



# **Construction Environmental and Social Management Plan (C-ESMP)**

## **Construction of Arnot Water Treatment Plant**

## Revisions and Version History

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 All previous versions are superseded.

<b>Document Title:</b>	C-ESMP	<b>Date of Issue</b>	06/05/2024
<b>Document Ref:</b>	TBC	<b>Version No:</b>	V.1 (DRAFT)

Revision No.	Date	Reason for Revision

<b>Reviewed by:</b>			
<b>Signature:</b>			
<b>Date:</b>			
<b>Position:</b>			

<b>Authorised by:</b>			
<b>Signature</b>		<b>Date:</b>	
<b>Position:</b>			

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## Definitions and Glossary

CI2	Means Climate Investor Two, a financing facility for water, sanitation and ocean projects in emerging markets offering an integrated funding solution. “CI2 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.
Environmental and Social Action Plan	The environmental and social action plan agreed upon between the Fund and 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	A document detailing the necessary measures and actions to be adopted in order to address the issues raised in the impact and risk assessment process, to comply with applicable national laws and regulations, and to meet the requirements of the applicable IFC PS and other applicable requirements. Typically this plan is produced as part of an Environmental and Social Impact Assessment process.
Environmental and Social Requirements	The requirements applicable to and which must be adhered to by the Project and the Project Company and include: - <ul style="list-style-type: none"> <li>• Project ESIA Report, the ESMP and related plans.</li> <li>• The Project’s ESAP.</li> <li>• South Africa regulatory framework.</li> <li>• Applicable permits and licences.</li> <li>• Contractual agreements and covenants.</li> <li>• IFC Performance Standards (2012).</li> <li>• Good International Industry Practice as set out in the World Bank Group Environmental, Health, and Safety General Guidelines (2007), the sector-specific World Bank Group Environmental, Health, and Safety Guidelines, etc.</li> <li>• ILO Core Labour Standards, the ILO Basic Terms and Conditions of Work, and the UN Guiding Principles on Business and Human Rights.</li> <li>• The requirements described in CFM’s ESMS.</li> </ul>
ESMS	A system describing the governance, institutional, organisational and management arrangements for appropriately addressing the HSSE impacts and risks of a Project.
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 process for receiving, evaluating, and addressing project-related grievances from affected persons at the level of the company, or project 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. An internal grievance mechanism is a process implemented for responding to grievances raised by employees or members or the project workforce. An external mechanism should be established as a separate process for dealing with grievances raised by communities and other external stakeholders.

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.
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.
Project	Project (consisting of assets and activities) in which a CFM-Managed Vehicle is or is going to be invested.
Project Company(ies)	means any company, partnership or other entity in which a CFM managed vehicle holds an Investment (source: AOIC Annexure A).
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
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
CDP	Community Development Programme
C-ESMP	Construction Environmental and Social Management Plan
CFM	Climate Fund Managers
CI2	Climate Investor Two
CLO	Community Liaison Officer
COD	Commercial Operations Date
EPC	Engineering, Procurement and Construction
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan

ESMS	Environmental and Social Management System
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
PC	Project Company
PPM	Planned Preventative Maintenance
PTW	Permit to Work
SEP	Stakeholder Engagement Plan
UNGP	United Nations Guiding Principles on Business and Human Rights

## 1. Introduction and Purpose

### 1.1. Introduction

Nafasi Water Technologies (Pty) Ltd (“Nafasi Water”), a water technology and water utility service company, has been approached by Seriti Resources (Pty) Limited (“Seriti”) to develop, build, finance, operate and maintain a series of water treatment plants for Seriti’s coal mining operations in South Africa. The first of these is a water treatment plant (WTP) for Seriti’s Arnot mining area in Mpumalanga Province, South Africa (the “Nafasi Seriti Arnot Project” or “the Project”). Climate Investor Two (CI2) is considering an equity investment, through a partnership with Nafasi Water, to establish a new development company (“the Nafasi-Seriti DevCo”), to fund the construction of the Arnot project and to develop the pipeline of Nafasi-Seriti projects. Each underlying project will be owned and operated by a Special Purpose Vehicle (SPV) (“Nafasi AssetCo”).

This document describes the Project’s Construction Environmental and Social Management Plan (C-ESMP) and provides an overview of the key arrangements to be adopted for managing the health, safety, social and environmental (HSSE) issues, risks and impacts associated with the construction of the Arnot Project. It is intended to help ensure that the Project complies with all relevant requirements.

### 1.2. Objectives

The key objectives of this C-ESMP are to:

- Provide a single reference point for the key HSSE management and monitoring controls to be adopted during the project design, planning and construction phase.
- Provide input into the required content of more detailed and subject matter-specific management plans.
- Provide the basis for the management controls that will be implemented in the ESMS that is still to be developed for the Project.

### 1.3. Scope

This C-ESMP applies to all activities to be undertaken during the construction phase including the project design, planning and pre-construction activities. It does not include operations, maintenance and decommissioning activities which will be managed through the implementation of the ESMS.

The scope is limited to general HSSE aspects of the construction phase. As required by this C-ESMP, a number of detailed management plans will be developed and implemented for specific HSSE subject matter.

The requirements contained herein apply to the activities of the Nafasi AssetCo itself, and to all contractors, subcontractors, suppliers and service providers (i.e. third parties) conducting activities at the Arnot Project site and/or on behalf of Nafasi AssetCo. Whilst Nafasi AssetCo may not be directly responsible for the activities of subcontractors and third parties, it remains ultimately accountable for the HSSE aspects of works undertaken on its behalf.

### 1.4. Structure of This Document

This C-ESMP is structured as follows:

Section	Title
Section 1	Introduction and Purpose
Section 2	Project Standards
Section 3	Project Description
Section 4	Roles, Responsibilities and Competencies
Section 5	Stakeholder Engagement and Communication
Section 6	Management, Monitoring and Reporting

<b>Error! Reference source not found.</b>	Risk Assessment and Management
<b>Error! Reference source not found.</b>	Minimum Requirements for the Management of Impacts on Local Communities
<b>Error! Reference source not found.</b>	Minimum Requirements for Personnel Selection and Recruitment
Appendix D	Minimum Requirements for Management of Labour and Working Conditions
Appendix E	Minimum Requirements for Selection and Management of Subcontractors and Suppliers
Appendix F	Minimum Requirements for Fitness for Work, Welfare and Accommodation
Appendix G	Minimum Requirements for Project Security
Appendix H	Minimum Requirements for Vehicles and Driver Safety
Appendix I	Minimum Requirements for Noise and Vibration Management
Appendix J	Minimum Requirements for Management of Hazardous Materials
Appendix K	Minimum Requirements for Environmental Management

### 1.5. Review

This C-ESMP and any associated documentation will be reviewed 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.
- Changes to laws and regulations.
- Changes in project policies and reporting procedures.
- Changes in project activities.



## **2. Project Standards**

Nafasi AssetCo and its contractors are required to comply with a range of legal and regulatory requirements relating to health, safety, social, security and environmental management. These requirements are enforced by law and are established through legislation, permits, licences, contracts and legislated standards. The Project is also required to meet a number of international standards and good international industry practices.

This C-ESMP is intended to help ensure that such standards are met. Where standards are inconsistent or contradictory, the Project shall apply the most stringent standard, unless otherwise justified to its stakeholders.

All legal, statutory and other requirements relevant to the Project shall be identified and documented in a legal register which forms part of the ESMS.

### **2.1. Company Policies**

The Project will adopt an HSSE Policy which will apply to all activities carried out by or on behalf of Nafasi AssetCo including those delivered by the Project's Contractors.

### **2.2. National Legislation**

The Project is subject to a range of legal and statutory 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.

Various permits and licenses applicable to the Project have been issued by the relevant South African regulatory authorities. Principles Contactors, Contractors, and Suppliers must ensure that all relevant environmental and social requirements of these permits are addressed and that any requirements arising from any revision/amendment of these permits is also applied.

### **2.3. International Standards**

The Project is also required to comply with international standards relating to E&S management. The international standards to be applied to the Project are categorised as follows:

- Relevant international treaties and conventions ratified by South Africa.
- 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.
- IFC Performance Standards.
- World Bank Group EHS Guidelines.
- IFC Workers' Accommodation: Processes and Standards.
- Voluntary principles, standards and code of practice.

### **2.4. Other Requirements**

- Environmental and Social Impact Assessment (ESIA).
- Contractual obligations agreed with Project investors.
- Agreements with government authorities.
- Agreements with other external stakeholders e.g. community groups and non-governmental organizations.
- Any other additional Project-specific standards adopted for the Project.

### 3. Project Description

#### 3.1. Overview

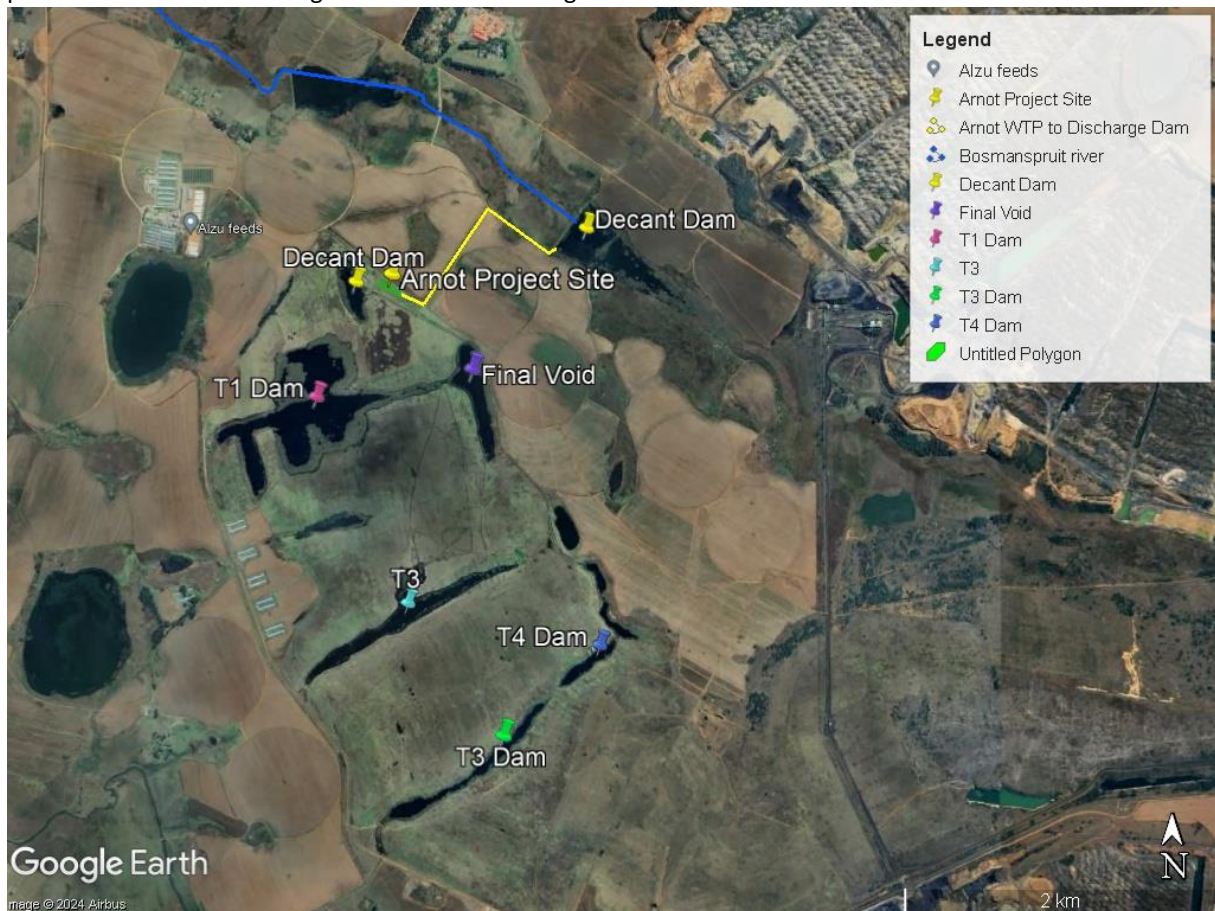
Seriti’s Arnot mining operations ceased in 1992 and the area is currently undergoing mine closure rehabilitation as part of the fulfilment of the mine closure obligations. Mine-impacted water from Seriti’s mining area is discharged into a dam, from where it is pumped to evaporators used to dissipate the water for irrigation purposes. The high energy and maintenance requirements make this system costly and unviable in the long term.

In order to address the challenges associated with the current system, the Project has been commissioned to deliver an alternative solution. Once commissioned, the Project will have a water treatment capacity of 6 million litres/day. Works that will occur during the construction phase include civil and earth works for the construction of the WTP, as well as installation of the associated pipelines and pumping infrastructure. The proposed Arnot project site is located approximately 23 km north southeast of the town of Middelburg, in the Steve Tshwete Local Municipality in the Mpumalanga Province of South Africa. The proposed activity will take place at the Seriti mining area as indicated in Figure 1.

Water will be pumped from the various dams (T1, T2, T3, T4, and Final Void) to the WTP, where it will be treated utilising a reverse osmosis process. Water will then be sent to the Steve Tshwete Local Municipality (around 2MI/day) and the rest will be discharged into a decant dam (Figure 1), where the water will be allowed to flow into the nearby Bosmanspruit river, which flows into the Klein Olifantsrivier.

#### 3.2. Project Location

The proposed Project site is located approximately 23 km north southeast of the town of Middelburg, in the Steve Tshwete Local Municipality in the Mpumalanga Province of South Africa. The proposed activity will take place within the Seriti mining area as indicated in Figure 1 below.

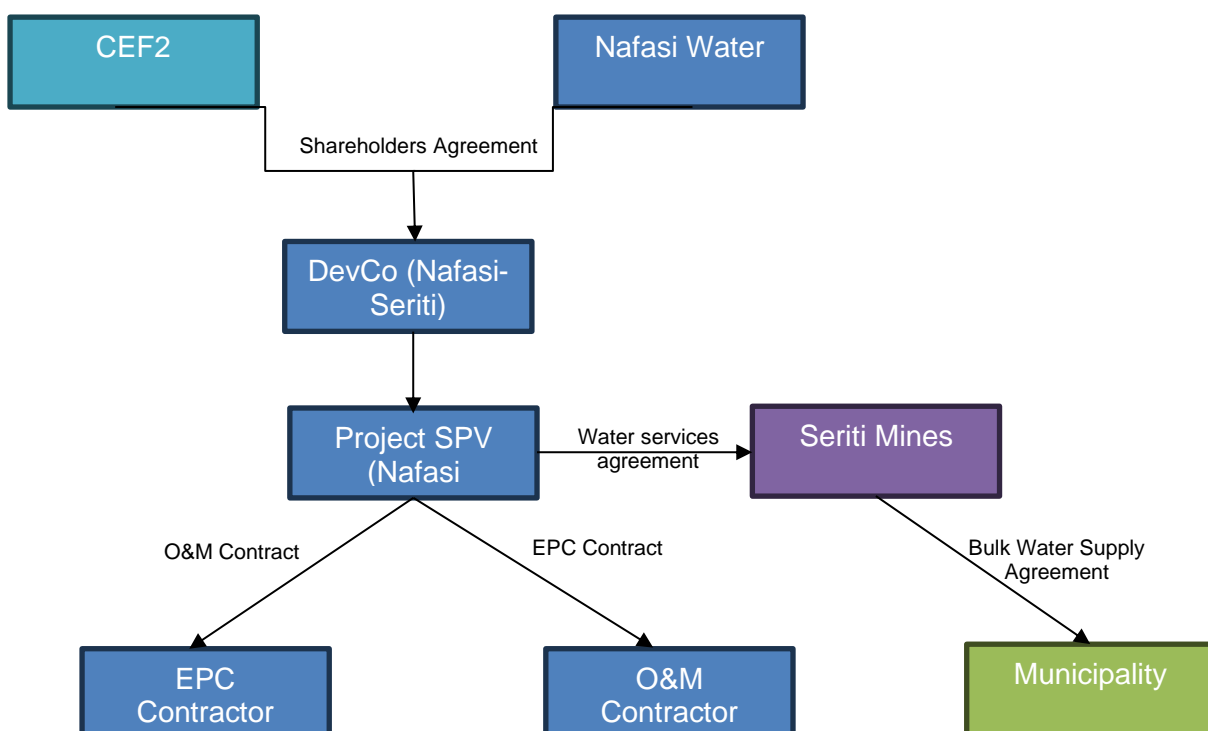


**Figure 1: The location of the WTP within the boundaries of the old Arnot colliery.**

### 3.3. Project Sponsors

Nafasi Water, formerly known as Aveng Water, is a 100% BBEEE owned leading water technology and water utility service company. Founded in 2003, Nafasi Water provides engineering, design, construction supervision, project management, and operations and maintenance (O&M) services for water and wastewater treatment and industrial process plants, including sea water desalination and treatment plants for mine-impacted water.

CI2 Construction Equity Fund (“CEF2”) has been invited to participate in the Project as a shareholder and E&S advisor to the Project. Funding for the development of the Project is estimated to be approximately \$1 mln, including CFM’s due diligence costs, which will be fully funded by Nafasi. CEF2 will not take any development risk and will only invest when the Project is fully developed. See Figure 2 below for a layout of the proposed structure for the project.



**Figure 2: Proposed structure of the Arnot Project**

The CI2 fund is focused on a range of climate-relevant water, sanitation and ocean sub-sectors in emerging markets, including: (i) climate resilient bulk water supply, treatment and distribution for municipalities and/or industries; (ii) climate resilient waste and wastewater collection, management and treatment for municipalities and/or industries; (iii) climate resilient ocean infrastructure projects (“blue economy”) and the sustainable management, protection and/or restoration of wetland, riverine, coastal and marine ecosystems.

## **4. Roles, Responsibilities and Competencies**

Compliance with the requirements detailed in this C-ESMP is the responsibility of the Project Company and its contractors. Responsibilities for implementation of the specific Project requirements will be detailed in the individual management plans.

### **4.1. Project HSSE Management**

Nafasi AssetCo is accountable for the HSSE performance of the Project and for the implementation of this C-ESMP. The Nafasi SHEQ Manager is the designated management representative who has overall responsibility for the implementation of the C-ESMP and is appointed in this role by the Project's Technical and ESG Management Committee.

The Nafasi AssetCo HSSE Manager co-ordinates with the EPC Contractor to ensure that the requirements of this C-ESMP are complied with. The Project HSSE Manager reports to the Nafasi SHEQ Manager.

### **4.2. Company Roles and Responsibilities**

Nafasi AssetCo responsibilities include supervising implementation of all proposed mitigation measures and monitoring which are undertaken by the EPC Contractor. If Nafasi AssetCo directly engages other contractors (other than the EPC Contractor), Nafasi AssetCo shall ensure that the mitigation measures are implemented by these parties. The mitigation measures should be followed by all parties involved in the construction process.

### **4.3. Nafasi AssetCo Employees**

All employees working for, or on behalf of the Project 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 requirements of this C-ESMP and understand their role in implementing it.

### **4.4. EPC Contractor**

The EPC Contractor is responsible for making sure there is adequate and competent staffing to effectively manage and implement all environmental and social mitigation and monitoring measures as defined in this C-ESMP and associated management plans. This shall be achieved through a competent HSSE team to be appointed by the EPC Contractor. Where the EPC Contractor has engaged contractors to carry out some of the scope of work, the EPC Contractor is responsible for ensuring that the contractors comply with the E&S Requirements.

Requirements for the EPC Contractor and the subcontractors shall be defined in the relevant articles of their contracts and associated mandatory annexes. All contractors shall develop an HSSE Plan that shall be submitted to Nafasi AssetCo for approval, and each contractor shall be responsible for ensuring that its HSSE Plan is implemented. In addition, each contractor is required to ensure that it meets all subject-specific requirements outlined in each management plan that is relevant to its scope of work. Contractors are also responsible for ensuring that any relevant subcontracted work meet these requirements.

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

Effective training is a key requirement for successful construction of the Project and contractor(s) will be required to identify staff training needs and provide appropriate training to all workers.

The EPC contractor shall develop a training needs assessment and training plan identifying all competency, training and awareness requirements that are considered necessary to comply with the Project's requirements. This training plan and the proposed training materials shall be compliant with the requirements detailed in the Nafasi AssetCo ESMS and shall be shared with Nafasi AssetCo if requested. Training records shall be kept by both Nafasi AssetCo and contractor(s).

## **5. Stakeholder Engagement and Communication**

### **5.1. Internal Communication**

The requirements of this C-ESMP shall be communicated to all Nafasi AssetCo employees as well as to the EPC Contractor. All workers at the Arnot Project site are required to adhere to the requirements this C-ESMP. The EPC Contractor is responsible for communicating these requirements to its subcontractors. Third parties shall be responsible for communicating the relevant requirements to their own workforce.

### **5.2. External Communication**

Arrangements for external communication will be described in the Project Stakeholder Engagement Plan (SEP). The EPC Contractor shall support Nafasi AssetCo in the implementation of this plan. The SEP will be designed in accordance with IFC PS1 and will provides for a programme of engagement activities to take place with external stakeholders during the construction phase. Requirements for monitoring and reporting will be included.

### **5.3. Grievance Mechanism (GMs)**

#### **5.3.1 Internal GRM**

Nafasi AssetCo's HR Management Plan will include a worker Grievance Mechanism (GM), which is to be followed by Nafasi AssetCo for managing, handling responding and escalating any grievances received from workers. The EPC contractor may establish its own internal GM or otherwise shall adopt that of Nafasi AssetCo, all sub-contractors shall adopt the GM used by the EPC Contractor. All contractors appointed directly by Nafasi AssetCo shall adopt the Nafasi AssetCo GM.

#### **5.3.2 External GM**

The Project SEP will include a GM, which is to be followed by Nafasi AssetCo to (i) receive and register external grievances from stakeholders, including the affected community; (ii) screen and assess the issues raised and determine how to address them; (iii) provide, track, and document responses; and (iv) provide access to remedy. The EPC Contractor and all other (sub)contractors shall also adopt the external GM.

## 6. Management, Monitoring and Reporting

### 6.1. HSE Management and Performance Monitoring

Nafasi AssetCo requires all projects to be designed, planned and constructed in accordance with all relevant legal requirements and with international standards for HSE management. Detailed and specific HSE management plans will be established for each project. These plans shall be used as guidelines for the EPC Contractor to write its own plans and procedures which will explain in detail how the management, mitigation and monitoring actions will be implemented.

The plans provide detailed requirements on elements such as roles and responsibilities, equipment requirements, budget estimates, detailed monitoring parameters, monitoring methodology, monitoring dates/times (where applicable), monitoring frequency and monitoring locations, and reporting requirements. The list of management plans applicable to the Project are listed in **Table 6-1** below.

**Table 6-1 Detailed Management Plans**

Plan Type	Plan Name
Environmental	Pollution Prevention Management Water & Wastewater Management Waste Management Hazardous Materials Management Roads and Traffic Management Emergency Preparedness and Response Biodiversity Management
Health & Safety	Workers Accommodation / Camp Management Occupational Health and Safety Security Management
Social and Labour	Stakeholder Engagement Gender Action Plan Human Resources Policy and Management Community Development Programme Cultural Heritage Management and Monitoring ( <i>includes Chance Finds Procedure</i> )

### 6.2. General HSE Management and Monitoring Measures

In support of the above listed management plans, the general HSE management and monitoring measures for all HSE aspects of the Projects are detailed in **Table 6-2**. These set the minimum requirements to be adopted for the key HSE aspects to be considered in the planning, design, pre-construction, and construction of the Project.

The EPC Contractor will be responsible for the implementation of most of these measures. Where the EPC Contractor engages subcontractors to undertake all or part of the work scope, the EPC Contractor shall ensure that the mitigation measures are implemented by these parties.

If Nafasi AssetCo directly engages other contractors (other than the EPC Contractor), it shall ensure that these management and monitoring measures are implemented appropriately. All measures shall be followed by all parties involved in the construction process.

Once the Project approaches the operation phase, the Nafasi AssetCo will take sole responsibility for the ongoing management and monitoring of HSE compliance and performance. This C-ESMP does not include measures relating to the operating phase; these will be established separately as part of the ESMS.

### **6.3. Monitoring Activities**

Monitoring is a means of verifying overall effectiveness of the management and mitigation measures contained within the management plans listed above. Key objectives of the monitoring process include:

- Verification of the effectiveness of management and mitigation measures.
- Compliance with Applicable Standards (i.e. South Africa regulatory standards, IFC Performance Standards and IFC EHS Guidelines).
- Development of adaptive management measures to account for changes in HSSE status, potential changes to the Project schedule and/or non-planned events.
- Monitoring the status of, and impacts on workers, the general public, and the environment.
- Provision of early warning that a control measure is ineffective or failing to achieve the desired performance so that changes can be implemented to address the issue.
- Provision of a basis for continual review and improvements.

### **6.4. Compliance Monitoring**

Nafasi AssetCo will audit contractor performance in line with project audit procedures as outlined in the ESMS. In addition to contractor audits and the audits led by Nafasi AssetCo the Project will also be subjected to regulatory audits and lender compliance monitoring visits and these may include an assessment of compliance with this C-ESMP and associated management plans. All contractors shall document their approach to monitoring compliance with the requirements of this C-ESMP and associated management plans.

### **6.5. Key Performance Indicators**

Key Performance Indicators (KPI) are quantitative or qualitative measurements used to gauge performance over time. They can be used to assess the effectiveness of control measures and demonstrate performance improvements during steady state operations. Relevant KPIs are presented in each management plan. Where appropriate, Nafasi AssetCo shall set minimum environmental and social standards and associated threshold values (e.g. using legal standards and/or international standards) for measuring HSSE performance.

### **6.6. Non-Conformances and Corrective Action**

Non-conformances and progress on associated corrective actions will be identified, recorded and managed in line with Nafasi AssetCo's ESMS procedures and action tracking system.

### **6.7. Reporting**

Nafasi AssetCo and the EPC Contractor shall submit performance monitoring reports to CI2 in accordance with the requirements of the ESAP and Nafasi AssetCo's ESMS.

**Table 6-2 Construction HSSE Management and Monitoring Requirements**

Activity	Impact	Ref.	I.D.	Management Measure	Responsibility	Means of Verification	Project Phase
<b>1.0 Risk Management System and Processes</b>							
1.1 – Management of HSSE impacts and risks	Risk of non-compliances with legal and other requirements due to inadequate or lacking governance	IFC PS1	1.1.1	Develop and communicate to all staff, contractors and third parties a policy that details Nafasi AssetCo’s commitments and arrangements for managing HSSE impacts and risks.	Nafasi AssetCo	Management system manual	Project design and planning
		IFC PS1	1.1.2	Develop and implement an integrated management system for management of HSSE impacts and risks in accordance with the requirements detailed in <b>Appendix A</b> .	Nafasi AssetCo	Audit and inspection reports	Project design and planning
		IFC PS1	1.1.3	As part of the HSSE Management System, develop a documented procedure for HSSE risk identification and assessment which includes among other aspects, provisions for human rights, gender equality and women’s empowerment, supply chain, indigenous peoples, biodiversity, and cultural heritage.	Nafasi AssetCo	Risk assessment and management procedure	Project design and planning
		IFC PS1	1.1.4	Develop and implement a formal HSSE training programme that provides specific training requirements for Nafasi AssetCo employees and contractors in order to comply with local legislation and the requirements of this C-ESMP.	Nafasi AssetCo	Training programme, training records	Project planning, construction
		IFC PS1	1.1.5	Monitor compliance against the management system through periodic audits and inspections.	Nafasi AssetCo	Audit and inspection reports	Construction
<b>2.0 Local Communities and Stakeholders</b>							
2.1 - Stakeholder Engagement	Project activities may have adverse impacts on external stakeholders	IFC PS1	2.1.1	Develop a stakeholder engagement framework to be used as a guide in the development of Project-specific SEPs.	Nafasi AssetCo	Framework document	Project design and planning
		IFC PS1	2.1.2	Develop and implement a Project-specific SEP for the Nafasi Seriti Arnot project and monitor compliance against it.	Nafasi AssetCo	SEP, Monitoring records	Project design and planning, construction
		IFC PS1	2.1.3	Provide the project community with an understanding of the project activities and the possible impacts and risks as part of the engagement process.	Nafasi AssetCo	Communication records	Construction
		IFC PS1	2.1.4	Implement a grievance mechanism and communicate this to affected communities.	Nafasi AssetCo	Documented GM, grievance log	Construction
		IFC PS1	2.1.5	Manage impacts on local communities in accordance with the minimum requirements detailed in <b>Appendix B</b> with specific attention	EPC Contractor	Monitoring records, grievance log	Construction



Activity	Impact	Ref.	I.D.	Management Measure	Responsibility	Means of Verification	Project Phase
				paid to community assets including local residential properties, crops, animals, etc.			
<b>3.0 Labour and Working Conditions</b>							
3.1 - Human Resources Management	Potential for discrimination and unfair and unequal treatment in selection, hiring and management of workers	IFC PS2	3.1.1	Implement arrangements for the selection and recruitment of workers in accordance with legal requirements and the minimum requirements detailed in <b>Appendix C</b> .	Nafasi AssetCo	Monitoring records, grievance log	Construction
		IFC PS2	3.1.2	Implement measures as necessary to promote gender equality and women's empowerment in accordance with the Nafasi AssetCo Gender Action Plan, which is to be developed.	Nafasi AssetCo	Monitoring records, grievance log	Construction
		IFC PS2	3.1.3	Adopt the minimum safeguards for labour and working conditions of all Nafasi AssetCo's directly employed workers in accordance with labour laws and the requirements in <b>Appendix D</b> regarding aspects including non-discrimination; worker consultation; freedom of association; collective bargaining; employment contracts, terms and conditions; workers' compensation, grievance mechanism, etc.	Nafasi AssetCo	Monitoring records, grievance log	Construction
3.2 - Employment of local/migrant workers	Potentially vulnerable workers in the supply chain may be exposed to weakly enforced labour and working standards	IFC PS2	3.2.1	Conduct robust due diligence and ongoing monitoring of Nafasi AssetCo's primary suppliers of labour, goods and services to check for (and eliminate) risks associated with human rights, child labour and forced labour prior to entering into contracts. This includes third party suppliers of agency staff directly employed by Nafasi AssetCo, where relevant.	Nafasi AssetCo	Due diligence records, monitoring records	Pre-construction and construction
3.3 – EPC Contractor Management	Risk of inadequate standards of labour and working conditions in the contractor supply chain	IFC PS2	3.3.1	Implement a Contractor Management Plan that details Nafasi AssetCo's requirements regarding labour and working conditions to be met by all contractors working for and on behalf of Nafasi AssetCo.	Nafasi AssetCo	Written contracts	Construction
		IFC PS2	3.3.2	During the bidding stage for the EPC Contractor, clearly communicate the requirements regarding labour and working conditions and include these in contract documentation.	Nafasi AssetCo	Documented assessments	Pre-construction
		IFC PS2	3.3.3	Include a commitment in the EPC contract requiring the use of local labour as well as other goods and services where possible.	Nafasi AssetCo	Documented GM, communication records	Construction
3.4 - Employment of local/migrant	Risks associated with labour and working conditions in the	IFC PS2	3.4.1	Include all relevant requirements of Nafasi AssetCo's Contractor Management Plan in contracts for all local and migrant workers hired to work on Nafasi AssetCo's projects.	EPC Contractor	EPC contract document	Design and planning

Activity	Impact	Ref.	I.D.	Management Measure	Responsibility	Means of Verification	Project Phase
workers by the EPC Contractor	contracting supply chain	IFC PS2	3.4.2	Adopt the minimum safeguards for labour and working conditions of the contractor and subcontractor workforce in accordance with labour laws and the requirements in <b>Appendix D</b> regarding aspects including non-discrimination; worker consultation; freedom of association; collective bargaining; employment contracts, terms and conditions; workers' compensation, grievance mechanism, etc.	EPC Contractor	Monitoring records, grievance log	Construction
		IFC PS2	3.4.3	Monitor sub-contractors and suppliers of goods and services to detect any risks of non-compliance with labour laws and the requirements detailed in <b>Appendix D</b> .	EPC Contractor	Monitoring records	Construction
		IFC PS2	3.4.4	Implement arrangements for the screening, selection and management of subcontractors in accordance with the minimum requirements detailed in <b>Appendix E</b> .	EPC Contractor	Monitoring records, grievance log	Construction
3.5 - Local Content Opportunities	Potential for positive benefits to local businesses and communities	IFC PS2	3.5.1	Communicate information about Project-related employment and business opportunities to local communities and prioritise local people wherever feasible.	EPC Contractor	Communication records	Construction
		IFC PS2	3.5.2	Develop and implement a local content plan for sourcing local goods and services.	EPC Contractor	Documented plan	Construction
		IFC PS2	3.5.3	Provide capacity building activities including skills improvement training for local labour force to enable them to access future job opportunities.	EPC Contractor	Training records	Construction
		IFC PS2	3.5.4	Work closely with local government agencies for the recruitment of local workers.	EPC Contractor	Recruitment plan	Construction
<b>4.0 Occupational Health and Safety</b>							
4.1 – Site-based construction activities	Exposure to health and safety risks during activities relating to vehicles and driving, working at height, manual handling, noise, vibration, electrical hazards	IFC PS2	4.1.1	Implement an Occupational Health and Safety Management Plan in accordance with CFM requirements to prevent accidents, injury, illness and disease and monitor implementation by contractors.	EPC Contractor	Documented plan	Construction
		IFC PS2	4.1.2	Conduct all work in accordance with documented method statements which have been approved in advance by Nafasi AssetCo.	EPC Contractor	Documented method statements	Construction
		IFC PS2	4.1.3	Implement a permit to work (PTW) system in accordance with CFM requirements for all high-risk activities including but not limited to: (i) entry into confined space; (ii) working at height; (iii) lifting operations; (iv) hot work; (v) work on energized systems, and/or (vi) ground disturbance in locations where buried hazards may exist.	EPC Contractor	Documented PTW system, completed permits	Construction

Activity	Impact	Ref.	I.D.	Management Measure	Responsibility	Means of Verification	Project Phase
		IFC PS2	4.1.4	Conduct regular refresher training, toolbox talks, and other communication campaigns to maintain awareness of health and safety risks and controls.	EPC Contractor	Training records	Construction
		IFC PS2	4.1.5	Conduct ongoing monitoring of HSSE performance through daily site inspections.	EPC Contractor	Inspection records	Construction
		IFC PS2	4.1.6	Ensure that all construction workers and visitors to project sites wear long legged pants which extend below the top of the safety boots and provide suitable PPE for all personnel and visitors.	EPC Contractor	Inspection records, inventory of PPE	Construction
		IFC PS2	4.1.7	Provide the additional items of PPE as determined on the basis of a risk assessment and to comply with legal requirements for job-specific construction activities.	EPC Contractor	Inspection records, inventory of PPE	Construction
		IFC PS2	4.1.8	Implement occupational health risk controls as determined on the basis of a risk assessment and to comply with legal requirements.	EPC Contractor	Monitoring records	Construction
<b>5.0 Workplace Welfare and Fitness for Work</b>							
5.1 – Provision of healthy work environment	Potential for ill health due to poor welfare facilities on site	IFC PS2	5.1.1	Provide welfare facilities for all workers that comply with legal standards and the requirements detailed in <b>Appendix F</b> .	EPC Contractor	Inspection records	Construction
		IFC PS2	5.1.2	Prohibit smoking, including the use of e-cigarettes and vaping, in living and working accommodation. Smoking shall be permitted only in designated areas. Adequate smoke sensors, fire-fighting provision and fire escapes shall be provided.	EPC Contractor	Inspection records	Construction
		IFC PS2	5.1.3	Locate, design and manage all worker accommodation in accordance with the minimum requirements detailed in <b>Appendix F</b> and document these arrangements in a Worker Accommodation Management Plan.	EPC Contractor	Inspection records	Construction
		IFC PS2	5.1.4	Implement a fitness for work procedure aligned with the requirements detailed in <b>Appendix F</b> to manage risks relating to: drugs and alcohol; disease vectors; fatigue; remote site working, etc.	EPC Contractor	Documented programme	Construction
		IFC PS2, CRVA Adaptation Plan	5.1.5	Implement the following controls to protect construction workers against the risk of exposure to thermal stress: <ul style="list-style-type: none"> <li>Document a risk assessment that considers thermal stress and indicates the required controls.</li> <li>Provide shaded areas where workers can rest and eat meals out of direct sunlight.</li> </ul>	EPC Contractor	Monitoring records	Construction

Activity	Impact	Ref.	I.D.	Management Measure	Responsibility	Means of Verification	Project Phase
				<ul style="list-style-type: none"> <li>Establish maximum/minimum temperature thresholds in line with expert advice and/or a legally specified limit for safe working outside and indoors.</li> <li>Design the work schedule to limit working outdoors in extreme heat/cold.</li> <li>Provide PPE for working in high temperatures (e.g. lightweight, natural fibre clothing; sunhat).</li> </ul>			
<b>6.0 Security Management</b>							
Presence of private or state security	Human rights violations against local communities and/or workers	IFC PS4	6.1.1	Ensure security personnel are recruited, equipped, remunerated, managed and trained according to a written security management plan. Refer to <b>Appendix G</b> .	Nafasi AssetCo	Documented plan, monitoring records	Design and planning
		IFC PS2	6.1.2	Ensure security personnel are recruited, equipped, remunerated, managed and trained according to the security management plan and the requirements described in <b>Appendices C and D</b> .	EPC Contractor	Inspection records	Construction
<b>7.0 Driving and Vehicle Safety</b>							
7.1 – Activities involving driving of light goods and passenger vehicles	Risk of road traffic accident causing harm to driver, passengers and other road users, property damage	IFC PS1, 4	7.1.1	Develop and implement a traffic management plan for all construction vehicles which covers the requirements detailed in <b>Appendix H</b> .	Nafasi AssetCo	Documented plan	Design and planning
		IFC PS1, 4	7.1.2	Ensure that all drivers working for or on behalf of the Principal Contractor undergo safe driver training.	EPC Contractor	Training records	Construction
		IFC PS1, 4	7.1.3	Allow any vehicle that is brought onto Site (including privately owned vehicles) to be searched at any time while on Site, or when entering or leaving the Site.	EPC Contractor	Inspection records	Construction
		IFC PS1, 4	7.1.4	Choke blocks must be used for all vehicles parked on site and drip trays must be placed under the vehicles in case of oil leaks.	EPC Contractor	Inspection records	Construction
		IFC PS1, 4	7.1.5	Manage all vehicle movement on public roads in accordance with the requirements detailed in <b>Appendix B</b> in order to reduce risks to other road users including members of local communities.	EPC Contractor	Inspection reports, grievance log	Construction
<b>8.0 Noise and Vibration</b>							
8.1 - Noise and Vibration associated with construction work	Exposure of workers to noise and vibration hazards	IFC PS2	8.1.1	Implement a noise and vibration management plan in order to comply with legal standards and the requirements detailed in <b>Appendix I</b> and monitor compliance against it.	EPC Contractor	Documented plan, monitoring records	Construction
		IFC PS2	8.1.2	Operate a planned preventative maintenance regime to keep equipment in good working order.	EPC Contractor	PPM records	Construction

Activity	Impact	Ref.	I.D.	Management Measure	Responsibility	Means of Verification	Project Phase
		IFC PS2	8.1.3	As far as is reasonably practicable, reduce noise levels emitted by equipment, and do not exceed noise levels of 85 dB(A) at 1 metre from the source, in line with international standards.	EPC Contractor	Noise monitoring records	Construction
<b>9.0 Hazardous Materials</b>							
9.1 – Transport, storage, handling and use of hazardous materials	Impacts to worker and public H&S and the environment	IFC PS2, 3	9.1.1	Manage hazardous materials on site in accordance with legal requirements and the minimum requirements detailed in <b>Appendix J</b> .	EPC Contractor	Management plan/procedure, inspection reports	Construction
		IFC PS2, 3	9.1.2	Check that hazardous material storage containers are suitable for the contents and are labelled with the contents and any hazard symbols.	EPC Contractor	Inspection reports	Construction
		IFC PS2, 3	9.1.3	Procure and make available the necessary equipment for dealing with a spill or leak (including spill kits).	EPC Contractor	Inspection reports	Construction
		IFC PS2, 3	9.1.4	Provide project workers with training and information relating to the content of the risk assessments and the emergency response measures.	EPC Contractor	Training records	Construction
		IFC PS2, 3	9.1.5	Conduct weekly site inspections, including on all storage locations, equipment, machinery, and fuel tanks (e.g. to check for leaks of fuel oil).	EPC Contractor	Inspection reports	Construction
<b>10.0 Environmental Management</b>							
10.1 – Use of resources and emissions to air, land and water	Inefficient use of resources; adverse impact on environment	IFC PS3	10.1.1	Manage waste in accordance with all legal standards and the minimum requirements detailed in <b>Appendix K</b> .	EPC Contractor	Inspection reports, copies of licences, waste log, grievance log	Construction
		IFC PS3	10.2.1	Manage water and wastewater in accordance with all legal standards and the minimum requirements detailed in <b>Appendix K</b> .	EPC Contractor	Inspection reports, grievance log	Construction
	Unsustainable and/or inefficient use of water resources; adverse impact on environment	IFC PS3	10.2.2	Incorporate water conservation measures into the project design e.g., rainwater harvesting at the project site. Identify methods of water reuse and recycling on site.	EPC Contractor	Engineering design	Project design and construction
		IFC PS3	10.2.3	Implement a water management plan and monitor compliance against it.	EPC Contractor	Documented plan, monitoring records	Construction
		IFC PS3	10.2.4	Arrange for all sanitary wastewater to be disposed of by a licensed sanitary waste contractor.	EPC Contractor	Waste log	Construction

Activity	Impact	Ref.	I.D.	Management Measure	Responsibility	Means of Verification	Project Phase
	Adverse impact on local air quality; harm to worker and community health	IFC PS3	10.3.1	Implement an air quality management plan aligned with the minimum requirements detailed in <b>Appendix K</b> and monitor compliance against it.	EPC Contractor	Documented plan, monitoring records	Construction
		IFC PS3	10.3.2	Define potential emergency scenarios wherein there could be an unintended release into the atmosphere that may result in an exceedance of permitted emission standards. Include this in the Project's emergency preparedness and response plan (see 11.1.1).	EPC Contractor	Emergency response plan	Construction
<b>11.0 Unplanned Events</b>							
11.1 – Unplanned events during construction	Unplanned events that have the potential to cause harm or injury to workers and/or the public and environmental damage	IFC PS1, 4	11.1.1	Develop an emergency response plan all potential emergency situations (e.g. fire, environmental spill, H&S incident/accident relating to workers and/or the community).	EPC Contractor	Documented plan	Construction
		IFC PS1	11.1.2	Procure fire extinguishers and make sure these are readily accessible in the work area including near to where hazardous materials are stored/used.	EPC Contractor	Equipment inventory	Construction
		IFC PS1	11.1.3	Provide spill kits in areas where hazardous materials and hazardous wastes are stored for use in the event of an accidental spill or release.	EPC Contractor	Accident/ incident log	Pre-construction
		IFC PS1	11.1.4	Establish and train an emergency response team for the key hazards such as: fire, first aid, environmental spill.	EPC Contractor	Training records	Construction
		IFC PS1	11.1.5	Conduct emergency response drills at least once per month.	EPC Contractor	Log of drills	Construction
		IFC PS1	11.1.6	Keep up to date information available in local language and using pictures to convey the key actions to take in an emergency, along with the emergency points of contact.	EPC Contractor	Inspection records	Construction
<b>12.0 Biodiversity</b>							
12.1 – General construction activities	Adverse impact to sensitive species of flora and/or fauna, non-compliance with Project requirements, reputation risk	IFC PS6	12.1.1	Implement the Project's Biodiversity Management Plan once available and monitor to ensure ongoing compliance.	EPC Contractor	Monitoring records	Construction
<b>13.0 Cultural Heritage</b>							
13.1 – General construction activities	Adverse impact to tangible and/or non-tangible cultural	IFC PS8	13.1.1	Implement a chance finds procedure once available and monitor ongoing compliance against it.	EPC Contractor	Documented procedure, monitoring records	Construction

Activity	Impact	Ref.	I.D.	Management Measure	Responsibility	Means of Verification	Project Phase
	heritage, non-compliance with Project requirements, reputation risk						
<b>14.0 Community Development</b>							
14.1 – Community development programme	Failure to implement and comply with CDP results in loss of community support, reputation risk	SHA requirement	14.1.1	Implement the Project’s CDP once available and monitor ongoing compliance against it.	EPC Contractor	Monitoring records	Construction

## Appendix A

### Risk Assessment and Management

A1	Nafasi AssetCo, the Project and the Contractor shall implement an HSSE Risk Assessment Procedure for the assessment and management of environmental and social risks associated with the scope of work to ensure HSSE risks are proactively and systematically identified, assessed, evaluated and controlled.
A2	Risks shall be assessed, and the evaluation recorded in a HSSE risk register.
A3	The identification of control measures shall be based on the hierarchy of controls. This will be followed with the focus being to seek opportunities to eliminate risks wherever possible. The hierarchy will be adhered to by all parties when devising appropriate controls and mitigation strategies and measures.
A4	Each work activity must have a risk assessment supported by documentation in the form of a procedure, job hazard assessment (“JHA”) or equivalent. Each individual company (i.e. EPC Contractor, Contractor or Subcontractor) may use its own system, but this must fulfil Nafasi AssetCo’s minimum requirements as specified herein.
A5	The Contractor’s Project specific HSSE management manual shall identify the Contractor and Subcontractor procedures that will be implemented at site that incorporate the minimum requirements specified in Annex 6 (Health and Safety Rules), including but not limited to the following High Risk activities. a) Working at Heights b) Safe Mechanical Lifting c) Hot Work d) Driving e) Working On or Over Water f) Work Authorisation g) Energy Isolation h) Confined Spaces
A6	The procedures, JHAs and risk register must be maintained, reviewed and updated by the Contractor. The Contractor is responsible for ensuring that the risk assessments have been performed on all work activities.
A7	The Contractor shall detail within its scope specific HSSE management manual the procedure that will be used to assess and put in place the necessary controls to address HSSE risks associated with major changes including but not limited to: (i) changes to the scope of work such that new activities are introduced; (ii) changes relating to site layout (e.g. such that emergency evacuation routes require modification); (iii) introduction of new types of hazardous substance (such that new risks are introduced); (iv) commissioning/energization of plant and equipment; (v) changes in key personnel (managerial staff).
A8	For each site work activity, the Contractor, Contractors and Subcontractors must prepare a written Method Statement. All Method Statements must be submitted to Nafasi AssetCo’s Project Director for review four weeks prior to start of the relevant work activity for Nafasi AssetCo’s acceptance.
A9	Method Statements must be supported where required, by attaching as relevant the following documentation: risk assessments, procedures, lifting plans, transport route survey, emergency response plan, confined space entry arrangements, hot work permitting requirements, work at height assessments, and any permits as required for the specified work activity.
A10	Nafasi AssetCo will not permit the Contractor, Contractors or Subcontractors to perform any work, unless the contractor’s Method Statement has been reviewed and accepted.



## Appendix B

### Minimum Requirements for the Management of Impacts on Local Communities

<b>B1 Stakeholder Engagement</b>	
B1.1	The Contractor shall adhere to Nafasi AssetCo's stakeholder engagement plan and any additional requirements in relation to any engagement with local communities and other third parties.
B1.2	The Contractor shall report any grievances received directly by a member of the community in accordance with the Nafasi AssetCo's external grievance mechanism.
B1.3	The Contractor shall ensure that all workers receive training in cultural awareness and appropriate conduct.
B1.4	The Community shall be informed of any planned activities that may raise concern or alarm (but no risk) and shall ensure that necessary warnings are given in advance, for example through audible alarms, radio alerts, vehicle mounted speakers, etc. Such activities may involve a visible emission to atmosphere; odour; use of explosives, etc.
B1.5	The Contractor shall ensure that the local community is aware of any potential risks associated with an emergency arising at the Project Site through ongoing engagement and sensitisation.

<b>B2 Community Health and Safety</b>	
B2.1	The design and management of Project infrastructure such as access roads, bridge crossings, borrow pits, etc shall consider and seek to avoid the potential health and safety risks to members of the community.
B2.2	Barricades and safety warning signs shall be erected around the perimeter of the site to deter the community from entering.
B2.3	No Project vehicle shall be driven through a residential district/village/town at speeds in excess of 15 km/hr.
B2.4	The Contractor shall have a procedure in place to plan all vehicle movement on public roads to avoid busy times (e.g. when children are going to and from school) to reduce traffic congestion and reduce risk of accidents.
B2.5	Heavy vehicles shall be driven at a consistent low speed on public roads to avoid noise from heavy braking and revving.
B2.6	Vehicle horns and sirens shall only be used on public roads when necessary (i.e. to avoid accident).
B2.7	To avoid disturbance to local residents and other off-site stakeholders, noise levels at the Project boundary shall not exceed whichever is the more stringent of either the legally defined limits or the IFC limits as defined in the IFC General EHS Guidelines or otherwise result in a maximum increase in background levels of 3 dB at the nearest receptor location off-site.
B2.8	Audible reversing warning systems on mobile plant and vehicles should be of a type which, whilst ensuring that they give proper warning, have a minimum noise impact on nearby residents.
B2.9	Project related activities (including transport to and from the site) shall be avoided during the night-time hours (i.e. 22.00-07:00 hrs) and activities which generate elevated noise levels shall be avoided after 18:00 hrs.
B2.10	The Contractor shall assess the risk of introducing or elevating exposure to communicable disease vectors (including sexually transmitted infections) in local communities and shall adopt the controls necessary to avoid or otherwise minimise this risk.
B2.11	The Contractor's emergency preparedness and response plan shall include consideration of all potential scenarios that may affect or involve members of the community and shall ensure the necessary arrangements are made to manage such risks.

## Appendix C

### Minimum Requirements for Personnel Selection and Recruitment

The following requirements apply to both Nafasi AssetCo (in the case of workers directly employed by the Project Company) and the EPC Contractor (in the case of contractor workforce including subcontractors and third-party workers).

C1	Define the HSE competency needs for all roles, the tasks they perform, and shall select personnel based on their HSE competence.
C2	Define and implement a recruitment strategy and process for prioritising the sourcing local workers where possible.
C3	Appoint a workforce that includes a minimum of 30% female staff with employment conditions in compliance with national laws.
C4	Prioritize and support suppliers of local goods and services where possible, and ensure that these: (i) promote gender equality in hiring and training (policy and practice); and (ii) improve working conditions for women i.e., facilities; child-care; gender-based violence and sexual harassment (GBVH) policies and remedy etc.
C5	Establish and follow a robust interview and selection process for the recruitment of all workers that will be assigned to work at the Site.
C6	Prepare and implement a training needs analysis for the appointment of candidates for H&S critical roles as well as all staff appointed into supervisory and managerial positions. No candidates for H&S critical roles shall be permitted to commence work at the Site until and unless all required training can be demonstrated in writing to have been successfully completed.
C7	Record and keep on file evidence of the competence, skills and training of every worker and make this available to the Project Company on request.
C8	For all roles: a) Ensure that all new staff and any visitors are informed of the HSE requirements as part of their induction training. b) Provide updates and refresher training on a periodic basis. c) Provide specific and relevant training as required for individual roles.
C9	Develop a scope specific induction programme to ensure all personnel working on the contract are familiar with the HSE requirements and the H&S rules.
C10	Regularly review and maintain the site induction programme to ensure that it reflects current circumstances. During the construction and decommissioning phases the induction may need to be updated every month.
C11	Upon completion of site induction, record the name, company and date of training for each worker.
C12	Provide every worker with a photo identification card which must be worn by the worker in a visible location when on site to establish that the worker has undergone induction training.
C13	Provide all workers with ongoing HSE training through toolbox talks and refresher sessions. Conduct training using non-technical language and the local language.
C14	Identify any additional training specific to individual roles and arrange for this to be delivered for all relevant workers.
C15	Identify any material gaps in training/competency (that would prevent the individual from being able to safely perform their role) prior to commencement of any work at the Site.

## Appendix D

### Minimum Requirements for Management of Labour and Working Conditions

D1	The Project Company and all contractors shall implement a procedure for communication, consultation and participation with all workers on matters related to HSSE management.
D2	The Project Company and all contractors shall recognize workers' rights to form or join workers' organizations regardless of the recognition of this right by the national law. This may take the form of a forum for workers to communicate HSSE concerns with the Contractor via a committee of employee representatives.
D3	The Project Company and all contractors shall implement a mechanism for workers to raise complaints, feedback and grievances (a "grievance mechanism").
D4	The Project Company and all contractors shall develop and implement a human resources policy that outlines its commitments and arrangements for managing workers.
D5	The Project Company and all contractors shall commit to and uphold principles of fair treatment, non-discrimination and equal opportunity in relation to recruitment, compensation, termination, promotions, and all other aspects of working conditions and terms of employment of all workers.
D6	Every worker shall receive a written contract in local language which details the terms and conditions of their employment.
D7	Every worker shall receive compensation for hours worked which at least is equivalent to the national minimum wage. Hours worked shall be recorded in the form of documented timesheets and written receipts of wages paid shall be prepared and issued.
D8	The Project Company and all contractors shall ensure through due diligence and ongoing monitoring that there is no forced, bonded or child labour in the direct workforce as well as in the supply chain including subcontractors and suppliers of goods and services. No individuals under the age of 18 years are permitted to carry out any work directly or indirectly for the Project Company.
D9	For contracts in locations in which migrant workers may be recruited, the Project Company and all contractors shall ensure they are not exposed to any discriminatory practices and shall receive the equivalent terms and conditions of employment as all other workers.
D10	The Project Company and all contractors shall ensure all necessary arrangements are made for a safe and healthy work environment.
D11	The Project Company and all contractors shall have sufficient and adequate workers' compensation insurance to provide for medical assistance, including medical treatment and recovery and wages lost in the event of work-related harm or injury.
D12	The Project Company and all contractors shall provide compensation in line with legal requirements in the event of loss of life resulting from a work-related accident or incident.

## Appendix E

### Minimum Requirements for Selection and Management of Subcontractors and Suppliers

E1	The Contractor shall screen all potential subcontractors and suppliers of goods and services to confirm their ability and commitment to comply with and uphold all HSSE Requirements.
E2	The Contractor shall prioritize contractors and suppliers of goods and services that (i) invest in and value women; and (ii) are majority owned (at least 51%) or are founded by women.
E3	The Contractor shall prioritise the selection of subcontractors and suppliers of local goods and services that are committed to and have a proven track record in: <ul style="list-style-type: none"> <li>a) promoting gender equality and women’s empowerment in the workplace;</li> <li>b) ensuring working conditions are gender-sensitive and cater to the needs of women, including but not limited to: sanitary and ablution facilities; child-care facilities and/or arrangements; gender-based violence and sexual harassment (GBVH) policies and remedy; PPE designed for women; safe and secure transportation to and from the Site.</li> <li>c) recruiting women into roles across all levels of the business.</li> </ul>
E4	The Contractor shall select and recruit subcontractors and suppliers using a transparent and auditable process that is strictly in compliance with Nafasi AssetCo’s procurement rules and corporate policies. The Contractor will ensure that: <ul style="list-style-type: none"> <li>a) The HSSE capability and track record of HSSE-critical suppliers and contractors is evaluated as part of the selection and contract award process.</li> <li>b) HSSE risks arising from, or associated with, a Contract are properly assessed and that all required risk reduction measures are identified and agreed upon in advance of any appointment.</li> </ul>
E5	The Contractor shall prepare and implement a plan for managing all subcontractors that it appoints and shall adopt all necessary measures to manage interface risks.
E6	The Contractor shall not appoint any other Contractor or Subcontractor without the express written approval of Nafasi AssetCo in accordance with the Contract.
E7	Only the Contractor and approved Contractors and/or Subcontractors are permitted to access and/or undertake work on the Site as identified in the relevant contract.
E8	All work conducted by the Contractor and the subcontractors shall be in accordance with the HSSE Requirements detailed in this document.
E9	The Contractor shall manage its subcontractors using a transparent and auditable process that is strictly in compliance with Nafasi AssetCo’s requirements for contractor management.
E10	At a minimum the Contractor shall ensure that: <ul style="list-style-type: none"> <li>a) HSSE risks arising from, or associated with the activities of the subcontractor are properly assessed, and risk reduction measures are identified and implemented.</li> <li>b) The HSSE performance of HSSE-critical suppliers and subcontractors is monitored and reviewed on an ongoing basis and as an integral element of overall service delivery performance.</li> </ul>
E11	The Contractors and Subcontractors will ensure that all verbal and written communications with Nafasi AssetCo and Nafasi AssetCo’s Representative are in English.
E12	The Contractor and its subcontractors shall ensure that sufficient language skills and/or translators are available to facilitate communication in the local language.
E13	The Contractor shall ensure that all important and relevant information regarding health, safety, social and environmental issues is communicated to all workers.
E14	HSSE information shall be posted on noticeboards at all work locations. Regular checks shall be undertaken by the Contractor to ensure that all information posted is current.
E15	The Contractor shall commit to the ongoing communication and disclosure of information shall attend and participate in all meetings when requested to do so by Project Company personnel.
E16	The Contractor shall organize and facilitate the following meetings throughout the duration of the contract: <ul style="list-style-type: none"> <li>a) Kick off meeting;</li> <li>b) Plan of day (PoD) meetings;</li> <li>c) Contractor Safety Meetings (weekly) (chaired by the Contractor’s Site Manager);</li> </ul>

	d) Health and Safety Committee Meeting (every two weeks), and e) Monthly HSSE Meetings.
E17	The Project Director and/or any delegated personnel shall be invited and allowed to attend all HSSE meetings.
E18	Ongoing consultation between the Contractor, the Subcontractors and Nafasi AssetCo will be maintained via regular meetings.
E19	The Contractor shall hold toolbox meetings with all workers prior to starting a work activity and at the beginning of each work day. Employees shall be given the opportunity to provide feedback and raise questions or concerns.

## Appendix F

### Minimum Requirements for Fitness for Work, Welfare and Accommodation

<b>F1 Fitness for Work</b>	
F1.1	A fitness for work procedure shall be implemented that must consider at a minimum: <ol style="list-style-type: none"> <li>alcohol and other (prescription, pharmaceutical and illegal) drugs including testing (where legally permitted);</li> <li>fatigue, stress, and lack of physical, mental and/or emotional fitness;</li> <li>medical assessment and surveillance, and</li> <li>back to work rehabilitation.</li> </ol>
F1.2	The Contractor shall make all necessary arrangements such that all workers commencing work in safety critical jobs undergo a pre-placement medical examination, followed up by periodic medical examinations, based on risk assessment and detailed position descriptions.
F1.3	The medical criteria for fitness shall be documented and based on an evaluation of the physical and medical requirements for the jobs.
F1.4	All workers in safety critical jobs shall be required to report to their supervisor/manager/medical provider any condition that might impair their ability to safely perform the functions of their position.
F1.5	The Contractor shall provide a mechanism whereby a worker reporting such a condition as referred to in A6.26.4 may be referred to an approved medical adviser for consideration as to the worker's fitness for their work.
F1.6	The periodic medical assessment programme for workers in safety critical jobs must include: <ol style="list-style-type: none"> <li>The identification of modifiable risk factors that may impact fitness for work;</li> <li>Education and support to maintain health or address identified risk factors; and</li> <li>Education and support to assist workers regain their fitness for work.</li> </ol>
F1.7	The Contractor shall implement controls for remote site work including aspects such as travel; exposure to harmful flora and fauna; exposure to extreme high or low temperatures and altitudes, etc.
F1.8	Where a shift and/or overtime system is implemented, the Contractor shall design the system to consider and manage: <ol style="list-style-type: none"> <li>The effect on worker fatigue;</li> <li>The effects of activities carried out during rostered and overtime hours;</li> <li>The impact on sleep cycles of activities such as the time for commuting to and from site; and</li> <li>The monitoring and control of working hours.</li> </ol>

<b>F2 Alcohol and other Drugs</b>	
F2.1	The use, possession, transportation, promotion or sale of illegal drugs, controlled substances, drug paraphernalia and the consumption of alcohol on the Site is absolutely prohibited.
F2.2	The Contractor shall implement an Alcohol and Other Drugs Policy which shall be implemented through the Fitness for Work programme and shall apply to all workers including subcontractors.
F2.3	Testing may be conducted as follows: <ol style="list-style-type: none"> <li>On a random basis;</li> <li>In cases when it is suspected that someone is under the influence of drugs or alcohol, and</li> <li>Immediately following an accident or incident (or a Near Miss if the circumstances indicate it is appropriate).</li> </ol>
F2.4	Testing shall be performed at a medical facility or other approved facility which conducts drug and alcohol screening.
F2.5	Nafasi AssetCo reserves the right to conduct checks to confirm that Project personnel working or seeking admission to the Site are not under the effects of alcohol or drugs.

<b>F3 Workplace Welfare and Worker Accommodation</b>	
F3.1	Contractors shall provide the following facilities:

	<ul style="list-style-type: none"> <li>a) Clean and shaded rest areas and cooking/dining facilities for all workers (including subcontractors) that is separate from sanitary and ablution facilities.</li> <li>b) Provide clean and accessible handwashing facilities which shall be equipped with soap and hand sanitizer.</li> <li>c) Separate sanitary and ablution facilities shall be provided for males and females. Female facilities shall be safe and secure.</li> <li>d) Provide unlimited safe drinking water to all workers of a quality that is certified to conform to World Health Organisation (WHO) drinking water quality standard.</li> <li>e) In case water is sourced from regular taps, boreholes or an indirect source (e.g. by water tanker), ensure it is appropriately tested before consumption to confirm it meets the most stringent of local standards or WHO quality standard for drinking water.</li> <li>f) If water is stored in bulk on site, monitor the water through regular sampling and analysis at recognized laboratories and obtain documented test reports.</li> <li>g) Bulk water storage containers shall be cleaned every fifteen days to ensure the water quality remains acceptable. Maintain documented cleaning records and display these on the tank/receptacle.</li> </ul>
F3.3	All living and working areas shall be designated as non-smoking. Smoking shall be permitted only in designated areas. Adequate smoke sensors, fire-fighting provision and fire escapes shall be provided.
F3.3	All worker accommodation shall be sited, designed and managed in accordance with the standards specified in the IFC/EBRD guidance. A Worker Accommodation management procedure will be in place.

## Appendix G

### Minimum Requirements for Project Security

G1	The Contractor shall conduct an assessment of conflict sensitivity within the project location, the associated facilities and supply chain, and the contextual risks that the Contractor may cause, exacerbate or be directly or indirectly impacted by.
G2	The risk assessment shall consider all potential stakeholder groups including (but not limited to) workers, members of the community, and visitors.
G3	The Contractor shall not engage with the community (including ongoing engagement) on the assessment and management of security risks unless explicitly authorised by the Project Company HSSE Manager.
G4	The Contractor shall develop and implement a security management plan taking into account legal requirements and GIIP (e.g. IFC guidance document <sup>1</sup> ) and monitor compliance against it.
G5	The Contractor shall make arrangements for site security, including: <ul style="list-style-type: none"> <li>• On-site security personnel providing 24 hours/day protection.</li> <li>• Installation of perimeter fencing to control access into Project areas.</li> <li>• Designated and controlled access and egress.</li> <li>• Secure storage facilities for workers' personal belongings, as well as for all work equipment.</li> </ul>
G6	Where private security is to be appointed, the Contractor shall carry out background checks on all security personnel prior to recruitment to ensure that they have not been implicated in any previous crimes. Efforts to do the same shall be made where the security is to be provided by national guard/military/police force.
G7	The Contractor shall ensure the security team is gender-balanced (i.e. 50% of the team shall be female).
G8	The Security Management Procedure shall identify the types of checks and screening for people, property and vehicles at gates or other access points and shall define the types of searches, equipment to be used in such searches, the minimum competency (in terms of instruction and training) to be approved to conduct such searches, and the legal aspects of search and seizure.
G9	Body searches will only be conducted by security personnel of the same gender.
G10	The Contractor shall ensure that security personnel have successfully completed (and continue periodically to receive refresher) training which covers at a minimum: appropriate conduct, conducting searches (of person, property and vehicles); the principles of proportional response, and the use of force towards workers and communities.
G11	The Contractor shall ensure that the security team receives separate and additional training that focuses on cultural and religious sensitivities, and awareness of and respect for gender equality, women's rights, and culturally specific gender issues
G12	No member of the security team shall be armed or carry weapons.

<sup>1</sup> IFC Good Practice Handbook (2017) Use of Security Forces: Assessing and Managing Risks and Impacts Guidance for the Private Sector in Emerging Markets



## Appendix H

### Minimum Requirements for Vehicles and Driver Safety

H1	The Contractor shall implement a traffic management plan for all vehicles for which it is responsible, and which covers driving on Site and on public roads, and shall monitor compliance against it.
H2	The traffic management plan shall limit travel on unlit public roads between the hours of sunset and sunrise whenever practical. A justification to travel by vehicle in these restricted situations shall require written approval from the Project Director.
H3	The maximum speed limit on site is 20 km/hr.
H4	Safety signs including speed limit notices shall be adhered to at all times. In cases where a flag person is used to direct traffic, their instructions shall be complied with.
H5	Prior to use of any vehicles in any activities associated with the Project including off-Site activities, the Contractor shall confirm: a) Vehicle is fit for purpose, inspected, certified or licenced and confirmed to be in safe working order; b) Number of passenger does not exceed manufacturer's design specification, and all passengers use a safety belt; c) Loads are secure and do not exceed manufacturer's design specifications or legal limits; d) safety helmets are worn by riders and passengers of motorcycles, bicycles, quads, and similar types of vehicle; e) Drivers are authorized and properly licensed according to local regulations; f) Drivers are trained, certified and medically fit to operate the class of vehicle; g) Drivers are not under the influence of alcohol or other drugs, and are not suffering from fatigue; and h) Drivers do not use hand-held cell phones and radios while driving.
H6	The Contractor shall comply with all Project Company access rules and shall not bring to or operate on Site any Vehicle unless authorised to do so.
H7	Drivers of approved vehicles shall ensure that the Site's approved vehicle permit is visible within the vehicle at all times.
H8	All vehicles permitted to be operated on site shall remain on and within designated and demarcated routes. There shall be no driving outside of demarcated areas except with the prior approval of the Project Director.
H9	No vehicle shall be parked outside of a designated parking area. All vehicles shall be reverse-parked, and chocks shall be used to prevent any unintended movement.
H10	The Contractor shall be responsible for repairing any damage caused by driving outside of designated areas and shall bear any associated costs.
H11	The Contractor shall obtain any required permits or licences prior to the movement of abnormal loads and/or hazardous materials on public roads.

## Appendix I

### Minimum Requirements for Noise and Vibration Management

I1	The Contractor shall implement a noise and vibration management procedure and monitor compliance against it.
I2	All work equipment shall be assessed by the Contractor and selected before use to ensure that noise levels are reduced to levels that are within whichever is the more stringent of either legally defined workplace exposure limits, or those referenced in IFC's General EHS Guidelines for Occupational Health and Safety.
I3	Where the risk of elevated noise levels exists, the affected work areas shall be: a) Identified as designated areas and mapped, signposted or otherwise clearly communicated to all workers; b) Managed in accordance with the requirements detailed in the noise management plan; c) Monitored to ensure ongoing compliance.
I4	A regime of planned preventative maintenance (PPM) shall be adopted to keep all noise and vibration generating equipment in good working order.
I5	Where reasonably practicable, the use of engineering controls such as noise abatement devices including mufflers or acoustic enclosures shall be used and maintained.
I6	Where PPE is required to be used, each worker shall receive information, instruction and training in its use.
I7	Exposed workers shall be subject to a medical examination prior to starting work in a designated area and shall be subject to periodic surveillance.
I8	The Contractor shall monitor and record noise levels and if identified to be at or above permissible limits, the Contractor shall immediately stop the related work activity and promptly submit a report to Nafasi AssetCo.
I9	All equipment known or suspected to cause vibration shall be subject to a quantitative risk assessment by a Competent Person which shall consider as a minimum the direction, frequency, and intensity of movement; and any variation with time and duration.
I10	Where risk of exposure to vibration has been confirmed, the Contractor shall manage exposure through use of vibration dampening pads or devices and through limiting the duration of exposure.
I11	The Contractor shall conduct ongoing monitoring to ensure that exposure does not reach or exceed whichever is the more stringent of either legally defined workplace exposure limits, or those referenced in IFC's General EHS Guidelines for Occupational Health and Safety.

## Appendix J

### Minimum Requirements for Management of Hazardous Materials

J1	The Contractor shall implement a hazardous materials management procedure and monitor compliance against it.
J2	The Contractor shall prepare suitable and sufficient risk assessments for the selection, approval, safe storage, handling and use of hazardous materials and shall communicate these to all workers as appropriate.
J3	The Contractor shall compile and maintain an inventory of hazardous substances and their storage location(s) and shall ensure incompatible substances are stored in accordance with whichever is the more stringent of legal requirements and international standards.
J4	The Contractor shall ensure that storage areas are designed appropriately (taking into account factors such as but not limited to ambient temperatures, sunlight, heat, water ingress, sources of ignition) and controlled so that access is restricted only to authorised (i.e. trained) personnel.
J5	When selecting and procuring hazardous materials, the Contractor must consider if a substance with safer properties can be used.
J6	The Contractor shall ensure that the carriage of hazardous materials on public roads (including by third parties) is compliant with all legal and Project requirements.
J7	The Contractor shall implement controls for the safe receipt of deliveries of hazardous substances to the Site which shall include as a minimum: <ul style="list-style-type: none"> <li>a) Maintenance of a list of approved materials at the site entrance which shall be checked in relation to all deliveries;</li> <li>b) Quarantine arrangements for unapproved materials;</li> <li>c) Provision and use of appropriate PPE when unloading hazardous materials from delivery vehicles. This also applies to third party delivery drivers; and</li> <li>d) Provision of instruction and training for all workers responsible for checking and accepting deliveries of hazardous materials to the Site.</li> </ul>
J8	The Contractor shall: <ul style="list-style-type: none"> <li>a) provide sufficient information and training to all workers using hazardous substances;</li> <li>b) Provide suitable PPE;</li> <li>c) Ensure safety data sheets (SDS) are current, comprehensive and available to all workers, and</li> <li>d) Ensure the emergency response plan is appropriate for all potential incidents related to hazardous substances.</li> </ul>
J9	The Contractor shall ensure: <ul style="list-style-type: none"> <li>a) Full and proper use of any control measure;</li> <li>b) Return of substances back to the storage area provided for that substance;</li> <li>c) Notification of any defects at once to relevant management;</li> <li>d) Correct content information labels on containers; and</li> <li>e) That substances from unmarked/ unlabelled containers are not used.</li> </ul>
J10	No asbestos containing materials shall be used on Site.
J11	Fuel tanks shall be covered and installed over a spill containment area or container (secondary containment) that shall have the capacity of 120 % of the fuel tank capacity.
J12	All substances hazardous to the environment shall be stored and used on hardstanding and within a bunded area or otherwise they must be self-bunded to prevent spills or leaks. This also applies to equipment containing such substances such as diesel generators and bowsers.
J13	The Contractor's emergency preparedness and response plan shall consider the risk of a spill or release to the environment and appropriate equipment (including spill kits) shall be made available.

## Appendix K

### Minimum Requirements for Environmental Management

<b>K1 Air Quality and Emissions Management</b>	
K1.1	The Contractor shall implement an air quality and dust management procedure and monitor compliance against it.
K1.2	The Contractor shall adopt the controls necessary to manage emissions to air such that pollutant concentrations do not reach or exceed whichever is the most stringent of either national legislated standards, or the current World Health Organisation (WHO) Air Quality Guidelines.
K1.3	The Contractor's emergency preparedness and response plan shall consider the risk of an unintended release into the atmosphere that may result in an exceedance of permitted emission standards.
K1.4	The Contractor shall implement controls to minimize or eliminate dust and release of loose materials including through covering and securing materials in storage and transport, and through watering exposed surfaces.
K1.5	The use of diesel generators shall be avoided to the extent reasonably practicable (for example by connecting the Site's power supply if available).
K1.6	Where it is not possible to avoid the use of diesel in generators and other plant and machinery, the Contractor shall ensure that: <ul style="list-style-type: none"> <li>a) such equipment is in working order;</li> <li>b) uses low sulphur fuel; and</li> <li>c) does not emit black smoke.</li> </ul>
K1.7	There shall be no 'idling' of vehicles (i.e. stationary vehicles with the engine running) and all machinery and equipment shall be switched off when not in use.
K1.8	The Contractor shall monitor and record the monthly consumption of fuel and energy and shall report this data to Nafasi AssetCo on a monthly basis.
K1.9	The Contractor shall use energy-saving equipment wherever possible and shall actively promote energy efficiency initiatives.
K1.10	Air conditioning units installed by Contractors in Site offices or other buildings used for the Project shall not contain chlorofluorocarbons (CFCs) or hydrochlorofluorocarbons (HCFCs).

<b>K2 Water and Wastewater Management</b>	
K2.1	There shall be no discharges into any surface water (e.g. creek, river, lake, ocean) or to groundwater (e.g. via a soakaway pit or drain) unless the intended discharge is permitted and managed in accordance with the Project's ESIA and any relevant licence or permit.
K2.2	The Contractor shall not plan any permitted discharge of wastewater into the environment if it is known or suspected to be contaminated with any hazardous substances (e.g. solvents, paint thinners, oil). In such cases the Contractor shall arrange for the wastewater to be stored and disposed of as a liquid hazardous waste.
K2.3	There shall be no abstractions of any surface or groundwater unless the intended abstraction is permitted and managed in accordance with the Project's ESIA and any relevant licence or permit.
K2.4	The Contractor shall incorporate water conservation measures into the design and undertaking of all contracted activities.
K2.5	The Contractor shall implement a water management plan and monitor compliance against it.
K2.6	The Contractor shall use water only from authorised sources or suppliers (if tankers are used).
K2.7	The Contractor shall monitor and record the water usage of water and shall report this data to Nafasi AssetCo on a monthly basis.

<b>K3 Waste Management</b>	
K3.1	The Contractor shall ensure that no unauthorized dumping (either on or off site) of used oil and other hazardous waste is undertaken and immediately address any evidence of non-compliance.
K3.2	No wastes shall be burnt on site.

K3.3	The Contractor shall demonstrate and ensure that where feasible, it uses equipment and components of high durability and recyclability and that are easy to dismantle and refurbish in order to reduce or avoid generating unnecessary waste.
K3.4	Hazardous and non-hazardous wastes shall be segregated into separate, clearly labelled, and closed containers.
K3.5	Non-hazardous wastes shall be segregated into recyclable and non-recyclable fractions.
K3.6	All wastes shall be stored in a designated area and in suitable containers.
K3.7	All wastes shall be collected and disposed of only by suitably licensed contractors and only at licensed waste disposal or handling premises.
K3.8	A logbook detailing the types and volumes of wastes generated and taken off site shall be maintained and reported to Nafasi AssetCo on a monthly basis.
K3.9	Weekly site inspections of all waste storage areas shall be conducted to check that good housekeeping standards are maintained and to identify any leaks or spills.