

The Emerging Africa Infrastructure Fund Limited

July 2014

**ENVIRONMENTAL AND SOCIAL
MANAGEMENT SYSTEM
POLICIES AND PROCEDURES FRAMEWORK
("FRAMEWORK")**

1. ENVIRONMENTAL AND SOCIAL POLICY

This Framework is intended to guide the Emerging Africa Infrastructure Fund Limited (“**EAIF**”) Directors and the employees, officers and directors of its fund manager and supplier of management services, being Frontier Markets Fund Managers Limited (“**FMFML**”), and its principal advisor, being Frontier Markets Fund Managers¹ (“**FMFM**”), and their successors as appointed or authorised by the Board of EAIF. For the purposes of this Framework, the term “**Fund**” shall refer to all of EAIF, FMFML and FMFM as it is recognised that whilst the obligations rest with EAIF, the majority of the process and procedures have been contractually delegated to FMFM.

EAIF is committed to promoting sustainable development which contributes to economic growth, social development and environmental conservation.

EAIF ensures that all projects it finances comply with both the relevant national legislation and with international best practice as set out in the International Finance Corporation’s (“**IFC**”) Performance Standards on Social and Environmental Sustainability and the supporting Environmental, Health and Safety Guidelines (“**EAIF E&S Policy**”) (together the E&S Requirements. EAIF will not fund projects that are included on the EAIF Exclusion List (as set out in the EAIF Investment Policy) or present unacceptable environmental or social risks to EAIF or its business partners.

EAIF shall also apply effective Environmental and Social (“**E&S**”) management to its own activities.

This Framework and the EAIF E&S Policy, have been endorsed by EAIF’s Board and shall be communicated to all Fund staff, business partners and key stakeholders.

Signed

Date Effective

¹ Harith Partners UK Limited, trading as “Frontier Markets Fund Managers”, is a company registered in the United Kingdom (Company Number 08392993). Registered Address: 5th floor, 100 Canon Street, London EC4N 6EU. VAT Registration Number 172 4160 28. FMFM acts as the principal adviser to Frontier Markets Fund Managers Limited (“FMFML”), fund manager of EAIF and fund manager and provider of management services to GuarantCo.

2. INVESTMENT APPRAISAL AND SUPERVISION PROCEDURES

This section describes the processes by which EAIF seeks to ensure that environmental and social considerations are integrated into the projects it funds.

EAIF is often one of several investors in a development project. In such situations, generally one appropriate/qualified investor is selected to lead on environmental and social issues. In most cases this investor also leads the E&S supervision efforts post closing. For the purposes of this Framework, this investor is to be construed as an advisor to the Fund. Appropriate/qualified investors include: FMO, Proparco, DEG, African Development Bank, European Investment Bank, KFW, and IFC. Where EAIF leads on environmental and social issues, the following sections will be applied as appropriate. Where EAIF does not lead on environmental and social issues, the Fund will nevertheless actively participate in the process, be continually informed of and document decisions, and report to EAIF's Credit Committee and Board, as appropriate, to keep it fully apprised of potential risks as further described below.

2.1. Initial Screening and Notification

2.1.1. EAIF Exclusion List

All potential investments shall be immediately screened against the EAIF Exclusion List as set out in the EAIF Investment Policy .Any client engaged in clearly excluded commercial activities or proscribed labour practices will not be financed by EAIF.

In the event of any unclear interpretations of the Exclusion List (e.g. where project sponsors may not be “substantially involved” in a EAIF excluded activities) or should EAIF become aware of any changed circumstances regarding existing investments (e.g. client acquisition of an excluded business), FMFM will consult with the Board in such circumstance to agree and document the appropriate course of action.

2.1.2 Risk Categorisation and Review

If another qualified investor in the proposed project assumes the lead role in establishing and monitoring environmental and social governance, the Fund will actively seek information from such investor. The Fund shall continually collaborate as appropriate with such investor to ensure the adequacy of risk identification and mitigation strategy.

Where EAIF assumes the lead role for environmental and social governance, the Fund will undertake or commission a preliminary appraisal of the environmental and social risks of any project proposed for funding. This appraisal will have regard to the nature of the location and nature of the project, its environmental and social issues, including labour issues and community interactions, compliance status / arrangements and where relevant previous developer performance (i.e. a check for potential ‘red flag’ issues).

In order to facilitate the Fund's screening process, prospective clients shall be required to provide all requested information to the Fund for review prior to EAIF's credit committee approval. The Fund will ensure completion of the E&S Screening Form (see Appendix G) for each proposed investment to ensure that potential environmental and social concerns and compliance factors are identified, if any.

All New Business Committee approved investments shall be allocated prior to Credit Committee submission a risk categorisation, following due diligence/appraisal and taking account of the industry sector, the extent of the environmental and social issues identified, proximity to sensitive receptors and whether significant impacts are reversible or not (see Appendix F for general guidance on high/"Category A", medium/"Category B" and low/"Category C" risk projects). The appraisal will take account of the have regard to the classification system used by the IFC and other lenders, namely:

Category A: Projects with potential significant adverse social or environmental impacts that are diverse, irreversible or unprecedented.

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

Category C: Projects with minimal or no adverse social or environmental impacts.

EAIF will not invest in Category A projects without specification of the involvement of competent environmental and social experts either internal experts within co-investors or through the use of independent consultants in the assessment of project risks and impacts, definition of mitigation strategies and performance monitoring.

For Category B and C projects, depending upon the nature of the project and its associated risks and impacts, further due diligence would be carried out including assessment of compliance with the E&S Requirements to determine whether additional controls will be required. The due diligence process shall also be activated if there are clear shortcomings in the information supplied or the project has the potential for reputational risks to EAIF.

If a proposed investment is accepted for further due diligence, the Fund will advise the project sponsor of the need for it to ensure compliance with the E&S Requirements.

If not already concluded, references to the E&S Requirements shall be included in any Mandate Letter, Letter of Interest or similar document, in addition to the general wording included in Appendix B.

This process will be recorded and documented via:

- E&S Appraisal Form
- E&S content for Mandate Letter and/or Letter of Interest

2.2. Due Diligence

The Fund will conduct E&S due diligence on all accepted projects, the scope of which shall be commensurate with the risks identified in the Initial Screening described above and the respective risk categorization. The due diligence shall be documented in an Environmental and Social Due Diligence Report (“**Report**”). See Appendix D for guidance on Report format, key due diligence and reporting requirements.

This will be undertaken by external consultants unless either (i) the Fund has sufficient internal capacity and experience to conduct the necessary due diligence or (ii) the due diligence will be undertaken internally by a qualified investor recognised by EAIF to have the appropriate internal expertise (e.g. including IFC, African Development Bank, EIB, FMO, DEG and Proparco).

The Fund will prepare or procure the Terms of Reference for the due diligence exercise, based upon a review of all applicable documentation and an evaluation of the project against the E&S Requirements (see Section 2.1). Please see Appendix C for typical Terms of Reference for environmental and social due diligence consultants.

Due diligence may consist of a desk review, a site inspection and/or a detailed audit. For any Category A projects, a full-scale review and site visit is usually considered necessary and will be undertaken by the appointed experts and an investment officer from FMFM.

The Report will identify any gaps between actual or expected project performance and the E&S Requirements and specify requirements, and make recommendations, for addressing such gaps in a timely and effective manner.

Recommendations are likely to cover mitigation actions, management controls, monitoring / reporting routines and institutional arrangements during construction, operation and, as appropriate, closure. In particular, the Report will make clear which actions must be undertaken prior to financial close and any that must be formulated in a draft Environmental and Social Action Plan (“**Action Plan**”) that clearly sets out the measures to be taken, the responsible authority and the timescale for implementation.

The Fund will consult, as appropriate, other stakeholders on the draft Action Plan and report it, with the results of other due diligence, to the Credit Committee for their approval.

This process will be recorded and documented via:

- Consultant ToR for due diligence
- the Report
- Summary of the Report included within the credit submission to the Credit Committee.

2.3. E&S Conditions of Investment

For all proposed investments, the Fund will propose E&S conditions for the termsheet and finance documents. These will include standard terms applicable to all investments, such as compliance with the E&S Requirements , and project-specific terms. Potential text for inclusion into the investment agreements is shown in Appendix E and includes general E&S definitions, representations and warranties, disbursement conditions, and/or covenants. Critical mitigating actions, typically incorporated into the Action Plan with a clear timetable, will be included in the investment agreement as conditions of investment.

The Fund may require specific actions to be taken prior to any disbursement.

The Fund will require the project sponsor to report on the implementation of the Action Plan and the E&S Requirements at least annually. A template for summary reporting is provided in Appendix H. The Fund may also require an independent audit of progress at certain intervals.

This process will be recorded and documented via:

- Environmental and social investment conditions in the termsheet and the finance documents
- Annual Monitoring Report

2.4 Disbursement

Where disbursement is conditional on specific actions, the Fund will ensure that such actions have been implemented to the Fund's satisfaction prior to disbursement. This may necessitate further due diligence activities.

The Fund will only be willing to consider waivers or extensions where the project sponsor can demonstrate that such changes have been agreed with key stakeholders, including any other financing parties, and where such changes will not compromise the realisation of the agreed environmental and social performance of the project.

This process will be recorded and documented via:

- Disbursement memo indicating the state of compliance, additional corrective actions, or waiver justification.

2.5 Monitoring

The Fund will monitor the environmental and social performance of all projects. This will primarily be achieved by the review of the annual summary form (Appendix H) and/or more detailed E&S reports prepared and submitted by the project sponsors. Such reports must include a progress statement on implementation of the Action Plan and confirmation of compliance to the

requirements of any covenants or conditionalities. Project sponsors must also ensure timely notification to the Fund of any significant E&S incidents.

The Fund will also impose regular project monitoring and reporting requirements and thereafter review project progress and performance as appropriate.

As necessary, the Fund will discuss the E&S report with particular reference to any outstanding or potential E&S issues and appropriate additional actions with key stakeholders and the Client.

Further to any recommendations made by the monitoring and review process, the Fund or their consultants will make supervisory visits during construction and at project completion to ensure that all E&S requirements are being or have been implemented. Further supervisory visits may be made during operation involving, as appropriate, external auditors. Supervision reports will be prepared after each such visit.

In case of non-compliance with the E&S Requirements the Fund will promptly agree with the relevant sponsor, or require the relevant borrower/sponsor to undertake, as appropriate or necessary in the Fund's reasonable judgment, corrective measures to remedy such inconsistency or breach and diligently pursue the remedies available to the Fund under its legal agreements with the borrower. In the case that such efforts are unsuccessful, within a reasonable time-frame: (i) use all commercially reasonable efforts to dispose of the relevant Investment on commercially reasonable terms; and (ii) exercise such rights and remedies as it may lawfully and prudently be entitled to exercise to terminate its financing of the project, in each case of (i) and (ii) above, taking into account commercial practicability and practice, fiduciary responsibilities, and any potential Material Adverse Effect;

The Fund will also consider the need for a final E&S audit prior to divestment.

The process will be recorded and documented via:

- ToR for supervisory visits by consultants
- Supervision Reports
- Communications requiring additional corrective actions or requirements.

3. ORGANISATION AND RESPONSIBILITIES

Within the Fund, day to day responsibility for implementation of this Framework rests with FMFM and particularly in relation to a proposed investment with the investment officer leading the transaction for EAIF in FMFM and in relation to the Framework the “**Environmental Manager**” who has defined responsibilities for the environmental and social management system. It is recognised that in order for the Environmental Manager to fulfil their role that appropriate specialist support, as discussed in section 3.2 below, will need to be procured by EAIF for the use by the Fund.

3.1 Role of the Environmental Manager

The Environmental Manager shall have the following key responsibilities:

- To review project sponsors' annual reports on the implementation of their Action Plans and ensure that any additional conditions required by EAIF are duly put into practice in a timely and effective manner
- To ensure that the Fund is kept up to date in respect of publications and information, including partners' E&S policies and procedures
- To update the Fund's environmental and social policy and procedures as necessary

3.2 Specialist Support

As required to satisfy its commitments under this Framework, EAIF will procure certain specialist environmental and social support from appropriately qualified consultants. Currently, the Fund has appointed URS Corporation ("URS") to provide environmental and social capacity building, risk management and transaction support on all its potential investments. Specifically URS has been appointed to:

- Provide support to the Environmental Manager and training in relation to environmental and social issues and specifically the IFC Performance Standards
- Develop an effective and practical E&S policy and E&S management system
- Conduct initial E&S screening and due diligence of prospective and accepted investments
- Help prepare the Annual E&S Report
- Provide ongoing support in relation to E&S issues

4. REPORTING (INTERNAL AND EXTERNAL)

The Environmental Manager will be responsible for coordinating reporting to the Credit Committee, the Board and external stakeholders. They will compile the annual reports from the projects, any independent reviews and any other reports to produce a single report covering EAIF's portfolio of current projects.

The Environmental Manager will make periodic reports to the Board on the environmental and social performance of EAIF's portfolio projects. The Environmental Manager, with the assistance of the Fund's E&S consultants as appropriate, will seek to draw generic lessons from the experience of implementing E&S standards and will recommend to the Board of EAIF any proposed amendments and augmentation to this Framework, including the EAIF E&S Policy.

The Fund will report to its investors and other stakeholders on the E&S performance of its projects. These reports shall contain sufficient information

to give an outline picture of progress against Action Plans, achievements and problems.

5. REVIEW AND UPDATE

EAIF undertakes to review and update, as considered necessary by the Board of EAIF, this Framework at least annually or following a material change to international best practice.

APPENDICES

A. Left Blank Intentionally

B. POTENTIAL TEXT FOR PRE-INVESTMENT AGREEMENTS

Provisions in the form below should be included within any mandate letter and letter of interest:

When a project is proposed for financing, FMFM will procure an environmental and social review as an integral part of its overall due diligence. This review will be appropriate to the nature and scale of the investment, and commensurate with the level of environmental and social risks and impacts. The purpose of the review is to ensure that the project conforms to E&S Requirements.

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

The Emerging Africa Infrastructure Fund Limited does not finance new business activity that cannot be expected to meet the E&S Requirements over a reasonable period of time. In addition, there are several types of activities that EAIF does not finance. A list of these activities can be found in the EAIF Investment Policy (see www.emergingafricafund.com/[]).

C. TYPICAL TERMS OF REFERENCE FOR ENVIRONMENTAL AND SOCIAL DUE DILIGENCE CONSULTANTS

[This template can be used as a guide for developing a Terms of Reference (ToR) for a Consultant to perform certain aspects of the E&S appraisal of prospective investments of the Fund, as well as ongoing supervision of the investment portfolio.]

Introduction

The purpose of this Terms of Reference is to ensure that the Consultant performs the environmental and social review of a prospective investment, and later, the ongoing evaluation and supervision of portfolio projects according to the Fund's environmental and social management policies and procedures.

The Emerging Africa Infrastructure Fund Limited ("EAIF") is committed to promoting sustainable development which contributes to economic growth, social development and environmental conservation. Frontier Markets Fund Managers ("FMFM") acts as the principal adviser to Frontier Markets Fund Managers Limited, fund manager and provider of management services to EAIF.

EAIF realises this aim by carrying out appropriate environmental and social due diligence of proposed and committed investments, as procured by FMFM on its behalf. EAIF will ensure that all projects it finances comply with EAIF's E&S Policy (see www.emergingafricafund.com/[]) or other lenders' standards as notified in.

Consultant Qualifications

The Consultant must have substantial experience in the E&S review of infrastructure projects located in [], with particular focus on the support of project finance activities. They must be thoroughly knowledgeable of the EAIF E&S Policy and procedures, including the E&S Requirements.

Scope of Work

The Consultant will conduct the E&S appraisal of a prospective project, as well as the ongoing supervision of E&S performance of a portfolio project consistent with EAIF's E&S Requirements. For **new project appraisals**, the four tasks include:

1. Preliminary Review. Review all available information and documentation related to project environmental and social impacts and risks. Prepare a list of additional information and/or questions that will be needed to continue the appraisal.
2. Site Visit and Further Review. Conduct site inspections, review facility-based records, and interview key staff, including both sponsor personnel and relevant stakeholders (regulatory officials, community leaders, suppliers, and customers).
3. E&S Performance Gaps and Necessary Corrective Actions Analyses. Analyse project environmental and social performance in relation to EAIF's Environmental and social Policy (see www.emergingafricafund.com/[]). Identify these gaps and any corresponding corrective actions that will be

necessary. Prioritise these and recommend acceptable and justified implementation schedules.

4. Due Diligence Documentation. Prepare a report (see Appendix D) summarizing the results of the E&S due diligence (ESDD). The ESDD report shall include a summary of the impacts and risks associated with the project, including the related performance gaps and corresponding correction actions that will be necessary in order for EAIF to invest.

For **supervision** of EAIF's portfolio projects, the three tasks include:

1. Review Monitoring Reports. Review periodic documentation submitted by the project sponsor regarding implementation of any corrective actions included as conditions of investment, as well as overall environmental and social performance. Also, review information submitted by the sponsor concerning significant incidents or fatalities. Identify any follow-up corrective actions that might be necessary.
2. Site Visit and Further Review (Optional). Where directed by FMFM on behalf of EAIF, conduct a site visit to confirm E&S performance and/or to investigate incidents. Identify any follow-up corrective actions that might be necessary.
3. Supervision Documentation. Prepare a report summarizing the findings of the supervision activity.

Schedule

The Consultant shall submit a draft *[Due Diligence/Supervision] Report* by *[insert date]*. The final Report shall be submitted within 2 weeks after receiving comments from FMFM on the draft report. All reports should be written and prepared in English and delivered in electronic and hard copy.

D. E&S DUE DILIGENCE AND SUPERVISION FINDINGS – SUMMARY FORMAT

DUE DILIGENCE SUMMARY REPORT

1. Project Description (including the site and environmental and social setting, surrounding land uses)
2. Company Environmental and Social Management Systems (the processes by which the Company manages environmental and social performance, including community engagement activities)
3. Significant Environmental and Social Impacts and Risks (summarised according to the topics covered by the applicable IFC Performance Standards– Labour and Working Conditions; Pollution Prevention and Abatement; Community Health Safety and Security; Land Acquisition and Involuntary Resettlement; Biodiversity Conservation and Sustainable Natural Resource Management; Indigenous Peoples; Cultural Heritage)
4. Recommended Corrective Actions (for performance gaps, recommend corrective actions corresponding schedules, indicate priorities, and advise as to how to incorporate these into the Investment Agreement)

SUPERVISION REPORT

1. Project Business Status (i.e., construction, operation, expansion, shut-down)
2. Status of E&S Corrective Action Implementation
3. E&S Performance (ongoing compliance with EAIF E&S Policy)
4. Significant Incidents and Other Issues

E. POTENTIAL TEXT FOR INVESTMENT AGREEMENTS

The following text is provided for standard loan documentation and will need to be adjusted accordingly for other forms of investment:

The Borrower has not received nor is aware of any existing or threatened complaint, order, directive, claim, citation or notice from any Authority under applicable *[specify country]* law and local requirements which has, or could reasonably be expected to have, a Material Adverse Effect or any material impact on the implementation or operation of the Project;

Design, construct, operate, maintain and monitor the project in compliance with the Government of *[specify country]* and EAIF's Environmental and social Policy (see www.emergingafricafund.com/ []);

Implement the environmental mitigation and management measures specified in the *[Corrective Action Plan]*;

[Specify any particular conditions of disbursement addressing certain corrective actions recommended for the project];

Within [90] days after the end of each Financial Year, deliver to [EAIF] the Annual Monitoring Report consistent with the requirements of this Agreement confirming compliance with the Action Plan, the social and environmental covenants set forth in Section __, or, as the case may be, identifying any non-compliance or failure, and the actions being taken to remedy any such deficiency;

Within three days after its occurrence, notify EAIF of any social, labour, health and safety, security or environmental incident, accident or circumstance having, or which could reasonably be expected to have, any material impact on the implementation or operation of the project in compliance with the EAIF's Environmental and social Policy (see www.emergingafricafund.com/ []) or a Material Adverse Effect, specifying in each case the nature of the incident, accident, or circumstance and the impact or effect arising or likely to arise therefrom, and the measures the borrower is taking or plans to take to address them and to prevent any future similar event; and keep the Fund informed of the on-going implementation of those measures;

Notify EAIF within three (3) Business Days of receipt thereof by the borrower a copy of any written communication with any Governmental Authority relating to any material issue related to the Environmental and Social Requirements with respect to the company, or their respective operations.

[Specify additional covenants – e.g., additional monitoring or reporting requirements, or provisions addressing certain corrective actions recommended for the project and reference to the EAIF Exclusion List];

F. INDICATIVE EXAMPLES BY RISK CATEGORY

Examples of High-Risk Projects (i.e. generally Category A)

- Large dams and reservoirs
- Mining and quarrying
- Forestry and logging (large scale)
- Agro-industries (large scale)
- Industrial plants (large scale)
- Major new industrial estates
- Major oil and gas installations, including major pipelines
- Large ferrous and non-ferrous metal operations
- Large-scale pulp / paper mills
- Large port / harbour developments
- Large thermal or hydropower development
- Manufacture, use or disposal of large quantities of pesticides/herbicides or fertilizers
- Manufacture, transportation and use of hazardous and/or toxic materials
- Domestic and hazardous waste disposal operations
- Large-scale tourism developments
- Large-scale textile industries involving wet processes
- Large-scale transportation projects (airports, highways, motorways, railroads)
- Projects in or near to highly sensitive and high value ecosystems
- Projects with large resettlement components and all projects with potentially major impacts on human populations
- Projects affecting indigenous or tribal populations
- Projects which impose serious occupational or health risks
- Projects which pose serious socioeconomic concerns

Examples of Medium-Risk Projects (i.e. generally Category B)

- Exploration and feasibility studies for mining minerals or extraction of fossil fuels
- Agribusiness (small scale)
- City hotels, small scales tourism
- General manufacturing
- Chemical industries, without any bulk storage of inflammable, explosive or hazardous substances
- Manufacture of plastic products
- Processing and preservation of fruit and vegetable, fish, meat
- Vegetable/animal oil production and processing
- Manufacture of wines and other fermented beverages
- Dairy products manufacture
- Manufacture of leather products (except tanning and dyeing)
- Repair and maintenance shops
- Spinning, weaving and finishing of natural and synthetic fabric
- Printing
- Saw milling or manufacturing of wood products, including veneer, plywood and other wood-based materials
- Small power plants, including small run-of-the-river hydropower schemes

Note that there are no clearly defined thresholds for 'large scale' and 'small scale' to differentiate between what is Category A or B. For example, a palm oil processing plant may, by itself, be considered likely to be a 'B'; however, if it's success will be dependent

upon the establishment of plantations, the wider environmental and social impacts could require an 'A'. If in doubt, check with appointed consultants.

Examples of Low-Risk Projects (category C)

- Establishment of business services industries (business advisors, accountancy auditors, etc.)
- Establishment of restaurants and other food premises
- Education and training
- Broadcasting (TV, radio, satellite)
- Health services and family planning
- Purchase of computer equipment
- Establishment and equipment of art, design, telecommunications studios
- Spinning, weaving and finishing of natural and synthetic fabric
- Tailoring and dress-making shops
- Manufacture of leather products and clothing (except where tanning or dyeing is involved)
- Advisory assignment
- Life insurance companies

G. Environmental and Social Screening

Environmental and Social Investment Screening	
Project name:	Location:
Lending amount (\$m) and financial purpose:	
Industry sector:	Brief project description:
Site visit date:	Additional technical review required:
Reviewed by:	<input type="checkbox"/> Yes <input type="checkbox"/> No
Compliance:	
<input type="checkbox"/> Activities not on EAIF Exclusion List <input type="checkbox"/> Applicable national regulatory requirements <input type="checkbox"/> Specific environmental / health and safety / other permits granted / in hand <input type="checkbox"/> Safety / accident record and prosecutions (what, how and when: _____) <input type="checkbox"/> Employment-related fines (what and when: _____) <input type="checkbox"/> Environmental incidents and/or prosecutions (when and why: _____)	
<u>Comments:</u>	
Documented management system:	
<input type="checkbox"/> Environmental and social policy <input type="checkbox"/> Human resources policy (e.g., employee rights/non-discrimination) <input type="checkbox"/> Fire/safety plan or emergency prevention/preparedness/response plan <input type="checkbox"/> Environmental / health and safety training for employees <input type="checkbox"/> Procedures for managing environmental and social risks <input type="checkbox"/> Designated / competent person in charge of environmental and social issues <input type="checkbox"/> Internal process for sharing information	
<u>Comments:</u>	
Project site / receptors:	
<input type="checkbox"/> Non-urban / undeveloped land (greenfield / brownfield) <input type="checkbox"/> Proximity to river / stream / pond / lake / sea <input type="checkbox"/> Proximity to legally protected area, endangered species) or ecologically sensitive area (e.g. wetland / breeding grounds) (<b style="color: red;">potential Red Flag) <input type="checkbox"/> Potential for significant adverse impact upon eco-system services <input type="checkbox"/> Proximity to culturally sensitive receptor / indigenous area	
<u>Comments:</u>	

Community interactions:

- Designated person in charge of responding to questions from the community
- Procedures for managing community complaints / grievances
- Appropriate use of site security personnel

Comments:

Social issues:

- Land acquisition required
- Displacement and resettlement of affected communities / individual
- Impact on local settlements / livelihoods
- Impact on indigenous peoples (potential Red Flag)
- Complaints from neighbouring businesses / communities
- On or adjacent to site of cultural heritage or archaeological importance

Comments:

Employment issues:

- Provision of Personal Protective Equipment (e.g. safety goggles / hard hat / protective gloves / footwear, etc.)
- Adequate risk assessment and mitigation of employee health and safety measures (e.g. fall prevention / ventilation / lighting / machine guards, etc)
- Adequate working conditions (e.g. air quality / lighting / confined spaces / on-site hygiene)
- Equitable terms of employment (e.g. working hours / rest breaks / time off / overtime pay)
- Equal employment opportunities and no discrimination against gender / ethnic group / age
- Payment at or above minimum wage
- No employees below legal minimum age and specific risk assessments for any employees under 18 years of age
- Confirmation that no child or forced labour
- Process for employees to voice complaints
- Recognition of / no barrier to employee organisations / trade unions

Comments:

Additional comments

Signed: _____

Name:

Date:

H. Sponsor's E&S Reporting Summary

Environmental and Social Investment Reporting – Summary Sheet	
Reporting organisation:	
Project name:	Country:
Transaction stage:	Status:
Business sector:	Project category: A - B - C
Details of supplied project report (title / period covered, etc):	Report author / assurance (e.g. external audit or review details):
Brief project description:	
Environmental / social management system / action plan details (title / date latest version / current status):	
Labour / safety compliance status (confirm no child / forced labour concerns / brief summary of accidents and serious injuries and any prosecutions):	
Environmental compliance status (brief summary of spills / incidents and any prosecutions; if applicable, carbon footprint):	
Community compliance status (latest disclosure / consultation progress and summary of any grievances):	
Covenant / conditionalities compliance:	
E&S Reporting: <ol style="list-style-type: none"> 1. Identify any social, labour, health and safety, security or environmental incident, accident or circumstance which occurred during the year having, any material impact on the implementation or operation of the Project in compliance with the EAIF E&S Policy or a Material Adverse Effect, specifying in each case the nature of the incident, accident, or circumstance and the impact or effect arising or likely to arise therefrom, and the 	

measures the borrower/sponsor is taking or plans to take to address them and to prevent any future similar event; on-going implementation of those measures;

2. Summarise any written communication with any Governmental Authority relating to any material issue related to the Environmental and Social Requirements with respect to the project, or their respective operations which took place during the year.

Contact Name:

Position:

Telephone:

Email:

Signed: _____

Name:

Date: