels are used for wetting down of gravel and informal project site roads, where necessary
- Ensure burning of any waste is not permissible on site, and
- Ensure stockpiles of raw materials are covered, when not in use, to ensure dust emissions do not contaminate the stockpile.

6.5.5 Hazardous and E-Waste Management Plan

The investee should establish a Hazardous Waste Management Plan for their projects, providing guidance on:

- Identifying sources of hazardous waste generation, including oil spills, grey water resulting from effluent and washing activities.
- Establishing storage facilities with controlled temperature conditions, limited or no exposure to sunlight, appropriately lined to prevent contamination, contain drums filled with sand to prevent thermal runaway, and have limited or restricted access.
- Establishing waste handling training procedures outlining associated PPE to be used.
- Exploring and establishing waste component recycling and disposal strategies by:
 - Engaging with accredited service providers for safe and secure disposal
 - Partnering with other projects and project developers to achieve economies of scale in establishing a feasible recycling solution
 - Engaging with manufacturers to take-back components which can be used to replace raw material supply. When gathering quotes for equipment with hazardous waste components (e.g., cadmium found in solar panels, lithium-ion in batteries, etc.), consider addressing disposal strategies with suppliers or manufacturers, to understand which components can be recovered and if there are any incentives to take advantage of. Manufacturers and suppliers would have better insight into the most efficient and cost-effective routes for transport of their equipment as well as are better acquainted with which raw materials would prove most valuable, and

- Engaging with accredited repair services that are able to maintain equipment ISO standards.
- Monitoring and reporting of waste capacities and supporting documentation to verify disposal strategies.

6.5.6 Waste Management Plan

The investee should establish and implement a **Waste Management Plan** for their projects. The plan should include actions for the appropriate handling, storing and recycling or disposal of any hazardous waste and materials (such as end-of-life solar PV panels and batteries, fuels, oils and chemicals) and the minimisation and appropriate management of construction-stage waste.

The investee is expected to identify waste streams and types generated from the sub-project activities in terms of generation of emissions to air, discharge to water, project-related GHG emissions, contamination of land, project-associated waste and hazardous materials and pesticides. All the waste streams identified should be included in the Monitoring Plan. Investees should take efforts to avoid or minimise the release of pollutants and/or control the intensity and flow of their release. Where waste and other pollutants cannot be recovered or reused, they should be destroyed or disposed of in an environmentally sound manner that includes the appropriate control of emissions and residues resulting from the handling and processing.

A **Waste Management Plan** should:

- Effectively identify and sort all waste types in accordance with disposal strategies.
- Plan for the collection of data and information about waste streams or contaminants, including potentially hazardous chemicals or components that can potentially be exposed to soil, water and air, as well as their associated impacts. This includes Identifying whether a particular battery technology involves lithium, nickel, or cobalt.
- Include strategies to reduce generation of waste and divert waste to landfill.
- Plan for the recovery, re-use and re-purposing of waste that is safe enough for human use and reduced environmental impact. This includes identifying opportunities for waste reduction at source, by negotiating procurement opportunities to return reusable materials to the manufacturers. Discussions with the manufacturer and/or supplier about re-use and re-purposing hazardous elements/components can assist in finding a cost-effective disposal solution. Discussions had during the early stages of purchasing capex equipment provides an incentive and room to negotiate with manufacturers and suppliers to look into a solution that aligns with their own transportation, disposal and resourcing of raw material supply strategies. Manufacturers and suppliers can also look into already serviced clients within the same areas and provide an "economy-of-scale" transport solution.
- Plan for the safe and secure disposal of hazardous waste in an environmentally safe and secure manner to a licensed facility. Certification of such disposal is necessary for monitoring requirements. All waste containers designated for off-site transportation must be secured and labelled with the contents and associated hazards.
- Dictate the conditions for the safe and secure storage of hazardous materials and waste (e.g., shielded from direct sunlight, in a covered and lined facility that prevents leakage which could cause soil contamination).
- Define procedures and strict operational controls for the segregation of waste streams to prevent contamination, onsite storage, treatment or handling, and disposal. Procedures should outline the necessary PPE when handling specific hazardous waste streams.

The need to develop other supplementary management plans, such as a **Water Management Plan** and **Dust and Noise Management Plan**, to comprehensively address soil quality, water quality and air quality concerns should be defined in the project-specific risk assessment or an **Environmental and Social Management Plan (ESMP)**, defined within the ESIA.

The **ESMP** should consider the following:

- The impact the project will have on soil erosion, including any increased likelihood of landslides and its impact to the surrounding environment (including residents, nearby subsistence farms, nearby water supply,

etc.). This involves an analysis of the rate of rainfall and its effect on soil erosion or sedimentation that occurs on embankments (for hydro projects) and the effects on drainage channels (solar projects). Alternative drainage routes should be considered along with the area's geological composition for optimal solutions to soil erosion for solar projects. Reducing the probability of landslides and sedimentation can be achieved by reinforcing the stability of embankments, such as by planting vegetation, terracing or including a by-pass channel into the design of the project, dependent on the plant/project design.

6.6 Training

The investee should provide training for all staff on waste identification, segregation, and the handling and storage of hazardous materials and waste. The waste handling training should cover transportation, storage, disposal and the necessary PPE required throughout.

6.7 Monitoring and reporting

The investee must monitor and report on the following indicators to verify effective implementation of the Pollution Prevention Plan:

- Volume of hazardous waste and recyclables disposed of the volume of waste stored
- The storage conditions of hazardous waste
- Incidents and accidents occurred during project activities on site, and
- Mitigative measures implemented to combat a triggered environmental risk.

7 Community Health, Safety and Security Plan

7.1 Scope and Purpose

Investees have a responsibility to the community for ensuring all of their projects' operations are conducted in a manner that protects local communities' health, safety and security. The fund will ensure that each investee company has identified all the risks under community health, safety and security through carrying out Environmental and Social Impact Assessments, as explained in Section 1.8 above. The Community Health, Safety and Security Plan (CHSSP) provides guidance on how risks can be avoided or minimised through various measures under labour and working conditions, with particular attention given to the disadvantaged and marginalised groups.

7.2 Objectives

Investees should, where relevant to their projects and activities, make every effort to:

- Anticipate and avoid adverse impacts occurring through either routine or non-routine circumstances on the health and safety of affected communities during the project lifecycle
- Ensure quality and safety in the design and construction of project-related infrastructure, thereby preventing worsening potential safety risks and accidents
- Avoid community exposure to disaster risks, diseases and hazardous materials associated with project activities
- Ensure that the safeguarding of personnel and proper analyses of risks to communities is carried out in accordance with international human rights standards and principles, and
- Have in place effective measures to address emergency events, whether human-made or natural hazards.

7.3 Applicable Regulations, Standards and Guidelines

- Host country environmental and labour legislation
- IFC Environmental and Social Performance Standards
- Sustainability principles advocated by the UN Global Compact
- UN Guiding Principles on Business and Human Rights
- ILO Declaration on Fundamental Principles and Rights at Work
- International Bill of Human Rights

7.4 Roles and Responsibilities

Investees are responsible for:

- Developing a CHSSP for each of their projects
- Implementing the CHSSP for each of their projects
- Training their workers and the community on the plan, which should include how they will be implemented, and
- Monitoring, reviewing and making any necessary changes on the plan.

7.5 Community Health and Safety Approach

7.5.1 Infrastructure and equipment safety

All Camco-funded projects should be conducted in a manner that avoids harm to the surrounding environment and injury to humans, particularly where aspects of their operations are accessible to the community. If the activities involve the operation of moving equipment on public roads, necessary measures should be put in place to prevent incidents and accidents. These measures include having a Traffic Management Plan, Dust Management Plan, among others.

Site speed limits should be communicated through signs and during the induction process. Safety signage should also be used on project areas to convey various warnings to drivers, such as Dangerous Areas, Steep Slopes, Engage Low Gears, Deep Excavation, Sharp Bends, Animal Crossing, among others. All movement of equipment should only be done during agreed times of the day.

All safety concerns to the community during the project lifecycle must be considered by the investees. Considerations for construction sites that require blocked-off restricted areas, vehicle movements in public areas, public access road conditions and impacts resulting from vehicles driving through areas beyond the work zone, need to be integrated into a Traffic Management Plan and communicated to the community during stakeholder engagement.

7.5.2 Hazardous Materials Safety

Investees must avoid, prevent or minimise the potential for exposure of the community to hazardous materials. Measures outlined in the Pollution Prevention Plan on storage and handling of hazardous waste should be applied. The investee should also have procedures in place to control the safe delivery of project components' materials (e.g., solar PV panels and batteries) and the transportation and disposal of wastes that may be generated during the project life cycle.

7.5.3 Environmental and Natural Resources Issues

Investees are expected to implement their Pollution Prevention Plan to prevent, avoid or minimise the risks of natural hazards such as landslides, soil erosion and floods that could arise from land use changes due to their operations. The Plan should also prevent risks associated with destroying ecosystem services and altering the capacity of these healthy ecosystems to deliver this wide range of goods and services. Refer to Section 6.5 for more on how to develop a Pollution Prevention Plan.

To understand the effects of soil erosion and sedimentation (e.g., landslides, reduced biodiversity and ecosystem services) on communities, investees need to consider potential land encroachment, destruction of property or households, impact on drinking water supply, and the degradation of soil quality and produce in subsistence farming. Any relevant natural resource considerations should be integrated into applications for an environmental permit or license. For example, the availability of a sufficient water supply to a community should be integrated into the water abstraction permit approved by national environmental authorities for the project. In this case, investees should avoid as far as possible the infringement of water resources and are required to develop a Water Management Plan to address this risk in water-scarce or poor areas and communities.

7.5.4 Community Exposure to Diseases

Investees should, to the best of their ability, prevent or minimise exposure of the community to communicable diseases. This will be particularly relevant to projects which have an onsite labour force where there may be an influx of labour, either temporary or permanent.

Investees should develop measures to control any outbreak of communicable diseases, such as staff awareness raising on the health risks associated with sexual exploitation, abuse and harassment and related sexual diseases.

Training on the company's labour policy and grievance mechanisms should also be included to ensure full acknowledgement of the repercussions of inappropriate conduct. Other measures, such as voluntary counselling and testing for sexually transmitted infections, should be considered. The investee should also implement an infectious disease outbreak management programme, which might include vaccinating workers to reduce the potential for outbreaks or a containment exercise should an outbreak occur to reduce the spread of the disease among local communities.

7.5.5 Conflict Management

Investees have a responsibility to ensure that training programmes and awareness raising efforts have been put in place to manage conflicts between the community and the investee's staff. A conflict-sensitivity assessment is critical in fragile and conflict-affected areas⁵. This assessment requires:

- Understanding the socio-economic context in which the investee will operate to understand the peace and conflict dynamics, and the interests and incentives of key actors within the community. This requires identifying the main drivers of conflict the gender and conflict dynamics, key peace and conflict actors and most likely future scenario/s and opportunities to promote peace and inclusion.
- Assessing what type of intervention and how this intervention might impact conflict and gender dynamics, and unpack risks and opportunities associated. This can be determined by asking the following key questions:
 - How will the project contribute to addressing any conflict drivers? Will the intervention exacerbate existing tensions between groups? Will the intervention result in perceptions of bias and jeopardise the safety of staff and sub-contractors? Will any activities lead to the diversion of assistance by armed non-state actors or through involvement of corruption? Will the intervention or project activities favour one group (e.g., women) over others and put members of that group at risk of violence?
 - How will the project strengthen peace and inclusion in the project site?
 - What or whom does the project target and how will beneficiaries be selected? Is the selection of beneficiaries inclusive of all ethnic/social groups?
 - What unintended impacts could the project have on the conflict dynamics in the project site as well as within the wider context, and what mitigation measures will be put in place?
- Continually adapting the intervention to minimise harm and maximise opportunities to build peace and stability, allowing to adapt in response to evolving conflict dynamics. The conflict analysis should be reviewed periodically across all stakeholders to assess whether changes to project activities and implementation approaches are needed or require adjustment.

The investee must provide awareness raising and training on the Grievance Redress Mechanism in place for all project-related activities as well as the Camco Whistleblowing Policy. Any grievance submitted should be managed in accordance with the Grievance Redress Mechanism as outlined in Section 10.5: Stakeholder Engagement Plan.

7.5.6 Security Risk Management Plan

Investees must assess and evaluate the risks posed to the project site, their employees, subcontractors, third-party service providers and the community in order to understand the level and types of security measures to mitigate the risks. The investee should consider likely threats that would require a response by security personnel, both private and public, which is to be established in a Security Risk Management Plan. The plan should consider:

- The level of effort in assessing and managing security risks should be commensurate with the level of security risk associated with the project and its operating context. The type, number, responsibilities and

⁵ Global Affairs Canada, 2021. Conflict Sensitivity

arming of private security forces should flow from an assessment of the security risks and appropriate responses.

- Evaluate and analyse potential risks that impact the security and safety of critical infrastructure and people associated with the project site. Identify existing protective measures and vulnerabilities at project facilities and infrastructure and identifying ways to reduce vulnerabilities and enhance safety. This includes assessing physical security needs, cybersecurity, security management and staffing. Consider threats such as nonviolent and violent criminal threats (theft, threats of violence towards staff, active shooter incidents or terrorist threats, civil unrest, cybersecurity).
- Evacuation procedures for all staff and community members outlining key protection measures for all individuals. Evacuation routes and pathways to evacuate the premises.

7.5.7 Security Personnel

Investees must assess the risk posed by the security personnel and infrastructure to the community and their workers. They should be guided by the principles of proportionality and good international practice in relation to hiring, rules of conduct (aligned with the UN Guiding Principles on Business and Human Rights, ILO Declaration on Fundamental Principles and Rights at Work and International Bill of Human Rights), training and equipping of security personnel. Furthermore, investees should ensure that all security practices are aligned with local and national regulations and will assess and document risks arising from their projects' use of governmental security.

7.5.8 Vulnerable Communities

Particular attention should always be given to vulnerable groups when assessing community health, safety and security risks. The investee must ensure that safeguarding measures are applied to these groups and their property in accordance with relevant human rights principles and aligned with the principles set out in the Camco Safeguarding Policy (see Appendix B). The investee is also expected to conduct focus group discussions in which all relevant information about the health and safety risks of the project are openly discussed. Sexual exploitation, abuse and harassment (SEAH) against vulnerable groups should be addressed as a risk in the CHSSP, with all cases of SEAH reported and investigated under the Grievance Mechanism.

7.6 Stakeholder Engagement

Investees should use the Stakeholder Engagement Framework, set out in Section 10.5, to carry out any and all discussions or interactions with the community.

7.7 Grievance Redress Mechanism

Investees must develop a project-level Grievance Redress Mechanism for the community as part of its Stakeholder Engagement Plan (see Section 11), which provides guidelines on how to receive and manage grievances, claims and/or suggestions from the community, as well as provisions of training sessions to be undertaken by staff members involved in addressing any grievances.

Refer to Appendix K and L for comprehensive consideration of health and safety and social risks.

7.8 Training

Investees must ensure that the persons in charge of the CHSSP have undergone adequate training on how to handle community health, safety and security issues, including conflict management and emergency responses. The investee should also ensure community members are aware of the methods used to submit a grievance through the Grievance Mechanism.

Investee staff should undertake safeguarding induction training once onboarded and refresher training to continually raise awareness on safeguarding measures. Such conduct includes communication and awareness raising of the Grievance Mechanism in order to prevent:

- sexual exploitation or abuse
- physical, emotional or psychological abuse
- exchanging money, employment, goods or services for sexual activity
- engaging in any sexual relationships with beneficiaries of assistance, and
- engaging with sex workers.

7.9 Monitoring and Reviewing

Investees must monitor the effectiveness of the CHSSP's mitigation measures by monitoring the following records:

- Updated security risk register.
- Grievance records, outlining:
 - the circumstances of the grievance
 - corrective actions taken following the grievance
 - management decision on the grievance, and
 - progress of circumstances since corrective actions.
- Stakeholder engagement meeting minutes outlining key concerns.
- Training records, providing details on date, time, training material and attendance.

8 Land Acquisition Plan *and* Resettlement Action Plan

8.1 Scope and Purpose

The scope of these two plans is to ensure that investees undertake any land acquisitions and involuntary resettlements in accordance with the host country's laws and international best practice, specifically IFC PS 5 on Land Acquisition and Involuntary Resettlement. The plan should also provide guidance on how to approach all instances of physical and/or economic displacement and are applicable to all Camco-funded projects where land acquisition and involuntary resettlement are necessary.

8.2 Objectives

Involuntary resettlement arises when persons or communities do not have the right to refuse or object to land acquisition or restrictions on land use that result in physical or economic displacement. Involuntary resettlement shall be avoided where feasible, or minimised, exploring all viable alternative project designs, and through adopting a "willing seller-willing buyer" approach to acquire land.

Where involuntary resettlement cannot be avoided (i.e., an alternative project location cannot be identified), the following principles of the Land Acquisition Plan (LAP) and Resettlement Action Plan (RAP) are to be applied:

- Avoid the involuntary acquisition of land and other assets as far as possible. If this is unavoidable, the impact should be minimised by exploring possible alternative project designs.
- Potential E&S impacts of involuntary land acquisition and resettlement on project-affected persons and livelihoods shall be assessed in accordance with IFC PS 5 and other international best practices.
- Avoid forced evictions.
- Anticipate and avoid the adverse social and economic impacts from physical and economic displacement. Where avoidance is not possible minimise these impacts by:
 - providing compensation for loss of assets at replacement cost, and
 - ensuring that resettlement activities are implemented transparently and in consistent consultation and engagement with land-owners, land users, community members affected by the land acquisition and the community.
- Ensure replacement residential and productive land is similar or better in value to the land that has been lost and is accepted by the persons affected by the project.
- Restore and/or improve the livelihoods and living standards among physically or economically displaced people through the provision of adequate housing with security of tenure at the resettlement sites.

8.3 Applicable Regulations, Standards and Guidelines

- Host country legal frameworks concerning the environment and land
- IFC Environmental and Social Performance Standards
- Sustainability principles advocated by the UN Global Compact

8.4 Roles and Responsibilities

Investees are responsible for the development and implementation of the RAP and LAP. Some of the key roles and responsibilities include:

- Establishing a methodology for an agreed compensation framework and benefits to be aligned with legal, traditional and cultural rights to the land
- Facilitating and managing the participation of all affected stakeholders in consultations and disclosures for land acquisition and involuntary resettlement
- Ensuring that the persons affected by the project have been provided with relevant information about the project
- Developing, communicating and implementing a project Grievance Redress Mechanism, and
- Monitoring and reviewing the process of land acquisition and resettlement uptake by the community.

8.5 Land Acquisition and Involuntary Resettlement Approach

Involuntary resettlement refers to both physical and economic displacement due to land acquisition associated with an investee's operations. Land acquisition refers to the purchase and transfer of land rights to the investee.

8.5.1 Identifying Land Required and Analysis of Options

Investees will need to determine the following from an IFC-compliant ESIA:

- Exact location of the project
- Mapping of eligible land parcels and identification of land-owners (identified through census surveys, socio-economic studies, meetings and site selection studies) and their standards of living
- A process of consultation with and participation of project-affected people shall be conducted to inform the preparation and planning of any involuntary land acquisition and resettlement, as well as share information
- Identification of vulnerable peoples affected by the project who are land-owners and/or land users (identified through census surveys, socio-economic studies, meetings and site selection studies) and their standards of living
- The exact size of land influenced by the project
- Current economic activities undertaken on the land
- Potential involuntary restrictions on land use and access to natural resources for livelihood cultivation or ecosystem services by the communities, and
- Identification of an alternative land site in an effort to avoid land acquisition and physical and economic displacement in the event of compensation offers being rejected.

This process is also expected to include a census of affected populations or households to identify eligible persons who are willing to lease or sell their land parcels through the analysis of surveys, studies and consultations with affected persons concerning assistance benefits and development opportunities. A defined inventory of affected assets should then be compiled.

Camco-managed funds avoid, as far as is possible, projects in which involuntary resettlement is required. In the rare event of an involuntary resettlement resulting from persons or communities being faced with no right to refuse or object to land acquisition or restrictions on land use due to government owned land, the following guidance will be applied. This occurs in cases of (i) lawful expropriation, or temporary or permanent restrictions on land use, and (ii) negotiated settlements in which the buyer can resort to expropriation or impose legal restrictions on land use if negotiations with the seller fails.

The following will be applied, where land acquisition and resettlement is the responsibility of the host-country government:

- The investee will explore opportunities to collaborate with the responsible government agency, and if permitted by the agency, play an active role in resettlement planning, implementation and monitoring.
- In relation to previously planned or constructed projects, the investee will undertake a mapping of 1) legacy land ownership, 2) the resettlement process undertaken, and 3) compensation structures applied in the past, dependent on community engagement and documentation where available, to ensure the process complies with the then-existing national land ownership laws and IFC PS 5.
- The investee must prepare a Supplemental Resettlement Plan covering (i) the identification of affected people and impacts, (ii) a description of regulated activities, including entitlements of displaced persons provided under applicable national laws and regulations, (iii) the supplemental measures to achieve requirements set under IFC PS 5 permitted by the responsible agency, and (iv) the financial and implementation responsibilities of the investee in the execution of the Supplemental Resettlement Plan.
- In the event an entitled seller refuses the sale of land despite presented compensation structures or benefits, the investee must identify alternative land use options.

8.5.2 Development of a Resettlement Action Plan

The RAP must adhere to the host country's legal framework and incorporate its traditional and cultural land rights. Understanding that formal documentation is not always in place in Least Developed Countries (LDCs), the investee is required to determine the extent to which land ownership exists and their respective entitlements identified.

Below is a list of the key actions and considerations to be covered in the RAP.

- Identify legal entities to collaborate with in formally transferring and acquiring land titles, as well as estimated timelines in obtaining the necessary entitlements and structured compensation payments to affected people.
- Undertake meaningful consultations that are free of intimidation with project-affected people in the local language, including members of the community without a legal title to the land or asset, and guided by the stakeholder engagement process and, if applicable, the Grievance Redress Mechanism.
- Ensure continuous disclosure of the following through meaningful stakeholder engagement:
 - Specific legal step-by-step activities necessary in the land acquisition process to obtain land titles.
 - Process and planned timelines for affected members eligible for resettlement, inclusive of temporary or permanent status.
 - The agreed methodology used in calculating compensation.
- Establish a Compensation Plan, guided by the following actions:
 - Undertake a land evaluation assessment to substantiate the basis for compensation from a market-value perspective by a third-party service provider.
 - Identify traditional entities and village heads, as well as a social expert, to incorporate value in the valuation from a social and cultural perspective.
 - Discuss the social and economic value of assets held collectively by the community (such as common area resources, cultural structures, access to cultural heritage sites, etc.) with the community and ensure compensation is evenly distributed or designated to a village committee for management.
 - Identify vulnerable people and cumulative project-related impacts to their way-of-life (evidenced by census, socio-economic studies, surveys, meetings and site selection studies).
 - Establish non-discriminatory assistance programmes for vulnerable peoples affected by involuntary resettlement, taking into consideration land rights of vulnerable groups and facilitating meaningful participation in consultation and compensation discussions.

- Ensure compensation for lost assets is paid at full replacement cost, having integrated both the market and social value into the compensation calculation.
- Compensate informal land users for economic losses and potential livelihood restoration and resettlement if they have occupied the project land prior to project development.

No development of the project may commence until the land acquisition, resettlement and livelihood restoration requirements of the respective plans have been satisfied and legal access has been granted.

Involuntary physical displacements should be limited to fewer than 10 households.

8.6 Stakeholder Engagement

Stakeholder engagement is essential throughout the land acquisition approach and involuntary resettlement process, since continuous engagement allows for effective management of any project-related social risks that may arise. Transparency and awareness raising should be maintained through consistent engagement measures, such as information dissemination, meaningful consultation and the participation of affected persons, other community members and key local stakeholders throughout the entire land acquisition and involuntary resettlement process.

A variety of methods should be used by investees when consulting with identified stakeholders during the preparation of a RAP. These include:

- Public meetings involving the entire affected community
- Focus group discussions with affected community members, including land-owners and land users affected directly or indirectly by the project
- Focus group safeguarded discussions with vulnerable peoples, and
- Key informant interviews with relevant government officials, traditional leadership, religious leaders and youth leaders.

Consultations should be undertaken in local languages and translated to English/French depending on the location of the project. An important incentive for encouraging greater participation is to ensure consultations are undertaken at venues and times that do not disadvantage the vulnerable. Refer to Section 10: Stakeholder Engagement Plan for detailed guidance on undertaking effective engagements and considerations on safeguarding measures.

8.7 Grievance Redress Mechanism

A Grievance Redress Mechanism should be developed by the investee and communicated to all stakeholders, especially community members affected by the project. This refers specifically to the project-level grievance redress mechanism (Section 11). Attempts should be made to settle grievances or concerns through community consultations involving social and resettlement experts as required, and mediators and facilitators if necessary to ensure non-intimidation techniques are used.

Legal redress in a court of law should be the last corrective action sought, and only in the event that a land-owner, constituted by a household or inheritance divided amongst the family, is not in agreement on the action to sell their land or resettle. In this circumstance, the investee must await the decision of the court before proceeding with the implementation of land acquisition or involuntary resettlement.

Refer to Sections 10 and 11 respectively for guidance on the Stakeholder Engagement Plan and the Grievance Redress Mechanism and record keeping.

Refer to Appendix L for comprehensive consideration of social risks.

8.8 Monitoring, Reporting and Review

Investees must monitor the implementation of the LAP and RAP and provide the following records for review by any Camco-managed fund:

- List of affected individuals (noting vulnerable peoples) and applicable calculated compensation amounts (economic losses and physical displacement values), as evidenced by the Compensation Plan.
- Third-party market-related land evaluations with social considerations.
- Land lease agreements.
- Land ownership transfer documentation.
- Evidence of compensation payments.
- Stakeholder engagement meeting minutes demonstrating agreement of compensation calculation and agreement to displacement and/or acquisition requirements.
- Focus group discussion meeting minutes demonstrating all vulnerable peoples' agreement to displacement requirements and compensation calculations.
- Records of grievances, noting grievances raised and key concerns, actions taken to manage grievances and implemented corrective actions.

For RAP, the following is required:

- A description of the compensation provided and how this was calculated
- A description of any livelihood restorative benefits provided to displaced individuals, including replaced accommodation, relocation assistance provided, nearby and available infrastructure, and social services
- A description of the original accommodation and nearby infrastructure which can be compared to for evaluation purposes to demonstrate improved living conditions, and
- Evidence of the agreement from affected community members on the selected site.

9 Biodiversity Management Plan

9.1 Scope

The scope of the Biodiversity Management Plan (BMP) is to ensure that investees undertake biodiversity management in accordance with the host country's laws and international best practice (specifically, IFC PS 6 on Biodiversity Conservation and Sustainable Management of Living Natural Resources) and conserve biodiversity wherever possible.

9.2 Objective

The BMP should provide guidance to investees on how to protect and conserve biodiversity, maintain ecosystem services and sustainably manage living natural resources through the adoption of practices that integrate conservation needs and development priorities. A BMP should be developed by investees should a risk to biodiversity through the project be identified during the ESIA process.

9.3 Applicable Regulations, Standards and Guidelines

- Host country legislations and regulations
- IFC Performance Standard 6
- Sustainability principles advocated by the UN Global Compact

Also recommended:

- EIB's Guidance Note for Environmental and Social Standard 3 on Biodiversity and Ecosystems

9.4 Roles and Responsibilities

It is the responsibility of the investee to consider its project's direct and indirect impacts on biodiversity and ecosystem services to ensure the ecosystem services are conserved to the benefit of the surrounding communities. The following ecosystems services should be considered when assessing impacts:

- Provisioning services, which are the products people obtain from ecosystems
- Regulating services, which are the benefits people obtain from the regulation of ecosystem processes
- Cultural services, which are the nonmaterial benefits people obtain from ecosystems
- Supporting services, which are the natural processes that maintain other services.

9.5 Biodiversity Adaptive Management Approach

Investees must identify specific threats to biodiversity and ecosystems and the associated risks of the project throughout its lifecycle, to inform future management in a continual process, by conducting an IFC-compliant ESIA. The ESIA needs to establish a baseline of identified flora and fauna species within the project area of influence and cross-referenced with the IUCN Red List of Threatened Species across both dry and wet seasons of the project site. It should also identify whether the project area encompasses modified, natural and/or critical habitats, legally

protected and internationally recognised areas and/or invasive alien species. The resultant Biodiversity Management Plan should be revisited and revised every five years to ensure identified risks and mitigative measures are still relevant and applicable.

Furthermore, the ESIA should identify areas specific to animal migratory routes and pathways and apply the following considerations:

- Site selection is imperative to ensure land loss, habitat loss and degradation does not encroach onto migration routes and pathways and breeding sites. Wherever possible, investees should take measures to avoid or minimise impacts by selecting an alternative site. If unavoidable, they should ensure that the project design is adapted to encourage migratory and breeding habits of species as far as possible.
- The investee must ensure its operations are not located in or peripherally affect any “critical habitats”, as defined in Section 1.8.5.
- Should a vulnerable, endangered and/or critically endangered species be identified, a risk-averse approach should be taken whereby emphasis should first be placed on avoidance actions ensuring the project does not impact these species, ensuring protection and conservation of the species. If conservation is not possible, then corrective actions, such as habitat restoration, is necessary. Collaboration with biodiversity associations, wildlife specialists and authorities within the area to conserve the species will be necessary in understanding the full extent of the risk. The following steps should be considered:
 - In effectively assessing the critical habitat risk, a standalone Critical Habitat Assessment (CHA) is required, in which delineation of the natural, modified and critical habitats and the overlaying project infrastructure allows for identification of potential habitat losses. The CHA will delineate an Ecologically Appropriate Area of Analysis (EAAA) to inform potential direct and indirect impacts by human activity. The EAAA should not be limited to the project footprint, but rather a definable ecological boundary within which the biological communities have more in common with each other than they do outside of the boundary.
 - The CHA will consider the distribution of species or ecosystems (within and sometimes extending beyond the project’s area of influence) and the ecological patterns, processes, features and functions that are necessary for maintaining them (e.g., feeding area, breeding sites, migration, dispersal corridors).
 - The CHA will need to incorporate a baseline identification against either a “modified” habitat or “natural habitat. A “modified” habitat will showcase 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. A natural habitat will showcase a large proportion of plant and/or animal species of non-native origin, and/or where human activity has NOT substantially modified an area’s primary ecological functions and species composition.
- To achieve no net loss, the following mitigative measures should be considered:
 - Avoiding impacts on biodiversity through the identification and protection of set-asides, which are areas excluded from development and are targeted for the implementation of conservation enhancement measures. Set-asides will contain significant biodiversity values and/or provide ecosystem services of significance at the local, national and/or regional level and can be defined using internationally recognised approaches, such as high conservation value, systematic conservation planning.
 - Implementing measures to minimise habitat fragmentation, such as biological corridors.
 - Restoring habitats during operations and/or after operations.
 - Implementing biodiversity offsets.
- The investee should take into consideration potential armed forces amongst the community or outside individuals, should the project site be near a key conservation area in which valuable fauna is found. The risk of poaching increases and health and safety is at risk for the community and on-site personnel, which should be included in the security risk management for the site.

- Measures taken to avoid, prevent, reduce and – if possible – offset significant adverse effects on the environment are expected to contribute towards “no net loss” and “net gain” of biodiversity, where applicable.
- No Indigenous or culturally significant flora or fauna may be removed, disturbed or harmed as far as reasonably practical. Where applicable and agreed by the community, translocation or the establishment of a conservatory or nursery as a mitigation measure to ensure these species are protected as far as possible must be implemented.
- The investee should ensure that there are measures in place to avoid the introduction or cultivation of invasive species. If the project area has invasive species and they are to be cleared, the investee is required to establish an Invasive Species Management Plan to regulate replanting of any cleared vegetation.
- The investee should identify potential erosion risks that will consequently affect the available ecosystem services and implement, maintain and monitor any necessary control methods where required.
- Specifically, for a hydropower plant, an EFlow Assessment is critical in identifying the quantity, frequency, timing and quality of water and sediment flows necessary to sustain freshwater and estuarine ecosystems and the human livelihoods that depend on these ecosystems. An EFlow assessment should be agreed upon at concept and prefeasibility stages of project development and coordinated with the ESIA in establishing the baseline for seasonally representative information on hydrologic regimes, aquatic or terrestrial ecology.
- The study should be commensurate with the risks of a run-of-river hydropower project, dependent on the scale and to consider sensitivity of biodiversity impacts (low-, medium- or high-resolution method applied, dependent on the expanse and type of biodiversity present within the project area). In the event the hydro project is in a natural habitat, the EFlow assessment will need to implement a net gain or no net loss strategy, in which the developer will need to consider restorative measures (restoration offsets, avoided loss offsets or positive conservation actions) or offsets in addition to setting EFlows.
- The EFlow assessment should provide an Environmental Flows Management Plan (EFMP), informed by stakeholder engagement on ecosystem uses, livelihood dependence, conservation priorities, possible water resource development and other aspects of concern, which focuses on the EFlow mitigative measures, in describing the activities needed to implement, monitor and review the EFlows. A detailed list of the project’s planned activities should evaluate existing flow regimes and upstream and downstream water uses in consultation with potentially affected communities. Flow regimes maintained over seasonal or even smaller periods (e.g., monthly) should be evaluated. In hydropower projects with migratory fish populations, the following recommended measures should be considered to help mitigate the obstruction to fish movements and potential consequent destruction of natural fish stocks:
 - Identify migratory fish species, requiring passage past the dam or diversion structure to fulfil their life-cycle requirements, which may depend on upstream or downstream passage. Consider both locally important fish stocks and IUCN red-listed fish species.
 - Ensure appropriate mechanisms for upstream fish passages are provisioned within the design of the hydropower plant, such as fish ladders, mechanism or hydraulic fish lifts, and trap and transport programs.
 - Ensure appropriate mechanism for downstream fish passage, such as increased spill (provided that dissolved gas concentrations do not become excessive), bypass channel and trap and transport programs.
 - Consider using appropriate fish exclusion or guidance devices for both upstream and downstream passage that will prevent entry of fish into dangerous areas and guide them into bypass facilities. These can be physical meshes or a behavioural screen that uses a deterrent stimulus (such as electrical barriers, strobe lights, bubble curtains or acoustics).
 - Consider the use of “fish-friendly” turbine technology or construction of bypass structures to reduce fish mortality and injury from passage through turbines or over spillways, especially where large-scale downstream fish migrations occur. Typically, Kaplan turbines are more fish friendly than Francis turbines.

- Identify species, life stage and loss rates of fish and replace losses either directly (such as hatcheries or spawning channels) or indirectly (such as fertilisation or stream enhancement).
- Assess critical depths and velocity needed for upstream and downstream movements of indicator species based on fish swimming abilities to assure availability of such characteristics at key stages of the migration cycles.
- Specifically for wind power investments and investments including T-line assessments, include a specialist biodiversity report to determine the impact of the investment on avifauna (bird and bat) populations within migratory, breeding and feeding areas and dispersal corridors.

9.6 Training

The investee is required to ensure that any biodiversity risk is relayed to all employees by a biodiversity specialist, should the need to translocate species, conserve species and establish a nursery is required. Training should include capacity building on identifying the “at risk” species, as well as the methods for handling the species while translocating.

9.7 Monitoring and Reporting

The investee must monitor the implementation of the BMP and provide the following records and information for review by the fund:

- Species to be monitored
- Population monitoring of species of concern
- Impacts to breeding practices, measured by a biodiversity specialist
- Cultivation of translocated species
- Cultivation of culturally significant flora, and
- Frequency of monitoring.

10 Stakeholder Engagement Plan

10.1 Scope and Purpose

Camco-managed funds have a responsibility to ensure all of their investees continually engage with all stakeholders identified within the project area of influence (both directly and indirectly) to fully understand any shortfalls against its standards and international best practices and identify potential risks that can be managed effectively.

The below outline is meant to guide the complexity of an investee's Stakeholder Engagement Plan (SEP) as appropriate to the nature and scale of their project operations. Stakeholder engagement provides the basis on which E&S risks can be avoided, minimised and/or effectively managed through various agreed strategies across the IFC Performance Standards (IFC PS)'s areas of concern (these being: labour practices; human rights; pollution prevention strategies; provision of resource efficiencies; gender inequalities; community health and safety; land acquisition, resettlement and livelihood restoration; cultural heritage; and Indigenous peoples).

10.2 Objectives

The objectives of the SEP are as follows:

- Identify stakeholders including the people and/or communities that are, or are likely to be, affected by or have an interest in the project.
- Ensure that such stakeholders are engaged with in an appropriate and timely way with regards to E&S issues through a sustained and continuous stakeholder engagement process throughout the project lifecycle.
- Secure a "social license to operate," through building mutual trust and a mutual understanding of differing perspectives.

10.3 Applicable Regulations, Standards and Guidelines

- Host country environmental and labour legislation
- IFC Environmental and Social Performance Standards
- Sustainability principles advocated by the UN Global Compact
- UN Guiding Principles on Business and Human Rights
- ILO Declaration on Fundamental Principles and Rights at Work
- International Bill of Human Rights

10.4 Roles and Responsibilities

It is the responsibility of the investee to effectively manage and implement stakeholder engagement. This includes:

- Managing stakeholder mapping, ensuring stakeholder identification is fully inclusive.

- Preparing progress of project activity communications to all stakeholders, ensuring disclosure is distributed across all media channels to enable all stakeholders (inclusive of vulnerable groups) to have access to community engagements.
- Building, cultivating and maintaining a relationship between the investee and the community affected by the project.
- Providing a non-discriminatory safeguarded space for discussion amongst the members of the community and the investee to ensure core grievances are aired and resolved in a transparent manner.

10.5 Stakeholder Engagement Process

10.5.1 Stakeholder Identification

Stakeholder engagement should be planned for and carried out in line with the principles of free, prior and informed engagement and participation (FPIC), which defines a practice of public consultation and participation that is:

- Free from external manipulation, interference, or coercion, and intimidation
- Based on prior disclosure and dissemination of information
- Undertaken on an informed basis with information that is relevant, transparent, objective, meaningful and easily accessible in culturally appropriate local language(s), and using a format that is understandable to the affected individuals and communities
- Responsive to the needs, rights and interests of both women and men. It may be necessary to establish separate forums and engagement processes to ensure this, and
- With targeted capacity building and/or other assistance as necessary to empower impacted individuals and communities to fully and effectively participate in engagement and consultation processes. This is particularly relevant to vulnerable and marginalised people.

This process involves listing the key stakeholder groups who will be informed and consulted about the project (or the company's operations) and considering how external communications might facilitate a dialogue with all stakeholders, inclusive of vulnerable peoples. These should include persons or groups who:

- Are directly and/or indirectly affected by the project or the company's operations (this being local communities directly affected by the project).
- Have "interests" in the project or parent company that determine them as stakeholders, examples of which are national and local authorities, non-governmental organisations, neighbouring projects, etc.
- Have the potential to influence project outcomes or company operations, such as "vulnerable groups" (individuals and/or groups that suffer from discrimination, unequal access to rights, unequal access to and control over resources or unequal access to development opportunities), as defined in Section 7.5.7. Specific considerations of organisations, associations, businesses and members of other villages who strongly support or oppose the project should be included under this category.

In mapping the relevant stakeholders, the investee should answer the following questions:

- Who will be adversely affected by potential E&S impacts in the project's area of influence?
- Who are the most vulnerable among the potentially impacted, and are special engagement efforts necessary?
- At which stage of project development will stakeholders be most affected (e.g., procurement, construction, operations, decommissioning)?
- What are the various interests of project stakeholders and what influence might this have on the project?
- How are women's perspectives integrated into decisions making?

- Which governmental and authority organisations could provide important considerations incl. women’s rights and perspectives to the effects of the project
- Which stakeholders can best assist with the early scoping of issues and impacts?
- Who strongly supports or opposes the changes that the project will bring and why?
- Whose opposition could be detrimental to the success of the project?
- Who is it critical to engage with first, and why?

Examples of the above stakeholder categories can be seen in the table below.

Table 8: Stakeholder Categories

Category	Example bodies/groups
Directly affected by the project	<ul style="list-style-type: none"> • Community members’ quality of life is affected (lose access fully or partially to their immovable assets, cultivated lands, culturally significant areas, etc.) • Residents with land titles, who have elected to relocate and not use the land for their own purpose • Community members who lose access to pathways or routes to their property or culturally significant areas
Indirectly affected by the project	<ul style="list-style-type: none"> • Community members exposed to changes in the socio-economic environment • Surrounding or nearby communities and villages • Local traders, businesses, and service providers • Neighbouring projects
Local stakeholders	<ul style="list-style-type: none"> • District regulatory bodies • Prefectures • Community or village heads • Nearby commercial enterprises, associations or regulatory entities (national parks, NGOs, mines, industrial areas, etc.)
National stakeholders	<ul style="list-style-type: none"> • National NGOs • Environmental regulatory bodies • Energy regulatory bodies • Health and safety regulatory bodies • Labour regulatory bodies
International stakeholders	<ul style="list-style-type: none"> • Donors • Investors

10.5.2 Stakeholder Engagement Plan (SEP)

The complexity and depth of the SEP should be in line with the project’s risks, impacts and developmental stage, and be tailored to the characteristics and interests of the affected stakeholders. The plan should outline:

- The purpose and goals of the project and all consultations
- What information will be disclosed, in what formats, in what language and the types of methods that will be used to communicate this information to each of the stakeholder groups identified to ensure all stakeholders are reached

- How frequently in-person engagement will take place, as well as how frequently communication about the project will be released to the community
- The non-discriminatory methods used to consult with each of the identified stakeholder groups, and
- Details of how the records of all stakeholder engagements (e.g., meeting minutes, photos, attendance registers, signed agreements on major decisions from the community, records of concerns raised from community members) will be kept.

When conducting any engagement with the community, the investee is expected to ensure a diverse, gender sensitive and safeguarded approach to allow for the effective participation of identified vulnerable groups. Refer to Appendix B for the Camco Safeguarding Policy for additional guidance on how to cultivate a non-discriminatory, non-intimidating and safeguarded culture amongst stakeholders and the corporate structure of the investee. These can be achieved through focussed gender group discussions, allowing for women and other vulnerable peoples to voice their opinions without intimidation or hesitation.

The SEP should also outline how the views of stakeholders, vulnerable and marginalised groups will be cultivated and considered during engagement with defined actions in response to the views aired, while managing expectations. Where applicable, the SEP will include differentiated measures to allow for the effective participation of those identified as disadvantaged or vulnerable. The investee will collaborate with specialist associations, organisations and NGOs to ensure that support is available to all vulnerable groups, providing medical, psychological, emotional, and legal support. They should make it clear during the ESIA stage that gender-related risks could potentially evolve and that a gender expert may be contracted to engage with the community and ensure gender sensitivity or safeguarding measures are complied with.

Discussions should also address any other engagement activities that will be undertaken, including participatory processes, joint decision-making and/or partnerships undertaken with other local communities, NGOs or other project stakeholders. Focus group discussions must ensure free, prior and informed consent of identified Indigenous peoples is in line with IFC PS 7 and that an Indigenous Peoples Plan (refer to Section 12), is developed as part of continual stakeholder engagement. Investee staff should be trained in cultivating safeguarding measures, gender-sensitivity and a gender-responsive approach during stakeholder engagement to ensure all members of the community are effectively reached.

10.5.3 Safeguarding of Investee

When engaging with vulnerable groups, the investee should ensure focus group discussions are conducted by an adequately balance of female and male staff. A gender-equitable stakeholder consultation should be conducted by including women, girls, men and boys in the project area, as well as gender advocates, women's civil society organisations and/or relevant local and national authorities.

A **Code of Conduct** for all staff (employees, local employees, interns, part-time employees, sub-contractors, service providers and suppliers) to follow should be developed as part of the safeguarding culture within the investee company. The Code should define appropriate behaviour and explain the consequences of any breaches.

The above safeguarding measures should be outlined in a **Protection from Sexual Exploitation, Abuse and Harassment Policy**, to be incorporated into the investee's Labour Policy. Safeguarding training should be prioritised by the investee's management team and communicated in local languages.

The investee should adopt a gender-sensitive-approach as part of any social risk and impacts assessments by identifying and analysing gender issues and inequalities relevant to the project.

10.5.4 Requirements for Engaging with Indigenous Peoples

Investees should ensure that free, prior, informed consent (FPIC) is used as a measure to respectfully include Indigenous peoples in decision-making for policies, programmes and projects affecting them. To effectively implement FPIC measures, the investee must develop a culturally appropriate engagement plan that includes specific

provisions, such as the need for project information to be translated or made available in different formats or for Indigenous peoples' specialist, anthropologists or communication specialists to be brought in. The process of engaging with IPs goes beyond consultation to that of negotiation and full inclusion with the objective of obtaining the explicit consent and approval of the communities for the project, as well as mutually benefitting from the project.

As a long-term and derived benefit, the impact of the project serves to:

- Recognise and action customary or traditional land tenure arrangements
- Address gender, socio-economic divisions and intergenerational issues that exist amongst Indigenous peoples
- Protect traditional knowledge through intellectual property rights
- Build and strengthen inclusivity of Indigenous peoples to participate in development planning or programs
- Build and strengthen capacity of regional and national governmental institutions on providing services to Indigenous peoples, and
- Foster meaningful inclusion and participation of Indigenous women and other marginalised groups

For further guidance on integrating IPs into stakeholder engagement communications and the development of an Indigenous Peoples Plan refer to Section 12: Indigenous Peoples Policy.

10.5.5 Stakeholder Disclosure

All Camco-managed funds require its investees to provide a written summary of its project's anticipated E&S impacts in both English and the local language, which should be posted in locations convenient to affected or potentially affected peoples. The summary should include:

- The date, time and place of community engagement
- The purpose, nature, and scale of the activities, and the intended beneficiaries
- The duration of proposed activities and any progress on project activities to date
- A summary of key concerns or grievances raised from stakeholder consultations and the planned stakeholder engagement process
- Investee responses and suggested mitigation or corrective measures to key concerns. Should this not be addressed within the in-person engagement, drafted corrective measures by the investee should be distributed via media channels to the community, providing an opportunity for the community to challenge the suggested measure or measures
- List of participants (with contact information) representing vulnerable people and groups where it is possible and safe to do so
- Methods of disclosure for reaching vulnerable groups, including the use of focus group discussions to ensure privacy and confidentiality, if necessary, and
- The available Grievance Redress Mechanism, detailing both the confidential and public avenues for grievance submissions.

Investees should ensure that all disclosure for stakeholder engagement is effectively communicated by providing a schedule providing details, including dates and locations, of the various stakeholder engagement activities. Investees should also ensure a method of communication is available for all stakeholders to query and interrogate any information released from the investee about the project or company.

10.6 Training

The investee is required to ensure the Grievance Mechanism is well communicated across all staff members and surrounding communities. It is important these people understand which members of the investee company are responsible for 1) receiving the grievance, 2) who can be approached to escalate the grievance, and 3) deliberating on the final resolution of the grievance. A written procedure for submitting a grievance should be displayed in common areas for accessibility. The process will need to include anonymous submission of grievance for example through post box, online form or employee and community representative. Training should focus on communicating this mechanism.

10.7 Monitoring and Reporting

Investees are required to monitor the implementation of its Stakeholder Engagement Plan and provide the following records to the fund for review:

- Records of the grievance, detailing the nature of the complaint, the date and time, and the name of the person accused (if applicable) or responsible department. All grievances should be registered and logged.
- Stakeholder engagement meeting minutes and/or focus group discussion meeting minutes. The minutes should include the date, time, list of attendees, agenda topics covered during discussions and consultations, key concerns raised by all members of the community/focus group discussions and responses by the investee, as well as any and all expectations raised by the community/focus group discussions and agreed to by the investee.
- Training records, detailing the time, date, list of attendees, topics covered by the training session or awareness raising and training material used.

11 Project-specific Grievance Redress Mechanism

11.1 Scope and Purpose

Camco-managed funds require investees to establish a Grievance Mechanism for all stakeholders (inclusive of employees, part-time employees, probationary employees, community members, service providers, suppliers and sub-contractors) to receive and facilitate the resolution of affected individuals or groups of individuals' concerns and grievances about the project's E&S performance and associated risks. The process should be easy, accessible and free of charge, and carried out in a confidential manner, should this be preferred.

Investees should provide a guideline to all stakeholders on how grievances, claims or suggestions from the community and or affected individuals are promptly managed and effectively resolved. As part of the Grievance Redress Mechanism, contact details for the person responsible for receiving grievances or concerns from the public or within the company should be publicised to the community, all staff, service providers, suppliers and sub-contractors, as well as contact details for the individual responsible for managing and resolving the grievance or concern and communicating the response back to the complainant.

11.2 Objectives

The objective of the Grievance Redress Mechanism is to provide an accessible, timeous and effective response to all directly and indirectly affected stakeholders that experience a negative impact arising from project-related activities. The mechanism allows for:

- Traceability of key decisions made within the project and project company
- Provision of a key tool through which all stakeholders can exercise their voice
- Justifiable proof to fulfil human rights obligations under the host country's regulations, laws and international standards that govern the project and project company, and
- Contribute towards and establish a relationship built on trust and build goodwill with all stakeholders (inclusive of employees, part-time employees, probationary employees, community members, service providers, suppliers, sub-contractors and investors).

11.3 Applicable Regulations, Standards and Guidelines

- Host country environmental and labour legislation
- IFC Environmental and Social Performance Standards
- Sustainability principles advocated by the UN Global Compact
- UN Guiding Principles on Business and Human Rights
- ILO Declaration on Fundamental Principles and Rights at Work
- International Bill of Human Rights

11.4 Roles and Responsibilities

The investee has the responsibility of developing, implementing, training and communicating the procedural details and methods for submitting a grievance, that complies with the standards listed above. Compliance clauses with the grievance mechanism approach laid out below and its implementation should be integrated in all employee, sub-contractor, contractor and service provider contracts, ensuring that all employees involved with the project are legally bound to comply. The investee should designate two persons, one of each gender, to respond to grievances and all personnel designated with this responsibility should receive the necessary training to resolve conflict and address grievances with an unbiased supportive approach or impartial manner until evidence of the grievance is sought to support a company decision.

The investee will appoint a community liaison officer whose role is to engage with the local communities, act as their primary point of contact and maintain a good and constructive relationship with the community and members of staff. This role needs to be undertaken independently by the investee from the EPC.

11.5 Grievance Redress Mechanism Approach

The Grievance Redress Mechanism will apply the Effectiveness Criteria detailed in Principle 31 of the Guiding Principles on Business and Human Rights across both project-level and institutional level grievances. These are:

- Legitimate: Enabling trust from stakeholders for whose use they are intended and being accountable for the fair conduct of the process.
- Accessible: Being known to all affected stakeholder groups, providing assistance where relevant.
- Predictable: Clean and known procedure with an indicative time frame, clarity on types of process and outcomes they offer.
- Equitable: Seeking to ensure that aggrieved parties have reasonable access to sources of information, advice and expertise.
- Transparent: Keeping parties informed about the progress and providing information on the mechanism's performance.
- Rights-compatible: Outcomes and remedies accord with internationally recognised human rights.
- A source for continuous learning: identifying lessons for improving the mechanism and preventing future harms.
- Based on engagement and dialogue: consulting with stakeholder groups for whose use they are intended on design/performance, focusing on dialogue to resolve the grievance

11.6 Project-level Grievance Redress Mechanism Approach

The investee will undertake the following steps to build, establish, communicate and report for the site-specific and field grievances under the grievance redress mechanism:

Step 1: The investee will implement a procedure for managing a grievance, which shall describe the process for:

- Receiving and registering external communications from the public
- Screening and assessing the issues raised and determining how to address them
- Promptly responding to the grievance to confirm it has been received
- Providing, tracking and documenting any responses, and

- Conducting a trend analysis on grievances received to identify potential systemic issues in how the company and/or project operates that may be indicative of a broader issue such as loss of community support.

Step 2: The investee should publicise the existence of the Grievance Mechanism to all levels of stakeholders, if necessary, by meeting individuals and representatives of the different stakeholders of the community. The investee should ensure that all stakeholders understand how a grievance is submitted and introduce the community to key project personnel and/or a project designated trusted member of the community, who will be receiving and managing grievances. The communication of the Grievance Mechanism, either by in-person meetings, media releases, publications or posters, should be in local language throughout the community.

Step 3: The investee should establish the various methods by which a grievance can be submitted in both a confidential and transparent manner to all stakeholders. These methods include in-person submissions at the project offices, submission to a suggestion box at the project office, electronic submissions, via a toll-free number or customer call centre, confidentially to the investee's Community Liaison Officer, confidentially to the village head, and so on.

Step 4: All grievances will be thoroughly investigated by the investee and/or an Indigenous peoples' specialist, should this be required, to validate its eligibility. Once validated, the investee's management team will decide on the corrective measures, which will be communicated to the complainant. Agreement on the corrective measure or measures must be decided before any action is taken to resolve the grievance. Corrective measures that involve larger groups of stakeholders will be addressed during a stakeholder engagement meeting to ensure complete transparency to affected members of the community. The Grievance Mechanism must involve a transparent consultative process that is culturally appropriate and readily accessible.

Step 5: The investee's Project Manager and/or the Community Liaison Officer will monitor the situation and sentiment of the complainant to ensure the grievance has been resolved. The effectiveness of the Grievance Mechanism will be evaluated and improved upon should any gaps or other issues exist in the system.

Step 6: The investee will provide specific support for reported cases of gender-based violence and harassment (GBVH) to reflect and be respectful of the local context in which the project operates. The investee will integrate GBHV prevention measures by developing and aligning with a Gender Action Plan, to ensure gender equality is built within the leadership structure and company culture. See Section 11.7 for GBHV prevention measures. This includes identifying specific avenues of support, in ways of medical, psychological, emotional and mental support from specialist associations, organisations, NGOs and other GBVH aides. The Grievance Mechanism will work as the first step in providing a safe, confidential and child-friendly mechanism and to ensure safeguards are in place to protect witnesses and other members involved (e.g., family members). All personnel responsible for receiving or addressing GBVH cases or concerns must receive the appropriate training in line with international best practices.

In operationalising the Grievance Redress Mechanism, a relationship of trust between the investee, staff members and the community in which they operate is imperative. The integrity of the Grievance Redress Mechanism must remain strong enough to ensure that:

- Any grievance submitted is treated with importance and respect to ensure that targets of GBVH feel secure enough to reach out.
- Personnel handling or receiving the grievance are trained in SEAH mitigation measures, conflict resolution, location-specific cultural customs and how to effectively build a sense of safety with the aggrieved.
- The aggrieved can reach members of the community or staff through a various number of avenues, recognising that any individual can be a perpetrator of GBVH, and any individual can be a target.
- Referral systems with specialist associations, organisations and NGOs are established to ensure that external services for counselling, legal, medical, psychological, mental health and / or social support is accessible.
- The mechanism is flexible to accommodate the wishes of the aggrieved in procedurally assessing the grievance in either an informal confidential or formal manner. This includes investee companies understanding that the grievance may be withdrawn without explanation.

- A timely outcome and resolution are sought and enacted to reduce further risk to the survivor or victim as well as build trust and confidence in the Grievance Mechanism system among community members and staff. Confidential record keeping and monitoring of timelines is imperative.
- Regular and consistent communication on the updates of the investigation must be given to those involved, without breaching confidentiality. Communication should be limited to the process of the investigation, timelines and steps taken thus far.
- The aggrieved are able to reserve the right to withdraw their complaint, particularly during a formal process. The investee company should continue to provide support to the aggrieved, allowing for them to return with any grievances, as well as ensuring they feel safe enough to return to a respectful working environment.
- Enactment of a proportionate level of decided sanctions and disciplinary measures, removing hesitation amongst members of the community, staff and investee company to come forward with a grievance. However, it is important to ensure that large breaches in policy result in an appropriate sanction or disciplinary measure, making certain the “prevention of GBVH risks” message remains strong within the workplace.

Confidence in the Grievance Redress Mechanism can be measured by:

- Regularly reporting on resolved grievances (without identifying individuals)
- Consistent communication of the Grievance Redress Mechanism and how to fully engage with and access it, and
- Feedback from those involved in operationalising the Grievance Redress Mechanism.

11.7 Violence and Harassment Management

Violence and harassment within the workplace refer to physical assault, emotional or verbal abuse, threatening behaviour, vandalism, sabotage, theft, arson, threat of murder or intimidation at her or his employment. Work-related abusive behaviours can also occur away from work but resulting from a work-related matter.

Management of these behaviours relies on the investee’s commitment to conflict resolution and zero tolerance for the exhibition of any such behaviour, both within and outside the workplace, as stated in the Codes of Conduct, Labour Policies, Occupational Health and Safety Policy, Prevention of Sexual, Abuse and Harassment Policy and Grievance Redress Mechanism. Investee companies are expected to take every opportunity to assure all levels of staff that reporting of such acts will be confidential and the investee will provide measures of support and prevention training to ensure this type of behaviour is not encouraged or repeated.

It is important in conflict resolution that the investee and its management is proactive in resolving any misunderstanding and that all communication in a conflict is transparent. Ensure all matters of conflict are followed-up on, personal boundaries are honoured, and the work relationship is monitored consistently throughout the year.

11.8 Gender-based Violence and Harassment (GBVH) integration

GBVH is an umbrella term for any harmful act that is perpetrated against a person’s will. It includes acts that inflict physical, sexual or mental harm or suffering, threats of such acts, coercion, and other deprivations of liberty.

In operationalising GBHV prevention measures, a relationship between the investee company and its employees, part-time workers, probationary employees, service providers, suppliers, sub-contractors, contractor is cultivated to:⁶

- Understand the company's GBHV risks and how they integrate these into the risk management system. Senior management and executives should consider undertaking a gender risk assessment, that identifies the legal implications and administrative needs (providing accessible information by producing leaflets, and websites, working on social media campaigns targeting youth and schools) in addressing and operationalising prevention and response measures within the company. The GBHV risk prevention measures should also be integrated into the employee training and administrative system.
- Ensure senior management buy-in to address GBHV prevention across the company and develop a supportive organisational culture, which can be integrated by:
 - a. Identifying and rewarding workforce members that try to address GBHV and influence good practices amongst other members of the team, such as company award schemes or company-wide recognition
 - b. Including gender-based violence awareness raising into the role and responsibility of a key member within senior management
 - c. Tracking progress and improvement by including explicit communication and reporting on GBHV efforts completed within the company culture as part of annual reporting commitments, as well as establishing a board-level committee to provide oversight on GBHV, and
 - d. Emphasising the company's support for seeking justice in crimes of GBHV acts.
- Communicate consistently with members of staff and service providers and/or suppliers about GBHV prevention measures. This can be achieved using communication methods that are sensitive to cultural traditions and behaviour expected of workers, subcontractors and suppliers. As such, different methods of communication should be considered when addressing the training needs of the workforce, in alignment with company culture (i.e. staff meetings, service provider/supplier meetings, stakeholder engagement meetings, newsletters, emails, posters, leaflets, company reward schemes, etc.).
- Identify and establish mutually beneficial partnerships with stakeholders that can provide GBHV support. Align and partner with organisations that can provide expertise on key GBHV risks and have local and national knowledge/context on cultural traditions. These organisations are best placed to guide risk management processes and review or revise company GBHV preventative measures regularly.
- Take steps to develop a positive and inclusive organisational structure, by including more diverse leadership into their teams, to build a safe and inclusive workplace. Measures such as:
 - Mentorship training programmes to empower promising women into managerial/leadership positions within the organisation/company, that could champion GBHV prevention measures.
 - Recruitment procedures (advertised job description, shortlisted candidate selection, candidate interview process, the process for selection of the eventual candidate) should include gender neutral, non-discriminatory and equal opportunities throughout.
 - Diversity Action Plan and Policy that takes into account feedback from a diverse workforce and create a dedicated diversity task force with team members for candidate recruitment and training. The development of a diversity task force creates transparency as well as ownership and buy-in from the whole team and can assist with outgoing efforts in strengthening workplace culture and employee engagement.

⁶ IFC, CDC European Bank for Reconstruction and Development, 2020. Addressing Gender-Based Violence and Harassment: Emerging Good Practice for the Private Sector. Accessed: <https://www.ifc.org/en/insights-reports/2020/publications-gpn-addressinggabhv>

- Allocate sufficient budget for prevention measures to encourage reporting and reporting response measures. Investment will be required to implement key GBHV mitigation measures, such as:
 - Independent/third-party review of company policies with a gender perspective.
 - innovative and aggressive communication methods (as identified in prevention measure 3 above) of the grievance redress mechanism across marginalised groups, specifically vulnerable peoples (i.e. women, girls, Indigenous peoples, elderly, disabled, ethnic minorities, etc.).
 - Training sessions directed at men on “how does sexual abuse and harassment affect the community and company”.
 - Social and gender specialist engaged at key stages in project development to advise and implement a Gender Action Plan.
 - Provision of information on already available resources for GBHV support structures or organisations in the community.
 - Involvement of local expert organisations or consultants to design training specific to local cultural challenges.

11.9 Training

Investees must ensure that the persons in charge of the Grievance Redress Mechanism have undergone adequate training on how to handle community health, safety and security issues, including conflict management and emergency responses. The investee should also ensure community members are aware of the methods used to submit a grievance through the Grievance Redress Mechanism.

Investee staff should undertake safeguarding induction training once onboarded and refresher training to continually raise awareness on safeguarding measures. The following subject areas should be allocated training for all personnel involved in receiving, investigating, deliberating on and reporting of a grievance:

- SEAH risks and awareness, exploring the following avenues:
 - Sexual exploitation or abuse
 - Physical, emotional or psychological abuse
 - Exchanging money, employment, goods or services for sexual activity
 - Engaging in any sexual relationships with beneficiaries of assistance, and
 - Engaging with sex workers.
- Gender equality, gender sensitivity and gender-responsive approach.
- Safeguarding measures and conflict resolution.
- Awareness of respectful methods of understanding cultural customs and traditions.
- Impartial investigation skills.

11.10 Monitoring and Reporting

Investees are required to monitor the implementation of its Project Site Grievance Redress Mechanism and provide the following records to the fund for review:

- Training attendance registers and training material.
- Grievance report.
- Communication to larger group on the progress of the grievance resolution.

- Communication on the Grievance Mechanism on a regular basis.
- Communication from established specialist associations, organisations and NGOs with available support services available.

12 Indigenous Peoples Policy

12.1 Scope and Purpose

Investees should establish an Indigenous Peoples Policy (IPP) for projects where Indigenous people(s) are present and/or have or had a collective attachment or rights to the land territories, and resources. Investees will fully respect and support Indigenous peoples' rights related to land, territories and resources, and rights related to cultural and spiritual heritage and values, traditional knowledge, resource management systems and practices, occupations and livelihood, customary institutions, and overall well-being. The IPP will apply regardless of whether the project activity will have a negative or positive impact on the Indigenous people(s). It will also be applicable even if the Indigenous people(s) are not officially recognised or identified as Indigenous; however, in projects where Indigenous people(s) have been identified and are either physically present or have a collective attachment, an Indigenous People Plan should also be developed in addition to the IPP.

12.2 Objectives

The IPP has several objectives, including:

- Ensuring acknowledgement and full respect of Indigenous peoples' human rights, dignity, aspirations, culture, and natural resource-based livelihoods.
- Avoiding impact wherever possible; where not possible minimise and mitigate the risk and compensate appropriately for those impacts.
- Acknowledging the different challenges faced by women, girls and other vulnerable groups within Indigenous communities, and promote the participation and leadership of women in project activities given their role as traditional custodians of cultural and spiritual heritage and values.
- Establishing and maintaining an ongoing relationship, based on informed consultation and participation, with the Indigenous people(s) affected by a project throughout its lifecycle. This includes engaging the principle of free, prior and informed consent (FPIC) when there are any potential impacts on cultural and/or natural resources, or land owned by or under customary use of Indigenous people(s).
- Ensuring there is no physical relocation from community-held lands and natural resources subject to traditional ownership or under customary use.
- Ensuring sustainable and culturally appropriate development benefits/opportunities for Indigenous peoples.

12.3 Applicable Regulations and Standards

- IFC Environmental and Social Performance Standards
- United Nations Declaration on the Rights of Indigenous People

The following guidelines are also recommended:

- Green Climate Fund's Indigenous People Policy

12.4 Roles and Responsibilities

Investees are responsible for:

- Ensuring that all of the information and impacts on Indigenous peoples and/or minority groups have been appropriately disclosed and the affected communities have been comprehensively consulted
- Developing and implementing a management system to manage the risks and impacts which are associated with their project's activities
- Developing an equitable benefit sharing plan for all Indigenous people affected by the project activities
- Monitoring and reviewing the IPP, and
- Receiving, recording and ensuring solutions have been provided for any grievance raised by Indigenous peoples.

12.5 Management Approach

The investee should identify specific groups of Indigenous peoples within their project's area of influence by conducting an IFC-complaint E&S impact assessment (ESIA). The ESIA should establish a baseline, including the nature and degree of the expected direct and indirect economic, social, cultural (including cultural heritage) and environmental impacts on Indigenous peoples who are present in, or have a collective attachment to the project area of influence. The ESIA must also ensure that project activities are culturally appropriate and enhance the benefits of the Indigenous peoples and should examine the project alternatives where adverse impacts may be significant. The social aspect of the assessment should also identify if projects funded by Camco-managed funds will involve change in use or management of commonly held properties in the community and/or involve the commercial development of natural and cultural resources on lands or territories that are traditionally owned or customarily used or occupied by Indigenous peoples.

The IPP must ensure that:

- Impact assessments are undertaken by a social expert and address the nature and degree of expected direct and indirect economic, social, cultural (including cultural heritage) and environmental impacts on Indigenous peoples.
- All efforts to avoid, minimisation of impact on natural resources and alternative project sites are explored and documented in the impact assessment.
- Representatives of the Indigenous peoples - in collaboration with traditional authorities and structures within the communities, and with respect for the traditional decision-making structure and processes in the project area - will select a stakeholder meeting venue that is considered as appropriate by way of mutual consensus. Focus group discussions for vulnerable groups, including women and girls, should take place separately to ensure these people are safeguarded.
- Adequate notice is provided for any meetings being held to allow for all vulnerable groups within Indigenous peoples to attend. The meetings should be held at a suitable time and allow time for consensus to build and to ensure full presentation of Indigenous peoples' views and preferences.
- All meetings and consultations must be conducted in the local languages of the Indigenous people(s) and must be conducted in a safeguarded and meaningful manner. The investee should ensure that stakeholder engagement is conducted at the earliest possible stage, prior to substantive project activities. The investee should make the Indigenous peoples' rights and their role in the project clear to them during all consultations. Consultations must provide information and guidance on the Grievance Redress Mechanism available for submitting concerns or grievances pertaining to the project, as well as provide information on key project contact persons. Refer to Sections 10 and 11 respectively for the Stakeholder Engagement Plan and Grievance Redress Mechanism for more guidance.
- Compensation structures are calculated in the case of the commercial and non-commercial development of Indigenous peoples' land and natural resources, together with culturally appropriate sustainable development opportunities. In calculating these compensation structures, investees should:

- Identify and assess all property interests without negatively affecting any Indigenous peoples' land claims, tenure arrangements and traditional natural resource consumption prior to purchasing, leasing and undertaking a land acquisition, as a last resort.
- Ensure communication to affected Indigenous peoples provides transparency on the below as well as in accordance with Section 8.5.1:
 - i. Indigenous land rights under applicable country laws and international best practice standards, and
 - ii. Scope and nature of project activities proposed and their potential impacts.
- Provide comparable land-based compensation to the land acquired from Indigenous people or compensation-in-kind in lieu of cash compensation where feasible.
- Provide a mutually beneficial and agreed upon fair lease arrangement.
- Ensure continued access to natural resources, identifying equivalent replacement resources, –r - as a last option - providing compensation and identifying alternative livelihoods if the project development results in the loss of access and/or the loss of natural resources.
- Ensure fair and equitable sharing of the benefits associated with the project's usage of resources, where the investee intends to utilise natural resources that are central to the identity and livelihood of affected communities of Indigenous people. Benefit sharing encompasses revenue distribution, job creation, ownership of companies and shares, negotiated agreements and community development programmes.
- Provide affected communities of Indigenous peoples with access to, usage of and transit on land that the investee is developing, subject to overriding health, safety and security considerations.

Refer to Appendix L for a comprehensive consideration of social risks.

12.6 Monitoring and Reporting

Investees must monitor the performance of the IPP and provide the following records to the fund for review:

- Grievances records, detailing the nature of the grievance, the date and time, and the accused responsible person for the grievance (if applicable) or responsible department, and actions taken to resolve the grievance. All grievances must be registered and logged.
- Stakeholder engagement meeting minutes demonstrating date, time, list of attendees, agenda topics covered during discussions and consultations, key concerns raised by all members of the community and responses by the investee, as well as any and all expectations raised by the community and agreed to by the investee.
- Focus group discussion meeting minutes demonstrating date, time, list of attendees (inclusive of identified Indigenous peoples), agenda topics covered during discussions and consultations, key concerns raised by all members of the discussion group and responses by the investee, as well as any and all expectations raised by the discussion group and agreed to by the investee.
- Training records, detailing the time, date, list of attendees, topics covered by the training session or awareness raising and training material used.

13 Chance Find Procedure

13.1 Scope and Purpose

The Chance Find Procedure (CFP) sets out how investees will respond appropriately to the discovery of critical cultural heritage artifacts or sites of significant importance during the project activities. This includes how investees

should manage chance finds of either disturbed or intact cultural objects and notify the local community, relevant authorities, cultural heritage experts and the fund. The applicability and magnitude of the CFP for each investment is established during the ESIA process and is relevant to all investees that has the potential to uncover heritage items or sites. These being archaeological (prehistoric) artefacts, paleontological, historical, cultural, artistic and items of religious significance.

13.2 Objective

The objective of the CFP is to protect cultural heritage from any adverse impacts or project activities and to reduce social risks that may occur as a result of accidental finds during construction. It aims to support the preservation of cultural heritage by helping to avoid or reduce any adverse impacts that investee projects might cause. The CFP also considers the opportunity for restoration of chance finds, where possible, and in some cases the provision of compensation.

13.3 Applicable Regulations, Standards and Guidelines

- Host country environmental and cultural heritage regulations
- IFC Performance Standard 8 - Cultural Heritage

13.4 Roles and Responsibilities

Investees are responsible for ensuring compliance with national laws associated with implementing the host country's obligations under the Convention Concerning the Protection of the World Cultural and Natural Heritage. As part of this, investees are responsible for identifying and protecting cultural heritage by ensuring internationally recognised practices are implemented.

13.5 Chance Find Procedure

If an investee discovers a physical cultural resource (such as, but not limited to, an archaeological site, a historical site, remains and objects, or a cemetery and/or individual graves) during excavation or construction, they must adhere to the following procedure:

- **Stop all works in the vicinity of the find** until consultation with the community can be undertaken to agree on a plan of action for the physical cultural resource found.
- **Determine whether the physical cultural resource is of significance** through safeguarded consultation with the community. Additional guidance can be sought from local regulatory agencies that are entrusted with the protection of cultural heritage.
- Where the physical cultural resource holds value and makes the place where it was found a culturally significant site, confirmed through community consultation, the investee should **ensure continued access to the site** or provide an alternative route. Where the physical cultural resource is not culturally significant, according to members of the affected community, the discussion is recorded to provide evidence of community consultation.
- When a culturally significant physical cultural resource is found, **the site where it is discovered should be avoided**, in so far as this is possible. Where this is not possible, the investee should take measures to minimise any adverse impacts and, where relevant and possible, implement restoration measures in situ to

ensure the value and functionality of the cultural heritage is maintained, including maintaining or restoring any ecosystem processes needed to support this endeavour. Where restoration in situ is not possible, effort should be made to restore the functionality of the cultural heritage in a different location.

- If the physical cultural resource is found to be critical, the **project is then excluded** from funding by any Camco-managed funds. Refer to Section 1.8.5: Project Exclusions for more.

Investees should notify the fund and the relevant local authority or authorities of the status of any physical cultural resource found and secure the site where the item is found to prevent damages or loss of any removable objects. The handling of the find will then be determined by the responsible authorities.

Construction activities should only resume after permission is granted from the responsible authorities.

Refer to Appendix L for a comprehensive consideration of social risks.

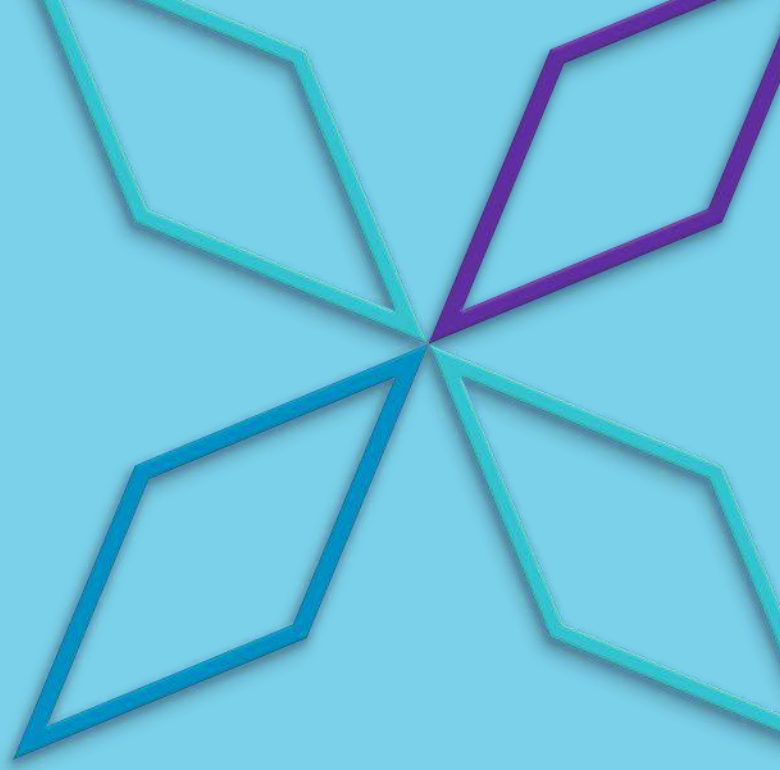
13.6 Training

All investee staff, especially workers involved with earth removal, should be trained on the CFP to ensure they are aware of the immediate necessary steps to undertake. This should be conducted during regular occupation health and safety toolbox talks for construction labour.

13.7 Monitoring and Reporting

A monitoring procedure for the construction phase should be established by the investee to record chance finds and archaeological finds in the event that they are discovered and need to be preserved. Chance find records should outline the following:

- The date and time of the find
- Description of the find
- Details pertaining to the cultural significance of the find to individuals within the community
- Discussions on agreed upon actions to be taken in that particular area of the find or agreed upon actions with the community should there be no cultural significance of the find
- Progress of the project once actions have been implemented, and
- Other indicators to be evaluated during monitoring include the number of employees trained in the company's chance find procedures.



| Appendices

A. Camco Environmental and Social Safeguards Policy

Version History

Version No	Updated By	Update Summary	Date Updated
1	Laura Lahti	Initial Policy	
2	Laura Lahti	Inclusion of explicit references to ILO requirements	August 2022
3	Laura Lahti	Decision process and monitoring moved to ESMF; inclusion of SFDR; explicit prohibition of SEAH; inclusion of mini-grid and isolated grid-specific conditions for backup generation.	September 2024

Approval Record

Version No	Approver	Approval Date	Effective Date
1	Camco Board of Directors	15 June 2020	15 June 2020
2	Camco Board of Directors	29 Sept 2022	29 Sept 2022
3	Camco Board of Directors	23 October 2024	23 October 2024

Ownership

Head of Impact

Applicability

The policy applies to all employees, contractors, and any other individuals or entities within the Camco Group and funding platforms managed by Camco, if and where relevant.

Failure to comply with these policies and procedures may result in disciplinary action, including but not limited to warnings, additional training, termination of employment, or legal action.

Purpose

To ensure that the E&S performance of the projects and investee companies supported by Camco-managed funds are sustainable.

Objectives

Incorporate environmental and social (E&S) considerations into Camco's decision-making to:

- Avoid, and where avoidance is impossible, mitigate and manage, adverse impacts to people and the environment within reasonable time.
- Give due consideration to vulnerable populations, groups and individuals.

Scope

This E&S safeguard policy applies to all Camco-financed and managed activities.

Standards

All projects, developers or financial intermediaries ("investees") supported by Camco shall meet:

- Host Country Legislation
- IFC Environmental and Social Performance Standards
- Sustainability principles advocated by the UN Global Compact
- UN Guiding Principles on Business and Human Rights
- ILO Declaration on Fundamental Principles and Rights at Work
- International Bill of Human Rights, and
- UN Declaration on the Rights of Indigenous Peoples.
- GCF revised Environmental and Social Policy;
- GCF Indigenous Peoples Policy;
- International Labour Organization (ILO) Basic Terms and Conditions of Employment; and
- Sustainable Finance Directive Regulation (EU) (2019/2088

Principles

Sustainability underpins the work of Camco. This guiding policy and each investees company's E&S management system (ESMS) provides an opportunity to incorporate E&S considerations in project design to ensure sustainability.

Do No Harm: Any activity financed by a Camco-managed fund must not cause harm to any of the following objectives: climate change mitigation, climate change adaptation, sustainable use and protection of water and marine resources, transition to a circular economy, pollution prevention and control, and protection and restoration of biodiversity and ecosystems. This ESMF works to ensure that E&S risks arising from project development and implementation are sufficiently assessed and the necessary policies and procedures are in place to mitigate and manage potential negative effects on the social fabric and the environment.

A scaled risk-based approach is implemented to ensure that E&S requirements and processes are adopted that are commensurate with the level of risk, so that the ESMS established is fit for purpose. In screening the potential E&S risks and impact of its activities, Camco will consider and include direct and indirect, induced, long-term impacts, and cumulative impacts and will take into account the activities' areas of influence including associated facilities and third-party impacts.

Camco adheres to IFC's mitigation hierarchy, which aims to anticipate and avoid, or where avoidance is not possible, minimise, and, where residual impacts remain, compensate/offset for risks and impacts to workers, affected communities, and the environment. Camco only supports projects where negative impacts can satisfactorily be mitigated within reasonable time.

Stakeholder engagement and information disclosure is essential for designing and implementing sound and sustainable projects and programmes. Investee companies must establish and implement an ongoing stakeholder engagement and grievance mechanisms, based on a standard process at the corporate level, which is applied to every site, considering the site's characteristics. Women and men shall be provided with equal opportunity to take an active part in stakeholder engagement.

Camco promotes gender diversity and Sustainable Development Goal (SDG) 5- Achieve gender equality and empower all women and girls and SDG Goal 10 Reduced Inequalities through a twin-track approach. Firstly, it will mainstream gender equality and diversity in its management and operations and secondly, it will work with investee companies to ensure that gender equality and diversity is mainstreamed into the design, implementation, monitoring and assessment of all renewable energy and energy efficiency initiatives funded by Camco. This is done by requesting its investee companies to adopt a gender-sensitive approach as part of social risks and impacts assessments and linking the corresponding gender risk management measures to the activity-level gender action plans.

All investees supported by a Camco-managed fund shall design and implement projects and programmes in a manner that will promote, protect and fulfil universal human rights recognised by the United Nations.

The design and implementation of activities will be guided by the rights and responsibilities set forth in the United Nations Declaration on the Rights of Indigenous Peoples. All investees supported by Camco shall avoid adverse impacts on Indigenous peoples and support the full and effective participation of Indigenous peoples. Investees are required to obtain free, prior, and informed consent ("FPIC") of the affected communities of Indigenous peoples.

All projects shall be designed and implemented in a manner that will protect and conserve biodiversity, especially critical habitats.

All funds managed by Camco have **zero-tolerance of Sexual Exploitation, Sexual Abuse and Sexual Harassment (SEAH)**. To ensure this, all fund investees will need to implement zero-tolerance SEAH policies and ensure required training and an inclusive and a survivor-centered grievance mechanism.

E&S requirements

The E&S requirements and management plans are defined in Camco's Environmental and Social Management Framework (ESMF), which addresses, the risks and impacts in line with the IFC Performance Standards (PS) 1-8 as follows: (a) Environmental and social risks; (b) Labour and working conditions; (c) Resource efficiency and pollution prevention; (d) Community health, safety and security; (e) Land acquisition and involuntary resettlement; (f) Biodiversity conservation and sustainable management of natural living resources; (g) Indigenous peoples; and (h) Cultural heritage.

Furthermore, exclusions are applied for each funded activity in accordance with industry best practices, namely the IFC Exclusion List and the Harmonized EDFI Exclusion List, as specified in the Camco exclusion list.

Risk categorisation

Camco-managed funds only support investments where negative impacts can satisfactorily be mitigated during the project life-cycle. Therefore, only projects categorised low risk (Category C/I-3), medium-low risk (Category B/I-2) or medium-high risk (Category B+) as per IFC E&S risk categorisation shall be supported by Camco.

The investment-level ESIA should clearly determine and establish projects' E&S category according to IFC guidance.

Roles and responsibilities

All investees shall comply with the above-mentioned standards and implement the following in accordance with the above-mentioned principles:

- Assessment of E&S impacts in the form of an ESIA, ESMP, resettlement action plan (RAP) in accordance with PS 5, if relevant, Indigenous Peoples Plan (IPP) in accordance with PS 5, if relevant.
- Establish, implement and maintain an ESMS including the requisite organisational capacity.
- Ensure that the requirements of the ESMS are followed faithfully and transparently, and make any corrections required by Camco in line with this policy.
- Contracting and managing an E&S consultant in compliance with this policy.
- Complying with and monitoring project performance against the ESIA, ESMP, ESMS and Key Performance Indicators (KPIs).
- Report ongoing compliance and activity transparently to Camco on a periodic basis based on frequency agreed with each investee.
- Notify Camco immediately if there are major changes in the activity design and execution, regulatory setting, unanticipated environmental risks and impacts, or other circumstances that may raise the risk categorisation of the activity.

Camco in its review and due diligence will ensure that the requirements of this policy are applied by:

- Carrying out E&S risk screening and due diligence on investees prior funding
- Ensuring that ESIA's for projects fulfil the required standards (incl. gender equality) by reviewing the ESIA and ESMP
- Ensuring that investees establish and implement their ESMS and monitor the implementation of the ESMS, and
- Confirming that all information related to the E&S safeguards of project and programme activities are appropriately disclosed.

Process

Camco-managed fund will engage with investees in accordance with the processes for the assessment of projects' or programmes' E&S risks and impacts as well as establishment of appropriate ESMS.

The initial E&S risk screening, is done by a project manager of Camco, reviewed and signed off by the E&S implementation team. The risk screening consists of a Risk Assessment Tool ("RAT") and an E&S Initial Screening Checklist to pre-define risk category and eligibility of the project.

An E&S onboarding call with the investee company takes place once initial E&S risk screening is determined to ensure the company understand Camco's E&S requirements and processes.

After this, an E&S Gap Analysis by E&S implementation team takes place based on the review of investee company's ESIA and ESMS to the extent available. The focus of the gap analysis is on E&S risk and impacts assessment and the investee company's ability to mitigate and manage them. The results of the gap analysis are presented in a Red Flag Report ("RFR").

Based on the results of the E&S Gap Analysis the investee company will either establish or revise the ESIA and ESMS to conform with Camco requirements.

A full Due Diligence ("DD") will be conducted by Camco, which will include revision of RFR with focus on the entire ESMS, site visit and summary of results in DD Report. The DD work is led by Camco's project manager with assistance of the E&S implementation team and signed-off by the E&S manager.

Once an ESMS has been established to the satisfaction of Camco and the investee company proceeds to project implementation, the project is monitored by investee and Camco according to the monitoring and evaluation procedures below.

Organisational capacity E&S compliance is implemented and administered by three different units of Camco. These units are the Investment Committee, Management Team and Impact Team.

The proper functioning of the ESMS critically depends on the co-operation of the Investee company. Camco oversees this process, assists the Investee in finding capable E&S experts and assists in the implementation of the ESMS.

Monitoring and evaluation

Camco ensures diligent oversight of portfolio investments by monitoring and reporting their performance through key performance indicators (KPIs) and E&S indicators identified in the ESIA and ESMS to ensure compliance with the above-mentioned standards—monitoring based on objective, self-reported data by investees' companies.

The information monitored and reported by the investees will be used to provide a comprehensive picture of the portfolio performance. This includes:

- The activities that have been completed and those which remain unfinished
- Whether outcomes expected at this stage have been met, and which, if any, are still unattained, and
- Analysis of potential consequences (including financial, reputational, legal and E&S impacts) due to exiting or not exiting for different relevant stakeholders.

If the investment is off track, or if goals have not yet been met, this data can be used to consider if there is a need to adjust the investment strategy or expected outcomes.

A periodic review is implemented to measure, compare and analyse a projects performance against the baseline and targets set during the due diligence. The annual review is based on document review and interviews with the investee. If substantial material issues are discovered, a site visit may form a part of the Annual Review. The results of the annual review will confirm whether support can be continued in its current form; if modifications of the support is needed, or if withdrawal of support is required.

Specific requirement – mini-and isolated-grids

Mini- and isolated-grids are broadly defined as a renewable electricity generator, potentially also including an energy storage system, interconnected to a distribution network that supplies electricity to a localised group of customers. Mini-grids and isolated-grids may include diesel or other fossil fuel-based generation solely as a backup element in certain circumstances, such as ensuring continuous power to critical services.

B. Investee Safeguarding Policy

Version History

Version No	Updated By	Update Summary	Date Updated
1	Camco Board of Directors	23 October 2024	23 October 2024

Purpose

This policy seeks to protect the rights and well-being of those implementing the transactions of Camco platforms and all those impacted by such activities.

Safeguarding principles

The guiding principle of the Investee Safeguarding Policy is Do No Harm. Recognising the historical imbalances that exist, special focus is placed on vulnerable and/or disadvantaged groups. This Policy is prepared in light of IFC Performance Standard 4 (Community Health, Safety and Security), the EHS Guidelines of the World Bank, the Equator Principles and the general principles of transparency, proportionality and accountability.

Safe and trusted environment

The goal of the Camco Investee Safeguarding Policy is the creation of a safe and trusted environment for those implementing Camco platform transactions and, to the extent possible, the vulnerable and/or disadvantaged groups impacted by these transactions. As discussed below, achievement of this goal is based on a multi-pronged approach of risk assessment and mitigation, working with partners, training and interaction with other Camco policies.

Risk assessment

It is the responsibility of the Camco Board and the senior leadership team of the platform to be fully aware of the contents of this Policy and ensure that safeguarding risk assessment is a continuous activity integrated into the operations of Camco.

The safeguarding risks identified by Camco include:

- **Physical harm:** The risks of physical harm for persons implementing Camco platform projects include accidents, terrorism and violent crime. In relation to vulnerable groups, especially women and Indigenous communities, additional risks of physical harm arise from conflict over land and resources, which may be exacerbated by the implementation of Camco platform projects.
- **Emotional abuse:** Bullying and emotionally abusive conduct are risks in any organisation and include issues of work-life balance that may arise in an expert-led dedicated team. Emotional abuse may also arise towards

staff implementing Camco platforms from developers and other stakeholders, especially when faced with a negative funding decision by Camco.

- **Sexual misconduct:** Sexual misconduct is a broad range of behaviour that includes but is not limited to sexual harassment, sexual assault, non-consensual sexual contact, sexual exploitation, intimate partner violence (domestic and dating violence) and stalking.
- **Exchanging of benefits:** Of particular concern to Camco, is the risk of exchange of benefits whereby goods, employment, food and/or money are exchanged for sexual favours.
- **Discrimination:** Discrimination based on gender, age, disability, ethnicity, sexual orientation and/or religion is illegal under the Equality Act 2010 and will not be tolerated by Camco. The risk of discrimination exists internally and also in the implementation of Camco platform projects.
- **Neglect and acts of omission:** Vulnerable groups - particularly women, children and Indigenous communities - are at risk from acts of omission, i.e. not receiving benefits they are entitled to. This risk occurs during stakeholder engagement and the allocation of community benefits when implementing Camco platform projects.

The appropriate and proportionate mitigation of these risks will vary from project to project, but nevertheless shall be based upon the principles set out above.

Risk mitigation

Primary risk mitigation tools include:

- **Code of Ethical Conduct:** Adherence to the Code of Ethical Conduct is mandatory for all Camco staff.
- **Contractual provisions:** Compliance with this Policy is mandatory under the contractual terms of the funding agreement with Camco-managed funds. In addition, it is required that the Policy be inserted into any contract for technical assistance funded indirectly by Camco platforms.
- **Recruitment processes:** The Camco shall ensure that the recruitment of its key staff have the necessary experience to ensure implementation of this Policy.
- **Approval processes:** The Camco shall ensure that safeguarding issues are addressed in the selection, design, approval and implementation of Camco platform transactions. The Camco Investment Committee shall explicitly consider the impact of each Camco platform transaction on vulnerable groups, particularly women, children and Indigenous communities.
- **Procurement processes:** The Camco Procurement Policy shall be implemented to ensure that safeguarding issues are adequately addressed by all service providers to Camco platforms.
- **Integrity checks:** The integrity checks commissioned directly by the Camco Board (as to the integrity of Camco's application of Camco policies and procedures), shall give specific consideration of compliance with this Policy.

Working with investees and partners

The financial support provided to projects by Camco is channelled to investees for the purpose of development capital and/or flexible gap funding. Accordingly, it is essential to ensure that these stakeholders share Camco's commitment to safeguarding and the protection of vulnerable and/or disadvantaged groups. The inclusion of contractual terms requiring compliance with this Policy by investees and those providing technical assistance to Camco platforms and/or their projects will be mandatory. Similarly, Camco will utilise its network of partners to understand and promote best-in-class safeguarding policies.

Training and compliance

The role of the Compliance Officer includes:

- Being responsible for safeguarding issues within Camco platforms and proactively monitoring safeguarding risks
- Ensuring training on the Camco Investee Safeguarding Policy for those implementing Camco platform projects and awareness raising on communities' rights as part of the stakeholder engagement process
- Serving as the initial point of contact for incident reporting
- Reviewing this Policy at least annually
- Making referrals to relevant regulatory authorities and/or law enforcement agencies as appropriate, and
- Training Camco staff on safeguarding shall be conducted at least annually.

Incident reporting

Safeguarding concerns shall be immediately reported to the Compliance Officer (or in the event that they concern the Compliance Officer, directly to the Managing Director of Camco). The rights of staff of Camco to report concerns are protected by the Public Interest Disclosure Act 2013.

In addition, Camco has a 24-hour anonymous whistleblowing hotline on +44 191 516 7764 / camco@safecall.co.uk that can serve as an initial point for reporting safeguarding concerns.

All reports of safeguarding concerns will be documented, treated in confidence and reported to the Camco Board by the Compliance Officer. In certain circumstances, matters may be referred to the police or other authorities in the relevant jurisdiction and may also serve as the basis for disciplinary action, including termination of employment.

C. E&S Screening Checklist

EXCLUSION CRITERIA

Y/N

Is the project located in “critical habitats”⁷, defined as:

- Highly threatened or unique ecosystems
- Habitat of significant importance to critically endangered, endangered or vulnerable species, as defined by the IUCN Red List of Threatened Species and in relevant national legislation
- Habitat important to the survival of endemic or restricted-range species or unique assemblages of species
- Habitat supporting globally significant migratory and/or congregatory species
- Biodiversity and/or ecosystems with significant social, economic or cultural importance to local communities and Indigenous peoples, and/or
- Habitat of key scientific value and/or associated with key evolutionary processes.

Does the project influence an area which includes a critical cultural heritage site or significant artefact (e.g., objects, property, sites, structures, unique natural features having archaeological, paleontological, historical, cultural, artistic or religious values)?

Does the project involve significant involuntary resettlement, which requires physical displacement of more than 10 households as a result, not including households in the way of a transmission line or pipeline for geothermal projects?

Does the project entail adverse impacts to the rights, resources and lands of Indigenous peoples?

Does the project have significant adverse E&S impacts which are diverse, irreversible and unprecedented? (e.g., large hydro projects, in which a dam is used for storage, geothermal projects)

GENERAL E&S CONSIDERATIONS

Does the investee have an Environmental and Social Policy in place committing to avoidance, and where avoidance is impossible, mitigating adverse impacts to people and the environment?

Has an ESIA been completed?

Does the ESIA conclusively identify if the project area is in an ecologically valuable habitat (critical, natural or modified)?

Does the investee have an environmental and social management system (ESMS) in place?

SOLAR PV AND BATTERY BACK UP

What is the investee's plan for the appropriate safe and secure disposal of hazardous waste (e.g., solar PV panels and e-waste)?

>>

Confirm the investee is not using any of the solar supply companies listed here: <https://www.dhs.gov/uflpa-entity-list> and <https://www.cbp.gov/trade/forced-labor/withhold-release-orders-and-findings>

>>

Has manufacturer responsibility been considered for recycling mechanisms and waste management systems?

>>

HYDRO

⁷ European Investment Bank (2018): Guidance Note for Environmental and Social Standard 3 on Biodiversity and Ecosystems, p. 11. Accessed at: https://www.eib.org/attachments/strategies/guidance_note_for_standard_3_on_biodiversity_and_ecosystems_en.pdf

How does the investee make sure that the project design ensures sufficient ecological water flow remains in the riverbed when undertaking a project? Has this been sufficiently addressed in the ESIA or hydrological study?

>>

What steps has the investee taken to ensure water quality and water availability is maintained for community consumption?

>>

How has the investee ensured the design of fish passages and screens (water intake structure) is installed in line with internationally recognised guidance?

>>

WIND

How has the investee considered the refurbishment of access roads leading into the communities in their project financing?

>>

Confirm the investee is not using any of the supply companies listed here:

<https://www.cbp.gov/trade/forced-labor/withhold-release-orders-and-findings>

>>

How has the investee considered proximity of their projects to the nearest residential area?

>>

What is the proximity to the nearest residential area? For large wind farms, residential areas are to be more than a km away⁸.

>>

⁸ Barclay, C. (2011). Wind Farms – Distance from Housing. Library House of Commons, Science and Environment Section. Accessed: <https://ascogfarm.com/wp-content/uploads/2020/07/SN05221.pdf>

D. Environmental and Social Red Flag Report Template

Project:	[xxx]
Developer:	[xxx]
Country/ies of project site:	[xxx]
Date:	[xxx]
Author:	[xxx]
Quality check:	[xxx]

This Environmental and Social Red Flag Report summarises the environmental and social (E&S) risks and impacts relating to the above-named project based on the following review of documentation, if available at the structure paper stage.

[list here documents reviewed, date document was prepared and author of document]

This report is an internal report prepared by the impact team. It constitutes a preliminary assessment of the project's relevant documentation against the IFC Performance Standards on Environmental and Social Sustainability 1-8, which apply to all projects funded by Camco-managed funds in accordance with the Camco Environmental and Social Policy.

Please note that external validation of the project being funded must confirm risk categorisation, as per the IFC Risk Categorisation as well as the GCF Revised Environmental and Social Policy.

IFC risk categorisation

- Category A
- Category B+
- Category B
- Category C

This red flag report will be revisited at the due diligence stage to develop the Environmental and Social Action Plan (ESAP). The scope of the gap analysis at the due diligence stage should be extended to the entire Environmental and Social Management System (ESMS) of the project.

Summary of key E&S recommendations for the project:

[Provide summary based on the conclusions and recommendations provided in the sub-sections]

E&S SAFEGUARD INSTRUMENTS

Category B+ transactions

Required: Y/N ESAP item reference

E&S Policy

ESIA, EFlow study, CIA, ESMP and Audit/Due Diligence Report

Occupational Health and Safety Plan

Emergency Preparedness and Response Plan

Labour Policy and Employment Handbook, SEAH Risk Assessment and Policy

Supply Chain Procurement Policy

Waste Management Plan

Stakeholder Engagement Plan

Grievance Mechanism

Where applicable: Y/N ESAP item reference

Biodiversity Action Plan

Critical Habitat Assessment

Invasive Species Management Plan

Land Acquisition and Resettlement Plan

Indigenous People Plan

Chance Find Procedure

Water Management Plan

Traffic Management Plan

Security Risk Assessment, Conflict Sensitivity Assessment

E&S SAFEGUARD INSTRUMENTS

Category B transactions

Required: Y/N ESAP item reference

E&S Policy

ESIA, ESMP and Audit/Due Diligence Report

Occupational Health and Safety Plan

Emergency Preparedness and Response Plan

Labour Policy and Employment Handbook

Supply Chain Procurement Policy

Waste Management Plan

Stakeholder Engagement Plan

Grievance Mechanism

Where applicable: Y/N ESAP item reference

Water Management Plan

Critical Habitat Assessment

Invasive Species Management Plan

Land Acquisition Plan

Traffic Management Plan

Security Risk Assessment, Conflict Sensitivity Assessment

Category C transactions

Required: Y/N ESAP item reference

E&S Policy

Simplified ESIA and ESMP

Occupational Health and Safety Plan

Labour Policy and Employment Handbook

Waste Management Plan

E&S SAFEGUARD INSTRUMENTS

Stakeholder Engagement Plan

Grievance Mechanism

IFC PS 1: Assessment and Management of Environmental and Social Risks and Impacts

[OK/!]

Environmental and Social Assessment and Management System (ESMS)

[Comment on the extent to which the following requirements are met in the investee's ESMS:

- E&S risk assessment (including risk of climate change - e.g., accumulated or heightened degrees of heatwaves, floods, landslides, fires, droughts, frequency of natural disasters - on employees', community's and Indigenous peoples' health and safety, and endangered species).
- Review of the gender assessment, in so far as it has been conducted by the investee.
- Establishment and maintenance of ESMS appropriate to the nature and scale of the project and commensurate with the level of its E&S risks and impacts.]

[OK/!]

ESMS – Policy

[Comment on the extent to which the following questions are met in investee's policy:

- Does it establish an overarching policy defining the E&S objectives and principles with regards to preservation and conservation?
- Does it refer to compliance with host country and international laws and regulations and other standards, certifications and codes of practices relevant to the business and its activities?]

[OK/!]

ESMS - Identification of risks and impacts

[Comment on the extent to which key adverse impacts, risks, opportunities and benefits have been identified. Consider if the investee has sufficiently:

- Established and maintained a process for identifying the E&S risks and impacts of the project, including issues covered by IFC PS 2-8 as applicable, and those who are likely to be affected by them. This should be guided by the project's type, scale and location, and be based on recent E&S baseline data. Project areas to include area of influence and have all associated facilities including land required for transmission line installation.
- Include the rationale for the categorisation noted in the ESIA, to be aligned with IFC Risk Categorisation and the GCF Revised Environmental and Social Policy
- Incorporate climate change risk and adaptation opportunities and planning, potential transboundary effects, relevant third-party risks and impacts, labour safety risks within reasonable control, sexual exploitation and abuse and harassment (SEAH), risks of gender-based violence, risks to Indigenous people and culturally significant land issues, and related and applicable plans, studies and assessments in the ESIA.
- Addressed the project areas' primary ecological functions and species composition in the project's Ecologically Appropriate Area of Analysis (EAAA), against "critical, natural and modified" habitats. A Critical Habitat Assessment must be completed, if not assessed in the ESIA
- For hydro projects, a stand-alone ecological flow assessment should be completed for the project, in accordance with World Bank EFlows Good Practice Handbook. An EFlow assessment should be agreed upon at concept and prefeasibility stages, and coordinate with the ESIA.
- Identified significant adverse environmental impacts, in the ESIA, that are sensitive, diverse, irreversible or unprecedented. If found, the project will not be approved for

funding. Projects with the following environmental risks will also not be eligible for funding:

- Projects located in a “critical habitat”, defined as:
 - highly threatened or unique ecosystems
 - habitat of significant importance to critically endangered, endangered or vulnerable species, as defined by the IUCN Red List of Threatened Species and in relevant national legislation
 - habitat important to the survival of endemic or restricted-range species or unique assemblages of species
 - habitat supporting globally significant migratory and/or congregatory species
 - biodiversity and/or ecosystems with significant social, economic or cultural importance to local communities and Indigenous peoples; and/or
 - habitat of key scientific value and/or associated with key evolutionary processes. Project area includes a critical cultural heritage site or significant artefact (e.g., objects, property, sites, structures, unique natural features having archaeological, paleontological, historical, cultural, artistic or religious values).
- Compounded environmental pressures resulting in adverse effects on environmental and social risks and ecosystem services (e.g., vegetation clearing or changes in land use and forest cover for project construction compounded with over-utilisation, accumulated effects from climate change and environmental contamination affecting the breeding habits of a specific fish species and therefore contributing to high risk or extinction classification under the IUCN Red List of Threatened Species).
- Potential of keystone species’ loss, which irreversibly affects critical habitats and potential restoration or rehabilitation costs and value.
- Projects that involve significant involuntary resettlement and require physical displacement as a result. Significant involuntary physical resettlement is defined as more than 10 households.
- Noise impacts from wind projects that negatively and irreversibly affects the local residential population.
- Established an E&S due diligence process to identify risks and impacts once the project’s physical elements are reasonably understood, where the project area has not been identified.
- Key adverse impacts and risks to consider and comment:
 - Potential resettlement of households
 - Clearing of vegetation, including felling of economically beneficial trees such as shea nut trees
 - Disturbance during construction - transportation of heavy equipment to the site and safety of community
 - Visual disturbance e.g., reflection from the PV panels
 - Obsolete batteries and panels – the disposal could expose the communities to hazardous chemicals if not properly handled.

- Cumulative impact assessment, considering the following valued E&S components (VECs), if other existing, planned, and/or reasonably anticipated future projects are within the same site area competing for common natural resources:
 - physical features, habitats, wildlife populations, (e.g., biodiversity)
 - ecosystem services (e.g., water quality and supply, soil quality, shade, loss of species)
 - natural processes (e.g., water and nutrient cycles, microclimate)
 - social conditions (e.g., health, economics, land use access to Indigenous people), and
 - cultural aspects (e.g., traditional spiritual ceremonies, access to cultural heritage sites)

[OK/!]

ESMS - Management programmes

[Comment on the extent to which necessary management plans describe the mitigation activities and performance improvement measures and actions that address the identified E&S risks and impacts of the project.

- Has an E&S Action Plan been established defining the desired outcomes and actions to address the identified issues, with elements such as performance indicators, targets and acceptance criteria that can be tracked? It should also include estimates of resources (both financial costs and roles responsible to perform the function) for implementation, specific records to be documented and responsibilities for implementation and verification.]

[OK/!]

ESMS - Organisational capacity and competency

[Comment on the extent an organisational structure has clearly defined roles and responsibilities appropriate to effectively manage the nature and scale of E&S impacts to the project and community. Competency along with lines of responsibility and authority should be visible within the organisational structure.

Comment on the extent that on-site management is evident, such as the following roles are in place:

- E&S Manager
- HSE Manager/Officer
- CLO]

[OK/!]

ESMS - Emergency preparedness and response

[Comment on the extent a step-by-step procedure to prepare trained response personnel for accidental and emergency situations has been established, in a manner appropriate to prevent and mitigate any harm to people and/or the environment. Include identified areas or activities where potential accidents or emergency situations might occur, communities and individuals that may be impacted, details of the necessary protective equipment, communication details of key emergency services and details of planned training on emergency procedures.]

[OK/!]

ESMS - Stakeholder engagement, external communication, grievance mechanisms and ongoing reporting to Affected Communities

[Comment on the extent to which the below requirements are met:

An ongoing stakeholder engagement process has been established including:
stakeholder identification analysis and engagement planning

public disclosure and dissemination of information

consultation and participation

grievance mechanism

ongoing reporting to Affected Communities.

Stakeholder identification analysis: Has the range of stakeholders that may be interested and affected by the project been sufficiently identified together with necessary external communications methods?

Stakeholder Engagement Plan (SEP): Has an SEP (or Framework, in the event the exact location is not known) been developed that is scaled to the project's risks, impacts and development stage, and tailored to the characteristics and interests of the Affected Communities. Where applicable, the SEP should include differentiated measures (such as safeguarding measures) to allow for the effective participation of those identified as disadvantaged or vulnerable.

External communications and information disclosure: A procedure for external communications been established including methods for reaching all members of the Affected Communities and interested parties. These methods for external communications will also need to ensure they reach vulnerable groups, which means focus group discussions to ensure privacy and confidentiality may be required.

Grievance Mechanism: Has a Grievance Mechanism to receive and facilitate resolution of Affected Communities' concerns and grievances about the project's E&S performance been established. The process should be easy, accessible and free of charge, and carried out in a confidential manner should this be preferred. The Grievance Mechanism should be extended to ALL stakeholders (inclusive of employees, probationary employees, community members, service providers, suppliers, and sub-contractors).

Ongoing monitoring and reporting: Have procedures to provide periodic reports to the Affected Communities that describe progress with implementation and development of the project and all associated Action Plans been defined.]

(NOTE: Vulnerable peoples are defined as individuals and/or groups who are at higher risk of being unable to anticipate, cope with, resist and recover from project-related risks and/or adverse impacts. Examples of vulnerable peoples are women and children, people with disabilities, people marginalised by virtue of their gender identity, Indigenous peoples, and other marginalised groups of people.)

[OK/!]

ESMS - Monitoring and review

[Assess whether mechanisms for the reporting of KPIs are in place, recording and definitions of KPIs are understood, and expectations for quarterly and annual reporting requirements are communicated. Ensure any performance indicators, targets and acceptance criteria can be tracked. Provide estimates of the resources (both financial and responsible role) needed for implementation, plus details of the specific records to be documented and responsibilities for implementation and verification.]

Conclusions and recommendations

[Summary of the above recommendations in meeting the fund requirements.]

IFC PS 2: Labour and Working Conditions

[OK/!]

Working conditions and management of worker relationships

[Comment on the extent to which below requirements are met:

A human resource policy and procedures have been established appropriate to the size of the workforce and committing to comply with:

Host country labour laws and regulations

UN Guiding Principles on Business and Human Rights

ILO Declaration on Fundamental Principles and Rights at Work, and

International Bill of Human Rights.

The human resources policy should adhere to host country national regulations, including rights applicable to collective agreements and rights related to working hours, wages, overtime, compensation and benefits, prevention of harassment, and intimidation and/or exploitation.

Where accommodation is provided to employees, this should be consistent with non-discrimination and equal opportunity principles.

Employment relationships should be founded on the principle of equal opportunity and fair treatment. This approach is to be applied across recruitment, hiring, compensation, working conditions and terms of employment, access to training, job assignment, promotion, termination, retirement and disciplinary practices. Retrenchment practices should transparently follow grievance records and disciplinary actions taken.

A Grievance Mechanism should be in place to ensure ALL employees (interns, part-time employees, local employees, sub-contractors, service providers, suppliers, etc.) are able to raise a workplace concern in a transparent or confidential manner, with timely feedback from management. A Camco Whistleblowing Policy is in place, should an employee of an investee approach Camco regarding a human rights violation.]

[OK/!] **Protecting the workforce, occupational health and safety, workers engaged by third parties and supply chain**

[Comment to the extend which commitments are in place to prohibit forced and child labour in the company labour policy as dictated by the Camco's E&S Policy and host country national labour laws, as well as to provide a safe and healthy work environment. Employment must be prohibited from interfering with a child's education or being harmful to a child's health or physical, mental, spiritual, moral or social development. Employment of forced labour, which consists of any work or service not voluntarily performed or is performed under threat of force or penalty, is prohibited. Steps to ensure occupational health and safety (OHS) are laid out in IFC PS 1.

Where third-party service providers and contractors are unable to provide a Grievance Mechanism, the investee must extend its own Grievance Mechanism to serve workers engaged by third parties.

Has the primary supply chain been reviewed by the investee for high risks of child or forced labour practices? Has the primary supply chain been screened against supply companies listed here: <https://www.dhs.gov/uflpa-entity-list> and <https://www.cbp.gov/trade/forced-labor/withhold-release-orders-and-findings>. The investee will be required to undertake supply chain due diligence, through which OHS certifications, labour and human rights, policies and procedures are reviewed. The investee is also required to establish a supply chain procurement policy and plan in line with the Camco guidelines, to ensure management of high-risk labour practices. Steps to remedy and correct any identified cases of forced or child labour practices will need to be implemented to qualify for funding under a Camco-managed fund.

Confirm whether these measures are applied to ALL employees (interns, part-time employees, local employees, sub-contractors, service providers, suppliers, etc.)]

Conclusions and recommendations

[Recommendations for improvement from investee, if any.]

IFC PS 3: Resource Efficiency and Pollution Prevention

[OK/!] **Resource efficiency: Greenhouse gases and water consumption**

[Extrapolate from E&S risk assessment if water abstraction volumes and water supply allowances have met with local regulatory permit stipulations. Ensure allocations allow for sufficient supply for community consumption and survival. Review if permits have been obtained for the right capacity of the plant. Comment on whether the power plant will improve efficiency in its consumption of energy, water and other resources available, thereby conserving raw materials, energy and water.]

[OK/!] **Pollution prevention: Wastes, hazardous materials and pesticide use and management**

[Comment to the extent which a Pollution Prevention Plan has been established to:

- Effectively identify and sort all waste types in accordance with disposal strategies. Identify if the battery technology involves lithium, nickel or cobalt. If hazardous materials are identified, the investee should ensure its due diligence practices are aligned with OECD Due Diligence Guidance for Responsible Mineral Supply Chains, and that the refinery/smelter they source raw materials from is a Responsible Mineral Initiative conformant.⁹
- Implement strategies to reduce generation of waste.
- Recover, re-use and re-purpose waste safe enough for human use and reduced environmental impact.
- Safely and securely dispose of hazardous waste in an environmentally safe manner to a licenced facility. Certification of such disposal is necessary for monitoring requirements.
- Dictate conditions for the safe and secure storage of hazardous waste (shielded from direct sunlight, in a covered facility stored away from environmental conditions and in a lined facility in which soil contamination from leakage is prevented).]

Conclusions and recommendations

[Recommendations for improvement from investee, if any.]

IFC PS 4: Community Health, Safety, and Security

[OK/!]

Community health and safety:

[Comment to the extent which Community Health, Safety and Security plans consider the following:

- Infrastructure and equipment design and safety
- Hazardous materials management and safety
- Ecosystem services
- Community exposure to disease
- Emergency preparedness and response
- Grievance Mechanism applied to all groups (inclusive of vulnerable groups)
- Labour rights are implicated and applied to all local employees (prohibited forced and child labour)
- Evaluate risks and impacts to the health and safety of Affected Communities during the project life cycle
- Establish preventative and control measures consistent with best international industry practice

List in this section any significant risks and impacts to the health and safety of the Affected Communities associated with the project.]

[OK/!]

Security personnel

[Comment on the extent to which the risks posed by the project's security arrangements to those within and outside the project site. Assess if security measures in place are sufficient.]

⁹ Responsible Mineral Initiative, access: <http://www.responsiblemineralsinitiative.org/responsible-minerals-assurance-process/smelter-refiner-lists/cobalt-refiners-list/conformant-cobalt-refiners/>

Conclusions and recommendations

[Summary of the above recommendations in meeting the fund requirements.]

IFC PS 5: Land Acquisition and Involuntary Resettlement

[OK/!] Land acquisition, involuntary resettlement and economic displacement

[Comment to the extent to which:

- The project design in place avoids, minimises physical and/or economic displacement, where possible.
- Compensation structure, method for calculation and consistent application to all community members affected has been identified. Has the compensation value included the social cost (e.g., cost to the community of being removed from their homes, moving costs, replacement costs, etc.) along with market value?
- Benefits for displaced persons have been clearly defined including relocation into similar or the same kind of home.
- Community engagement, conducted through stakeholder, has include options presented to the community or alternatives, where applicable. In the case of Indigenous peoples, assess whether this is applicable to the area and community. Ensure all vulnerable peoples and affected groups have been sufficiently considered.
- Has a Grievance Mechanism, in accordance with IFC PS 1 been applied or put in place.
- Have legal requirements and process to obtain land title been clearly defined including any social requirements as determined by the property owners, community land committees and community?
- Have legacy land ownership and land use compensation been addressed?
- Does displacement procedures ensure improved living of displaced persons?
- Have feasible alternative to project design been considered to avoid or minimise physical and/or economic displacement.
- When displacement cannot be avoided, have displaced communities and persons been compensated for loss of assets at full replacement cost]

Conclusions and recommendations

[Summary of the above recommendations in meeting the fund requirements.]

IFC PS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources

[!] Protection and conservation of biodiversity

[Identify whether the project encompasses modified, natural and/or critical habitats, legally protected and internationally recognised areas, and invasive alien species, and apply caution accordingly.

Comment to the extent on which the following have been undertaken in biodiversity scoping:

The legal conservation regime of the area, if any.

The type of habitat (natural, semi-natural – or socio-ecosystems, urban).

The biodiversity value of the habitat (criticality). Has the ESIA addressed the project areas' primary ecological functions and species composition in the project's Ecologically Appropriate Area of Analysis (EAAA), against "critical, natural and modified" habitats. A Critical Habitat Assessment must be completed, if not assessed in the ESIA.

Ecosystem services vital to local communities and Indigenous groups.]

Comment to the extend the ESIA report states that the project site is [not] part of a[ny] protected area.]

[OK/!] **Management of ecosystem services**

[Comment on the extent to which requirements are met:

Biodiversity Impact Assessment with the aim to achieve no net loss and preferably a net gain of biodiversity for habitats sensitive to high species loss. A rehabilitation plan should be in place for habitat risks. Compared with baseline trends, what are the impacts resulting from the construction, operation and decommissioning phases? Are there conservation NGOs, organisations or associations for critically endangered species within the area, that require consultation and collaboration with to ensure preservation of species? Has the scoping report / ESIA considered the impacts associated with the supply of living natural resources?

What are the cumulative impacts associated with the different elements of the project and with other projects in the area? What are the cumulative impacts from climate change (watershed areas, wetlands, etc.)?

In the case of hydropower plants, is there sufficient water flow to sustain the ecosystem and the service it provides to sustain aquatic life? Is the weir height below the prescribed height (5m)? Is the power density of the power plant below 5W/m²? Do the biodiversity risks require a stand-alone EcoFlow assessment, in accordance with the World Bank Good Practice Handbook? Is there need for a Dam Safety report, in accordance with the World Bank Good Practice Handbook?]

[OK/!] **Sustainable management of living natural resources**

[Comment on the extent to which requirements are met to:

Monitor plans for biodiversity assessment are mandatory in projects that affect critical habitats but are also required in other cases to support the ongoing auditing of the effectiveness of the Biodiversity Management Plan.

How have the biodiversity and ecosystem services, of the project site actually changed throughout the life of the project?

Are additional measures required to avoid further impacts?]

[OK/!] **Supply chain**

[Comment on the extent to which investees supply chain procurement plan covers necessary standards: Suppliers Labour policy, OHS policy and procedures, and certificates of accredited OHS and ESMS, including ISO 45001 and ISO14000.

A supply chain due diligence process has been put in place to investigate OHS labour practices and preservation of human rights.]

[!] **Conclusions and recommendations**

[Summary of the above recommendations in meeting the fund requirements.]

IFC PS 7: Indigenous Peoples

[OK/!] **Avoidance of adverse impacts**

[Comment on the extent to which below requirements are met:

The investee intends to minimise, restore and/or fully compensate for impacts in a culturally appropriate manner commensurate with the nature and scale of the impact, in accordance with the United Nations Declaration on the Rights of Indigenous Peoples.

An IPP has been established, a FPIC resisted and has been well documented.

The IPP should outline:

Participation and consent

Circumstances requiring free, prior and informed consent of Indigenous peoples, identified through stakeholder engagement (of all affected members of the community, including women)

Impact on lands and natural resources subject to traditional ownership or under customary use

Relocation of Indigenous peoples from such lands and natural resources

Critical cultural heritage, and

Mitigation and development benefits.]

Conclusions and recommendations

[Summary of the above recommendations.]

IFC PS 8: Cultural Heritage

[OK/!] **Protection of cultural heritage in project design and execution**

[Comment on the extent to which requirements are met:

Chance Find procedure, has been established

Consultation as per stakeholder engagement has been ensured

Community access has been identified]

Conclusions and recommendations

[Summary of the above recommendations in meeting the fund requirements.]

E. Terms of Reference for the ESIA

Introduction

[Project implementing entity name] (the “Investee”) is an Independent Power Producer...in [Country]. The investee is developing... [specify project technology and size], located at [specify location and site details].

The investee has received funding support from the [Camco-managed fund name] to undertake environmental and other technical studies for both project sites.

The investee now invites eligible firms/and or individual consultants (“Consultant”) to submit proposals for conducting E&S impact assessments as described below.

Project Description

[Provide a short description detailing project, site and any specific environmental considerations that need to be highlighted based on Camco policy / local situation.]

Overall Assignment

The Consultant will complete the Environmental and Social Impact Assessment (ESIA), in accordance with local legislation [specify law/ degree no]. The ESIA will aim to ensure that the project(s) have/has a minimal impact on the environment and maintain sustainability of natural resources, thereby obtaining an environmental compliance certificate and/or permit.

The final ESIA Report and ESMS, must be prepared and submitted in accordance with the environmental guidelines under [specify law/ degree no, effective date], regulated by the [Add entity name typically local Ministry of Environment] and the World Bank Environmental, Health and Safety Guidelines, including the following standards:

- IFC Performance Standards on Environmental and Social Sustainability¹⁰
- GCF Revised Environmental and Social Policy
- GCF Indigenous Peoples Policy
- ILO Declaration on Fundamental Principles and Rights at Work
- International Bill of Human Rights
- UN Guiding Principles on Business and Human Rights
- All applicable laws and regulations of the [Country].

The objective of the ESIA report and ESMS is to:

- develop an environmental baseline of the affected community and project area
- assess the extent of direct and indirect effects of a project on the ecological equilibrium
- identify potential positive and adverse project impacts
- [add any site/ country/ technology specific considerations, relevant]

¹⁰ IFC PS 2012: <https://www.ifc.org/en/insights-reports/2012/ifc-performance-standards>

- identify the gender baseline; and
- develop feasible and cost-effective measures to enhance and monitor positive impacts and avoid, reduce, or mitigate and monitor adverse impacts during construction, operation, and decommissioning as per applicable standards, in tabular format.

The ESIA report and ESMP shall be provided in English / [two languages English and local language].

The Scope Of Work

The Consultant, in accordance with the [local law/ degree name, no., effective date], and on behalf of the investee, will undertake the following activities as described below, to ensure compliance with environmental regulations.

The following requirements are expected to be fulfilled:

Preparation and submission of an **Inception report**, providing a brief overview of the current local environmental landscape, expected high level key environmental risks and project timeline.

Preparation and submission of all draft and revised finalised documentation required for an **ESIA compliance certificate and/or permit**, in accordance with local environmental regulatory requirements established by [entity name]. The Consultant is expected to take care of all relevant steps and continually liaise with the relevant and necessary authorities and organisations to ensure issuance of the environmental compliance certificate and/or permit.

Preparation of the **Environmental and Social Management System (ESMS)** with public consultations, consisting of the following:

The ESIA report including:

- a. The summary of the specific information required in simple language.
- b. Description and analysis of the initial state of the site and its physical, biological, ecological, socio-economic and human environment, inclusive of triggering of critical, natural and/or modified habitat criteria.
- c. Description and analysis of all natural resources, climate change effects¹¹ and socio-cultural elements that may be affected by the project, as well as the reasons for choosing the site.
- d. Description and analysis of cumulative impacts on valued E&S components, taking into account the current situational landscape and planned project developments based on stakeholder discussions.
- e. Description of the project and the reasons for this choice of location among the alternatives.
- f. A review of the applicable environmental legal and institutional framework, with recommendations for compliance for the ESIA, covering:
 1. Identification and evaluation of possible effects of the implementation of the project on the natural and human environment
 2. Identification of possible effects on valued E&S components, and recommendation whether a Cumulative Impact Assessment is required
 3. Identification of optimal eco-flow requirements to sustain and maintain primary ecosystem functions, with respect to hydropower projects

¹¹ Key concern is water availability, however other consideration includes slow (e.g. sea level raise) and rapid onset events (e.g. heatwaves, fires, droughts, floods and landslides) impact and cumulative impact on labour and community health and safety, endangered species and nomad Indigenous people that are likely to be aggravated due to the project.

4. Indication of the measures to avoid, reduce or eliminate harmful effects on the environment and surrounding community
 5. Identification of the necessary management plans to be developed in response to the E&S risks, and
 6. Classification of the project in accordance with the IFC Risk Categorisation: [https://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/sustainability-at-ifc/policies-standards/es-categorisation] and aligned with the GCF Revised Environmental and Social Policy [https://www.greenclimate.fund/sites/default/files/document/environment-social-policy_0.pdf]
- g. Stakeholder engagement and consultation in accordance with local legislation and IFC Performance Standards.
- h. Conduct a **gender analysis**, as part of the ESIA, by establishing a gender baseline including an overview of the socio-economic factors that contribute towards gender equality or risk of inequality in the country and in the targeted sector (description of gender issues that may be relevant to the project and its impacts and opportunities. At minimum the gender baseline should indicate:
- i. Proportions (%) of households and individuals (males and females) with access to electricity in the country/ region, urban/ rural.
 - ii. Proportions (%) of female-headed households in the country/region, urban/ rural.
 - iii. Proportions (%) of men and women employed in relevant sector in country (compare to job opportunities created by the project construction/ service sector/ agriculture/forestry/engineering).
 - iv. Proportions (%) of men and women that have access to affordable capital, similar to the loan/payment facilities provided by the project [delete if not relevant for the project type].
- i. Establish an **Environmental and Social Management Plan (ESMP)** for the project with control mechanisms including an E&S Monitoring Plan. The Monitoring Plan shall be provided in tabular format and shall contain following:
- i. Potential impact
 - ii. Proposed mitigation measures
 - iii. Parameter monitored
 - iv. Measurement unit
 - v. Measurement range/ target level
 - vi. Source of data
 - vii. Timing
 - viii. Frequency of monitoring
 - ix. Reporting frequency
 - x. Location where recorded
 - xi. Corrective action
 - xii. Quality assurance and /or supporting document
 - xiii. Responsible person and their contact information, and
 - xiv. Estimated cost of implementation.

Please see Appendix [N], for monitoring and reporting template.

Preparation and development of a **Stakeholder Engagement Plan**, in accordance with IFC Performance Standard 1, providing the affected communities with access to relevant information on the following:

- a. The purpose, nature and scale of the project
- b. The duration of proposed project activities
- c. Any risks to and potential impacts on such communities and relevant mitigation measures (with regard to the environment, land tenure changes (resettlement, land acquisition or expropriation), occupational and community health, safety and security, and any other potential adverse impact on communities arising from the project)
- d. The envisaged stakeholder engagement process (including opportunities and ways in which the public can participate, time and venue of any envisaged public meetings, and the process by which meetings are notified, summarised and reported)
- e. The grievance mechanism for community as well as labour, and
- f. Any added value and opportunities for benefit sharing.

This information should be disclosed and disseminated:

- In local language(s) appropriate for project location and stakeholder group
- In a manner that is timely, accessible and culturally appropriate, considering factors such as literacy, unequal gender relations and access to dissemination media, and
- Taking into account any vulnerable or minority groups and their right to equitable representation and consideration of their rights, view and interests.
- Public consultations must be conducted with a register of key stakeholders (specifying gender of participants) and a record of discussions and action points for consideration, to be taken forward by the project and/or Client.

Recommendations and/or development of the necessary management plans to address the E&S risks and impacts identified. These being:

- i. **Cumulative impact assessment**
- ii. **SEAH risk assessment**
- iii. **Conflict-sensitivity assessment**
- iv. **Security risk assessment**
- v. **Occupational Health and Safety Management Plan**
- vi. **Labour Management Plan**
- vii. **Emergency Preparedness and Response Plan**
- viii. **Pollution Prevention Plan (inclusive of Waste Management Plan, Water Management Plan, Traffic Management Plan, Dust and Noise Management Plan, Hazardous and E-Waste Management Plan)**
- ix. **Community Health, Safety and Security Plan**
- x. **Supply Chain Management Plan**
- xi. **Land Acquisition Plan and Resettlement Plan, and/or Livelihood Restoration Plan**
- xii. **Biodiversity Management Plan, Critical Habitat Assessment and/or Invasive Species Management Plan**
- xiii. **Stakeholder Engagement Plan and Grievance Redress Mechanism**
- xiv. **Indigenous Peoples Plan**
- xv. **Chance Find Procedure**

Deliverables

The following deliverables will be expected in alignment with the above scope of work:

- Inception report
- ESIA report compliant with IFC standards, local law and the scope of work identified above. A draft version will be submitted to the investee for review before finalised for submission to the [entity/department]
- Submission of ESIA reports to relevant authorities for issuance of a permit
- Establishment of ESMS and ESMP compliant with IFC Performance Standards, specifically the following required management plans:
 - Stakeholder Engagement Plan and Grievance Redress Mechanism
 - Occupational Health and Safety Plan
 - Emergency Preparedness and Response Plan
 - Supply Chain Management Plan
 - Waste Management Plan
- Establishment of the following management plans as part of the ESMS, only where the risk has been identified in the ESIA and requires comprehensive management:
 - Pollution Prevention Plan
 - Water Management Plan
 - Traffic Management Plan
 - Community Health and Safety Plan
 - Indigenous Peoples Plan
 - Land Acquisition Plan, and Resettlement Plan and/or Livelihood Restoration Plan
 - Biodiversity Action Plan, Critical Habitat Assessment, Invasive Species Management Plan, and
 - Chance Find Procedure.

All reports will be submitted in English [and in local official language, where required.]

Communication

The Consultant will report directly to investee's designated manager on technical and procedural aspects of this contracted scope of work. The Consultant is responsible for the liaison with the relevant and necessary authorities and organisations to ensure issuance of the environmental compliance certificate and/or permit.

Proposal Submission Requirements

1. Technical Experience:

The Consultant is required to demonstrate the following in their proposal submission, specific to this RFP:

- An understanding of project impact zone and outline of the local environmental regulatory requirements for the issuance of an environmental compliance certificates and/or permit for this specific project
- An understanding of the key steps, activities and documentation required to comply with local environmental regulation, and
- An understanding of the requirements necessary under the IFC Performance Standard.

2. Company Capability and Capacity

The Consultant must provide sufficient evidence to demonstrate their experience and capability, as follows:

- Proven project experience within Africa or countries with similar economic structures
- Proven understanding and compliance of local environmental regulatory requirements, inclusive of an agreement/approved to conduct an ESIA in [country] issued by the [relevant authority]
- Proven track record in the assignments being completed in [specify project type/technology]
- Proven track record in developing ESIA studies in [specify country] and understanding of local ecological and cultural circumstances
- Proven experience with projects that are operational and applying the ESMS
- Proven track record in applying IFC PS, and
- Professional indemnity insurance, the value of which to be twice that of the professional fees outlined in the quotation and to cover the period during which the service will be conducted plus an additional period of 12 months.

3. Budget

The proposal shall indicate full contract value, itemising environmental permit fees, staff remuneration, logistic costs and other expenses. Transport and logistics costs will be incurred by the Consultant.

The charges are exclusive of VAT and other local taxes.

Please note, the Consultant will issue proforma invoices for Client approval ahead of formal invoicing. Payment will be structured against the project phases, with 40% following signature of the contract, 30% after submission of the draft ESIA and Stakeholder Engagement Plan to the Client for review, and 30% upon issuance of the Environmental Compliance Certificate and/or Permit [revised, as relevant to specific project]. Payment terms will not exceed 30 days from receipt of formal invoice.

4. Project Timeline

The Consultant must provide in their proposal a Gantt Chart indicating timelines for submission of the above deliverables, and outputs.

F. Terms of Reference for CIA

Introduction

[Project implementing entity name] (the “investee”) is an Independent Power Producer...in [Country]. The investee is developing... [specify project technology and size], located at [specify location and site details].

The investee has received funding support from the [Camco-managed fund name] to undertake environmental and other technical studies for both project sites.

The investee now invites eligible firms/and or individual consultants (“Consultant”) to submit proposals for conducting E&S impact assessments as described below.

Project Description

[Provide a short description detailing project, site and any specific environmental considerations that need to be highlighted based on Camco policy / local situation.]

Overall Assignment

The Consultant will complete the Cumulative Impact Assessment (CIA), in accordance with local environmental and land legislation [specify law/ degree no]. The CIA will aim to ensure that the project(s) have/has a minimal impact on the environment and maintain sustainability of natural resources.

The final CIA report and management plan, must be prepared and submitted in accordance with the environmental guidelines under [specify law/ degree no, effective date], regulated by the [Add entity name typically local Ministry of Environment] and the World Bank Environmental, Health and Safety Guidelines, including the following standards:

- IFC Performance Standards on Environmental and Social Sustainability¹²;
- GCF Revised Environmental and Social Policy
- GCF Indigenous Peoples Policy
- ILO Declaration on Fundamental Principles and Rights at Work
- International Bill of Human Rights
- UN Guiding Principles on Business and Human Rights
- All applicable laws and regulations of the [country].

The objective of the CIA report and management plan is to:

- determine if the combined impacts of the project, other projects and activities, and natural environmental drivers that may put the sustainability of a Valued Environmental and Social Components (“VECs”) at risk, and
- determine what management measures could be implemented to prevent unacceptable VEC conditions,
- The CIA report and management plan shall be provided in English / [two languages English and local language].

The Scope of Work

The Consultant, in accordance with the environmental [local law/ degree name, no., effective date], and on behalf of the investee, will undertake the following activities as described below, to ensure compliance with environmental regulations. The following requirements are expected to be fulfilled:

- Preparation and submission of an Inception report, providing a brief overview of the current local environmental landscape, expected high level key environmental risks with respect to nearby projects and other influencing factors and project timeline.
- Preparation and submission of all draft and revised finalised documentation required for a CIA, in accordance with local environmental regulatory requirements established by [entity name].
- Preparation of the **Cumulative Management Plan** with public consultations, consisting of the following:

3.2 The **CIA report** including:

- a. An executive summary of the contributory factors to cumulative impacts required in simple language
- b. Define and identify spatial and temporal boundaries for all forecasts of the cumulative impacts identified

¹² IFC PS 2012: <https://www.ifc.org/en/insights-reports/2012/ifc-performance-standards>

- c. Define and identify all VECs (e.g., natural resources, climate change effects and socio-cultural elements) in consultation with affected communities and stakeholders
- d. Develop baseline of present conditions of all VECs identified
- e. Identify other existing and reasonably predictable projects and human activities that do/would affect the VECs
- f. Assess cumulative impacts and evaluate their significance over VEC's predicted future conditions
- g. Design the following:
 - i. a management plan and procedures to manage cumulative impacts
 - ii. determine appropriate and practical monitored indicators to assess management of cumulative impact
 - iii. determine appropriate supervision across designated roles and responsibilities.

Re-classification of the project in accordance with the IFC Risk Categorisation and the GCF Revised Environmental and Social Policy, taking into account the effect cumulative impacts will play on the project site within the next 10 years.

Deliverables

The following deliverables will be expected in alignment with the above scope of work:

- Inception report.
- CIA report, compliant with “IFC Good Practice Handbook: Cumulative Impact Assessment and Management”¹³, local law and the scope of work identified above. A draft version will be submitted to the investee for review before finalised for submission.
- Establishment of Cumulative Impact Management Plan, compliant with IFC Performance Standards.

All reports will be submitted in English [and in local official language, where required.]

Communication

The Consultant will report directly to investee’s designated E&S Manager on technical and procedural aspects of this contracted scope of work.

Proposal Submission Requirements

1. Technical Experience:

The Consultant is required to demonstrate the following in their proposal submission, specific to this RFP:

- An understanding of project impact zone and outline of the local environmental regulatory requirements
- An understanding of the key steps, activities and documentation required to comply with local environmental regulation, and

¹³ IFC, 2013. Good Practice Handbook. Cumulative Impact Assessment and Management: Guidance for the Private Sector in Emerging Markets. Accessed: <https://www.ifc.org/content/dam/ifc/doc/mgrt/ifc-goodpracticehandbook-cumulativeimpactassessment.pdf>

- An understanding of the requirements necessary under the IFC Good Practice Handbook.

2. Company Capability and Capacity

The Consultant must provide sufficient evidence to demonstrate their experience and capability, as follows:

- Proven project experience within Africa or countries with similar economic structures
- Proven understanding and compliance of local environmental regulatory requirements
- Proven track record in the assignments being completed in [specify project type/technology]
- Proven track record in developing CIA and ESIA studies in [specify country] and understanding of local ecological and cultural circumstances
- Proven track record in applying IFC PS, and
- Professional indemnity insurance, the value of which to be twice that of the professional fees outlined in the quotation and to cover the period during which the service will be conducted plus an additional period of 12 months.

3. Budget

The proposal shall indicate full contract value, itemising staff remuneration, logistic costs and other expenses. Transport and logistics costs will be incurred by the Consultant.

The charges are exclusive of VAT and other local taxes.

Please note, the Consultant will issue proforma invoices for Client approval ahead of formal invoicing. Payment will be structured against the project phases, with 40% following signature of the contract, 30% after submission of the draft CIA to the investee for review, and 30% upon issuance of the final CIA report. Payment terms will not exceed 30 days from receipt of formal invoice.

4. Project Timeline

The Consultant must provide in their proposal a Gantt Chart indicating timelines for submission of the above deliverables, and outputs.

G. Terms of Reference for Investee E&S Manager

Role title: Environmental and Social Manager	Reports to: [Insert]
Duration: [Insert]	Location: [Insert]

Section one: Background to company
[Insert]
Section two: Role and responsibilities
<p>The E&S Manager’s primary role is to manage E&S risk during project design, operation and construction. He/she will work closely with the relevant on-site management team and workforce. The successful candidate would:</p> <ul style="list-style-type: none"> • Support E&S consultants in delivering ESIA’s, specialist technical reports or assisting in investor due diligence site visits • Develop and adapt an E&S management system aligned with IFC PS • Supervise, collaborate with and implement the ESMS across all sites to be managed by on-site managers • During the construction phase, supervise on-site managers in all aspects of the project construction to ensure compliance against the ESMS, project-specific ESMP and health and safety practices • During operations phase, ensure compliance with ESMS, project-specific ESMP, including ensuring environmental audits are carried out as required by local and international law • Support in negotiations with sub-contractors to ensure that E&S labour rights are embedded in legal contractor agreements, including supplier due diligence requirements, certifications and necessary audits (where appropriate). • Regularly monitor compliance against with the company E&S requirements, KPI reported data and policies, including the implementation of agreed action plans and/or creation of E&S sub-committees of boards (as required to mitigate against specific E&S risk). • Prepare reporting for investors and other stakeholders • Contribute to the delivery of E&S training on company policies and procedures, both for workforce and sub-contractors or service providers. • Contribute towards ensuring the integrity of the Grievance Redress Mechanism is maintained, has an objective perspective and supports all members of the workforce • Mentoring and working with more junior team members. • Represent the company with external stakeholders in attending donor or investor related E&S workshops or responsible investment conferences • Work on ad hoc projects, such as external communications on E&S (e.g., an annual E&S report and case studies highlighting E&S value addition).

Section three: Background and skills

Minimum requirements:

- Advanced university degree (master's or equivalent) in a relevant discipline, preferably environmental engineering, environmental or social studies; development studies / development finance; or a similar area.
- At least five years' work experience in a related field (relevant sector, E&S, OHS and / or sustainability etc), preferably within E&S consulting, development finance or OHS.
- Experience and demonstrable commitment to our markets.
- Ability to travel for up to 40 days a year, often at short notice.

Personal skills:

- Strong communication skills, including report writing (use of PowerPoint and diagrams to present information in a concise format) and oral communication.
- Effective negotiation skills, including the ability to be persuasive as well as to listen and pragmatically identify when compromise is required.
- Highly motivated and results driven.
- Strong analytical and problem-solving skills.
- Excellent logical reasoning and structure in thought and communications.
- Proven ability to mentor and grow the skills of team members.
- Demonstrated ability to independently manage and prioritise a busy and diverse workload with a range of deliverables for a variety of stakeholders.
- Enjoy working as part of a team, collaborating and coordinating where appropriate.
- Good judgement and attention to detail.

Technical skills: [adapt for a company with a particular sectoral profile or to emphasise a preference for a particular environmental and/or social skillset]

- Knowledge of relevant sectors and E&S issues – Required.
- Insight into the challenges associated with implementing E&S improvements in emerging markets – Required.
- Familiarity with the application of the IFC Performance Standards – Required.
- Familiarity with the World Bank's EHS Guidelines and / or similar standards – Desirable.

H. Terms of Reference for Community Liaison Officer

Role title: Community Liaison Officer	Reports to: [Insert]
Duration: [Insert]	Location: [Insert]

Section one: Background to company
[Insert]
Section two: Role and responsibilities
<p>The CLO’s primary role is to build trust between the project company and the community and to manage community health and safety concerns during project design, operation and construction. He/she will work closely with the relevant on-site management team, workforce and closely with the community. The successful candidate would:</p> <ul style="list-style-type: none"> • Support the project and community in employing local workers for relevant roles within the project life-cycle • Cultivate and establish project initiatives for community development with the project management team • Coordinate and facilitate stakeholder engagement meetings, in both local language and English • Liaise between key community members or village heads on disputes associated with compensation and valuations of land during land acquisition or livelihood restoration • Represent the interests and concerns of community members when security or crisis situations occur • Advocate of the Grievance Redress Mechanism and GBVH issues that may arise, inclusive of collaboration between the project, the community and NGOs/associations to support GBVH cases • During the construction phase, collaborate with on-site managers and community members in all aspects of the project construction to ensure compliance against the ESMS, project-specific ESMP and health and safety practices • During operations phase, collaborate with on-site managers and community members to ensure compliance with ESMS, project-specific ESMP, and health and safety practices • Liaise directly with HSE Managers and E&S site Managers to ensure community needs are being met • Assist in preparing reports for investors and other stakeholders on social risks • Contribute to the delivery of E&S training on company policies and procedures, both for workforce, sub-contractors or service providers and community members. • Contribute towards ensuring the integrity of the Grievance Redress Mechanism is maintained, has an objective perspective and supports all members of the workforce and community members

Section three: Background and skills

Minimum requirements:

- Higher level of education (high-school or undergraduate) in a relevant discipline, preferably social studies; development studies or a similar area.
- At least three years' work experience in a related field (relevant sector, E&S, OHS and / or social risk skill etc), preferably a well-known and trusted member within the local community or understand the dynamics of the community and neighbouring communities
- Conflict resolution skills
- Skilled sensitivity in addressing, supporting and giving guidance in GBVH issues
- Can objectively collaborate with vulnerable peoples and Indigenous peoples

Personal skills:

- Strong communication skills, including report writing (use of PowerPoint and diagrams to present information in a concise format) and oral communication.
- Effective negotiation skills, including the ability to be persuasive as well as to listen and pragmatically identify when compromise is required.
- Highly motivated and results driven.
- Strong problem-solving skills.
- Excellent logical reasoning and structure in thought and communications.
- Proven ability to mentor and grow the skills of team members and community members.
- Demonstrated ability to independently manage and prioritise a busy and diverse workload with a range of deliverables for a variety of stakeholders.
- Enjoy working as part of a team, collaborating and coordinating where appropriate.
- Good judgement and attention to detail.

I. E&S Action Plan Template

Site	Key E&S risk	Corrective action linked to gap in red flag report	Deliverable	Priority level	CP for disbursement milestone	Evidence submitted
1	IFC PS 1: Assessment and Management of Environmental and Social Risks and Impacts					
2	IFC PS 2: Labour and Working Conditions					
3	IFC PS 3: Resource Efficiency and Pollution Prevention					
4	IFC PS 4: Community Health, Safety, and Security					
5	IFC PS 5: Land Acquisition and Involuntary Resettlement					
6	IFC PS 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources					
7	IFC PS 7: Indigenous Peoples					
8	IFC PS 8: Cultural Heritage					

J. Permits and License Tracker

PERMIT/LICENSE NAME	ISSUING DATE	ISSUING AUTHORITY	CONDITIONS	PROJECT PHASE	EXPIRY DATE	ACTION

K. Health and Safety Checklist

Issue	Suggested questions to identify relevance of issues to business viability	Rating (Satisfactory/Unsatisfactory/Not applicable)	Action required
Consultation with workers	Is occupational health and safety included in work force consultation?		
Inspections	Are there regular and effective health and safety inspection and compliance checks?		
Communities	Are there any health and safety risks to local community associated with project?		
Training programs	Is general and specific safety training provided?		
Lifting of loads	Are mechanical lifting aids provided where necessary?		
Accident reporting and investigation	Are accidents reported? Are investigations carried out?		
Maintenance schemes	Is there a program of preventative maintenance? Is calibration of equipment included in maintenance plans?		
Machinery safety: guards and electrical	Are machinery guards fitted? Is the workplace tidy? Is lighting adequate?		
Electrical safety, overhead lines	Are electricians trained? Is a standard applied for all electrical installation?		
Fire and explosion beam	Are there fire and explosion hazards such as dusts, LPG, fuels, solvents? Is there an alarm system? Is fire-fighting equipment provided (with water supply, and extinguishers?) Where will contaminated fire water drain to?		
Transport of people and materials	Is there evaluation of driver's licenses for personnel contracted to drive as part of their role?		
Toxic dusts, fumes	Are workers exposed to hazardous chemicals or materials (e.g., solvents, dusts, asbestos)?		
Personal protective equipment provision	Is PPE provided appropriate for protection/ventilation/filtration during project activities or work environment?		
First Aid provision	Is first equipment provided? Are there trained first aid personnel?		

Issue	Suggested questions to identify relevance of issues to business viability	Rating (Satisfactory/Unsatisfactory/Not applicable)	Action required
Emergency plans and drills	Are fire/safety drills carried out? Are there emergency plans for on-site and off-site incidents?		

L. Social Risk Checklist

Issue	Suggested questions to identify relevance of issues to business viability	Rating (Satisfactory/Unsatisfactory/Not applicable)	Action required
Low wages	<p>Are wages at or around the level of the minimum wage?</p> <p>Are wages likely to fall below the level sufficient to meet basic needs?</p>		
Community development	<p>Does the investment contribute to any community development programmes?</p> <p>What impacts may the investee's activity have on local communities and other stakeholders?</p>		
Policy	Effective HR policy in place?		
Consultative structures	Is there an effective grievance mechanism for labour workforce and community?		
Child labour	Children under 18 employed?		
Discrimination	Does the investee commit to non-discrimination based on gender, race, colour, disability, political opinion, religion or social origin?		
Forced labour	Are any project activities extracted under threat of force or penalty, e.g., does the employer hold workers' identity documents?		
Retrenchment	Does the investee provide transparency on actions that trigger retrenchment?		
Access to facilities or services	Are proposed site facilities provided (e.g., housing, access to food and water, sanitary facilities)		
Non-local work force	<p>Will the investee (or investee sub-contractors) import non-local workforce requiring accommodation and access to facilities for longer than 3 months?</p> <p>Have awareness raising activities for both labour workforce and project affected community social groups been conducted?</p> <p>Has training of the grievance mechanism (confidential and public) been conducted in labour workforce, and project affected communities?</p>		

Issue	Suggested questions to identify relevance of issues to business viability	Rating (Satisfactory/Unsatisfactory/Not applicable)	Action required
Resettlement/economic displacement	<p>Are people being moved from or excluded from the project site?</p> <p>Have people been moved on an involuntary basis?</p> <p>Has compensation calculation methods and provisions been provided comprehensively for both landowners and land users in the LRP and RAP?</p>		
Cultural property	<p>Does the project affect a religious or ancestral site, or natural resources considered sacred or culturally significant by local people?</p> <p>Is a Chance Find Procedure in place?</p> <p>Has continued access to the culturally significant site been provided?</p> <p>Has stakeholder engagement with local community been conducted to better protect and respectfully align with traditional customs?</p>		
Indigenous People	<p>Have Indigenous people been identified in the project affected area?</p> <p>Have appropriate levels of stakeholder engagement been conducted with Indigenous peoples?</p> <p>Have opportunities to incorporate their perspectives in the design of community development plans been provided to them?</p> <p>Have the customary rights of the Indigenous peoples pertaining to lands or territories that are traditionally owned, or customarily used or occupied and where access to natural resources is vital to sustainability of their cultures and livelihoods been included in the IPP?</p>		

M. Grievance Incident Record Template

Name of Personnel lodging grievance (if applicable):	
Date of grievance submitted:	
Location (Region/Country):	
Grievance form completed by:	
Contact details (if applicable):	
Date of grievance:	
Nature of grievance:	
Actions undertaken thus far (by all senior and junior members of the team). Please provide full details:	
Follow-up actions and associated timelines:	
Recommendations for support from external consultants/groups/associations:	

N. Examples Monitoring Plan

POTENTIAL DIRECT IMPACTS	STAGE /TIMING	PROPOSED MITIGATION MEASURES	PARAMETER TO BE MONITORED	MEASUREMENT UNIT	RANGE/TARGET LEVEL	SOURCE OF DATA	MONITORING FREQUENCY	CORRECTIVE ACTION	REPORTING FREQUENCY	LOCATION WHERE RECORDED	QUALITY ASSURANCE AND/OR SUPPORTING DOCUMENT	RESPONSIBILITY	APPROX. COST
e.g., pollution through hazardous waste	Construction	Safe handling, safe storage and disposal	Amount of hazardous materials and waste Spillage records Disposal	tonne or m3 Number tonne or m3	0.1 tonne Zero 0.1 tonne	Material inventory Visual observation and photos Disposal records	Continuous	Training Improves storage Clean up spill and dispose of contaminated soil	Quarterly	Investee records [provide location] REPP 2 DMS	Site survey Photos of storage solution Disposal records	EHS Manager	\$ 250 for waste handler license
e.g., OHS incidents	Construction and operation	OHS training and PPE usage	Incidents, Training events	Number of occurrences Number of people trained	Zero 100%	OHS records	Continuous	Additional training and daily/weekly toolbox talks	Quarterly	Investee records [provide location] REPP 2 DMS	Incident report, training records, attendance registers, training material, grievance records	EHS Manager	\$ 135/day for 1 trainee
e.g., loss of bat species	Construction and operation	None. Observe situation	Bat fatalities	Number	Zero	Onsite monitoring records	Daily	Switch off turbines during dusk and dawn	Quarterly	Investee records [provide location] REPP 2 DMS	Survey and site interviews, if required Register of switching off turbines	Site Operator	N/A
e.g., community health and safety	Construction and operation	Training on health and safety topics, (hazardous project site areas, HIV and SEAH awareness raising),	Training events Community meetings Grievances raised Grievances resolved	Number	Two Monthly (construction) Annually (operation)	Training records, capacity building records Minutes of the meetings	Continuous	Subject to issue: added training, disciplinary hearing, increased community engagement	Quarterly	Investee records [provide location] REPP 2 DMS	Meeting and grievance records Capacity building materials Community interviews, if required	EHS Manager / community liaison officer	\$ 200/day for 1 trainee

		Community engagement			Zero 100%	Participant records and photos Grievance log Grievance report, where relevant							
[add key impacts as per ESIA]													

O. Target country policy, legal and institutional framework

REPP 2 Framework

1.1.1 Cameroon

National Legal Framework

Law No. 96/12 of 05 August 1996 relating to Environmental Management

The Law lays down the general legal framework for environmental management. It requires that any development which might have adverse effects on the natural environment shall require an impact assessment. The Law also describes how to protect the atmosphere, continental waters and flood plains, the coast and maritime waters, and soils and sub-soils, as well as the protection of human settlements and waste management.

The Law has established procedures for and Environmental Impact Statements (EIS) and Environmental and Social Impact Assessment (ESIA). The EIS undergo screening, drafting of terms of references to be approved by the relevant municipality, elaboration of the EIS by the proponent, and a review of the EIS by both the proponent and Ministry of Environment, Protection of Nature, and Sustainable Development (MINEPDED). The municipality makes decisions on the EIS after getting advice from the local MINEPDED. The procedure for establishing an ESIA requires a screening, but it is not mandatory, followed by preparation of Terms of references which are submitted to MINEPDED for approval. An ESIA is then carried out with public consultations and hearings. The license is issued once the final ESIA is approved by the environment minister.

Labour Code Law No. 92/007 of 14 August 1992

The Law governs labour relations between wage-earners and employers and recognises the right of the workers and employers to set up free associations for the defence and protection of their interests. Forced or compulsory labour is forbidden. The Law also determines wages and how wages shall be paid, as well as the conditions of employment, which includes hours of work, night work, employment of women, young persons, and children.

The Law under Title VI establishes the management of health and safety at the workplaces and states the responsibilities for the employer and the employee. The employer is directly responsible for the implementation of all prevention, health, and safety measures to ensure the protection of their workers' health.

Water Law No. 98/005 of 14 April 1998

The Law defines the procedures pertaining to water and general principles for environmental management and protection of public health. Section 4 prohibits acts that could impair the quality of surface, ground or sea water, or jeopardise public health as well as marine fauna and flora, which is prejudicial to economic development and tourist activities.

According to Section 5, any person who produces or stores waste must eliminate or recycle it in approved installations. The individual must also inform the public on the effects of waste production, storage or recycling on water, the environment and/or public health as well as on the preventive measures and compensation.

1974 Land Tenure Ordinance

The Ordinance declares that all land belongs to the state, which implies that private individuals or communities cannot be granted ownership of land. However, an individual can register for land ownership, but must show visible evidence of development (i.e., building using permanent materials and visible signs of use). The Ordinance divides the land into three categories: national domain, private domain, and public domain. National domain land does not have a land certificate; public domain land belongs to the country collectively, such as public roads; private domain land has land certificates and accounts for around 11% of Cameroonian land.

Law No. 98/015 of July 1998 on establishments classified as dangerous, Unhealthy, or Inconvenient

The Law gives guidelines relating to establishments classified as dangerous, unhealthy, or having obnoxious substances, and governs the principles of environmental management and protection of public health.

According to Sections 25 and 26, classified establishments which pollute the environment shall be liable to an annual pollution tax. Those that import equipment used in eliminating greenhouse gases, carbon dioxide and chlorofluorocarbons from their production processes or products, or to reduce any form of pollution, shall be granted a reduced customs tariffs on such equipment in the proportions, and for periods determined as necessary by the finance law.

Law No. 94/01 Forestry, Wildlife and Fisheries Regulations.

The Law lays down forestry, wildlife and fisheries regulations. The law and its implementing instruments lay down regulations in order to attain the general objectives of forestry, wildlife and fisheries policy within the framework of integrated management to ensure the sustainable conservation and use of the said resources and of the various ecosystems.

Part III distinguishes two main categories of forests: (i) permanent or classified forests which are lands used solely for forestry and or as a wildlife habitat; and (ii) non-permanent or unclassified forests which comprise forest lands that may be used for purposes other than forestry.

Policy Framework

Cameroon has adopted policies, programmes, action plans and laws relating to the protection of the environment and development of natural resources. These instruments include the: (i) National Environmental Management Plan adopted during the broad-based national consultation held in March 1996, which is reviewed every five years; (ii) National Environment and Sustainable Development Fund (FONEDD) to finance the implementation of the National Environmental Management Plan; and (iii) National Regional Development Plan (SNAT).

Institutional Framework

Ministry of Environment, Protection of Nature, and Sustainable Development (MINEPDED)

This Ministry was set up by Decree No. 2004/320 of 8 December 2004 and is responsible for the development, coordination, and implementation of the national environmental management plan.

The Ministry of Energy and Water Resources (MINEE)

The Ministry of Energy and Water Resources is placed under the authority of a Minister whose role is to develop, implement and evaluate the government's policy on the production, transportation and distribution of energy and water.

International Agreements and Conventions

Cameroon is a signatory to several international conventions relating to the environment, climate, endangered species of wild fauna and flora, etc. Some of these agreements include the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES); Convention for Co-operation in the Protection and Development of the Marine and Coastal Environment of the West and Central Africa region; Vienna Convention for the Protection of the Ozone Layer; Montreal Protocol; Convention on Biological Diversity (CBD); United Nations Framework Convention on Climate Change (UNFCCC); Kyoto Protocol; Ramsar Convention, and the 1972 UNESCO Convention of Paris for the protection of the World Cultural and Natural Heritage.

1.1.2 Democratic Republic of Congo

National Legal Framework

Environmental Protection Act, 2011

The Law sets out the fundamental and universal principles for sustainable development and sound environmental management. It also sets the requirement for an ESIA, which should include an Environmental and Social Management Plan (ESMP). The procedure for establishing an ESIA involves the submission of screening study by the proponent. The l'Agence Congolaise de l'Environnement (ACE) determines whether the project is eligible for an ESIA or not. Environmental certificate is issued after submission of ESIA.

The Law states how waste is supposed to be managed, including solid waste, wastewater and other pollutants that include radiation, vibration and noise. Solid waste is treated within the framework of sanitation and the preservation of public health, but policies and plans specific to waste management have not yet been formulated.

Law No. 14/003 on Protection of Nature

The Law establishes the principles for the protection of nature and modern principles on biological and genetic resources management, as well as the requirements of international conventions, including among others the Treaty on The Conservation and Sustainable Management of Forestry Ecosystems in Central Africa.

Land Law, 1973

The state owns all land, including public land and private property. These lands can be conceded to third parties according to defined modalities that are based on anticipated use.

Labour Code, Law No. 015/2002

The Code stipulates the minimum wage and working hours and prohibits forced and child labour, although the Article on Child trafficking does not meet international standards.

Under Title VII of the Labour Code, the Law requires that an employer ensure that a worker's work is carried out in suitable conditions, both regarding safety, health, and the worker's dignity. The Labour Code has a workforce size threshold for the appointment of occupational health and safety (OSH) practitioners. An OSH committee which is dependent on the threshold, should be established and comprise both staff and management representatives.

National Policy Framework

National Environmental Action Plan (PNAE, 1997)

The Plan addresses the issues related to the environment in DRC in relation to sustainable development and identifies the various ways to avoid degradation of resources. It also proposes various actions and strategies which can be implemented to avoid adverse effects if the mitigation measures are not effective.

Institutional Framework

Ministry of Environment, Nature Conservation and Tourism (MENCT)

The Ministry of Environment is responsible for the implementation of the government's Policy on the environment and sustainable development, and the Minister for Environment, Nature Conservation and Tourism is responsible for clearance/issuing ESIA certificates.

Environmental Agency – Groupe d'Etudes Environnementales du Congo (GEEC)

The Agency's main roles are conducting and coordinating the activities relating to E&S impact studies, defining the procedures of the ESIA and ensuring that the execution of all projects or development programmes is undertaken in accordance with strict E&S standards, and promoting consultation and information sharing with the public concerning the management of environment among others.

Ministry of Environment and Sustainable Development

The Ministry prepares and implements government policies in the field of environmental protection. The Ministry is responsible for the mitigation of pollution and desertification, as well as the protection and regeneration of soils/land, forests and forests.

International Agreements and Conventions

DRC is a signatory to several international conventions on the environment and other multilateral agreements. These include: Convention on Biological Diversity; Algiers Convention on the Conservation of Nature and Natural Resources; Bamako Convention on the Ban of Import of Hazardous Wastes in Africa; Convention on Persistent Organic Pollutants (POPs) or Stockholm Convention; United Nations' convention to combat desertification in those countries experiencing serious drought and/or desertification, particularly in Africa; UNFCCC; Paris Convention; Convention Concerning the Protection of World Cultural and Natural Heritage; Ramsar Convention on Wetland of International Importance; and Aarhus Convention 1998 on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters.

1.1.3 Lesotho

National Legal and Regulation Framework

Constitution of Lesotho (Act No. 5 of 1993, as amended in 2001)

Protection of the natural environment is enshrined in Section 36, which states “Lesotho shall adopt policies designed to protect and enhance the natural and cultural environment of Lesotho for the benefit of both present and future generations and shall endeavour to assure to all its citizens a sound and safe environment adequate for their health and wellbeing”.

Environmental Act No. 10 2008

The Act makes provision for the protection and management of the environment and the conservation and sustainable utilisation of the country’s natural resources.

Under pollution control, the Act prohibits the discharge of hazardous substances, including chemicals and oils, into the environment. It also states the prohibition of water pollution and that an effluent discharge license is required for discharging effluents.

The Act has established the procedure for establishing an ESIA/EIA for activities listed in the Act’s first schedule. The procedure starts with screening to determine if the project has significant impacts to the environment. If there are no significant impacts, no assessment is required. If there are significant impacts, scoping is carried out, which is then followed by baseline assessment studies, project impact assessments, monitoring and mitigation measures. An ESMP is then developed which is followed by the issuance of the license by the Director of the Department of Environment.

Water Act No. 15 2008

The Act stipulates that the ownership of all water resources be vested in the Basotho Nation and held in the trust by the King. The Act makes provision for different types of water use permits and how they are supposed to be obtained. No person shall engage in an activity of using or abstracting water without a water use permit, which is valid for five years.

National Heritage Resources, Act No. 2 of 2012

The Act provides for the protection of man-made cultural sites and artifacts, as well as flora and fauna. No flora or fauna may be destroyed, damaged, or removed from the original site or habitat without written consent from the authorities.

Labour Code Order 24 of 1992

The Law ensures there is no discrimination at workplaces regarding sex, race, colour, religion, marital status or political views. It also prohibits sexual harassment and forced labour and guarantees freedom of association.

The Labour Code stipulates the minimum wage, working hours, overtime, and leave for all employees.

Collective bargaining is allowed under Section 2 of the Labour Code as an integral mechanism to resolving disputes between an employee and their employer, and every employee has a right to join a trade union.

The Workmen’s Compensation Act no 13 of 1977

Workers are entitled to compensation if they suffer from work-related injuries or occupational diseases.

Land Act, 2010

Land in Lesotho is vested in the Basotho Nation and held in trust by the King. The Act provides the terms for owning a title to land.

National Policies and Plan Framework

National Environmental Policy (NEP), 1998

The overall goal of the NEP is to achieve sustainable livelihoods and development for Lesotho. The NEP's objectives include: securing for all Basotho a high quality of environment to enhance health and wellbeing; using and conserving the environment and natural resources for the benefit of present and future generations while considering the rate of population growth and productivity of available resources; and conserving Basotho cultural heritage and utilise it for the benefit of present and future generations. Also, to halt environmental degradation, and to restore, maintain and enhance the ecosystems and ecological processes essential for the functioning of the biosphere; to preserve biological diversity while implementing the principle of optimal sustainable yield in the use of natural resources and ecosystems; and, lastly, to ensure that the true and total costs of environmental use and abuse are borne by the user (i.e., the "polluter pays" principle).

Lesotho Water and Sanitation Policy (LWSP), 2007

The objectives of the LWSP are to promote the proper management of the country's water resources and its sustainable utilisation; ensure an adequate and sustainable supply of potable water and sanitation services to all of the population of Lesotho; and coordinate in the management and development of water and other related natural resources in order to maximise the resultant socio-economic benefits without compromising the sustainability of vital ecosystems. Also, to harmonise processes and procedures followed by different development partners and other stakeholders in order to optimise available internal and external resources as well as ensure timely implementation of sector programmes.

National Range Resources Management Policy, 2014

The purpose of the policy framework is to provide guidance for the development of effective strategies that combat land and vegetation degradation and motivate for improved legislation and implementation. One of the key areas of the policy is the maintenance and protection of wetland areas.

National Biodiversity Strategy and Action Plan (NBSAP) 2000

Lesotho's NBSAP provides for the conservation of biological diversity, the sustainable use of biological resources and the fair and equitable sharing of benefits arising from the use of genetic resources. The Plan also captures the conservation of indigenous flora and aims to design measures to protect threatened habitats and ecosystems in Lesotho.

National Environment Action Plan (NEAP) (1989)

The NEAP provides a framework for the incorporation of environmental considerations into Lesotho's economic development. NEAP's aim is to facilitate the coordination of Lesotho's environmental endeavours, where earlier plans have failed to achieve set objectives. NEAP identifies high priority areas of environmental concern and details the actions needed to address these concerns. It defines a National Environmental Policy for Lesotho and lays out the institutional and legislative structures required to implement that policy.

Institutional Framework

Ministry of Tourism, Environment and Culture (MTEC)

Responsible for promoting environmentally and culturally sustainable development and regulating environmental management at all levels in Lesotho.

Department of Environment

Responsible for review and approval of EIA and all policy and legal aspects relating to protection of the environment.

Department of Culture

Responsible for policy formulation and protection of Lesotho's cultural heritage.

Ministry of Forestry, Range and Soil Conservation (MFRSC)

Promotes the protection and rehabilitation of the physical environment through forestry, the management of rangeland resources and the control of soil erosion and harvesting of water so as to enhance the livelihoods of local communities.

Ministry of Local Government and Chieftainship Affairs (MoLGCA)

MoLGCA is responsible for facilitating and coordinating the implementation of the national decentralisation policies and programmes, along with the capacity development of local authorities.

Land Administration Authority (LAA)

LAA implements the land administration parts of the Land Act. The developer obtains permission to use this committal from the LAA prior to construction activities commencing and needs to compensate affected parties prior to construction activities commencing

International Conventions

The international conventions that Lesotho has ratified include: Convention on Wetlands of International Importance Especially as Waterflow Habitat (Ramsar); Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES); Convention on Biological Diversity (CBD) (1993); Africa Convention on Conservation of Nature and Natural Resources (15/09/1968); World Heritage Convention (UNESCO), Basel Convention on Transboundary Movement of Hazardous Waste (R 1051 of 21 August 1998); Kyoto Protocol to the UNFCCC; Montreal Protocol on Substances that Deplete the Ozone Layer (1987); and International Labour Organisation (ILO) conventions.

1.1.4 Madagascar

National Legislation Framework

Law No. 90-033 of December 21, 1990, Charter of the Environment, Amended in 2015

The Law sets the fundamental rules and principles for environmental management and stipulates the protection, safeguarding and conservation of national and cultural heritage.

Law No. 2015-003 Malagasy Environmental Charter

The Law states that any public or private investment project - whether submitted or not for the authorisation or approval by an administrative authority, or likely to cause impacts on the environment - must be subjected to an impact study. The impact study can be either an EIA or an Environmental Commitment Programme (ECP). The procedure for establishing an EIA/ECP starts with determining whether an EIA or an ECP is required. The EIA/ECP is then compiled and submitted to the National Office for the Environment for its review and the issuance of an Environmental Permit. The National Office for the Environment monitors and controls ESMP implementation.

Law No. 99-021 of August 19, 1999-Waste

The Law provides a framework for industrial pollution management. It states the guidelines on how to manage gaseous effluents, liquid and solid waste, and noise control measures.

Law No. 2003-044 on the Labour Code

The Law provides the general principles applicable to all workers, including working conditions and how to manage labour disputes. It also stipulates terms around the hygiene, safety and working environment of employees. Forced or compulsory labour is prohibited.

Under health and safety, the Code sets provisions for hygiene, security and the work environment. It defines employer and employee duties and responsibilities, with the employer required to provide appropriate equipment and clothing for the collective and individual protection of workers against all risks inherent to the job and against HIV/AIDS. Employers are also obligated to carry out medical examinations when hiring, periodic check-ups, and resumption examinations, among other duties.

Workers' Health and Safety Legislation

Act No. 68-023 of December 17, 1968, establishes a pension scheme and creates the National Social Security Fund. This contributes to the protection of workers' health and safety since the fund plays an important role in providing reparations for industrial accidents and occupational diseases.

Law No. 2005-109 of October 17, 2005. Land Act

The Law sets the principles governing the status of land, which can be owned by the state, individuals, or groups. Landowners have exclusive rights to possession and use of their land, and land is freely transferrable. Landowners can lease their land under various agreements.

Institutional Framework

Minister of the Environment, Ecology and Forestry (MEEF)

The Minister has the responsibility of taking decisions on the level of environmental assessment to be applied on any project as well as verifying compliance with environmental specifications. The Minister is also the chairperson of the Technical Assessment Committee, which reviews ESIA's which have been submitted for approval.

National Environment Authority (ONE)

ONE has the mandate of drafting guidelines on ESIA conduct according to The Development Compatible with Environmental Investments (MECIE) Decree and taking decisions on the level of environmental assessment to be applied. After an ESIA has been submitted, ONE reviews and issues environmental clearance for approved ESIA's. The Authority also prepares Cahier de Charges Environnementales (CCE) based on the ESMP and is responsible for the supervision, monitoring and control of the ESMP.

International Agreements

Madagascar has ratified the Convention on Biological Diversity (CBD) and agreements around the conservation of ecosystems and animals (CACNR), the conservation and rational use of wetlands (RAMSAR), heritage (UNESCO) and polluting gases under the Kyoto Protocol.

1.1.5 Malawi

National Legal Framework

Constitution of Malawi

The Constitution of the Republic of Malawi (1995) is the supreme law of the country. The Constitution recognises that responsible environmental management can make an important contribution towards achieving sustainable development, improved standards of living, and the conservation of natural resources (SADC, 2012). The Constitution states that the environment of Malawi should be managed to prevent the degradation, to conserve and enhance biological diversity, and to provide a healthy living and working environment for the people.

Environmental Management Act, 2017

The Act concerns the conservation and management of the environment and biological resources in Malawi and prescribes the environmental standards. It established the Malawi Environment Protection Authority, which is the principal agency protecting and managing the environment and the sustainable utilisation of natural resources.

The Authority advises the Minister of Natural Resources, Energy and Mining (MNREM) on projects to undergo EIAs and Environmental Audits (EA). The procedure for establishing an EAI includes screening of the project to determine if it requires an EIA, scoping to establish the principal issues to be addressed in the EIA, and then lastly carrying out the assessment and submitting the report for approval.

Under waste management, the Minister shall on the recommendation of the Authority make provisions for the management, transportation, treatment, recycling, reduction, and safe disposal of waste, and for prohibiting littering of public places.

Every person has the duty to manage any waste generated by their activities or activities of those working under their direction in a manner that causes no ill health to other persons or damage to the environment.

Occupational Safety, Health, and Welfare Act, 1997

The Act provides regulations for employee safety, health and welfare at the workplace, plus inspections of plants and machinery and prevention of accidents in the workplace. The Act is based on the ILO Conventions No. 155, 161, 170, and 174, although Malawi has not ratified the listed conventions.

Employment Act, No 6 of 2000

The Act reinforces and regulates minimum standards of employment and applies to both the private sector and the government. It gets its authority from the Constitution of the Republic of Malawi on issues of forced labour, antidiscrimination, fair pay and equal pay for equal work, and child labour. Other issues covered by the Act include working hours, sick leave and maternity leave.

The Labour Relations Act, 1996

The Act provides for the promotion of sound labour relations through the protection and promotion of freedom of association, the encouragement of effective collective bargaining and the promotion of orderly and expeditious dispute settlement.

Water Resources Act, 2013

The Act is the major legislation dealing with the control, conservation, apportionment, and use of water resources in the country. The Act also prohibits any person to divert, dam, store, abstract or use public water for any other purpose except in accordance with the provisions of the Act. The right to use public water may be limited if the use may cause damage to natural resources of the area or in the vicinity.

Workers Compensation Act, No 7 of 2000

The Act describes compensation for contraction of a scheduled disease arising out of and in the course of their employment.

Land Act, 2016

The Act is the principal act with respect to land administration and management in Malawi and for all matters relating to land, such as land tenure, land transfer, land use and compensation. The Act vests all land in the Republic in perpetuity. The Act has two categories of land, which are public land and private land. Section 7(2) classifies public land as government land and unallocated customary land, while Section 7(3) classifies private land as freehold, leasehold or customary estate.

Customary Land Act, 2016

Customary land is the land occupied and used by members of a community who live under customary law. Customary land, however, is not communal land. Most customary land is divided into pieces allocated for the use of individuals and their families. Rights to this land are usually well defined, often for exclusive use and transmissible.

Land Acquisition Act, 1970

The Act sets out in detail the procedures for the acquisition of customary land and freehold land, and any land acquisition should follow the steps as provided for within the Act. Procedures include steps to be undertaken for government to acquire land, starting from issuance of formal notices to persons with existing formal land ownership.

National policy framework and plans

National Environmental Action Plan (NEAP), 2004

The NEAP was prepared in 1994 (updated in 2004) in response to Agenda 21 (Rio 1992 Declaration) as an action plan for integrating environmental issues into socio-economic development programmes.

The NEAP outlines actions that need to be considered to ensure adequate environmental protection. For example, EIAs will be required for any development that may affect fragile ecosystems and the government will ensure that workers are supplied with the appropriate protective equipment during construction and operation.

National Environmental Policy (NEP), 2004

The NEP aims to create a balance between protection of natural resources and national development. The Policy promotes sustainable social and economic development through sound management of the environment and natural resources.

In the NEP, there are strategies on environmental planning and environmental impact assessment. The objective on environmental planning is to ensure that national and district development plans integrate environmental concerns to improve environmental management and ensure sensitivity to local concerns and needs.

National Land Policy, 2002

The Policy guides land management and administration issues, provides definitions of land ownership categories, and describes details on compensation payment for land. In terms of land use planning, the policy provides that land allocation should make effective use of land and consider the environment and welfare of the community. In terms of environmental management, the Policy aims at lending support to the policies and strategies that are already in place. The Policy covers issues related to both urban and rural management of solid and liquid waste, protection of sensitive areas, agricultural resource conservation and land use, community forests and woodland management, overdependence on fuel wood, forest programmes, co-ordination of multiple land use, water resources and wetlands, lakeshore environmental management, and mining and minerals.

National Water Policy, 2004

Malawi's policy on water resources management requires that water should be managed and used efficiently and effectively in order to promote its conservation and future availability in sufficient quantity and acceptable quality, and that all programmes related to water should be implemented in a manner that mitigates environmental degradation.

National HIV/AIDS Policy, 2003

The Policy provides technical and administrative guidelines for the design, implementation, and management of HIV/AIDS interventions, programmes and activities at all levels of the Malawi society.

International Agreements

Malawi has concluded or ratified a number of international conventions and agreements relating to industry, development and environmental management. In certain cases, conventions and agreements have influenced policy, guidelines and regulations and therefore are relevant to planning, construction and operation of projects. The conventions and agreements include: The Basel Convention on the Control of Transboundary Movement of Hazardous Wastes and Their Disposal; the ILO's Fundamental Conventions related to forced labour, freedom of association, discrimination and child labour; International Covenant on Economic, Social and Cultural Rights; International Covenant on Civil and Political Rights; UNFCCC, Convention on Biological Diversity (CBD); African Charter on Human Rights and People's Rights; Montreal Protocol on Substances that Deplete the Ozone Layer; Ramsar Convention; and United Nations Convention on the Law of the Sea.

1.1.6 Niger

National Legal Framework

Article 35 of the Constitution of 28 Nov 2010

Article 35 of the Constitution states that every person has the right to a healthy environment and that the State has the obligation to protect the environment in the interests of the present and future generations.

Law No. 98-56 Framework Law on Environmental Management

The Law establishes the general legal framework and the fundamental principles of environmental management in Niger. It prohibits any activities which may impair the quality of the air or cause any form of modification of its characteristics likely to harm public health or the conservation of property. The procedure for establishing an EIA/ESIA starts with screening and the categorisation of the projects, followed by scoping and elaboration of the terms of reference before conducting out the EIA and reviewing of the report. A licence is then issued by the National Environmental Assessment Office for the ESIA if it meets all the requirements.

The Act categorises projects into four categories where Category A projects require a detailed EIA, Category B projects require a simplified ESIA, and Category C and Category D are not subjected to ESIA's.

Ordinance 93-015 of March 2, 1993

The Ordinance sets out the guiding principles of the rural code and defines the legal framework for agricultural, forestry and pastoral activities with a view to land use, planning, environmental protection, and human development.

Labour Code Law No. 2012-45, 2012

The Code sets the minimum wage and overtime compensation. Normal working hours are 40 hours per week, although this might be exceeded depending on the profession. The Code prohibits forced or compulsory labour and provides regulations on fair treatment, which covers equal pay and sexual harassment. The Code has set the minimum employment age at 14 years and minimum age for hazardous work at 18 years.

Article 140 under the Code states that the Technical Advisory Committee of Health and Safety at Work should determine the general protection and safety standards applicable to all establishments subject to the Code, particularly with regard to workplaces, lighting, ventilation, drinking water, sanitary installations, removal of dust and fumes, precautions against fire, radiation, noise and vibrations, as well as, when needed, specific requirements for certain professions.

Order No. 2010-09 of 1 April 2010 on the water code

Article 9 of Title II requires that water management should aim to ensure the sustainable, equitable and coordinated use of water resources.

National Policy Framework

National Policy on Environment and Sustainable Development in Niger

The Policy seeks to provide general conditions conducive to economic, social and cultural development through the preservation and sustainable management of the environment and natural resources and the strengthening of measures to adapt to the negative effects of climate change in order to ensure the long-term food security of the people of Niger and improve their living environment.

National Policy on Spatial Planning

The Policy's purpose is "to set the legal framework for all interventions by the State and other actors that have the effect of structuring, occupying and using the national territory and its resources" (Art.1). It defines spatial planning as a tool "consisting of a coherent set of guidelines, strategies and measures aimed at promoting sustainable and spatially balanced development" (Art. 2). Spatial planning policy must, among other things, contribute to "the preservation and improvement of natural factors of production" (Art. 3).

National Environment Plan for Sustainable Development (PNEDD)

The Plan was developed to come up with favourable conditions for improving food security, solving the domestic energy crisis, improving the health conditions, and the economic development of the population. According to the Plan, environmental concerns are supposed to be integrated into all programmes and projects being implemented.

Economic and Social Development Plan 2017-2021

The Plan is the reference framework for all development interventions in Niger and is a five-year plan for the operationalisation of the Sustainable Development and Inclusive Growth Strategy (SDDCI) Niger 2035. It is based on the Niger Renaissance Program, and aims to promote the economic, social and cultural well-being of the population.

Sustainable Development and Inclusive Growth Strategy (Niger 2035 SDDCI)

The objective of the Niger 2035 SDDCI is to build a modern, democratic, united, well-governed and peaceful country that is open to the world and is an emerging economy based on a balanced sharing of the fruits of progress. The main strategic outcomes of the Niger 2035 SDDCI are as follows: the internal security of the country and its borders is ensured; the State is modernised; the level of human capital is significantly raised; the rural sector is radically transformed; the private sector is competitive; and the demographic transition is effective.

Institutional Framework

National Environmental Council for Sustainable Development (CNEDD)

Created by Decree No. 96-004/PM of January 1996 and amended and supplemented by Decree 200-272/PRN/PM of August 2000, the CNEDD is a deliberative body whose mission is to develop, implement, monitor and evaluate the implementation of the PNEDD. It is mainly responsible for ensuring that the environmental dimension is considered in Niger's social-economic development policies and programmes

The Ministry of Environment, Urban Sanitation and Sustainable Development (MESUDD)

MESUDD is responsible for environmental management at the national level, including drawing up and implementing environmental policy. The Ministry is organised through Decree n°2018-745 /PRN/ME/SU/DD of October 19, 2018, in central administration, decentralised technical services, decentralised services, public programmes and projects. Within the framework of the project, the services mainly involved are: the National Environmental Evaluation Office (BNEE), the Directorate General for Sustainable Development and Environmental Standards, and the Directorate General for Water and Forestry (DGEF).

The National Environmental Assessment Office

This is the national structure responsible for the administrative management of the country's environmental assessment procedure. The Office is an environmental assessment decision support body that has jurisdiction, at the national level, over all activities, projects, programmes or development plans for which an EIA is mandatory or necessary in accordance with the provisions of Law No. 2018-28 of 14 May 2018 determining the fundamental principles of environmental assessment in Niger. Its missions include, among others, (i) to conduct environmental inspections in order to enforce the laws and regulations on environmental assessment and to ensure compliance with the related requirements, and (ii) to ensure the conformity control of the planned works and the E&S protection standards. Within the framework of the project, the BNEE will be a key player in monitoring its implementation, particularly with regards to ensure compliance with the monitoring of the works and E&S protection standards.

International Legal Framework

The Framework comprises the treaties, conventions and agreements signed/ratified by Niger. These include: Stockholm Convention;; Convention on Biological Diversity; Convention to Combat Desertification; UNFCCC; Bamako Convention; Convention Concerning the Protection of the World Cultural and Natural Heritage; ; Paris Climate Agreements resulting from the Conference of the Parties (COP21); Niger Basin Water Charter and its Annex 1 on environmental protection; Regulation C/REG.3/05/2008 on the harmonisation of rules governing the approval of pesticides in the ECOWAS region; Ramsar Convention; Vienna Convention; Rotterdam Convention; and The African Convention on the Conservation of Nature and Natural Resources.

1.1.7 Nigeria

National Legal Framework

National Environmental Standards and Regulation Enforcement Agency Act 2007

The Act focusses on the protection and sustainable development of the environment and its natural resources. The Act establishes an agency which ensures compliance with environmental laws. The Act also has regulations for national effluent limitations, which requires industry facilities to have anti-pollution equipment for the treatment of effluent.

Environmental Impact Assessment (EIA) Act 2004

The Act deals with the considerations of environmental impact in respect of public and private projects. The procedure for establishing an EIA entails a feasibility study, initial environmental evaluation by the Secretariat, screening and scoping to find out if an elaborate EIA is required. After scoping, an EIA is then conducted, submitted for review and a license is issued.

Harmful Waste (Special Criminal Provision) Act 2004

The Act prohibits, without lawful authority, the carrying, dumping or depositing of harmful waste in the air, land or waters of Nigeria.

Land Use Act 1978-Cap L5 Laws of the Federation of Nigeria 2004

The Act places the ownership, management and control of land in each state of the federation in the Governor. Land can be distributed with his authority for commercial, agricultural and other purposes.

The Act categorises the land in a State to urban and non-urban or local areas. The administration of the urban land is vested in the Governor, while the latter is vested in the Local Government Councils. At any rate, all land

irrespective of the category belongs to the State, while individuals only enjoy a right of occupancy as contained in the Certificate of Occupancy, or where the grants are “deemed”.

Labour Act, Chapter 198 of 1990 and National Minimum Wage (Amendment) Act, 2011

The Act prescribes the minimum terms and conditions of employment and states the general provisions with regards to the protection of wages, contracts of employment and terms and conditions of employment.

The Endangered Species Act CAP E9, LFN 2004

This Act focuses on the protection and management of Nigeria’s wildlife and some of its species in danger of extinction as a result of over-exploitation.

National Policy Framework and Guidelines

National Policy on Environment

The policy was created in 1988 and revised in 1999. It provides a viable national mechanism for co-operation, co-ordination and regular consultation, as well as harmonious management of the policy formulation and implementation process which requires the establishment of effective institutions and linkages with and among the various tiers of government.

The Federal Ministry of Environment

The Ministry is charged with the responsibility of all matters concerning the nation’s environment and its biodiversity. It has developed instruments of intervention to halt environmental degradation in the form of policies, standards, guidelines and regulations and programmes. With the initiation of these instruments, enforcement by the Ministry has become the most effective tool to bring industries and regulated community into compliance through compliance promotions.

National Land Policy

The legal basis for land acquisition and resettlement in Nigeria is the Land Use Act of 1978, modified in 1990. According to the Act, all land in Nigeria is vested in the Governor of each State, to be held in trust for the use and common benefit of all people. The administration of urban land is directly under the control and management of the Governor, whereas non–urban land is under the control and management of the Local Government Area.

Social Protection Policies

Social protection policy has been on the agenda since 2004 when the National Planning Commission, supported by the international community, drafted a social protection strategy. More recently, the National Social Insurance Trust Fund drafted a social security strategy. The social protection policy approaches social protection using a life-cycle and gender lens, recognising both economic and social risks, including, for example, job discrimination and harmful traditional practices. The policy was organised around four main themes: social assistance, social insurance, child protection and the labour market.

International Conventions

The international conventions to which Nigeria is a signatory and are relevant to this project are as follows: African Convention on the Conservation of Nature and Natural Resources; Convention on Biological Diversity; Endangered Species (Control of International Trade and Traffic); Conservation of Migratory Species of Wild Animals; Convention to Combat Desertification; UNFCCC; International Union for Conservation of Nature and National Resources (IUCN); The “Equator Principles”; World Bank Operational Policies, Public Health Legislations and Regulations; The Rio Declaration on Environment and Development; The Kyoto Protocol; Montreal Protocol on Substances that Deplete the Ozone Layer; The African Convention on the Conservation of Nature and Natural Resources; Convention on the Elimination of All Forms of Discrimination Against Women; Human and Peoples’ Rights on the Rights of Women in Africa in 2005; Civil and Political Rights Covenant; Economic, Social and Cultural Rights Covenant; Convention on the Elimination of All Forms of Violence Against Women; Convention on the Rights of the Child; ILO Occupational Safety and Health Convention; and ILO Conventions and Core Labour Standards.

1.1.8 Sao Tome and Principe

National Legal Framework

Environmental Law No. 10/99

The Law provides the basic legislation on environmental protection and sustainable development. It lists the basic principles such as prevention and precaution, ecosystems carrying capacity, adequate management and use, participation and access to information, user pays, and polluter pays. The Law defines the objectives and measures to be implemented in the national environmental policy, as well as competencies related to environmental protection.

Article 45 states that the plans, projects, activities and actions that may cause an impact on the environment, territory, or the quality of life of populations, should comply with environmental regulation and are subject to the development of an EIA.

Article 45 further provides the minimum content of the EIA and specifies that environmental approval is provided by the Ministry in charge of the environment. As per article 46, it is mandatory to obtain an environmental licence before engaging in any activity prone to pollute or contaminate the environment.

Decree No. 37/99 approving the Environmental Impact Assessment

The Decree defines the principles applicable to the EIA process. Plans, projects, activities and actions that may cause an impact on the environment, territory or the quality of life of populations should comply with environmental regulations and are subject to the development of an EIA.

The establishment of an EIA involves submitting a brief description of the project activities, conducting and submitting the EIA study, conducting a public consultation on the EIA, and finally the issuance of the certificate

Law No.14/2003 and Decree No 36/1999-Waste Management

The Law defines the principles and rules applicable to the management of waste derived from packaging material with the view of waste prevention and recycling.

The Decree regulates solid waste disposal requirements, including authorisations associated with collection, transportation, storage, disposal and reuse of solid waste. The waste regulations are only applicable for waste generated in the country.

Law No. 9/2001 on Fisheries

The Law sets out basic legislation on fisheries, defining main principles related to the conservation, use and management of fisheries, with the aim of assuring biological diversity, protection of species and, at the same time, a sustainable development of the sector. The Law also establishes the legal regime for the protection, exploitation and management of marine resources. Despite being directed at fisheries, Chapter II regulates the "conservation, exploitation and management of other living aquatic resources". Article 9 states that "No human activity, whatever its nature, and even if developed under any legal authorisation, may compromise, directly or indirectly, the equilibrium of ecosystems or cause the death of biological species, cause degradation or pollution of coastal areas, marine environment, rivers and lakes, or the immediate or progressive contamination of fish and human species". Article 11 defines some of the activities likely to cause environmental damage.

Law No. 11/1999

The Law provides the framework for the protection of flora and fauna and the creation of protected areas. It also provides a list of protected species. Marine protected areas are not considered in this law.

Order No.11/2012

Under protected species and protected areas, the Order creates the National Committee for Monitoring Activities related to the National Strategy and Plan of Action for Biodiversity Protection. It defines the roles and responsibilities of the committee, which include, but are not limited to, assessing any activity which is to be implemented, and to advise and update the National Strategy and Plan of Action related for Biodiversity Protection.

Presidential Decree No. 6/2005

This Decree ratifies the 1972 UNESCO Convention for the Protection of Natural and Cultural Heritage.

Law No. 6/1992 Labour Law

The Law regulates the beginning, execution and termination of employment relations.

Law No. 14/2007 Safety, Hygiene and Health

The Law stipulates the measures to ensure the safety, hygiene and health of workers in their workplace. It defines the duties and responsibilities of the employer and the employee. It is applicable to public, private, cooperative, and social sectors and compliance is monitored by The General Labour Inspectorate and the Health Authority.

Law No 3/91 Land Management Act

The Law defines the framework for land ownership, identifying public and private property of the state. Maritime waters, riverbeds, coasts, harbours, airports and air space are considered as public (state) property

National Policy Framework

National Biodiversity Strategy Action Plan (NBSAP) 2015-2020

The Plan has been developed to consider major environmental issues, including, amongst others, capture of endangered species (e.g., turtles), marine pollution from ships, and illegal dumping at sea. The Plan also includes an annex with flora and fauna species of local conservation concern, including some species of marine turtles and seabirds.

Institutional Framework

Ministry of Infrastructure, Natural Resources and Environment (MINRE)

This is the main government body which has been mandated to take care and be responsible for all aspects related with natural resources management, conservation, and the environment. The Ministry is responsible for in-country resources and approvals of all sectors' EIAs.

Directorate General of Environment

The Directorate is responsible for the execution of the government policy for the environment.

Environmental National Council

The main responsibility of the Council, which was created by Law No. 10/99, is to offer advisory services for environmental aspects. These services cover legislation and the national plans developed by the government of Sao Tome and Principe.

Directorate of Forests and Biodiversity

This Directorate falls under the Ministry of Agriculture and Rural Development and takes care of biodiversity issues in the country.

International Agreements and Conventions

Sao Tome and Principe has signed and/or ratified several agreements and conventions, many of which relate to the protection of the environment. These agreements and conventions include: Kyoto Protocol to the UNFCCC; Vienna Convention on the Protection of the Ozone Layer; the Montreal Protocol on Substances that Deplete the Ozone Layer; Paris Agreement on Climate Change; Bamako Convention on the Ban on the Import into Africa and the Control of Transboundary Movement and Management of Hazardous Wastes within Africa; Stockholm Convention on Persistent Organic Pollutants; Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal; Memorandum of Understanding concerning Conservation Measures of Marine Turtles of the Atlantic Coast of Africa; Convention on Wetlands of International Importance (Ramsar Convention); African Convention for the Conservation of Nature and Natural Resources; Convention on International Trade of Wild Fauna and Flora Endangered Species; Convention on the Conservation of Migratory Species; Convention on Biological Diversity; -UNFCCC; International Convention for the Conservation of Atlantic Tunas; MARPOL Convention for the Prevention of Pollution from Ships 1973 (as modified by the Protocol of 1978), except Annex VI; International Convention on Civil Liability for Oil Pollution Damage and its protocol; and Convention Concerning the Protection of the World Cultural and Natural Heritage.

1.1.9 Sierra Leone

National Legal and Regulations Framework

Environmental Protection Agency Act, 2008

The Act is an overarching legislation with the mandate of protecting the environment. The Agency has a Board of Directors set up as its governing body. It stipulates the requirements of an EIA and sets out the processes and procedures leading to the acquisition of an environmental license with respect to the conduct of fully acceptable EIA studies. The license is required for projects whose activities involve or include power plants and transmission lines, among others.

Under waste management, The Act describes how waste is supposed to be managed and stipulates the functions of the Agency under waste management, which includes generation, treatment, storage, transportation and disposal of industrial waste. It also determines the control and prevention of waste discharge into the environment and the protection and improvement of the quality of the environment.

The Crown Land Act 1960 No. 19 of 1960 (State Lands Act)

There are a plethora of laws regulating land acquisition and use in Sierra Leone. Land ownership includes state land, private land, communal land, and family land. Land can be acquired through expropriation under Section 2 of the 1991 Constitution. Land can also be acquired through purchase, lease, allocation, inheritance, gift, clearing and adverse possession; however, the process depends on the tenure of land.

The Sierra Leonean government can lease state land to foreign investors for commercial and industrial use. Freehold land can be bought and sold by citizens.

Employers and Employed Act, 1960

The Act regulates the relationship between employers and employees and safeguards the health of the employed. It stipulates how employment contracts should be done and includes a minimum age for employment.

National Policy and Plans Framework

National Environmental Policy, 1994

The National Environmental Policy aims is to achieve sustainable development in Sierra Leone through the implementation of effective environmental management systems which encourage productivity and harmony between man and his environment. It also promotes efforts which will prevent or eliminate damage to the environment and biosphere and stimulate the health and welfare of nationals. The Policy serves to enrich the understanding of ecological systems and natural resources important to the nation.

National Biodiversity and Strategic Action, 2003

The Sierra Leone Biodiversity Strategy and Action Plan comprises a series of measures and mechanisms intended to conserve and promote the sustainable use of the different components of the country's biodiversity. The action proposed covers several key thematic areas under terrestrial biodiversity, inland water ecosystems, forest biodiversity, marine and coastal biodiversity, and agricultural biodiversity. In addition, actions are also proposed for key cross-cutting issues affecting the sustainable utilisation of biodiversity.

Draft National Lands Policy, 2013

The Lands Policy of Sierra Leone aims for the judicious use of the nation's land and all its natural resources by all sections of the Sierra Leone society in support of various socio-economic activities undertaken in accordance with sustainable resource management principles and in maintaining viable ecosystems.

Conservation and Wildlife Policy, 2010

The Policy was developed to reflect the advances made in biodiversity conservation in the past four decades and considered international obligations that arose through, for example, the Convention on Biological Diversity (CBD), the Convention on International Trade in Endangered Species (CITES) and the UNFCCC. The Policy identifies how challenges to biodiversity conservation in Sierra Leone result from a lack of knowledge due to "recent conflict, land use change, uncontrolled exploitation of natural resources, and a lack of recent comprehensive inventory".

Disaster Management Preparedness Plan, 2006

The Plan is a comprehensive approach that enhances increased political commitment to disaster risk management, thereby encouraging government agencies to take the lead and supported by non-governmental organisations. It also promotes public awareness and the incorporation of disaster risk management into development planning. The Plan highlights the sources of funding and the reduction of bureaucracies in accessing such funds for effective disaster co-ordination.

Institutional Framework

The Environment Protection Agency Sierra Leone (EPA)

The EPA was established in 2008 through the Environmental Protection Agency Act (2008) and became operational in 2009. The EPA is housed within the President's Office and is the main government agency in charge of all issues concerning the environment and climate change. The EPA was established with the goal of creating and enforcing a strict regulatory framework for environmental regulation in Sierra Leone. It has the mandate to coordinate, monitor and evaluate the implementation of national environmental policies, programmes and projects, including issuing EIA licences.

Land and Water Development Division (LWDD)

The division falls under the Ministry of Agriculture, Forestry and Food Security and is responsible for improving the conservation and effective use of land and water resources, amongst other functions.

International Conventions and Agreements

Sierra Leone is a signatory to many relevant international conventions, including: UNFCCC, United Nations Convention on Biological Diversity (UNCBD) and Convention of the International Trade of Endangered Species (CITES).

1.1.10 Zambia

National Legal Framework

Environmental Management Act, 2011

The Act provides principles that describe how adverse effects on the environment should be prevented and minimised through long-term integrated planning and the co-ordination, integration, and co-operation of efforts. The Act also provides for the protection of the environment and pollution control, establishes the Environmental Council, and prescribes the functions and powers of the Council. Under the Act, Zambia Environmental Management Agency (ZEMA) has the mandate of approving any project that may have adverse impacts on the environment.

The Environmental Protection and Pollution Control (Environmental Impact Assessment) Regulations, 1997

The Regulations provide procedures and requirements for compulsory project briefs and environment impact assessment. The process is as follows: the proponent submits a project brief to determine if the project requires an Environmental Project Brief (EPB) or an Environmental Impact Statement (EIS); if the project requires an EPB, no EIA is required. If an EIA is required, then the Agency and the proponent develops Terms of Reference.

The Zambia Development Agency Act

Malawi has concluded or ratified a number of international conventions and agreements relating to industry, development and environmental management. In certain cases, conventions and agreements have influenced policy, guidelines and regulations and therefore are relevant to planning, construction and operation of the project.

Waste management: Part III (Regulations 10-15) of SI 112 9 (2013)

These regulations provide definitions of waste and set out the licensing requirements for transportation and waste disposal site.

The Water Resources Management Act, 2011

The Act repeals and replaces the Water Act, 1949. This Act provides for, among other things, the establishment of the Water Resources Management Authority. This Authority controls and manages water resources directly or through Catchment Councils and catchment management plans, and otherwise has responsibility for the management, development, conservation, protection and preservation of the water resource and ecosystems. The Act also provides for equitable, reasonable and sustainable utilisation of water resource, and the use and management of groundwater resources.

Hazardous Waste: Part IV (Regulations 18-30 of SI 112 (2013))

These regulations provide for the control of generation, collection, storage, transportation, pre-treatment, treatment, disposal, export, import and transboundary movement of hazardous waste.

Solid Waste Regulation and Management Act, 2018

The Act provides for the sustainable regulation and management of solid waste. It also regulates waste management companies/service providers, including their licensing and functions (e.g., operation, maintenance, and construction of landfills and other disposal facilities).

Employment Act, 2019

The Act regulates the employment of persons, prohibits discrimination and establishes the Skills and Labour Advisory Committee, detailing its functions. Furthermore, the Act enforces the engagement of persons on contracts of employment and provides for employment entitlements and other benefits. It also covers the protection of wages, regulates the employment of children and young persons, and provides for employee welfare.

Occupational Health and Safety Act, 2010

The Act provides for the establishment of health and safety committees at workplaces and for the health, safety and welfare of persons at work. It provides for the duties of manufacturers, importers and suppliers of articles, devices, items, as well as for the protection of persons against risks to health or safety arising from, or in connection with, the activities of persons at work.

Workers' Compensation Act, 1999

The Act provides for the establishment and administration of a fund for the compensation of workers who have been injured while performing their duties at work or contracted occupational diseases. If there is a fatality, the payment of the compensation is made to the employee's next of kin.

Lands Act No,1996

The Act bestows all Zambian land to the President and recognises two tenure types: customary tenure and leasehold rights to State land. Customary land can be converted into private leasehold tenure. The Act restricts the State's ability to repossess underdeveloped land and liberalises the terms for foreigners to acquire land rights. The Act also states how land can be obtained through inheritance, land allocation (customary land is allocated by the chief or headman), purchase and lease of 99 years maximum.

The Urban and Regional Planning Act, 2015

The Act provides for development, planning and administration principles, standards and requirements for integrated urban and regional planning processes and systems to ensure multi-sector and level cooperation and coordination.

National Heritage Conservation Commission Act, 1989. And Heritage Conservation Commission Amendment Act, 1994-Cultural Heritage

The Acts provide for the establishment of the National Heritage Commission responsible for the conservation, restoration, rehabilitation, reconstruction, adaptive use, and good management of heritage conservation.

Policy Framework

National Policy on the Environment (NPE)

The NPE, which was officially launched in 2009, is the overall policy on the environment and provides environment and natural resources management policies to address current and future threats to the environment and to human

livelihoods and provides policy guidelines for sustainable development. The NPE was preceded by the National Conservation Strategy (NCS), adopted in 1985, which saw the establishment of environmental legislation and institutions. The NCS was updated in 1992 through the National Environment Action Plan (NEAP) to meet the demands of economic liberalisation and new technical information.

National Policy on Climate Change

The Policy is aimed at stemming the impact of climate change and subsequent reduction of the country's annual economic growth due to crop failure and the impact of climate change on energy production

Institutional Framework

Zambia Environmental Management Agency (ZEMA)

ZEMA is a statutory body under the Ministry of Water, Sanitation and Environmental Protection (MWSEP) which facilitates at the national level the coordination of the various Ministries and regulatory bodies that play a role in in the management and conservation of the environment.

Water Resources Management Authority

A statutory body under the MWSEP which is responsible for the management of water resources, and which liaises with ZEMA on issues relating to water pollution.

The National Heritage Conservation Commission (NHCC)

The NHCC, which falls under the Ministry of Tourism and Arts (MOTA), is responsible for the identification of sites of cultural and historical interest and their conservation. In the case of new discoveries of cultural or historical sites, the NHCC will be the first agency to be notified and give guidance on how to handle and preserve them. The NHCC is responsible for issuing permissions to remove/alter/destroy heritage sites and for establishing concession agreements for the management of heritage sites. The NHCC requires a Heritage Impact Assessment (HIA) as part of ESIA.

International Agreements and Conventions

Zambia is a party to a number of international and regional conventions related to E&S issues which influence the country's policies and legislations. These conventions include: Convention on Biological Diversity; UNFCCC; African Convention on Conservation of Nature and Natural resources; Convention on the Protection of World Cultural and Natural Heritage; UNESCO Convention for the Safeguarding of the Intangible Cultural Heritage; Convention on International Trade in Endangered Species of Wild Flora and Fauna (CITES); and Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and Their Disposal.

Zambia is also a signatory to various International Labour Organization (ILO) conventions, which are relevant to on-site working conditions and regulations during REPP 2 investment projects' construction and operation.

The Green Climate Fund Environmental and Social Policy

The Policy was adopted in 2018 and sets out a risk-based approach for identifying, assessing, and managing E&S risks and impacts of activities, projects, and programmes supported by GCF resources. The Policy aims at ensuring all GCF-supported activities commit to avoiding - and where avoidance is impossible, mitigating - adverse impacts to people and the environment. It also aims at ensuring GCF-supported activities enhance equitable access to development benefits and give due consideration to vulnerable and marginalised populations, groups and individuals, local communities, Indigenous people, and other individuals that are affected or potentially affected by GCF-financed activities.

The Policy is applicable to all activities (programmes, projects, and subprojects) which are financed by GCF and has stipulated the guiding principles on the implementation of ESMSs to meet its objectives. All activities financed by GCF shall undergo screening to assign appropriate risk categories consistent with their ESMS and GCF ESS standards. During screening, risks and impacts will be considered and will include direct, indirect, induced, long-term and cumulative impacts. Environmental and social management plans shall contain the measures to manage

and mitigate the identified risks and impacts, pursuant to the environmental social safeguards of the GCF and its policy.

The Policy requires the effective engagement of individuals and communities, including transboundary, vulnerable, and marginalised groups and individuals that will be affected or potentially be affected by the activities proposed for GCF funding. A Grievance Redress Mechanism shall be developed at the GCF level, the REPP 2 and the activity level.

TIDES Framework

1.1.1 Cook Island

Environmental Act, 2003

EIA applicable for all activity which causes or is likely to cause significant environmental impacts. The EIA is approved by the National Environment Service (NES). TORs for EIA are issued by NES which also makes recommendations to the Environmental Assessment Committee. The Minister makes final approval of the EIA.

Environmental Regulations

Designates the islands as community conserved areas under the management and control of the trustees of the Islands and the protection of specific habitats within the conservation area.

Public Health Act 2004, National Environmental Strategic Action Framework, National SWM Strategy 2013-2016, Solid Waste Management Policy 2016-2026

Part 6 of the Act describes how waste is supposed to be safely stored, collected, treated, removed, transported, disposed of, and otherwise dealt with.

Land Use Act, 1969

The land is Customary land, sale of land is prohibited though leasing is allowed.

Employment Relations Act, 2012

The Act allows for freedom of association and collective agreements and individual employment agreements. It stipulates the minimum terms and conditions of employment, how to handle disputes and the health, welfare, and safety in employment.

The Act states the duties of the employers and employees at the workplace, how to manage accidents, dangerous machinery and occupations and roles of inspector.

1.1.2 Fiji

Environment Management Act, 2005 and Environmental management regulation, 2007

The purpose of the Act is to ensure the environment is protected and describes the EIA process. Under the Act, EIA is required for Hydropower Projects, biomass projects or large Solar projects. The Department of Environment determines projects which require EIA and approve the EIA. Any project that may alter the physical nature of the land in any way should submit its proposal to the Approving Authority under the Department of Environment for approval.

Environmental management regulations (Environmental Impact Assessment and Waste Disposal and Recycling) Regulations 2007

The regulations describe the waste disposal process and permits required. The regulations also describe the requirements for waste recycling and administration.

Crown Acquisition of Lands Act (Cap 135)

Gives the prime minister the power to designate all land with the landowner's majority consent. It can be used to transfer iTaukei land from TLTB to the state.

iTaukei Land Act (Cap 134)

The Act states that the iTaukei land can only be leased by private investors under approval of iTaukei Land Trust Board (TLTB) which also defines the seven categories of the land use and registered landowners. The maximum lease allowed is 99 years which must be approved by the iTaukei Land Trust Board and registered landowners.

Land Sales Act (137)

The Act allows freehold land to be bought or be sold freely for industrial or commercial use by non-residents.

Employment Act (Cap 92), Workmen's Compensation Act (Cap 94), Employment relations Promulgation

The Act establishes the labour market rules and legislations and is implemented by the Ministry of Employment, Productivity, and Industrial relations. It stipulates minimum wage, working hours among others.

Health and Safety Act 1996

The applies to all workers in Fiji and stipulates the obligations of the employers on ensuring the health and safety of their workers. The Act also covers workplace arrangements which include setting up of health and safety committees for workplaces with more than twenty employees or election of safety representatives for workplaces with less than twenty employees.

1.1.3 Samoa

Planning and Urban Management Act 2004 and EIA Regulations, 2007

The Act ensures that the environment is protected. This is done under the Ministry of Natural Resources and Environment. The Planning and Urban Management agency determines if projects should conduct Preliminary Environment Assessment Report or Comprehensive Environmental Assessment Report. The EIAs are approved by the Director as required by EIA.

Waste management Act 2010

The Act ensures that waste management measures are implemented.

Noise Policy 2011

Acts ensure that all projects comply with permitted noise levels.

Occupational Health and Safety act,2002

Ensure that the health, safety and welfare of all staff, contractors and visitors are always ensured.

Labour and Employment relations Act 2013

The Act states the functions and duties of the Ministry regarding employment and labour relation. It also clarifies principles of employment, protection of wages, contract of services, termination of contract, foreign employee's employment permit and terms and conditions of employment

Lands, Survey and Environment Act 1989

The land is customary land (over 80%), freehold land or public and the lease of land should not be more than 20 years.

1.1.4 Solomon Islands

Environment Act, 1998

The purpose of the Act is to ensure that environmental resources are protected and improved. It also prevents, controls, and abates environmental pollution. The Act under Environmental Impact Assessment stipulates the EIA approval producers and distinguishes between the Public Environmental and EIA statement which is submitted as part of the development approval process.

Provides regulation on how waste is supposed to be transported, collected, treated, stored, and disposed.

Waste management and Pollution Control Strategy 2017-2026

Aims at planning the waste management and pollution control.

Land and Titles Act (Cap 133), Customary Land Records Act (cp 132) Land and Titles (Amendment) Act 2014

Land acquisition is challenging though it can be done through voluntary acquisition or compulsory acquisition (for public use) 88% of land is customary land while 12% is registered. Land is acquired through leasing, done through the government agency. The allocation of land is done through a Land Board which receives and approves the land allocation process.

Labour Act 1996

The Act makes provision for wages, working hours, employment contracts, employment of women, children, and young persons. It also guides on care of workers and other related issues.

Safety at Work Act 1982

The Act regulates health and safety at the workplaces. It protects the health, safety, and welfare of people (employee, employer and self-employed people) at work. It stipulates the duties and responsibilities of employees and employers.

1.1.5 Tonga

Environmental Impact Assessment (EIA) Act 2003 and Environmental Impact Assessment (EIA) regulations 2010

To provide for the application of environmental impact assessment to the planning of development in Tonga. All major projects to undergo EIA should be referred to the Minister Environment, Information, Disaster Management, Energy and Climate Change.

Environment Management Act 2010

To establish the Ministry of Environment and Climate Change to ensure the protection and proper management of the environment and the promotion of sustainable development

Waste Management Act 2005

To manage and oversee the function of the Waste Management Board.

Hazardous Wastes and Chemicals Act 2010

To provide for the regulation and proper management of hazardous wastes and chemicals in accordance with accepted international practices and the International Conventions applying to the use, transboundary movement, and disposal of hazardous substances and for related purposes.

Land Act 1927 and Land (Amendment) Act 1990,1991,1993,1997,1999,2002,2013

The Act provides for recognition and protection of titles in land, administration of land, use of land for public services, the land court and other matters related to land. All land of Tonga is property of the crown. Land can be leased for a period not exceeding 99 years.

Employment Relations Bill 2020, (A potential future Act, passed by the Legislative Assembly, awaiting gazettelement)

The Act establishes a legal framework governing employment. It sets the working hours and minimum wages, employment of children, payment and protection of wages, holiday and leave, equal employment opportunities among other key issues.

The Act also covers Occupational Safety and Health. It stipulates the duties of employers and employees

1.1.6 Vanuatu

Environment Management and Conservation Act 2002 (Cap 283), Environmental Protection and Conservation (Amendment) Act No. 24 of 2017

The Act states the required studies which areas are supposed to be done regarding impact on the environment and social or cultural customs. It describes the procedure for acquiring EIA for projects with adverse environmental, social, and cultural impact. It also states the costs of the EIA process.

Waste management Act No. of 2014

The Act provides for the protection of the environment through encouragement of effective waste services and operations.

Employment Act 1983, employment (Amendment) Act 2019, Labour (Work Permits) Act 1985

The Employment Act stipulates the process of hiring employees which includes the contracts and the maximum hours of work. The employer also has the duty of providing safe working conditions.

Health and Safety at Work Act (Cap 195) 1986

The Act deals with the various aspects of occupational health and safety. It specifies duties of employers to ensure health, safety and welfare at work of his/her employees, as well as duties of employees and manufacturers. The Act also regulates the activities of the of work inspectors.

Land Acquisition Act No.5 of 1992.

The Act makes provisions for the acquisition of land and easement in the public interest and to provide for matters therewith.

Land Reform Regulation 1980

The Purpose of the law is to provide for the registration of interests in land.

P. Environmental and Social Capacity and Capability of Camco

This annexe outlines the expectations placed on specific roles outlined in the Camco Environmental and Social Management Framework (ESMF) in terms of organisational capacity and competency for ensuring projects are appropriately interrogated and evaluated to meet international best practices and Camco E&S policy.

The roles set out in Section 1.7 Organisational Capacity and Competency of the Camco ESMF that require explicit and relevant E&S expertise are as follows:

Camco Board

The Board of Directors of Camco Clean Energy Limited (Camco and the Camco Board) has the mandate of setting the overarching impact strategy in adapting and improving on Camco's approach to effectively manage arising E&S risks. The Camco Board reviews the strategy implementation, environmental, social and governance (ESG), and the impact performance of Camco's contractual obligations. The Board has three standing subcommittees, of which the Sustainable Business Committee (SBC) monitors the social, ethical and sustainability performance of Camco and its subsidiaries and funds under management. The Camco Board meets on a quarterly basis.

At present, the Board of Directors consists of six Directors, one of whom is elected by employees and two of whom are non-executive directors.

Sustainable Business Committee

The SBC shall:

- Provide independent advice to the Board and assistance in developing policies, guidelines or other measures for Board approval to ensure that Camco operates in accordance with regulations, international best practice such as the IFC's Environmental and Social Performance Standards, and the United Nations Global Compact Principles, and any other compliance requirements.
- Monitor the social, ethical and sustainability performance of Camco and its subsidiaries and funds under management and make recommendations to the Board in relation to how such performance can be improved.
- Review the progress in implementing Camco's Environmental and Social Safeguards Policy, ESMF and Safeguarding Policy, as well as review Camco's performance in implementing the UN Sustainable Development Goals and the need for new policies, strategies or actions.
- Identify measures to improve transparency and accountability of Camco's operations.
- Review, assess, and provide input to the Audit and Risk Committee of the Board on the E&S and ethics related aspects of the risk management framework.

The overall expertise required for this committee is as follows:

- Extensive experience in the implementation of best practice approaches to ESG practices, in accordance with:
 - IFC Performance Standards
 - Sustainability principles advocated by the United Nations (UN) Global Compact

- United Nations (UN) Guiding Principles on Business and Human Rights
- International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work
- Task Force on Climate-related Financial Disclosures (TCFD).
- Knowledge and understanding of social and ethical performance in impact related investments, monitoring, reporting and disclosure requirements.
- Experience in the evaluation of a company’s implementation of key impact investment principles and provide reasonable corrective actions or measures in the overall policies, strategies, and management frameworks.

The SBC is comprised of Camco’s Head of Impact and two independent experts.

Investment Committee (IC) Member

The overall E&S expertise required in this role is as follows:

- Experience in the implementation of best practice approaches to ESG practices in accordance with IFC Performance Standards and UN Guiding Principles on Business and Human Rights, while ensuring commercial viability, taking appropriate levels of impact risk, minimising long-term costs and achieving impact outcomes.
- Understanding of the challenges and opportunities in financing transactions in emerging markets, including but not limited to Africa, and ideally expertise in small-scale renewable energy projects and commercial and industrial (C&I) energy solutions.
- Knowledge and understanding of impact investment principles and related monitoring, reporting and disclosure requirements.
- Strong commercial impact focus.

The IC comprises 2-3 senior-level Camco staff members and 1-2 independent experts, who are experienced in investing in or lending in the relevant markets and sectors.

Market Development Committee (MDC) Member

The overall E&S expertise required for this role in evaluating and ultimately deciding on technical assistance proposals and the approval of service providers is as follows:

- Renewable energy/energy access and broader sustainable development sectoral expertise.
- Expertise in supporting gender equity in companies, organisations and programmes.
- Experience in ESG risk management in infrastructure-related investments.

The MDC comprises two senior-level Camco staff members and 1-2 independent experts, who are expected to provide market development and regional expertise and knowledge.

Impact team

Camco’s impact team oversees and implements the ESMF across the entire investment portfolio. The team consists of the Head of Impact and the Impact Manager and/or Associate. The Impact Manager and/or Associate review each deal, assessing each investment proposal. The Head of Impact signs off the eligibility of each investment in line with the ESMF before it is submitted to the IC.

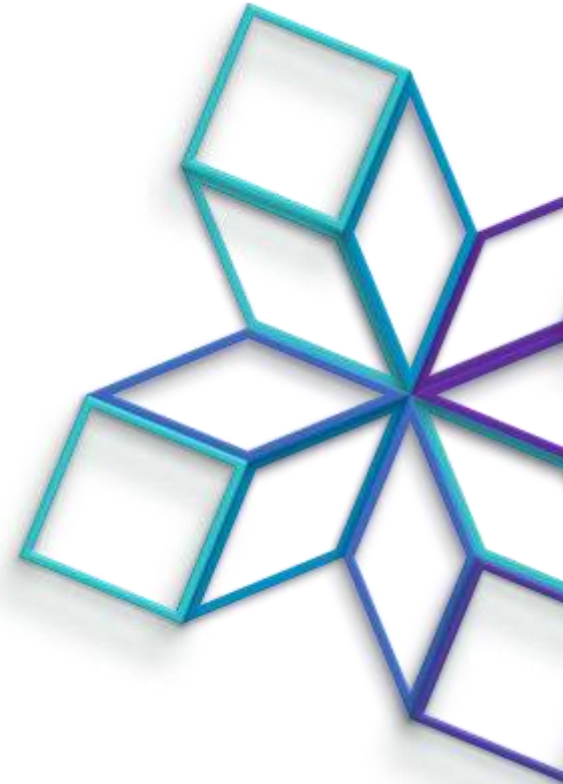
The overall experience to undertake this role of implementing the Framework and upholding the ESG standards and principles at the fund and investment portfolio level, is as follows:

- At least 15 years’ experience in the evaluation, analysis and implementation of international best practice ESG standards and principles, particularly IFC Performance Standards.
- Understanding of emerging market challenges and opportunities for ESG best practice implementation.

- Understanding of ESG risks of typical renewable energy/energy access project development throughout the project life cycle in emerging markets and their respective mitigative measures to de-risk the investment.
- Knowledge and understanding of social and ethical performance in impact related investments, monitoring, reporting and disclosure requirements.
- Understanding of international E&S reporting landscape, to ensure adaptation of Camco policies, strategies and management frameworks meet with relevant international best practice ESG principles.
- Hold at least a Master's degree in an environmental science, sustainable development or equivalent.

The impact team shall engage in periodic training to ensure their analysis of investments aligns with current and evolving international best practice sustainability and ESG principles and standards with necessary resourcing provided.

The size of the committees and Impact team may vary based on the value of assets under management.



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