



# **Environmental and Social Management System (ESMS)**

**Ampyr Group**

**Revisions and Version History**

This page is a record of all approvals and revisions of this document. All previous versions are superseded.

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## Definitions and Glossary

Ampyr Group	Entity receiving funds from CI1 and Ampyr Energy, and includes all subsidiaries and project companies.
Ampyr Group Project	Project (consisting of assets and activities) in which Ampyr Group funds (i.e. from CI1 and Ampyr Energy) is or is going to be invested.
Ampyr Group Project Company(ies)	Any company, partnership or other entity in which a Ampyr Group funds (i.e. from CI1 and Ampyr Energy) are invested holds an Investment.
Associated Facilities	Facilities that are not funded as part of the project (funding may be provided separately by a client or a third party including the government), and whose viability and existence depend exclusively on the project and whose goods or services are essential for the successful operation of the project.
Climate Investor One	Means Climate Investor One, a financing facility for renewable energy projects in emerging markets offering an integrated funding solution. "CI1 Funds" means the Development and the Construction Equity Fund.
Community Development	The implementation of needs-based programmes designed to deliver positive and sustainable impact to project communities throughout the investment lifecycle; add to the enabling environment in which the Fund seeks to invest; enhance the profile of the Fund, create goodwill for the Fund, the Funds' existing and future investments; lay the foundations for ongoing community engagement and development; and add to the resilience of the community to future climate and economic shocks.
Core Labour Standards	The requirements as applicable on child and forced labour, discrimination and freedom of association and collective bargaining, stemming from the ILO Declaration on Fundamental Principles and Rights at Work, adopted in 1998 and covering: (i) freedom of association and the right to collective bargaining, (ii) the elimination of forced and compulsory labour, (iii) the abolition of child labour and (iv) the elimination of discrimination in the workplace.
Health, Safety, Environmental and Social	An umbrella term covering environmental, social, labour and working conditions, occupational health and safety, and community health and safety aspects. Referred to in this document as HSSE (Health, Safety, Environmental and Social).
Environmental and Social Action Plan	The environmental and social action plan agreed upon between the Fund and any Project Company, defining actions, responsibilities, deliverables, compliance indicators, and a timeframe for the measures required to remedy the known non-compliances of the business activities of the Project Company with the Environmental and Social Requirements and for any other measure agreed upon, as amended from time to time.
Environmental and Social Impact Assessment	An assessment of potentially significant adverse environmental and social risks and impacts. The key process elements of an ESIA generally consist of (i) initial screening of the project and scoping of the assessment process; (ii) examination of alternatives; (iii) stakeholder identification (focusing on those directly affected) and gathering of environmental and social baseline data; (iv) impact identification, prediction, and analysis; (v) generation of mitigation or management measures and actions; (vi) significance of impacts (source: IFC PS 1).
Environmental and Social Management Plan	Means the document describing is the ESIA output document which sets out the mitigation and monitoring requirements which must be implemented during construction and operation.
Environmental and Social Requirements	The stricter of (i) Environmental Law, (ii) Social Law, (iii) statutory requirements; (iv) permits and licences, (v) ILO Core Labor Standards, ILO Basic Terms and Conditions of Employment and UN Guiding Principles on Business and Human Rights (UNGPR), (vi) all applicable IFC Performance Standards, and (vii) all other requirements set by this ESMS.
Good International Industry Practice	The exercise of professional skill, diligence, prudence, and foresight that would reasonably be expected from skilled and experienced professionals engaged in the same type of undertaking under the same or similar circumstances globally or regionally. The outcome of such exercise should be that the Project Company

	employs the most appropriate technologies in the project-specific circumstances (source: IFC).
Grievance	A concern, complaint or feedback raised by any stakeholder either affected or interested in company operations. Both concerns and complaints can result from either real or perceived impacts of a company's operations.
Grievance Mechanism	A mechanism for people to raise complaints and grievances and for these to be received and resolved appropriately and in accordance with Principle 31 of the UN Guiding Principles on Business and Human Rights.
HSSE MS	A system describing the governance, institutional, organisational and management arrangements for appropriately addressing the HSSE impacts and risks of a Project.
Human Rights	Human rights are inherent in all human beings, whatever their nationality, place of residence, sex, national or ethnic origin, colour, religion, language, or any other status. Every individual is entitled to enjoy human rights without discrimination. These rights are all interrelated, interdependent and indivisible. Human rights are often expressed and guaranteed by law, in the form of treaties, customary international law, general principles and other sources of international law. International human rights law sets out obligations on States to act in certain ways or to refrain from certain acts, so as to promote and protect the human rights and fundamental freedoms of individuals or groups. Business can impact all human rights both positively and negatively. Source: <a href="https://www.unglobalcompact.org/">https://www.unglobalcompact.org/</a>
International Finance Corporation	An international organisation established in Washington, DC, USA, by Articles of Agreement among its member countries.
International Labour Organisation	The tripartite United Nations agency which brings together governments, employers and workers of its member states in common action to promote decent work throughout the world.
IFC Performance Standards	The IFC Performance Standards on Social and Environmental Sustainability (including the technical reference documents known as IFC's Environmental, Health, and Safety Guidelines), as reflected on the IFC website.
Impact	An environmental or social impact is defined as any alteration of existing conditions, adverse or beneficial, caused directly or indirectly by a Project that results in a specific consequence to a resource/receptor.
Incident	An event or chain of events which caused or could have caused injury, illness, loss of assets or potential or actual damage to relationships or reputation.
Monitoring	In the context of this document, an umbrella term that includes various methods for evaluating performance including inspections and visual observations, and measuring and testing to confirm performance against key performance indicators.
Near Miss	An unplanned event that did not result in injury, illness, or damage – but had the potential to do so. Only a fortunate break in the chain of events prevented an injury, fatality or damage.
Permit to Work	An authorization, usually written and on prescribed forms for various reasons. This may include hazardous works, material handling and stowing, occupying a building or a sensitive area, access to certain confined and hazardous spaces that require special protection with an aim to safeguard and protect users, employees in a workplace, or considering the safety of the general public.
Stakeholder	Persons or groups that are directly or indirectly affected by a project as well as those that may have interests in a project and/or the ability to influence its outcome, either positively or negatively. This can refer to shareholders, investors, employees, communities, governments, industries and (international) third parties.
Stakeholder engagement	An umbrella term encompassing a range of activities and interactions between CFM and stakeholders (two-way communication) over the life of a project that are designated to promote transparent, accountable, positive, and mutually beneficial working relationships
Subcontractor	A subcontractor, sub-supplier, vendor, materials provider or other representative contracted or employed by the EPC Contractor to support the Project.

Toolbox Meeting	An informal safety meeting that is part of an organization's overall safety programme. Toolbox meetings are generally conducted at the job site prior to the commencement of a job or work shift and covers special topics on safety aspects related to the specific job.
UN Guiding Principles on Business and Human Rights	The United Nations Guiding Principles on Business and Human Rights were published in 2011 as the standard of responsibility for business with regard to human rights. The UNGP are founded on three pillars: (i) the State duty to protect human rights against abuse by third parties, including business, through appropriate policies, legislation, regulations and adjudication; (ii) the corporate responsibility to respect human rights, meaning to act with due diligence to avoid infringing on the rights of others and address adverse impacts with which they are involved; and (iii) the need for greater access to effective remedy, both judicial and non-judicial, for victims of business-related human rights abuse. The focus of the UNGP is on avoiding and addressing negative impacts. Source: <a href="https://www.unglobalcompact.org/">https://www.unglobalcompact.org/</a>
Vulnerable Groups	Individuals or groups within the project area of influence who could experience adverse impacts more severely than others based on their vulnerable or disadvantaged status. This vulnerability may be due to an individual's or group's race, sex, language, religion, political, opinion, national or social origin, property, birth or other status. Other factors should also be considered including gender, ethnicity, culture, sickness, physical or mental disability, poverty or economic disadvantage, and dependence on unique natural resources

AC	Affected Communities
BOP	Balance of Plant
CDP	Community Development Programme
C-ESMP	Construction Environmental and Social Management Plan
CFM	Climate Fund Managers
CI1	Climate Investor One
CLO	Community Liaison Officer
COD	Commercial Operations Date
E&S	Environmental and Social
EPC	Engineering, Procurement and Construction
ESAP	Environmental and Social Action Plan
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESMS	Environmental and Social Management System
GBVH	Gender-based violence and harassment
GIAP	Gender integration analysis and action plan
GIIP	Good International Industry Practice
GM	Grievance Mechanism
HR	Human Resources
HSSE	Health, safety, social and environmental
IFC	International Finance Corporation
IFC PS	International Finance Corporation Performance Standards
ILO	International Labour Organisation
KPI	Key Performance Indicator
LOTO	Lock Out Tag Out
NTP	Notice to Proceed
PC	Project Company
PPE	Personal Protective Equipment
PPM	Planned Preventative Maintenance



PTW	Permit to Work
SCADA	Supervisory Control and Data Acquisition
SEP	Stakeholder Engagement Plan
UNGP	United Nations Guiding Principles on Business and Human Rights

## **1. Introduction and Purpose**

### **1.1. Introduction**

This document is a manual that describes Ampyr Group's Environmental and Social Management System (ESMS), including health and safety (H&S), and provides an overview of the policies, processes and guidelines to be implemented by Ampyr Group, its subsidiaries and project companies to manage the health, safety, social and environmental (HSSE) issues, risks and impacts associated with their operations and activities (including during development, construction and operation of wind and solar projects).

### **1.2. Ampyr Group's Commitments to Environmental and Social Management**

Ampyr Group is committed to managing the HSSE (including community health, safety and security) risks and impacts of its activities and in line with national regulatory requirements as well as international best practice standards, such as the IFC Performance Standards on Environmental and Social Sustainability (2012) and applicable World Bank Group Environmental, Health and Safety (EHS) Guidelines, including relevant IFC sector-specific guidelines where available.

### **1.3. Purpose**

This ESMS describes the arrangements and requirements for managing HSSE impacts associated with the construction of the Sulekal Solar Project. It describes the key actions required to be taken along with the responsible party.

Contractors are required to develop specific and detailed management plans and procedures to satisfactorily implement these requirements.

### **1.4. Scope**

This ESMS applies to all activities to be undertaken during the development, construction and operation phases of projects funded by Ampyr Group and its subsidiaries. It also applies to the contractors and third parties who are hired to work on the projects, who shall in turn ensure that the requirements are applied as relevant to all subcontractors.

The scope of application of the Ampyr Group ESMS as described in this document includes all HSSE aspects of projects funded by Ampyr Group and its subsidiaries, including the activities of Ampyr Group, current and future subsidiaries, and current and future project companies (hereafter referred to as "Ampyr Group") and all contractors, subcontractors, suppliers and service providers (i.e. third parties) conducting activities at the project sites and/or on behalf of the Ampyr Group. These third parties will implement the objectives of this ESMS through their own management systems. Whilst the Ampyr Group may not be directly responsible for such activities; it remains ultimately accountable for the E&S aspects of any activities undertaken on its behalf.

The projects funded by the Ampyr Group will include wind and solar (ground mount utility scale) projects located in India.

### **1.5. Objectives**

The ESMS manual provides a structured approach to managing the HSSE issues, risks and impacts associated with projects funded by Ampyr Group and its subsidiaries in a planned and controlled manner, and ensuring continuous improvement of HSSE performance, by applying the established management cycle of:

- Plan: Define policies and objectives, identify risks and opportunities, develop action plans and allocate financial and human resources for implementation.
- Do: Implement action plans with allocated resources.

- Check: Monitor and evaluate the adequacy of action plans and resources by measuring results against policies and objectives.
- Act: Implement corrective actions to improve performance.

Implementation of the ESMS will enable Ampyr Group to comply with national legislative HSSE requirements as well as international best practice and the requirements of key stakeholders (refer to Section 6.1 for the HSSE Requirements). Specifically, the ESMS will enable Ampyr Group to ensure that:

- Environmental, health, safety and security risks are adequately managed;
- E&S performance is monitored, the effectiveness of the ESMS is regularly reviewed, and management measures are continuously improved; and
- Roles and responsibilities with regard to E&S management are clearly defined for Ampyr Group staff as well as those of key contractors and service providers.

## 1.6. Structure of This Document

The first section of this Manual sets out the business context and overarching management processes and structure of which the ESMS is part. The remainder of the Manual is structured as follows:

Section	Title
Section 1	Introduction
Section 2	Project Description
Section 3	Organisational Capacity, Roles and Responsibilities
Section 4	Overview of ESMS
Section 5	E&S Policy
Section 6	Planning
Section 7	Implementation and Management
Section 8	Monitoring and Reporting

## 1.7. Cross References and Ampyr Group ESMS Documents

This Manual cross references with existing business processes, procedures and other documentation as presented below:

Ampyr Group HSSE Policy	
Legal Register	
HSSE Requirements for Contractors / Project General HSSE Requirements	
Human Resources Plan	
HSSE Training Needs Assessment and Training Plan	
Community Development Framework	
Balenahalli Project Documents	Balenahalli Environmental and Social Management Plan (ESMP)
	Balenahalli Stakeholder Engagement Plan and Grievance Redressal Mechanism
	Balenahalli Gender Action Plan
	Balenahalli Chance Finds Procedure
	Balenahalli Traffic Management Plan
	Balenahalli Waste Management Plan
	Balenahalli Emergency Response Plan
	Balenahalli Environmental and Social Action Plan (ESAP)

	Balenahalli HSE Training Needs Assessment and Training Plan
	Balenahalli HSE Plan and Contractor Management
Sulekal Project Documents	Sulekal ESMP
	Sulekal Stakeholder Engagement Plan and Grievance Redressal Mechanism
	Sulekal Gender Action Plan
	Sulekal Chance Finds Procedure
	Sulekal Traffic Management Plan
	Sulekal Waste Management Plan
	Sulekal Emergency Response Plan
	Sulekal Environmental and Social Action Plan (ESAP)
	Sulekal HSE Training Needs Assessment and Training Plan
	Sulekal HSE Plan and Contractor Management

### 1.8. Exclusions

[Currently no specific exclusions].

### 1.9. Review

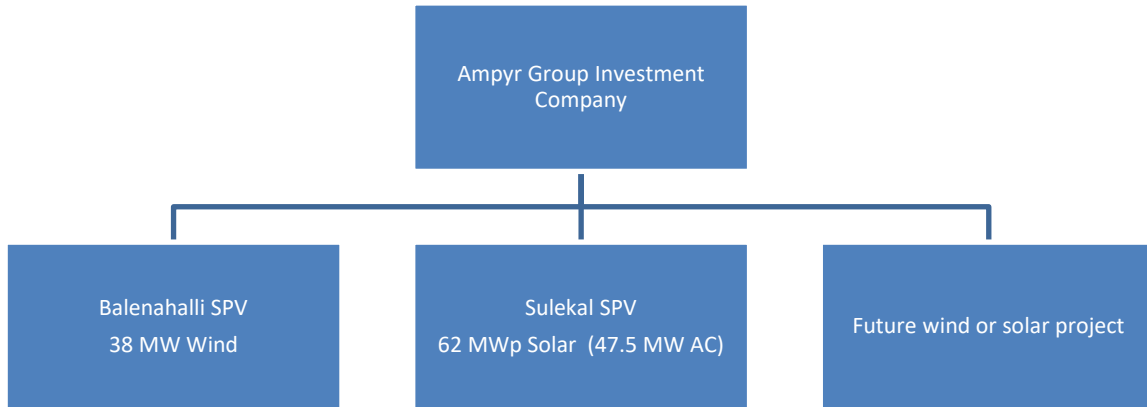
This ESMS and any associated documentation will be reviewed at least once annually and revised as required so that it remains relevant to site practices and activities and to reflect:

- Lessons learnt from accidents or incidents and continual improvements identified through periodic reviews.
- If Ampyr Group intends to fund projects/activities unrelated to wind and solar projects in India.
- Changes to laws and regulations.
- Changes in project policies and reporting procedures.
- Changes in project activities.

**2. Business Description**

**2.1. Overview**

Ampyr Group is an investment holding company, which has been operating since 2019. Through subsidiaries and special purpose vehicle (SPV) companies (i.e. project companies), Ampyr Group invests in wind and solar (ground mount utility scale) projects located in India. Staff are hired by the project companies in India.



**2.2. Current Portfolio**

**2.2.1 Location**

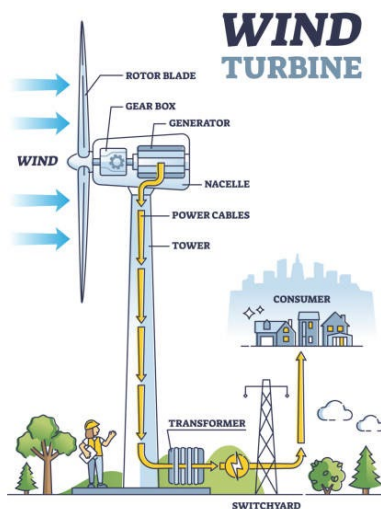
Ampyr Group will develop wind and solar projects in India.

**2.2.2 Overview**

**Wind Energy**

Wind energy is a renewable source of power that utilizes the natural force of wind to generate electricity. Wind turbines, equipped with aerodynamic blades, capture the kinetic energy of the wind and convert it into electrical energy through a generator. There are no significant fuel requirements or large quantities of water for operation of the plant. The following figure shows the typical layout of a wind project.

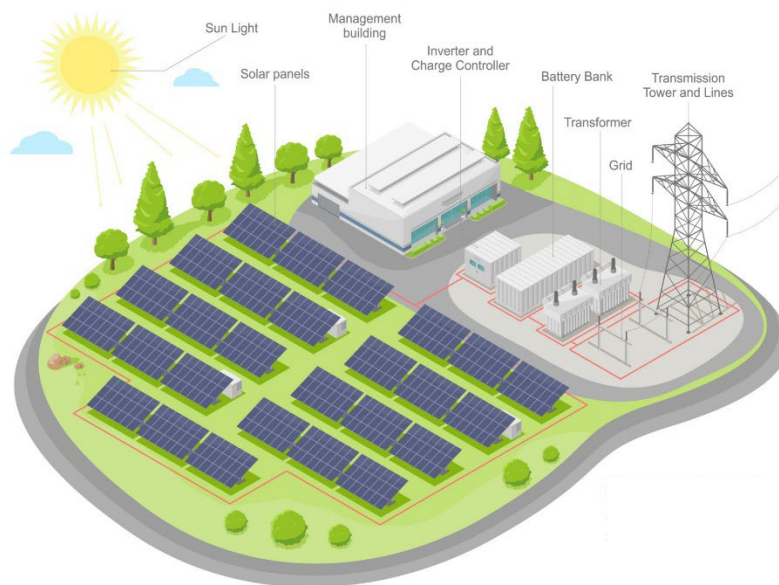
**Figure 2-1 Typical Components and Layout of a Wind Project**



### Solar Energy

Solar energy is a renewable and abundant source of power derived from the sun's rays. Photovoltaic (PV) panels, made up of semiconductor materials, capture sunlight and convert it into electricity through the photovoltaic effect. This clean and sustainable technology offers numerous benefits, such as reducing carbon emissions, lowering dependence on fossil fuels, and providing electricity in remote areas. The following figure shows the typical layout of a solar project.

**Figure 2-2 Typical Components and Layout of a Solar Project**



### Open Access

Wind and solar projects may be developed to sell electricity to different off takers under India's group captive scheme<sup>1</sup>. These projects are referred to as "open access power projects", which is the provision for consumers (offtakers) to purchase electricity directly from projects, such as the Balenahalli Wind Project and the Sulekal Solar Project under a group captive scheme. Introduced in India through the Electricity Act, 2003, which aimed to promote competition and create a more transparent electricity market, The act mandates that consumers with a connected load of certain minimum capacity (varies across states), can choose to purchase electricity from a generator of their choice: -

- Open access power is a key driver of renewable energy in India, enabling large-scale C&I consumers with significant consumption to procure renewable energy directly from IPPs through the grid, thereby making significant strides towards their sustainability targets and reducing their carbon footprint.
- Open access solar solutions or off-site solar solutions allow businesses and organisations to access renewable energy generated by solar projects located off their premises.

<sup>1</sup> The Group Captive Scheme is provided for under the Electricity Act 2003 and involves as such is established legislation in India for several years. The Group Captive scheme allows the generating plant to not have to pay cross-subsidy charges which range from INR 1.57 – 1.69 / kwh in Karnataka

Open access solar solutions are beneficial for large-scale businesses that wish to incorporate a greater percentage of renewable energy in their energy mix, without being constrained by the space available at the factory site(s).

A project description will be provided in the ESMP for each project funded by the Ampyr Group.

## **2.3. Investors**

### **2.3.1 Ampyr Energy**

Ampyr Energy is a renewable energy developer that develops, owns, manages construction and operation of renewable generation assets with a current focus on India. It is a wholly owned subsidiary of AGP Group, a Singapore-headquartered developer, owner and manager of sustainable real assets in fast growing, technologically driven markets.

The Ampyr Energy website is available at: [www.ampyrenergy.com/](http://www.ampyrenergy.com/)

### **2.3.2 Climate Fund Managers (CFM) and Associated Funds**

CFM is responsible for the management of the CI1 Managed Vehicles. The Managed Vehicles are focused on addressing climate change through mitigation and adaptation. The focus of both funds is on the least developed, lower-middle income and upper-middle income countries in Africa, Asia and Latin America.

#### **Climate Investor One**

Climate Investor One (CI1) is the inaugural facility managed by CFM, focused on providing capital to renewable energy Projects in developing countries. CI1 has a focus on Africa, South & Southeast Asia, and Latin America, and uses a whole-of-life financing approach intended to reduce implementation timelines. The CI1 Managed Vehicles are focused solely on investments in renewable energy projects in emerging markets, with a primary focus on wind, solar and run-of-river projects.

As a general principle, CI1 seeks to do no harm through the projects in which it invests. This means that those projects with the most significant impacts will be considered only on the basis of rigorous assessment and clear evidence of positive impact that is aligned with their 'do good' philosophy.

The CFM website is available at: [www.climatefundmanagers.com/](http://www.climatefundmanagers.com/)

### 3. Overview of ESMS

#### 3.1. ESMS Structure

The ESMS is based on the core aspects of the ISO 9001:2015; ISO 14001:2015 and ISO 45001:2015 management standards which are developed based on the of the Plan, Do, Check, Act (PDCA) management cycle. The core components of the ESMS for the construction of Sulekal Solar Project are shown in Figure 3-1 below. All components are included in the scope of this ESMS.

**Figure 3-1: Structure of ESMS**



Source: IFC ESMS Implementation Handbook for Construction (2014)

#### 3.2. Supporting Documentation

In addition to this ESMS Manual, there are management plans, procedures and work instructions for specific activities associated with the construction and operation of the projects.

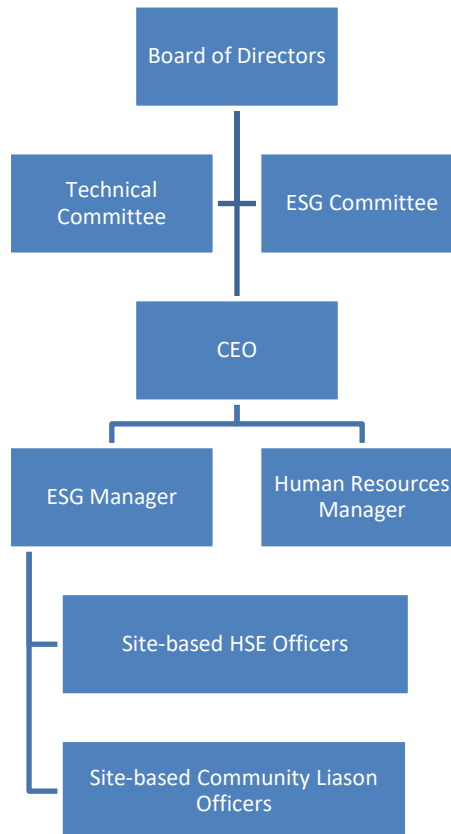


#### 4. Organisational Capacity, Roles and Responsibilities

##### 4.1. HSSE Management

Ampyr Group is ultimately responsible for the HSSE performance of the projects, which it funds and this responsibility is realised through implementation of this ESMS. E&S roles and responsibilities are integrated into the overall organisational structure of the Ampyr Group, with clear linkages and lines of authority between the HSSE staff as well as those of the key contractor(s) and service providers, as illustrated in **Figure 4-1**.

**Figure 4-1: Ampyr Group Organogram**



#### 4.2. HSSE Roles, Responsibilities and Authority

##### 4.2.1 Project Governance

Ampyr Group is governed by a Board of Directors. The CEO reports to the Ampyr Group Board of Directors.

An ESG Committee and a Technical Committee has been set up and reports to the Ampyr Group Board of Directors. The ESG Committee shall oversee and monitor HSSE performance of Ampyr Group, including during construction and operation of projects.

##### 4.1.1 HSSE Management Accountability

The CEO is the designated management representative who has overall responsibility and accountability for the maintenance and implementation of the ESMS and is appointed in this role by the Ampyr Group Board of Directors.

A Project Director is appointed by the CEO to be responsible and accountable for HSSE at specific projects.

#### **4.1.2 ESG Manager**

The ESG Manager is responsible for establishing and maintaining effective programmes, processes and procedures and to implement the ESMS. The ESG Manager co-ordinates with the project staff and EPC/O&M contractors and to ensure that the approach to HSSE management is integrated and applied consistently across all project activities. The HSSE Manager reports regularly to the CEO.

#### **4.1.3 Ampyr Group Employees**

All employees working for, or on behalf of Ampyr Group companies have a responsibility to ensure that they carry out their work in such a way that protects the environment. All employees should be aware of the ESMS and understand their role in implementing it.

### **4.3. Contractor HSSE Management**

The EPC and O&M contractor's are responsible for compliance with the requirements of the Ampyr Group ESMS relevant to the contractor's scope of work.

Every worker on the project sites is required to take responsibility in making sure the work carried out meets the HSSE Requirements as set out in Section 6.1 and in the Project General HSSE Requirements.

The EPC and O&M contractors are responsible for making sure there is adequate and competent staffing, scope-specific management plans and procedures, and resources to effectively manage and implement all HSSE requirements.

The EPC and O&M contractors are wholly responsible for the implementation of an organisation that will ensure that works within the scope are adequately supervised and coordinated. The EPC and O&M contractors will coordinate and manage all HSSE in relation to their work activities related to the project.

The EPC and O&M contractors will appoint an HSSE Manager and a H&S Officer to act as a point of contact for the project construction/operation activities and HSSE-related issues. This site management team shall be identified in the EPC and O&M contractors' project-specific ESMS and their emergency contact information shall be clearly posted at the project site so that site personnel and the surrounding community have visibility.

The EPC Contractor shall ensure that its H&S Officer is at the project site at all times during construction activity, except as reasonably required to complete the Contract scope (e.g., attending meetings or addressing social issues, and as documented in the daily report).

Where the EPC/O&M contractors have engaged sub-contractors to carry out some of the scope of work, the EPC/O&M contractors are responsible for ensuring that the sub-contractors comply with the HSSE Requirements.

### **4.4. Competency, Training and Awareness**

#### **4.4.1 Competency and Training**

Training is intended to develop appropriate knowledge, skills and behaviours which will enable individuals to become competent in their roles, to fulfil their responsibilities and required activities in their role at work. In this way, training is a key risk mitigation method for the business. Training is based on the following principles:

- Training is provided to both employees and contractors based on role, risk, and responsibilities.

- The training programme seeks to ensure competency and quality outcomes rather than only training attendance.
- The training programme focuses on the needs of the audience and uses different learning methods to cater for differing needs.
- Training is an ongoing and iterative process.

#### 4.4.2 Training Needs Assessment

An assessment of employee training needs will be undertaken by the relevant Ampyr Group Company (including project companies) and the EPC/O&M contractors to identify the type and frequency of training required for all project workers. The same will be required of all subcontractors. A Training Needs Assessment will be completed for all new project workers. This must address the risks and responsibilities including appropriate induction and skills building.

High risk groups must be identified, such as those performing safety critical roles, who require additional and immediate mitigations such as additional supervision alongside a coaching and training plan to address competency gaps. The training needs must be documented in the form of a Training Plan. These plans should be reviewed on a periodic basis, and if identified as necessary due to a risk assessment, corrective actions arising from an audit, or following the investigation into the root cause of an accident or incident.

#### 4.4.3 Training Delivery

Training delivery is a critical consideration to ensure the effectiveness of learning and competency. Training programmes must be developed and delivered based on the outcome of the Training Needs Assessment. Training can be delivered in-house and/or through external training providers, however the following shall be considered as a minimum:

- Consideration of the audience being trained, including language and literacy abilities.
- Setting objectives (goal, purpose and intent) of the training based on the required competencies.
- Use of the most appropriate (and varied) training methods for the required competencies.
- Ensure that the trainers or facilitators are experienced and/or qualified to deliver training. Checks must be made on external trainers, such as asking for copies of relevant training certificates and references.
- Where internal courses are deployed by internal staff, 'Train the Trainer' courses shall be provided to equip trainers with the skills necessary to train on internal Project requirements and practices.
- Training for significant risks shall be repeated regularly for all employees and contractors.

#### 4.4.4 Training Design & Content

In order to be effective, trainers must spend time planning training sessions to ensure that learning objectives are clear, achievable and that training is pitched at the appropriate level, speed and tone using the appropriate style for the audience and environment. The following elements shall be considered during training:

- Existing knowledge of the audience.
- Learning objectives.
- Appropriateness of training method(s).
- Variety of training methods.
- Communication style, both verbal and non-verbal.
- Cultural awareness.
- Energy level and engagement with the audience.
- Competency verification.
- Ability to respond to questions and misunderstandings.

#### **4.4.5 HSSE Awareness**

The Ampyr Group HSSE commitments and the requirements of this ESMS will be communicated to all Ampyr Group employees, as well as to third parties (contractors, subcontractors and service providers), and all staff employed at the project sites will be required to adhere to the requirements and procedures of this ESMS.

Third parties will be responsible for communicating the same to their own staff, and to incorporate a commitment to staff awareness, participation and training in their own management systems. Effective training is a key requirement for successful ESMS implementation and contractor(s) will be required to identify staff training needs and provide appropriate training to all workers. Training records will be kept by Ampyr Group companies and contractors.

#### **4.5. Stakeholder Engagement, Communication and Participation**

Effective stakeholder engagement (through consultation and participation) ensures that stakeholders are appropriately engaged and informed of the environmental, social and other impacts which could affect them through a process of information disclosure and meaningful dialogue with the Ampyr Group projects. It supports the maintenance of a constructive relationship with stakeholders on an ongoing basis. Stakeholder engagement requires both resources and investment; however, when undertaken successfully it will reduce financial and reputational risk, operational delay, increase operational value and enhance the social benefits for communities.

Arrangements for external communication are described in the Ampyr Group project-specific Stakeholder Engagement Plans ("SEP"). The EPC/O&M contractors shall support the relevant Ampyr Group project in the implementation of this plan. The project-specific SEPs will be designed in accordance with IFC PS1 and provide for a programme of engagement activities to take place with external stakeholders during all project phases. Requirements for monitoring and reporting will also be included.

Ampyr Group companies are also required to adopt measures for the effective communication and consultation with their staff and for their participation in matters that concern them. This includes engagement with workers' representatives/committees as appropriate.

#### **4.6. Grievance Redressal Mechanism (GRM)**

##### **4.6.1 Employee Grievances**

The Human Resources Management Plan includes a Worker GRM, which is to be followed by Ampyr Group Companies for managing, handling responding and escalating any grievances received from workers. All contractors will be required to adopt this GRM as part of their ESMS.

##### **4.6.2 External Stakeholders**

Ampyr [is in the process of developing a website, which will have a form for external grievances to be registered]. In the event that any grievances are received, the grievances will be subject to (ii) screening and assessing the issues raised and determining how to address them; (iii) providing, tracking, and documenting responses, if any; and (iv) adjusting the GRM, as appropriate.

The project SEPs include a GRM, which is to be followed by Ampyr Group projects for (i) receiving and registering external grievances from stakeholders, including the affected community; (ii) screening and assessing the issues raised and determining how to address them; (iii) providing, tracking, and documenting responses, if any; and (iv) adjusting the GRM, as appropriate.

**5. Policy**

**5.1. Project Commitments**

Ampyr Group has documented a Health, Safety, Social and Environmental Policy (“HSSE Policy”) which describes the overarching commitments for managing environmental, health, safety and social aspects relating to its activities and projects. It also describes the arrangements in place to achieve these commitments. The Ampyr Group HSSE Policy applies to all Ampyr Group companies. Responsibility for implementation of the HSSE Policy rests with the CEO.

The HSSE Policy will be reviewed every twelve months to ensure that it remains current and applicable to the Ampyr Group’s activities. It is communicated to all Ampyr Group personnel and those working on its behalf through provision of training and inclusion in contractor Invitation to Tender (ITT) and start-up documentation. Copies of the HSSE Policy are displayed in Ampyr Group offices [and on the website].

The following policy commitments will be applied throughout the Project. It is the responsibility of Ampyr Group and contractors to adhere to these commitments. This policy shall be communicated to all Ampyr Group project staff.

<b>Ampyr Group</b>
<p>Ampyr Group, its subsidiaries and project companies <b>commit to:</b></p> <ul style="list-style-type: none"> <li>• <b>Avoiding and otherwise minimizing and mitigating the impacts of its activities on local communities.</b></li> <li>• <b>Safeguarding the environment and sustainably using and managing natural resources.</b></li> <li>• <b>Managing its contribution to climate change through efforts to minimize use of fossil fuels; control of emissions to atmosphere, and through energy conservation.</b></li> <li>• <b>Protecting the health, safety and welfare of all those working on the Ampyr Group projects in line with international standards.</b></li> <li>• <b>Maximizing opportunities for positive environmental and social benefits to be realized through the Ampyr Group projects.</b></li> <li>• <b>Complying with all legislation and applicable environmental, health, safety and social requirements.</b></li> <li>• <b>Assigning adequate staffing and resources to the Project in order to effectively manage and implement all Ampyr Group project requirements.</b></li> <li>• <b>Adopting governance and management arrangements so that the projects can be managed in an appropriate, accountable and transparent manner.</b></li> <li>• <b>Monitoring and reporting on HSSE performance in an effort to strive for continuous improvement</b></li> </ul>

## 6. Planning

### 6.1. E&S Requirements

Ampyr Group companies are subject to a range of legal and regulatory requirements relating to HSE Management. These requirements are enforced by law and are established through legislation, permits, licences, contracts and legislated standards. Regulatory requirements include those enshrined in Acts, Regulations, or Standards/Guidelines that are given regulatory status under the legislation and may be enacted at a local, regional, state, national or international level. Ampyr Group companies are also required to comply with “Other” E&S Requirements relating to E&S management. The HSE Requirements required for project compliance include:

- Ampyr Energy and CI1’s policies, standards and guidelines.
- IFC Performance Standards.
- World Bank Group EHS Guidelines.
- IFC Workers’ Accommodation: Processes and Standards.
- Relevant international treaties applicable to the host country, including UN Declaration on the Rights of Indigenous Peoples, UN Guiding Principles on Business and Human Rights, International Covenant on Economic, Cultural and Social Rights and ILO Core Labour Standards, ratified by the host country.
- Contractual obligations agreed with Ampyr Energy and CI1.
- Agreements with other external stakeholders e.g. community groups and non-governmental organizations.
- Agreements with government authorities.
- Voluntary principles, standards and code of practice.
- Industry-specific technical standards, international best practice.
- Project Environmental and Social Impact Assessment (ESIA), project Environmental and Social Management Plan (ESMP) and other project management plans, as relevant.

All legal and other requirements relevant to the Ampyr Group are included in a register along with information regarding all permits, licenses and conditions required.

### 6.2. Environmental & Social Impacts and Risks

#### 6.2.1 Environmental and Social Risk Screening

All potential investments (projects) for the Ampyr Group will be assessed in terms of the potential E&S risks by the Ampyr Energy and CI1 and assigned an E&S risk categorisation. There are four risk categories, and these are aligned with those used by CI1. They are presented in the following table.

**Table 6-1 E&S Risk Categorisation**

Risk Category	Description
Category A (High risk)  <i>Equivalent to IFC E&amp;S Category A</i>	Business activities with potential significant adverse environmental or social risks and/or impacts that are diverse, irreversible, or unprecedented. This category includes (but is not limited to) Projects that are a narrow highest risk subset of all Projects, which: <ol style="list-style-type: none"> <li>(i) could adversely impact on critical habitat as defined in IFC PS 6, paragraphs 16-19; and/or</li> <li>(ii) could adversely impact on natural habitat as defined in IFC PS6, paragraphs 13-15; and/or</li> <li>(iii) incur complex resettlement (subset of PS5); and/or</li> <li>(iv) in relation to indigenous peoples, trigger the FPIC requirements of PS 7, as set out in IFC PS7, paragraphs 13-17; and/or</li> </ol>

Risk Category	Description
	(v) incur impacts on critical cultural heritage as defined in IFC PS8, paragraphs 13-15; and/or (vi) demonstrate a context of social and/or political conflict and/or severe security issues that pose a significant potential risk to the Project; and/or (vii) present potential significant adverse social or environmental impacts which are diverse, irreversible or unprecedented.
Category B+ (Medium high risk)  <i>Equivalent to IFC E&amp;S Category B</i>	Projects with potential adverse social or environmental impacts that are generally beyond the site boundaries, largely reversible and can be addressed through relevant mitigation measures.
Category B (Medium low risk)  <i>Equivalent to IFC E&amp;S Category B</i>	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 (Low risk)  <i>Equivalent to IFC E&amp;S Category C</i>	Projects with minimal or no adverse social or environmental impact.

Where the E&S footprint of the proposed investment is not well enough understood or defined at the time of conducting the E&S risk screening, the E&S risk category will be determined on the basis of the inherent E&S risks associated with the Project type as well as the information available regarding the E&S characteristics of the planned project activities and the likely geographical setting.

Investments that are known to have significant impacts on either or both environmental and social receptors, and which are expected to be located in a sensitive environmental area or an area where significant social disruption is anticipated, will be categorised as A. Where the same Project type is to be located in a lower E&S risk setting, a risk category of B+ may be assigned but this will be determined on the basis of Project-specific information. This approach is aligned with that adopted by IFC, the World Bank, and other development finance institutions. Ampyr Group will not proceed with any investment (project), which is categorised as Category A.

### 6.2.2 Environmental and Social Due Diligence

Once the proposed investment (project) has been approved for due diligence by the Ampyr Group, due diligence activities will be undertaken. The nature of the due diligence will vary and is based on the risk categorization. A visit to the Project location(s) and interviews with relevant stakeholders will be undertaken for all Projects with the exception of Category C Projects for which a desk-based review of information is likely to be sufficient.

The purpose of conducting due diligence is to confirm the required activities that will need to be undertaken in the development of the Project along with the required budget to fund these development activities. The due diligence also provides the opportunity to gather additional information and if necessary, revise the risk categorization. External consultant(s) may be appointed to conduct the due diligence assessment. The reference against which all Projects will be assessed is the IFC Performance Standards, along with the requirements of this ESMS, and the local legal framework.

The due diligence activities are described in Table 6-2. The scope of the due diligence assessment will cover the aspects detailed in Table 6.3; additional topics may be added as considered necessary for each individual investment. The findings of the due diligence will be classified in accordance with the categories described in Table 6.4.

#### Table 6-2 Due Diligence Activities

Activity	Description
Document review	<ul style="list-style-type: none"> <li>A review of available information. This may involve a review of any existing reports such as a 'red flags' report, an ESIA report, etc.</li> </ul>
Site visit (Cat. A, B+ and B Projects)	<ul style="list-style-type: none"> <li>A site visit will be conducted by Ampyr ESG team and/or an external consultant(s)<sup>2</sup> to further assess the potential E&amp;S risks and impacts of the project, its Associated Facilities, and any other current or planned activities or developments of which the Project may form part, and to identify 'red flag' issues of concern.</li> <li>Category C Projects will not normally be subject to a site visit.</li> </ul>
Assessment of Project Developer E&S awareness, capacity and commitment	<ul style="list-style-type: none"> <li>Interviews with key stakeholders to ascertain their internal E&amp;S resources, competence, and aptitude for managing E&amp;S in accordance with Ampyr Group and its investor requirements.</li> </ul>
Review of E&S Categorisation	<ul style="list-style-type: none"> <li>During the due diligence process the E&amp;S risk categorization will be revisited to confirm that it remains appropriate or needs to be modified on the basis of new information that may be generated.</li> </ul>
ESAP	<ul style="list-style-type: none"> <li>The output of the due diligence assessment will be an ESAP detailing the necessary actions required to be undertaken during the development phase to address areas of concern.</li> <li>On the basis of the assessment, the provisional E&amp;S risk rating shall be confirmed. Note that in the case of Projects rated as Category A or B+ (and potentially also B), the rating will be finally confirmed once any further necessary studies (e.g. ESIA) have been completed.</li> </ul>

**Table 6-3 Due Diligence Assessment Scope of Work**

Risk Category	Description
Overview of E&S legislation	<ul style="list-style-type: none"> <li>Applicable E&amp;S legislation with which the Project needs to comply with during the planning, installation and operation phases.</li> </ul>
Overview of requirements for E&S permits/licences and the process to follow	<ul style="list-style-type: none"> <li>Identification of the relevant E&amp;S permits required to implement the project, including requirements and applicability of the regulatory environmental (and social if included) impact assessment (EIA) process to meet applicable regulations.</li> </ul>
Associated facilities and activities	<ul style="list-style-type: none"> <li>Identification of associated facilities and activities (as defined by IFC PS1).</li> <li>Potential impacts of the facilities that are/will be managed by developer/promoter/counterparty including those that would not fall within the IFC PS1 definition of Associated Facilities but with which an association may present a risk to reputation and/or is contrary to the investors.</li> </ul>
Project stakeholders	<ul style="list-style-type: none"> <li>Description of the key project stakeholders, including confirmation of the ethnicity of the people and potential presence of indigenous peoples, ethnic minorities, and vulnerable persons.</li> </ul>

<sup>2</sup> Only consultancies that have been pre-approved by Ampyr and CI1 will be invited to tender for the due diligence assessment.



Risk Category	Description
Gender and human rights	<ul style="list-style-type: none"> <li>Overview of gender and human rights issues in the country/region including potential risks associated with the Project workforce and supply chain.</li> </ul>
Indigenous Peoples	<ul style="list-style-type: none"> <li>If the existence of IP communities in the Project area is determined during the E&amp;S screening phase, a specialist assessment will be required as part of the due diligence to confirm the presence of IP communities and the potential risk of adverse impact.</li> </ul>
Resettlement	<ul style="list-style-type: none"> <li>The due diligence should seek to confirm the presence of residential or other structures on the Project site, and any ongoing livelihood activities, as well as any other uses of the land (including but not limited to: use of ecosystem services; spiritual or religious purposes).</li> </ul>
Supply Chain	<ul style="list-style-type: none"> <li>The due diligence assessment shall involve an assessment of the potential risks associated with the Project Company's supply chain with a specific focus on labour, working conditions and human rights.</li> <li>The assessment shall - at a minimum - take into account the different type of workers, including full time, temporary, daily, contractor and supply chain workers as defined in IFC PS2. The key objectives will be to:             <ul style="list-style-type: none"> <li>- understand current and potential labor risks posed by the Project activities (including any high-risk contextual issues).</li> <li>- assess whether the human resources policies, practices and management systems applicable to the Project are in line with IFC PS 2 requirements.</li> <li>- assess how the human resources policies and management systems apply across the contracting chain i.e. all (sub-)contractors and core suppliers within Project scope.</li> <li>- opine on the capacity of the Client and of the main contractor to comply with IFC PS2 requirements.</li> <li>- identify mitigation, management and monitoring measures to address the root causes of actual or potential labor issues that (are likely to) prevent compliance with IFC PS2 requirements, including a timeframe for such measures.</li> </ul> </li> </ul>
Climate change	<ul style="list-style-type: none"> <li>Overview of the potential climate change risks and impacts. This will be supplemented by a climate risk and vulnerability assessment which will be conducted during the development phase.</li> </ul>
Community development opportunities	<ul style="list-style-type: none"> <li>A separate community needs assessment will be commissioned, however, any community needs and opportunities identified during the course of the due diligence will also be recorded.</li> </ul>

**Table 6-4 Description of the Individual Issue Categories**

Category	Definition of the Category
Red Flag Issue / Fatal Flaw	<ul style="list-style-type: none"> <li>Issues that trigger aspects of the IFC Project Exclusion List/Prohibited Activities;</li> <li>Issues that are not aligned to international standards and best practices and would have a significant financial implication (&gt; US\$ 0.5 million) to mitigate;</li> </ul>

Category	Definition of the Category
	<ul style="list-style-type: none"> <li>• Issues that can result in a significant regulatory non-compliance that may have repercussions for operational shut down, significant reputational damage and/or heavy fines/criminal proceedings;</li> <li>• Issues that would have irreversible impacts on ecological and/or social resources or receptors; and/or</li> <li>• Issues that could result in potential reputational and other impacts involving international media/watchdogs.</li> </ul>
High Risk Issue	<ul style="list-style-type: none"> <li>• Issues that are not aligned to international standards and best practices and would have a major financial implication (&gt; US\$ 0.3 million) to mitigate;</li> <li>• Issues that may have reputational risks for CFM and/or its assets and could lead to conflict with communities/external stakeholders;</li> <li>• Issues that are not aligned to the IFC Performance Standards and would have long-term repercussions in management of E&amp;S performance of the Project (e.g. may extend outside of the typical Project development timeframe);</li> <li>• Issues that are/may result in regulatory non-compliances leading to fines, significant business interruption and potential criminal proceedings in extreme scenarios; and/or</li> <li>• Issues that could result in reputational and other impacts involving national media/watchdogs.</li> </ul>
Medium Risk Issue	<ul style="list-style-type: none"> <li>• Issues that are not aligned to international standards and best practices and could have a moderate financial implication (&gt; US\$ 0.1 million) to mitigate;</li> <li>• Issues that may result in business interruption in the short-term but will not result in long-term implications for the Project;</li> <li>• Issues that 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; and/or</li> <li>• Issues that could result in reputational and other impacts involving local/regional media/watchdogs.</li> </ul>
Low Risk Issue	<ul style="list-style-type: none"> <li>• Issues that are a non-alignment with IFC Performance Standards and/or good international industry practice (GIIP), but can be readily addressed at minimal cost and will not attract adverse stakeholder/media/NGO attention.</li> </ul>

### 6.2.3 Environmental and Social Impact Assessment (ESIA)

The significance of the E&S risks and impacts associated with activities and operations will be identified through an IFC-compliant Environmental and Social Impact Assessment (ESIA) process for each project which is funded by Ampyr Group. Key risks and impacts will be included in a Project HSSE Impact and Risk Register and will be managed and monitored through detailed management programmes.

The HSSE Risk Register is a live document and will be maintained on an ongoing basis. If new HSSE risks or impacts are identified (due to changes in project activities or identified management programme inefficiencies), these will need to be identified and evaluated. The methodology used to, identify, assess and analyse risks shall be defined with respect to their scope, nature and timing to ensure methods are proactive rather than reactive; and provide for the identification, prioritization and documentation of risks, and the application of controls. The methodologies that are used will align with international good practice e.g. ISO 31000.

All risks shall be added to the Risk Register and management programmes will be updated (or new management programmes implemented) as required to address the new issues. All Project personnel must be made aware of the key risks identified as part of the risk assessment process and the measures that they are required to implement. The risk register, risk management procedures, and risk assessments must be available to Ampyr Energy and CI1 for review as required.

#### **6.2.4 Environmental and Social Management Plan (ESMP)**

An IFC-compliant ESMP will be prepared for each project as an output of the ESIA process. This ESMP will detail the project-specific actions required to manage and mitigate the E&S impacts as well as the arrangements required for compliance with legal and other requirements.

The standard content of the ESMP comprises the following:

- Introduction.
- Reference standards (including relevant legal requirements).
- Project description.
- Role, responsibilities and competencies.
- Overview of arrangements for stakeholder engagement and communication.
- Description of the grievance mechanisms in place for internal and external stakeholders.
- Overview of associated management plans for individual E&S aspects (e.g. waste management; hazardous materials; traffic safety, etc.).
- Management, monitoring and reporting obligations with assigned responsibilities, indicators for compliance, and the compliance timeframe.

#### **6.2.5 Stakeholder Engagement Plan (SEP)**

An IFC-compliant SEP and grievance mechanism will be prepared for each project. This will typically be completed as part of the ESIA process. Where indigenous peoples communities are present, the SEP and grievance mechanism shall include specific arrangements appropriate to their needs.

The grievance mechanism shall incorporate specific and survivor-centred measures for responding to and managing reported cases of gender-based violence and harassment (GBVH), with such measures also providing for the appropriate safeguarding of any witnesses, and other stakeholders such as whistleblowers.

### **6.3. Impact Generation and Opportunities**

#### **6.3.1 Gender Equality and Women's Economic Empowerment**

A gender integration analysis and action plan (GIAP) will be prepared for each project and this will be implemented in all phases of each project. This may be incorporated into the scope of work for the ESIA and the ESIA team will be required to include a gender expert. The analysis will be required to consider risks associated with GBVH and the required control measures and ongoing monitoring activities.

#### **6.3.2 Local Community Development**

The Ampyr Group is committed to maximising the opportunities for E&S benefits particularly to local communities in the area of influence of its project investments. The objective is to ensure that all projects contribute to society in an impactful way and at the same time enjoy the ongoing support of the broader community of which the Project forms part and serves. In line with CI1 requirements, community development will be guided by the following set of principles.

- Sustainable – Community development programmes will be designed to contribute to the relevant UN SDGs and will promote self-reliance and avoid dependency whilst creating opportunities for government support and partnerships with other development actors; they will have a clear and sustainable exit strategy.

- Community-Led - Community development programmes will be gender-inclusive, will be designed, planned, implemented and managed in consultation with and participation of community members and beneficiaries, including those identified as vulnerable.
- Inclusive – the development and delivery of programmes will involve engagement with national, regional and local governments as relevant, NGOs and CSOs, development agencies and other local stakeholders active in community development. This will seek to achieve a good fit with existing development activities in the area, and to be replicable across other communities as needed.
- Transparent – The development, implementation and management of all community development programmes will be transparent, auditable and open to internal and external scrutiny.
- Measurable - Key Performance Indicators will be established to measure the value that community development programmes give to the intended beneficiaries using outcomes and impact indicators to measure change.

A community needs assessment will be commissioned, and a community development plan will be prepared. Budget and community development activities will be planned and delivered to meet CI1's requirements. Contractual agreements shall be implemented with the selected delivery partner(s) to deliver the identified community interventions. The allocated budget for the community development programme shall be managed and disbursed in accordance with the contractual agreement with the delivery partner.

Specific requirements are provided below: -

Topic	Description
Development Phase	<ul style="list-style-type: none"> <li>• Ampyr shall identify 'rapid interventions' that are designed to build goodwill among the host community/ies.</li> <li>• Suggested interventions shall be proposed to CI1 for consideration and approval.</li> <li>• A ceiling budget shall be agreed with CI1 which will comprise a proportion of the total budget allocated for DF-phase community development.</li> <li>• A log of expenditure shall be maintained and submitted to the investors on a monthly basis.</li> </ul>
Construction Phase	<ul style="list-style-type: none"> <li>• During the construction phase, Ampyr shall be tasked with the implementation of a community development programme designed by CI1 during the development phase. Typically, the programme will be informed by a community needs assessment (completed during the DF phase of funding) and will comprise short, medium and long term actions.</li> <li>• The community development programme will typically be delivered by one or more local implementation partners that are selected by CI1 and Ampyr.</li> <li>• CI1 shall provide the necessary guidance to Ampyr so that the programme is implemented as required.</li> <li>• Ampyr will be required to submit reports to CI1 on the progress of the programme interventions as required.</li> <li>• Ampyr shall host visits conducted by and on behalf of CI1 for the purpose of ongoing monitoring and evaluation.</li> </ul>
Operating Phase	<ul style="list-style-type: none"> <li>• During the operating phase of the asset, Ampyr Project Company shall be responsible for the ongoing implementation of the community development programme, and for ensuring that the delivery partners provide performance reports as agreed.</li> <li>• Ampyr Project Company will be required to submit reports to CI1 on the progress of the programme interventions as required.</li> <li>• Ampyr Project Company shall host visits conducted by and on behalf of CI1 for the purpose of ongoing monitoring and evaluation.</li> </ul>

Topic	Description
Exit	<ul style="list-style-type: none"> <li>• It is CFM's vision that the community development programmes will endure beyond the lifetime of the investment in order to deliver a lasting positive legacy.</li> <li>• The arrangements for continuing the implementation of the programme will be discussed and agreed by Ampyr and CI1.</li> </ul>

#### 6.4. Emergency Preparedness and Response

An emergency preparedness and response plan will be developed for each project funded by Ampyr Group. The plan will be designed to:

- Ensure that emergency incidents are suitably managed and mitigated in a safe and efficient manner, minimising the impact upon the development, its occupiers, its neighbours, the wider community and the environment.
- Facilitate planning and liaison with emergency service providers, neighbours and other stakeholders.
- Provide guidance in terms of the classification, management, response to and reporting of incidents.

Environmental and social incidents shall be reported to the relevant Ampyr Group company and subsequently investigated in accordance with the requirements detailed in Section 8.7. Significant incidents shall be investigated and corrective actions and/or opportunities for improvement shall be implemented in a timely manner.

#### 6.5. Environmental and Social Action Plan (ESAP)

If Ampyr Group companies are required at any time to prepare an ESAP, the ESAP will be prepared and the Ampyr Group company will (A) promptly provide ESG Subcommittee with all such further information and assistance as the Investors require to facilitate agreement of each ESAP; (B) procure that each ESAP (cleared by the ESG Subcommittee) is implemented within the agreed timeframe and in accordance with the terms thereof; (C) not proceed with implementing the specific components for which involuntary resettlement impacts are identified until the ESAP has been cleared and discussed with ESG Subcommittee; (D) promptly provide the Investors with such information and monitoring reports as may be specified in the ESAP or as requested by the Investors from time to time to confirm the status of the implementation of any such ESAP; and (E) provide to the Investors as soon as possible and in any event within 5 (five) business days after any date specified in an ESAP as being the date by which the relevant event, circumstance or occurrence will be remedied, a notice which either confirms that the relevant remedial action has been completed or which provides details of the reasons why such remedial action has not been completed and the proposed steps being taken to remedy the relevant event, circumstance or occurrence.

#### 6.6. Control of Documents

##### 6.4.1 Documents of Internal Origin

All documents required by this ESMS are issued for general use once approved for release. All are made accessible to all Ampyr Group staff electronically on the Ampyr Group network. The HR Manager is responsible for the master copy of all HR documents. The Project Director is responsible for the master copy of all formal project documents. All hard copies of documents are uncontrolled. In all cases, the electronic copies of all documents (held on company network drives) are considered the current version and should be used if there are any doubts as to the currency of hard copy documents.

##### 6.4.2 Storage of Documents of Internal Origin

The network drive shall be used to store all ESMS-related documentation. No documents shall be held on personal hard drives/computers/laptops.

Any ESMS-related documents and information which, by their nature, cannot be maintained on company network drives for controlled access shall be stored securely at the Ampyr/project offices.

#### **6.4.3 Documents of External Origin**

Documents of external origin relevant to the ESMS include permits and licences, the ESIA (and EIA – as relevant), and the Environmental and Social Management Plan. Other external documents include those available via the internet, such as legal codes. Wherever possible external documents and information will be accessed, as required, on external websites to ensure current versions are used.

#### **6.4.4 Control of Records**

Records are primarily held in hard copy or may be saved electronically on the Ampyr Group network drive. Responsibility, retention period and location of a range of key records shall be detailed in a separate procedure.

Documents shall be stored electronically in such a way that they are protected against damage, deterioration or loss and so that they are fully identifiable and traceable. The Ampyr Group network drive must be backed up regularly and paper documents archived so documents can always be retrieved.

All records must be kept for the minimum term specified by legal requirements and where no specification exists, for a period of 40 years. Confidential files including medical and personnel records shall be held securely and in confidential manner.

### **6.7. Management of Change**

Changes in the organization, management, personnel, equipment, processes or procedures have the potential to affect the HSSE risks associated with the Project's activities. A management of change procedure shall be implemented that describes the process for planning for a change in manage potential HSSE impacts.

## **7. HSSE Management Plans**

### **7.1. Ampyr Project HSSE Management Plans**

Ampyr Group Companies will prepare and implement various management programmes (management/action plans and procedures) to meet the HSSE commitments and standards adopted for the projects, which are funded by Ampyr Group.

### **7.2. Contractor Management**

Ampyr Group Companies will manage contractor and other third-party E&S performance through the Contractor Management Plan / Employer HSSE Requirements, which establish minimum requirements for HSSE management and performance, including standards for HSSE management and monitoring, as well as key performance indicators arising from the project's HSSE commitments and standards.

The EPC and O&M contractors are required to operate a system that is compatible with the ESMS and ESMP. Interfaces need to be managed effectively between the EPC/O&M contractor, Ampyr Project Company and sub-contractors so that HSSE risks are minimized and performance maintained.

Contractors are required to submit an HSSE Management Plan upon award of the Contract. The Contractors' HSSE Plan should describe the operational arrangements for ensuring a good standard of HSSE performance is achieved.

When appropriate the Contractor will prepare a bridging document between its ESMS and the Ampyr ESMS to ensure clarity in relation to roles and responsibilities and consistency in approach during normal operations and in response to incidents.

#### **7.2.1 Contractor Management Programmes**

For supplier and contractor contracts, Ampyr Group Companies will ensure that the contract states that the contractor/supplier will comply with the HSSE Requirements (as applicable). Prior to engaging contractors, the contractors should review the HSSE Requirements and confirm that their programs and working practices can meet the requirements. The policies, procedures, and requirements identified should be considered contractual obligations and any non-compliance should be considered a breach of contract. While applying for any work with the Ampyr Group Companies, each contractor and supplier must demonstrate a history of safe operations and must be prepared to provide a copy of their environment, health and safety, waste disposal related documents and programs.

Contractor(s) will be required to develop and implement management programmes specific to their activities that detail the mitigation, management and monitoring measures that the contractor(s) will implement to manage the HSSE aspects, risks and impacts of their activities. Contractor management programmes must ensure compliance with the requirements of this ESMS and associated HSSE commitments and objectives.

In accordance with the HSSE Requirements included in the contractor documentation, the following management plans and arrangements shall be implemented by the contractor for environmental and social management. Ampyr Group Companies will monitor the implementation of these arrangements to confirm compliance.

The EPC/O&M contractor is required to develop and implement an ESMS for the construction/operation phase and submit these to Ampyr for review and approval. This is a contractual requirement (refer to HSSE Requirements for Contractors) and shall include, but not limited to:

- Plans setting out how they will comply with the HSSE requirements and project grievance mechanism, in relation to their scope of work.
- Register of Legal and other requirements relating to the E&S requirements.
- Organization chart for works (including details of subcontractors and other parties).

- Name(s) of the personnel responsible for compliance with the HSSE requirements and their qualifications and experience (“HSSE Manager” – this may include one or more persons).
- Risk assessment for each work activity supported by documentation in the form of job hazard assessment (JHA) or equivalent.
- List of activities and roles which require qualified personnel (e.g. working at height, driving, operating machinery, electrical works, etc.) and names of personnel and copies of the certificates for these roles.
- Emergency response plan, to include the arrangement for first aid.
- EHSS induction plan for workers, to include PPE arrangement.
- List of any hazardous substances to be stored on site and storage/handling requirements (to include Material Safety Data Sheets (MSDS)).
- Labour management policy and procedures.
- Alcohol and Other Drugs Policy, which shall be applicable for all workers (including those of subcontractors).
- Waste management plan.
- Chance find procedure.
- Arrangement for worker accommodation, work site facilities, drinking water (including for subcontractors).
- Program for audits and inspections during the works.



## 8. Monitoring and Reporting

### 8.1. Overview

Procedures for ongoing monitoring and reporting of Ampyr Group HSSE performance will be developed and implemented based on the HSSE Requirements as referenced in this ESMS.

Auditing and inspection of project activities will take place on a regular, planned basis and will consist of both internal inspections/audits (by the relevant party of their own performance) as well as by Ampyr Group Companies. All contractors and third parties will define an audit process within their own ESMS that specifies: frequency, methods, how the results will be analysed/evaluated and reported, and who the results will be reported to. Procedures will also be defined for responding to instances where monitoring results indicate non-compliance with standards or key performance indicators.

### 8.2. Evaluation of Compliance

To meet the Ampyr Group's commitment to compliance, audits shall be conducted to confirm ongoing compliance of the project's activities against the applicable legal and other requirements.

### 8.3. Non-Conformity, Corrective Action & Preventive Action

A non-conformance can be identified via a number of mechanisms including audits and inspections, external complaints, environmental monitoring or employee or contractor suggestions.

Non-conformities, observations and agreed corrective actions identified are recorded and tracked through to closure. Where required, verification of closure is provided via follow-up audits.

Non-conformities arising from external complaints are managed in accordance with the Project Grievance Mechanism included in the Stakeholder Engagement Plan.

Opportunities for improvement identified during inspections or as a result of employee or contractor suggestion that cannot be implemented immediately on site are tracked through to closure via the ESMS Inspection Programme.

### 8.4. HSSE Project Management Reviews

Project Management Review meetings will be held by on a periodic basis during the construction phase to review overall HSSE performance on each project. These reviews will be chaired by the Project Director. The representatives of the EPC/O&M contractor and all subcontractors will be required to attend.

### 8.5. HSSE Performance Reporting

#### 8.5.1 Monthly Report

The Ampyr Project Company will require that the EPC/O&M Contractor provides monthly data in its report to the Ampyr Project Company.

#### **EPC/O&M Contractor Monthly Report**

- Performance against the KPIs listed in Section 8.6.
- Project progress (summary of highlights and achievements, summary of recruitment and filling of key roles, a 3-month look-ahead and associated timeline, and associated HSSE concerns and risks).

- Employment data disaggregated by gender (including for direct and indirect hired labour) and number of hours worked.
  - Direct Employment (total number and disaggregated by gender, skill level and migrant and local labour).
  - Indirect Employment (total number and disaggregated by gender, skill level and migrant and local labour).
  - Total number of workers living on site and details of accommodation provided onsite/offsite.
  - Details of lowest hourly wage paid.
- Person hours worked (including for contractors, subcontractors, where applicable)
- Details of stakeholder engagement activity.
- Details of community development
- Compliance with the HSSE Requirements.
- Proposed corrective actions for any non-compliances.
- Confirmation that (i) all workers aware of the project grievance mechanism (ii) the workers are allowed to form and join workers organizations and bargain collectively; and (iii) all workers are insured against loss of earnings and medical in the event of an accident.

### 8.5.2 Quarterly E&S Report

The Ampyr Group shall prepare a quarterly report to submit to CI1 that outlines the HSSE performance of each project. A template for the report shall be provided by CI1. These reports will be sent to CI1 within 10 days of the end of each calendar quarter (i.e. 31 March, 30 June, 30 September and 31 December). The report shall present the following information:

#### Quarterly E&S Performance Report

- Performance against the KPIs listed in Section 8.6.
- Project progress (summary of highlights and achievements, summary of recruitment and filling of key roles, a 3-month look-ahead and associated timeline, and associated HSSE concerns and risks.
- Employment data, as follows:
  - Total number and breakdown of staff employed:
    - Direct Employment (total number).
    - Permanent number of males.
    - Permanent number of females.
- Person hours worked (including for contractors, subcontractors, where applicable)
- Compliance with the HSSE Requirements.
- Proposed corrective actions for any non-compliances.
- Any improvements in performance with a clear environmental benefit.
- Any improvements in performance with a clear social benefit.
- Compliance with the ESAP (if applicable).

### 8.5.3 Annual E&S Report

HSSE performance of each project will be evaluated by the investors on an annual basis. The benchmark for performance will be ongoing compliance against all applicable HSSE Requirements. A template for the report will be provided by CI1. Ampyr Group will be required to prepare and submit an annual HSSE monitoring report with the following detail for each entity/project:

#### Annual E&S Performance Report

- Summary assessment of significant HSSE risks.
- Details of key personnel (including the HSSE Team).
- Status of HSSE performance (including performance against the KPIs listed in Section 8.6), implementation of ESMS and agreed HSSE Action Plan (if applicable).
- Annual CO<sub>2</sub> equivalent emissions.
- Employment data, as follows:
  - Total number and breakdown of staff employed:
    - Direct Employment (total number):
    - Permanent number of males:
    - Permanent number of females:
  - Person hours worked (including for contractors, subcontractors, where applicable)
  - Details of any retrenchment of employees in the reporting period in terms of number of employees affected and retrenchment plan (copy to be provided with report).
- Date of the last site visit for HSSE auditing/assessment purposes.
- Compliance with the HSSE Requirements.
- Proposed corrective actions for any non-compliances.
- Any improvements in performance with a clear environmental benefit.
- Any improvements in performance with a clear social benefit.
- Compliance with the ESAP (if applicable).
- Details of any revisions to the ESMS (provide the copy of the latest ESMS as an attachment).

**8.6. Key Performance Indicators (KPIs)**

Ampyr Group will report on a monthly basis to the Investors using the following key performance indicators (KPIs):

Health & Safety	Environment	Social/labour
<ul style="list-style-type: none"> <li>- Number of fatalities</li> <li>- Number and severity of injuries</li> <li>- Number and nature of incidents involving damage to plant or property</li> <li>- Number and nature of near misses</li> <li>- Number of hazardous situations/safety observations</li> <li>- Number of persons inducted</li> <li>- Number of HSSE training sessions</li> <li>- Lost time injury frequency, incidence, and severity rates</li> <li>- Number of safe person hours worked</li> </ul>	<ul style="list-style-type: none"> <li>- Number and nature of environmental incidents</li> <li>- Energy and water consumption</li> <li>- Volume of solid waste disposal</li> <li>- Liquid effluents discharge</li> <li>- Emissions to air</li> <li>- Improvements in performance with a clear environmental benefit</li> </ul>	<ul style="list-style-type: none"> <li>- Numbers of complaints and grievances received by internal and external stakeholders</li> <li>- Improvements in performance with a clear social benefit</li> <li>- Average working hours and wages paid (disaggregated by gender)</li> <li>- Cases of underage workers</li> <li>- Incidences of disciplinary and discrimination complaints</li> <li>- Employee demographics matching access to training, jobs, and wages</li> </ul>

**8.7. Incident / Accident Reporting**

Should an incident or accident occur at any project site or related to project activities (this shall include transport to and from the project site), the EPC/O&M contractor is required to submit a notification report followed by a

comprehensive investigation report in accordance with the requirements described below. If unrelated to the contractor's activities, Ampyr shall complete the investigation report.

Ampyr will subsequently inform the Investors as soon as possible after becoming aware of the incident or accident.

#### **8.7.1 Notification Report**

The EPC/O&M contractor shall notify Ampyr of any social, labour, health and safety, security or environmental incident or accident to the project. The circumstance with respect to the incident/accident should reasonably be expected to have a material adverse effect or a material adverse impact on the implementation or operation of Ampyr's operations in compliance all applicable HSSE requirements. These could include for example any Environmental and Social Claim, accidents, loss of life, material breach of law, or material effect on the social or natural environment. This notification shall be made as soon as reasonably practicable and in any event within three days of becoming aware of the event. The initial notification shall be made by completing a notification report.

#### **8.7.2 Incident / Accident Detailed Report**

As soon as reasonably practicable thereafter, but ultimately within thirty (30) days of the first notification report, the EPC/O&M Contractor shall complete an accident investigation report and share this with Ampyr. This shall specify in each case the nature of the incident/accident/occurrence and the impact or effect arising or likely to arise, and the measures being taken, or plans to be taken, to address them and prevent any future similar event.

#### **8.7.3 Incident / Accident Progress report**

In severe cases, the EPC/O&M Contractor will keep Ampyr informed on a monthly basis of the on-going implementation of the measures as defined in the Incident / Accident Detailed Report.

