



15 APRIL 2020

DRAFT REPORT

Environmental and Social Due Diligence of New Energy Service Company (New ESCO)
for Evolution II Fund, Inspired Evolution

DRAFT REPORT

ESDD of NEW ESCO

INSPIRED
EVOLUTION
Investment Management



For: Evolution II Fund, Inspired Evolution

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Signed :

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INTRODUCTION

IBIS Consulting was appointed by Inspired Evolution (the Client) as the independent consultant to undertake an Environmental and Social (E&S) Due Diligence (ESDD) of a prospective investment into New Energy Service Company (ESCO) (the Target). New ESCO is a Sagemcom operation dedicated to the modernisation and operation and maintenance of decentralized hybrid systems to provide energy supply services to Orange owned or operated telecom sites in Liberia, Sierra Leone and the Democratic Republic of Congo (DRC). The aim of the ESDD is to identify E&S risks and gaps related to applicable E&S standards and advise the Client on any issues that may negatively impact the value of the investment. The scope of work included the following:

- Review of E&S documentation;
- Site visits to eight telecommunication facilities

(representative sample) in Sierra Leone*; and

- Management interviews during the week of 30 March 2020.

Limitations

IBIS undertook site visits to a sample of eight base stations in Sierra Leone. Site visits were not conducted in Liberia and DRC due to in-country travel restrictions and other government enforced measures due to the coronavirus pandemic.

All conclusions and recommendations made represent the professional opinions of the IBIS personnel involved with the Project, and the results of this report should not be considered a legal interpretation of existing regulations.

IBIS assumes no responsibility or liability for errors in the data utilized, information provided by the vendor, or statements from sources outside of IBIS, or developments resulting from situations outside the scope of this project. We make no warranties, expressed or implied, including, without limitation, as to merchantability or fitness for a particular purpose.

All data and information provided were assumed to be accurate and up to date.

INTRODUCTION

Report Structure

This report presents the findings of the ESDD and is structured as follows:

- Introduction;
- Project Description;
- Methodology & Reference Framework;
- E&S Assessment;
- Reputational Risk Review Summary;
- ESAP, as a separate Excel document; and

- Annexes:
 - Reputational Risk Review (Annex A)
 - Interviewee List (Annex B)
 - Document Review List (Annex C)
 - Photolog (Annex D)

The E&S assessment is structured as per the IFC Performance Standards.

PROJECT DESCRIPTION

Evolution II is considering providing equity funding along with co-investors into New ESCO. New ESCO is dedicated to the operation of decentralized hybrid systems to provide energy supply services to telecom sites in Liberia, Democratic Republic of Congo (DRC) and Sierra Leone. New ESCO is a holding platform domiciled in Mauritius for Escotel DRC, Escotel Liberia, and Escotel Sierra Leone, and ownership is split between Sagemcom Energy and Telecom (15%) and Investors (85%).

New ESCO is planning the deployment and 10-year operation of hybridization equipment (solar PVs, batteries, gensets, related electrical equipment) of a portfolio of telecom sites owned by Orange in the DRC (285 sites), Sierra Leone (305 sites) and Liberia (304 sites) (actual no. of sites may change). Orange will outsource all activities related to the management of the energy system of telecom sites to New ESCO. New

ESCO is responsible for the design, installation, operation and maintenance of power system and passive infrastructure of a portfolio of sites. New ESCO will contract the three local Sagemcom entities (Sagemcom DRC, Sagemcom Liberia and Sagemcom Sierra Leone) as the designated EPC and O&M contractor and transfer all technical and operational risks to Sagemcom. It is understood that the local Sagemcom entities will be responsible for actioning gaps identified in the report. Accordingly, the assessment has been conducted on these operations.

Sagemcom develops high added-value smart terminals (set-top boxes, internet boxes, multi-energy smart meters, etc.). Sagemcom Group is broadly split between three businesses, Audio and Video Solutions, Broadband Solutions and Smart City with Grid Infrastructure Solutions falling within the Smart City business.

PROJECT DESCRIPTION

Sagemcom Energy and Telecom provides telecom and energy solutions enabling the supply of connected systems to utilities, telecom operators and services operators. Solutions are based on renewable energy to supply sites with cost-effective and reliable energy.

These solutions reduce energy cost of off-grid sites or sites connected to a poor quality grid, replacing high OPEX cost of diesel generators. Potential energy solutions for telecoms include:

- Pure solar for low and medium consumption sites;
- Hybrid (combining solar and diesel generator) for high power consumption sites; and
- Batteries cycling, smart ATS (Automatic Transfer Switch) are also proposed to reduce time of operation of diesel generators and associated fuel and maintenance cost.

Due to poor reliability, availability and quality of electricity from the national grid, the deployment of solar solutions are favoured where feasible.

PROJECT DESCRIPTION: SAGEMCOM DRC

Sagemcom DRC has been operating in DRC since 2016. Sites are located throughout the country with approximately 60% of these sites located within urban areas. Sites are predominantly owned by Orange; in a few cases the sites are shared and may be owned by a third party. All energy agreements are between Sagemcom DRC and Orange DRC.

Sagemcom DRC is divided into three core services areas:

- Maintenance of base stations and other Orange facilities (approximately 60% personnel allocation);
- Modernisation of base station energy systems (approximately 20% personnel allocation); and
- Project management, where Sagemcom acts as supervisor of Orange's contractors and sub-contractors for the establishment of new facilities (approximately 20%

personnel allocation).

Between 2016 and 2018 Sagemcom DRC's scope of work was restricted to maintenance of the facilities, where equipment ownership remained with Orange. Maintenance includes the energy systems as well as the other base station structures, for example mast painting and torquing, and general maintenance of air-conditioners and site lighting. From 2018 the scope of work expanded to include the deployment of modernised energy systems on an own and operate basis. Currently, 399 telecom sites are in scope to modernise and maintain, including the provisions of security services. Only 52 are connected to the grid due to poor reliability, availability and quality of electricity from the national grid. Of the 399 sites, 88 have been modernised under the new agreement.

PROJECT DESCRIPTION: SAGEMCOM DRC

Where feasible, modernisation solutions prioritise solar energy as the primary source of energy, which includes approximately 60% of the 88 modernised sites at present. Space limitations for some sites, in particular in urban areas, provide a challenge for using solar given the space requirements of the photovoltaic (PV) cells. However, investigations are being undertaken to assess feasibility of installing PV on the base station towers. Remaining sites not connected to the grid or not yet modernised with PV operating rely on diesel driven generators.

Timeframes for the modernisation of the remaining sites have not been defined. Discussions with Orange DRC are on-going.

In addition to the base stations, Sagemcom provides refuelling and preventive maintenance of the energy systems for an additional 58 facilities of Orange, including data centres and shops owned or operated by Orange DRC.

Sagemcom DRC's in-country facilities includes a head office in Kinshasa. Five third-party warehouse facilities are used for the storage of spares and consumables including oils and other lubricants. An additional four warehouses are planned to be in use by end 2020.

Sagemcom DRC has a staff compliment of 95 permanent employees, however employees are not directly employed by Sagemcom DRC but are contracted through two employment agencies that manages Human Resource (HR) functions. In addition, approximately 50% of maintenance activities are outsourced to subcontracted service providers.

The procurement of energy equipment is largely managed at Group level through Sagemcom France with some small spares being sourced locally. Power equipment is manufactured mainly in Italy, China, and France.

PROJECT DESCRIPTION: SAGEMCOM LIBERIA

Sagemcom Liberia has been in formal operation since January 2020 when the contract with the customer (Orange Liberia) was concluded. The business took over the power systems operation and maintenance responsibility that was being managed by Orange Liberia at that time.

The scope of the operation current involves:

- Operation and maintenance of base station power systems at customer sites (including emergency repair); and
- Modernisation of base station power systems.

Operation and maintenance involves refuelling of diesel-powered equipment and routine maintenance of engines (e.g. change lubricating oil, change oil filters). The business unit is also responsible for repairs to power systems in the event of equipment or operational failure.

The operation currently covers 329 sites across Liberia. The current power systems configurations are about 75% hybrid solar systems (PV panels and battery storage) and 25% hybrid genset battery (HGB) (diesel-powered generator and battery). No sites are connected to the national power grid so all sites require an off-grid solution. The modernization programme involves replacement of older power equipment with new, more efficient and reliable equipment. In planning the modernization programme, Sagemcom Liberia undertook an inspection and audit of the sites to determine power load requirements, site layout (to determine space available for power equipment placement) and the current state of equipment performance.

PROJECT DESCRIPTION: SAGEMCOM LIBERIA

A plan was devised specific for each site. Modernisation will involve installation of new power systems including new diesel-powered generators, solar PV panels, battery storage, control equipment, and interconnecting equipment. The business unit is currently completing preparations to commence the modernization programme. The modernization programme is expected to last 12 to 18 months.

Sagemcom Liberia operates out of a leased office facility in Monrovia.

PROJECT DESCRIPTION: SAGEMCOM SIERRA LEONE

Sagemcom Sierra Leone has been in operation since about February 2019. The business unit took over the operation from GreenWish. The contract with the business unit's sole customer (Orange Sierra Leone) was renewed in February 2020. The operation currently covers 342 sites across Sierra Leone. Another 50 sites will be added to the scope of coverage in June 2020.

The scope of the operation current involves:

- Operation and maintenance of base station power systems at customer sites (including emergency repair); and
- Modernisation of base station power systems.

Operation and maintenance involve refuelling of diesel-powered equipment and routine maintenance of engines (e.g. change lubricating oil, change oil filters). The business unit is

also responsible for repairs to power systems in the event of equipment or operational failure.

The customer sites are located throughout Sierra Leone and the business units has organized the sites into three geographic 'clusters' to organize service coverage. At present one of the clusters is covered by Sagemcom Liberia workforce and the other two are covered by contractors.

The power systems on the sites are a variety of configurations (with approximate distribution): grid, solar, and diesel generator (20%); grid and diesel generator (15%); no grid and hybrid solar (57%); and no grid and HGB (8%). The modernization programme involves replacement of older power equipment with new, more efficient and reliable equipment.

PROJECT DESCRIPTION: SAGEMCOM SIERRA LEONE

Sagemcom Sierra Leone undertook a planning process similar to that in Sagemcom Liberia involving inspection and audit of the sites to determine power load requirements, site layout (to determine space available for power equipment placement) and the current state of equipment performance. The modernisation programme is currently in process.

Sagemcom Sierra Leone operates out of three leased office facilities spaced across Sierra Leone.

PROJECT CATEGORISATION

The business units' activities involve installation and operation of power equipment including solar PV panels, diesel-powered generators, battery storage systems, and connecting and control equipment. The equipment is installed at existing customer sites. The sites were developed by the customer and the customer is responsible for the environmental and social issues associated with acquisition of the land, planning and impact and risk assessment through government-regulated permitting processes (including as required, an environmental and social impact assessment process). The business units are responsible for installation and operation and maintenance.

The business units' activities associated with installation and operations and maintenance are neither highly unique nor unprecedented and negative environmental and social impacts and risks are few in number, site-specific, and can be readily

addressed through mitigation measures and management actions.

Referring to the IFC Sustainability Framework (2012), the Project is **Category B**:

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

METHODOLOGY & REFERENCE FRAMEWORK

IBIS undertook the following activities as part of the ESDD:

- Document review (see Annex C for document review list);
- Management interviews with in country Sagemcom staff via teleconference between 30 March and 01 April 2020;
- Perform a Reputational Risk Review (RRR);
- Site visits to a sample of telecommunication towers in Sierra Leone on 25 and 26 March 2020; and
- Preparation of a Draft and Final ESDD Report including an E&S Action Plan (ESAP).

When a finding gives rise to a recommendation in the ESAP, the ESAP Finding No. is indicated in the body of the report. The ESAP is appended to this report as an Excel spreadsheet.

The E&S Reference Framework which has been considered for this ESDD includes:

- Applicable DRC, Liberia, and Sierra Leone environmental, health & safety, community and labour related laws, regulations and standards;
- The 2012 IFC Performance Standards and applicable IFC EHS Guidelines (i.e. General EHS Guidelines);
- Core ILO Labour Standards and ILO Basic Terms and Conditions of Employment;
- Evolution II Fund's Environmental and Social Management System (ESMS);
- African Development Bank Group's Integrated Safeguards System;
- Equator Principles;
- United Nations Guiding Principles on Business and Human Rights; and
- European Investment Bank (EIB) E&S Standards (2013).

E&S ASSESSMENT



Environmental and Social Management System

Sagemcom Group's management system is certified to meet the requirements of ISO 14001:2015 and ISO 9001:2015 (both valid to 31 December 2022). Sagemcom group has also formally committed to supporting the UN Global Compact (2010) and has been awarded a gold medal for corporate social responsibility performance by Ecovadis (February 2019).

The Sagemcom Liberia and Sagemcom Sierra Leone business units are newly established and thus far the main effort has been in developing the operational capacity to commence operation and maintenance of the existing customer sites. The business units are in the early stages of establishing formalised business systems, including processes for environmental and social performance management. Environment, health, and safety performance is currently overseen by local operations management through various procedures.

The business units intend to develop such systems in line with the management systems already established by Sagemcom Group and drawing on systems already in place for similar businesses elsewhere in Africa (including DRC). The business units intend to eventually achieve certification to the ISO 14001 environmental management system standard and ISO 45001 occupational health and safety management system standard, in line with the requirements of Sagemcom Group. The exact timeframes for development, implementation and certification have yet to be established (see **ESAP #1**).

In DRC, a formal management system has been established in alignment with ISO 14001 and OHSAS 18001. DRC intends to seek certification in 2021 to both ISO 14001 environmental management system ISO 45001 occupational health and safety management system standards, though current documentation refers to OHSAS 18001 (see **ESAP #1**).

DRC's management system is largely focused on the management of health, safety and environment risks, and processes and documentation have been established for the following aspects: (i) policy; (ii) identification of risks and impacts; (iii) management programs (processes and procedures); (iv) organizational capacity and competency; (v) emergency preparedness and response; and (vi) monitoring and review. Formalised processes for stakeholder management are limited, specifically associated with grievance mechanism. Though labour processes have been established, gaps in human resource (HR) policies and procedures have been identified. These issues are further detailed in sections under PS2 and PS4 below.

Core to Sagemcom DRC's Management system is the Health, Safety and Environment Policy Manual (SGRDC HSE 001 Rev 01 - SAGEMCOM RDC - MS MANUAL), last updated 30

November 2019. The manual and system is underpinned by Sagemcom DRC's HSE Policy Statement, and provides the framework for the management system, committing to complying with local regulations and company procedures. The policy, manual and HSE procedures developed apply to both employees and contractors, importantly including contractors that provide essential security and maintenance services. Key documents that form the basis for the system include the following:

- Absolute Rules of Sagemcom DRC;
- Working at Heights Procedure;
- Working with Electricity Procedure;
- PPE Requirements;
- Warehouse Management Procedure;

- Preventive Maintenance Procedure;
- Mast Maintenance Procedure;
- Waste Management Procedure (for oil, fuel and filters);
- Driving Rules;
- Company Vehicle Charter;
- Security Procedure;
- Emergency Response Procedure and Emergency Response Plan;
- Monitoring and Measurement;
- Training Procedure;
- Contractor Management Procedure; and

- Training Procedure.

Supporting documentation (training registers, inspection checklists, legal register, PPE issue form etc.) have been established.

The system is in the process of being improved and implemented, with some processes having recently been implemented. Gaps identified in these procedures and mandated requirements are described in the respective sections below (see **ESAP #1**).

Policy

The Liberia and Sierra Leone business units have not established a formal policy for environmental and social performance. The business units intend to establish such a policy based on that which is in place for Sagemcom Group ('Sagemcom Our Commitments'). This policy commits Sagemcom Group to operate in accordance with ISO 9001 (for quality management), UN Global Compact (for sustainable development), ISO 14001 (for environmental management), and ISO 45001 (for worker health and safety). The group policy does not make specific reference or commitment to international standards or requirements which would need to be included in business unit-level policy (see **ESAP #2**).

In DRC, environmental and social commitments are documented in an 'HSE Policy Statement' that outlines

commitments to reducing environmental footprint, compliance with regulations, and strengthening prevention and protection of employees and those who work at its locations against occupational hazards. The policy does not mention commitments related to community risks and does not make specific reference or commitment to international standards or requirements. The policy is approved by the Country Manager. As required by Sagemcom DRC's management system, top management is mandated to set and approve the HSE policy, and departmental managers are accountable for compliance with legislative and statutory requirements as well as HSE performance in line with Sagemcom's policy and targets. The management system specifies that the HSE policy be communicated throughout the organisation (see **ESAP #2**).

Identification of Impacts and Risks

In Liberia and Sierra Leone operational risks are identified through experience of the local management and managed through good practice and oversight of activities by qualified personnel. The business units have not undertaken a formal process to identify impacts and risks associated with their own specific activities and to identify mitigations and controls. Such a process will need to be established as part of the business unit's ESMS.

In DRC where risk assessments processes are in place, assessment and management of risks has largely focused on the following major risk categories:

- **Travel risks**, including for example, driving at night, travel duration, roads in poor condition, inclement weather, security-sensitive areas, river crossing using barges,

travelling to remote areas or access restricted areas;

- **Security** in respect of the base stations; and
- **Site health and safety risks** (for example, risks associated with from working at heights, electrical work).

Two types of risk assessments have been conducted for Sagemcom DRC's scope of activities:

1. 'Risks Assessment for the evaluation of professional risks' (SGRDC HSE 010 Rev 02-HR_Form_Risks_Assessment, updated January 2020) documents the risks associated with Sagemcom activities, grouped into the following work areas:

- office,
- road,
- work on site, and
- warehouse.

2. Document “II.5.xlsx” (not dated or titled) refers to additional supporting functions and activities (generator maintenance, procurement, transport of personnel, transport of equipment).

Brief descriptions of preventive actions are provided in the risk assessments. Both risk assessments reviewed focus almost exclusively on worker health and safety hazards and risks, excluding risks relating to site security aspects, environmental aspects and risks associated with the community. Other safety risks mentioned during the management interviews had also not been recorded in the risk registers, for example crossing water bodies using barges (see **ESAP #3**).

The risk assessment procedures provide limited detail on the purpose of the two different risk assessments, and how risks are identified and assessed. Document “II.5” has no rating

table, for example, and the rating table in the document “Risks Assessment for the evaluation of professional risks” is considered basic, with severity parameters defined for injuries types alone (see **ESAP #3**).

Additionally, the risk assessments do not provide for the identification of site-specific risks and impacts. Accordingly, risks and impacts unique to a site (or several sites) may not be identified, and appropriate risk mitigation measures may not be established (see **ESAP #3**).

E&S Management Plans and Procedures

In Liberia and Sierra Leone, the business units are in the early stages of establishing formalised business systems, including processes for environmental and social performance management and documentation of the necessary plans and procedures. The business units will need to develop these plans and procedures as part of establishing a formal ESMS (see **ESAP #1**).

In DRC, processes, procedures and documented requirements are detailed in the manual and procedures as described above under *Environmental and Social Assessment and Management System*.

In reviewing the documents it was identified that measures understood to be in place are not explicitly documented.

Examples include:

- Restrictions on driving during inclement weather;

- Maintenance requirements for company owned motorcycles and cars to avoid breakdowns (the scope of the maintenance procedure is limited to site equipment maintenance);
- Restrictions on alone travel;
- Processes in place to mitigate risks associated with crossing of water bodies e.g. using barges; and
- Processes for the management of hazardous substances. Though 'use of flammables' and the associated explosion and fire risk has been identified in the risk assessment, controls are listed as 'Respect of MSDS + avoid sources of heat in the vicinity'. No additional procedures document requirements for the identification, storage, handling, use, and labelling of hazardous substances used or stored at site or in third-party warehouses.

Accordingly, the current set of procedures is not considered complete, potentially resulting in the inconsistent application of current processes or, lack of application of mitigation measures in line with either local requirements, IFC Performance Standards and the World Bank General Environmental, Health, and Safety (EHS) Guidelines. It is acknowledged that Sagemcom DRC is working towards the full implementation of ISO 14001 and OHSAS 45001 as indicated above, which is expected to result in additional management programmes and procedures and improvements of the existing management programmes and procedures (see **ESAP #1 and #4**).

Organizational Capacity and Competency

In Liberia and Sierra Leone, the business units are managed by a Country Manager who covers the operations in both countries. The Country Manager is highly experienced and was recently transferred from a similar position employed by a Sagemcom Group company in Cote d'Ivoire. He is knowledgeable of the environmental and social risks associated with the operations as well as the performance management requirements. The business units are in the process of recruiting a dedicated HSE Manager. The HSE Manager would report to the Country Manager and would cover both Liberia and Sierra Leone in a shared arrangement (see **ESAP #5**).

Training procedures that detail training requirements for the respective roles and responsibilities, training programmes and

will need to be developed and implemented as part of the Liberia and Sierra Leone business units' ESMS (see **ESAP#1**).

In DRC, an HSE Manager has been employed since August 2017. Though no formal HSE qualifications, the HSE Manager has been trained and gained experience in HSE management systems and operational aspects of the business' activities though prior experience in the information and technology industry. A training matrix, supported by a training procedure, outlines training requirements for different job roles, and includes training in fire safety and emergency evacuation, first aid, driving and traffic training, waste management, PPE, and HSE management system awareness, for example. Evidence of electrical compliance and working at heights training conducted by Sagemcom technicians (by the training services provider Bureau Veritas DRC) was also in place.

Integration and induction requirements for new Sagemcom DRC employees are outlined in an induction procedure covering medical and HSE matters (*procédure d'intégration v1*). The procedure details requirements for personnel to undergo a medical and be certified fit for work; to provided awareness of HSE rules and requirements, and for PPE to be issued.

Gaps in the training of contractors providing security services and undertaking maintenance tasks are described under Contractor Management section below (see **ESAP #11**).

Emergency Preparedness and Response

The Liberia and Sierra Leone business units are yet to establish an Emergency Preparedness and Response Plan (see **ESAP #6**). Various preventative and response mechanisms are however in place. Workers are trained in safe work procedures to reduce workplace accidents. The business units maintain insurance for workers that covers emergency medical costs. Safety warnings are posted at most sites. Fire extinguishing equipment is installed at most sites; some sites in Sierra Leone were observed to not have fire extinguishing equipment present (see **ESAP #7**). The business units are in the process of making sure that equipment is present and functional at all locations. Formal training of workers responsible for firefighting will be required, it was established that security guards in Sierra Leone were not familiar with the use of fire extinguishers. Safety of electrical equipment is verified by business unit technical specialists before operation (see **ESAP #6**).

In DRC, an Emergency Response Plan (SGRDC HSE 003 Rev) and Emergency Response Procedure (SC/RDC/HSE/PC-06) set out the emergency measures in place and actions to take to mitigate emergency incidents for the following incident types:

- Fire outbreak;
- Medical;
- Fuel spillages; and
- Security.

The procedure makes reference to incidents impacting personnel, contractors, and the surrounding community in which the operations are carried out; details training and emergency drill requirements; and requires emergency contact information to be displayed at the respective sites.

Checklists in DRC have been developed for the inspection of first aid equipment and firefighting equipment, though completed checklist were not available for review.

Security processes in DRC applicable to security guards have also been established and documented, and procedures detail the responsive actions to take in the event of criminal action, fire, civil commotion, bomb threats and robbery.

These plans and procedures and plans do not cover emergency processes IBIS understands is in place, specifically for vehicle breakdowns and security incidents (outside of base stations where there is no security guarding presence), for example for technicians traveling through high security risk security areas. The only relevant action in the emergency procedure refers to directing issues to the business unit's maintenance department for action; no further action or

guidance is detailed for personnel (excluding security guards) directly involved in security related incidents (see **ESAP #8**).

In the case of accidentally release of diesel fuel or lubricating oil, saw dust is commonly used for the containment and clean-up. Sawdust saturated with diesel fuel or oil poses a fire hazard and other materials are more appropriate (see **ESAP #9**).

Contractor Management

The business units' activities involve a significant number of workers that are managed by contractors and sub-contractors (e.g. security personnel and facility maintenance). Some processes are in place to verify technical performance (checklists, ad hoc inspections). The business units work closely with these employers to monitor performance and resolve issues as they arise (for example during regular Governance Meetings in all countries).

In Liberia and Sierra Leone, formal contractor management processes have not yet been established. These would need to be covered by the business units' ESMS (see **ESAP #1 and #10**).

In DRC, processes have been established to vet and onboard contractors as part of the HSE management system.

The evaluation of contractors is described in the contract management procedure (Procédure de contrôle des sous-traitants reference SC/RDC/OP /PC-05)), and includes criteria for financial, technical, competency, and health and safety considerations. The procedure also sets out the requirements to ensure contractors are appropriately trained, and measures for contractor oversight.

Vetted contractors are required to acknowledge the HSE Policy, and sign agreements to adhere to Sagemcom DRC's HSE requirements for contractors (*Clauses HSE Sagemcom DRC Et Ses Sous*). Signed copies of this document, as well as emails correspondence acknowledge receipt of the HSE Policy by a sample of contractors were reviewed and verified. Contractors are not required to be supervised on-site for all work, though inspections by the HSE Manager, as well as technical supervisors, are conducted.

In cases where direct supervision is not considered necessary, communication with contractors is conducted via mobile phone, with requests for the contractor to send photos of work completed.

Contractors are required to ensure contractor personnel are competent and trained; however where training is not deemed adequate, training provided to Sagemcom technicians is also provided to contractors if required, at no additional cost to the contractors. However, the training procedure and training schedules made available for review does not specifically identify which contractors required additional training, and what type of training is required by the respective contractors (see **ESAP #11**).

Security guarding services are outsourced to two security companies (Kafakis Security and Star Security System). Security specific procedures (Site Services Security

Processes) is provided to the security contractors, but no formalised process has been established to ensure there is adequate training provision for security guards in respect of risks, HSE awareness or technical tasks (see **ESAP #11**).

Monitoring and Review

The Liberia and Sierra Leone business units are in the process of developing their ESMS and as such, formal processes to monitor and review environmental and social performance are not yet in place. An effective monitoring process needs to be included within the development of the ESMS (see **ESAP #1 and #12**).

Sagemcom DRC has established a monitoring and measuring procedure (PROCEDURE DE SURVEILLANCE ET MESURE ref. SC/RDC/HSE/PC-10) that describes the process for identifying HSE monitoring indicators. Site inspections are conducted at approximately twice per year by the HSE Manager. In addition, supervisor site inspections are used to identify breach in HSE procedures. Monitoring checklists used to support inspections to assess site include first aid form, PPE inspection form, HSE audit form, ladder audit form and fire equipment forms, though completed checklists were

not available for review. The checklists do not cover site security facilities (see **ESAP #13**). Where non-conformances are identified, instructions are sent to the responsible parties and actions are scheduled for execution, and a change report prepared to ensure all necessary corrective measures were taken.

Sagemcom DRC reports on key HSE indicators on a monthly basis. This includes both lagging indicators, for example injury statistics (fatalities, lost time injuries, medical treatment cases, first aid cases), near miss incidents, theft cases, and spillage incidents; as well as leading indicators, for example HSE training, unsafe acts/conditions, and audits/inspections conducted. Reporting in this format commenced in November 2019. Verification of the reports could not be done. Additional operational indicators are routinely monitored and include use rates of key consumables (fuel, oils). Information is shared with Sagemcom Group on a quarterly basis and with the customer as needed.

Regulatory Compliance

The business units in all three countries are responsible for ensuring that they operate in compliance with applicable national environmental and social laws and regulations.

Specific to activities of the Liberia and Sierra Leone business units, the business units plan to engage a service provider to evaluate the business activities and to identify the specific legal obligations (referred to as a Legal Register). The provider will also be engaged to monitor for changes in the regulatory requirements on an annual or bi-annual basis. The business units would need to develop various actions and processes to comply with the requirements identified (see **ESAP #14**).

In DRC, to keep updated of changes in legislation Sagemcom DRC maintains a service that is registered with the local authority, where new legislation or changes to existing

legislation is communicated to Sagemcom. The applicable HSE legal requirements are maintained in a legal register.

There have been no reports of fines, penalties or contravention notices being issued by local environmental, occupational health & safety or labour authorities.

Environmental and Operational Permits

Development of customer's sites would have required environmental permits under national regulations. The customer would have conducted a process to identify impacts and risks as part of the initial planning and permitting of the sites i.e. an environmental and social impact assessment (ESIA). This process would have required that mitigation measures to avoid or reduce impacts be identified and that a plan be put in place to implement the measures as well as any conditions imposed by the government as part of the approval. These actions remain the responsibility of the customer,

In Liberia and Sierra Leone, environmental and operating permits understood to exist are not made available by the customer and accordingly the business units are not in a position to evaluate whether E&S requirements are contained in these documents that are relevant (see **ESAP #15**).

In DRC, environmental certificates (permits) are issued by the DRC environmental authority (Agence Congolaise de l'Environnement) and are provided to Sagemcom DRC, though ESIA reports (submitted by Orange DRC in application of obtaining the environmental certificates were) have not been provided to Sagemcom DRC.

Examples of certificates reviewed did not include specific environmental management conditions although they reference the ESIA reports where such conditions may be specified. As described in above (Identification of Risks and

Impacts), the ESIA could assist Sagemcom DRC to identify environmental and social impacts and risks associated with specific sites. Additionally, the ESIA reports would inform Sagemcom DRC of mitigation measures that fall under the responsibility of Orange DRC to implement, but which are potentially relate to Sagemcom DRC activities, and therefore should be covered by the ESMS (see **ESAP #15**).

Stakeholder Management, External Communications and Grievance Mechanisms

The sites are owned and operated by the customer and the customer is responsible for any requirement for active engagement with external stakeholders as might be required by regulations or permit conditions. The business units would engage stakeholders related to specific activities they undertake, including the operation and maintenance of the power systems. Stakeholders in this regard include people that might be affected by the activities and any associated emissions such as noise and air pollutants.

Business units typically have an ongoing presence at the sites, with security guards present on a 24-hour basis, as well as technicians (employees and contractors) routinely visiting sites to conduct scheduled and non-scheduled maintenance work.

Accordingly, business unit personnel and contractors are typically on the 'front line' for receiving grievances.

Additionally, Sagemcom DRC supports Orange DRC with on-site supervision of contractors commissioned by Orange DRC for the construction and establishment of new sites. Again, Sagemcom DRC is therefore likely to be the receiver of community grievances.

The business units have not established a formal plan for managing stakeholder engagement or a procedure for addressing complaints or grievances (see **ESAP #16**).

Labour Arrangements

The business units' workforce is comprised of workers under the business unit's control and workers managed by contractors. The business units' direct workforce is either:

- Employed directly by the business unit with HR managed by the business unit itself;
- Employed directly by the business unit with HR management outsourced to a service provider; or
- Employed by an employment agency under agreement to work for the business unit with the employment agency and business unit jointly managing HR matters.

HR Policies

Sagemcom Liberia and Sagemcom Sierra Leone are newly established and have not as yet established HR policies and procedures (see **ESAP #17**).

Sagemcom DRC has established a human resource (HR) policy. It applies to Sagemcom DRC employees (none at present) as well as workers employed through the employment agencies. The policy describes matters relating to, for example:

- Working hours (which refers to what is in the employee's contract, though this is not specified in the contracts);
- Hygiene, health and safety (instructions and controls relating to various risks including fire, electrical, and mechanical);
- Security;
- Medical aid provision;
- Medical surveillance;
- Alcohol, drugs and smoking;

- Informing the company of accidents and illness; and
- Disciplinary action.

The Sagemcom DRC HR policy is not aligned to international standards such as the IFC Performance Standards and ILO Labour Standards, and omit, for example, retrenchment procedures, rights to unions or worker representation, discrimination, or worker grievance processes (see **ESAP #18**).

Working Conditions and Employee Contracts

In Liberia, the direct workforce comprises about 70 full-time workers comprising engineers, technical specialists, and various management functions. The business unit outsources HR management to PWC Liberia under an annual contract.

The Sagemcom Liberia workforce comprises about 40 workers that were transferred from Orange Liberia and integrated into the business. The transfer was done under authorisation from the Department of Labour and with consultation with the worker union.

In Sierra Leone, the direct workforce comprises about 40 full-time workers, mostly technical specialists. About 20 workers are employed directly by Sagemcom Sierra Leone. HR management is the responsibility of the Country Manager who is supported by an administrator. About 20 workers are

employed through Jobsearch SL, an agency specialising in recruitment in Sierra Leone. HR management is the responsibility of the agency. These workers were mostly transferred from the previous contract holder (Greenwish).

In both Liberia and Sierra Leone, the business units use a 'flexible' employment arrangement (e.g. using fixed-term employment contracts) to account for the future need to change the workforce skill set once the modernisation process is complete and the operation shifts to O&M.

In DRC, all personnel working for Sagemcom DRC are contracted through two employment agencies: approximately 60% by Servtec RDC SARL; and 40% by Sesomo Services SARL. Sagemcom DRC in conjunction with these employment agencies share responsibilities for HR Management.

Communication is maintained on an ongoing basis with the agencies to manage HR issues, including sharing of information (e.g. leave, working hours, date of birth). Copies of the employee contracts are maintained by Sagemcom DRC. Documentation reviewed indicated the minimum age of personnel currently employed is 25. Working hours are registered using a biometric system for Kinshasa office personnel. Documentation for the period 15 January 2020 to 13 February 2020 indicated hours worked are typically 9 hours per day and 45 hours per week. Non-office personnel working hours are not specifically documented but are managed on a shift basis to avoid overtime.

It is understood that, although documentation was not provided, leave and working hours are managed by Sagemcom DRC in line with legal requirements, with available records provided to the employment agencies for record keeping.

Examples of employment contracts from each agency were provided for review, stamped by the national Department of Labour indicating employees have been registered in line with local regulations. The examples reviewed omitted the following details relating to working conditions :

- An example contract from Sesemo (one page) provides basic details, for example salary and legal references relating to termination, and reference to Sagemcom DRC working hours. No conditions relating to the amount of leave allowed was specified.
- Another example contract from Sesemo and two from Servtec provide greater detail. These cover annual leave of 18 days in line with regulatory requirements, and right of defense during disciplinary procedures. However, these contracts do not cover other leave types (sick bereavement, maternity and paternity), normal working hours, and rates for overtime (where applicable).

(See **ESAP #17 and #18**)

Working Conditions for Security Service Provider

Personnel: Terms of Employment

Facilities are guarded on a 24 hour basis by security guards stationed at each site working on a two shift system. Security services are subcontracted by Sagemcom. In addition to security services, security guards are tasked with providing technical support, and perform activities such as grid changeovers, power cycling generators, monitoring fuel consumption, reporting on generator run-times, monitoring and recording fuel supply and testing fuel for possible water and or oil contamination. Security guards are also expected to provide fire first response where necessary.

In DRC, for example, security is outsourced to two security service providers, Kafakis Security and Star Security System. Sagemcom DRC ensures the companies have obtained governmental licences to operate as a private security company regulated by government entities such Ministry of Internal Affairs and Ministry of Defence Organs. Operating

procedures are detailed in the Site Services Security Procedure (Procédure de Sécurité). The procedure includes aspects relating to access control, generators operation, refuelling, customer care, public relations, and emergency management. This procedure as well as the document HSE Requirements for Subcontractors (Clauses HSE SAGEMCOM DRC et Ses Sous) is issued to the two security companies during contract signing, though not verified whether security guards have been trained and are familiar with the requirements and tasks.

In all locations, it is therefore not clear that the security guards are qualified to conduct technical activities, or whether security personnel have received adequate job task or environment, health and safety training. There is the potential that security guards are not fully aware of the risks and impacts associated with these tasks, potentially exposing them to hazards, increasing the associated risk to them, assets, and operation (see **ESAP #19**).

Working Conditions for Security Service Provider

Personnel: Worker Facilities

Security guards are present on the sites for 24 hours per day. Each site is supposed to be fitted with a small facility to provide shelter for the security guard. Facilities are in disrepair at some of the sites and basic amenities such as toilet facilities are not always present. Night lighting is also not always present. This situation is more prevalent in Liberia and Sierra Leone where operations have recently commenced and upgrade of the sites is in process. The issues have already been identified by management during initial site assessments and these sites have been prioritised to address these issues, though it is understood that costs incurred to remedy the worker facilities will be the responsibility of the customer (see **ESAP #20**).

In DRC it was reported that in excess of 90% of the sites have adequate facilities, and where gaps are identified these are addressed by Orange as the customer. HSE site inspections are conducted at maximum twice per year by the SHERQ officer, and visits by the designated site supervisors also used to raise identified breach of HSE procedures. However, site Inspection checklist templates provided for review (for example as described in section PS1.1 Monitoring and Review above) omitted inspection items associated with security facilities (see **ESAP #13**).

Occupational Health and Safety

In Liberia and Sierra Leone, occupational health and safety management processes are yet to be established. Worker health and safety performance is maintained through use of trained and qualified workers and with oversight of management. As described, the business units are in the process of recruiting a dedicated HSE Manager that will be responsible for establishing the HSE management systems and for overseeing HSE performance.

Health and safety performance in Liberia and Sierra Leone has been good in the short time since the business units commenced operations. No fatalities or disabling injuries were reported, with management reporting only minor incidents mainly related to road travel where motorbikes are involved.

Sagemcom DRC's HSE management system has been

established and includes procedures and processes for i) identification of hazards (ii) provision of preventive and protective measures; (iii) training; (iv) documentation and reporting of occupational accidents, diseases, and incidents; and (v) emergency preparedness and response. In addition to the gaps identified in sections above under PS1 the following shortcomings in the health and safety specific procedures were identified:

- The PPE requirements documented in *SGRDC HSE 008 Rev 02 -SAGEMCOM RDC PPE Requirements* describes the type of PPE required for different tasks, and a supporting checklist is in place to confirm good PPE management practices are in effect; however, there is no documented procedure that defines the process for PPE (for example the identification, selection, issue, use, inspection and replacement of PPE).

- The PPE requirements are also not considered complete, for example the mandated use of life jackets when crossing water bodies is not specified;
- The Working at Heights procedure omits important details, for example specifying what height constitutes working at heights, use of ladders, inspection and maintenance requirements for harnesses, and requirements to be certified medically fit;
- During the management interviews measures to manage diseases (eg. malaria and typhoid) were provided, however these measures are not documented in company procedures.

(see **ESAP #21**)

In DRC, the Accident Reporting and Investigation Procedure (SGRDC HSE 004) has been implemented to ensure accurate

reporting and investigations periodic statistical reports for review by management for lost time injuries frequency rates and total recordable injury rates. No fatalities or disabling injuries have been reported. The 2019 incident and accident register recorded a total of 19 incidents. The majority of these incidents related to theft. Two incidents with injuries were reported: a fractured finger of a security guard and a minor injury during a vehicle accident; and a collapsed pylon with no injuries to Sagemcom personnel but resulted in injuries being sustained by members of the community.

A medical surveillance programme for workers has been implemented in DRC. It includes initial pre-employment medical and two-yearly periodic medicals, however upon leaving employment no exit medicals are conducted (see **ESAP #22**). A Medical Surveillance Programme has not been established for Liberia and Sierra Leone (see **ESAP #22**).

Hazardous Materials Management

Hazardous materials, specifically diesel fuel, oils and lubricants, and battery acid are used for the operation and maintenance of the power systems. Diesel storage at base stations sites are above ground, with tank capacity typically between 600 litres and 2000 litres. Tanks are generally stand-alone tanks.

In DRC, tanks located at Orange's data centres reach approximately 10,000 litres capacity, though Sagemcom DRC is responsible for refuelling only at these sites, and not maintenance. Five outsourced warehouses facilities are used hired for the storage of spares and consumables, including oils (no fuel is stored by Sagemcom DRC). Warehouse facilities and operators are inspected for HSE measures, typically conducted on an ad-hoc basis by technicians, though no

warehouse specific checklist is used. The Sagemcom DRC Warehouses Procedure (SC/RDC/FIN/PC-05) has been established however the objective focuses on inventory management and not HSE practices. Management of hazardous goods is therefore not fully described in company procedures, specifically detailing requirements of identification storage, handling, use, material safety data sheets (MSDS), and labelling (see **ESAP #23**).

Limited observations indicates that at least some fuel tanks are not fitted with secondary containment to prevent release to the environment in the case of accidental release. There are also reports that jerry cans are sometimes used to transport smaller volumes of fuel to the sites in non-routine circumstances (eg. emergency repairs) and that spills sometimes occur during filling (see **ESAP# 23**).

Waste Management

There are challenges relating to the lack of available waste disposal facilities in all countries, specifically for disposal of hazardous waste, including spent batteries, waste oils, waste oil filters, and electrical wastes.

In Liberia and Sierra Leone, formal waste management procedures have not been established, nor have waste disposal service providers been identified. In Sierra Leone, such waste is being temporarily stored at Sagemcom Sierra Liberia facilities (three locations). The business unit reports that about 1000 litres of waste oil, about 1000 used fuel filters, and about 1500 used batteries are being held pending identification of a suitable waste disposal provider. The volume of waste accumulated in Liberia is not as high given that operations recently commenced. The business unit estimates however that it will generate about 2500 waste batteries from the modernisation phase.

In DRC, wastes are returned to the supplier for recycling: used oil and spent oil filters to the distributor (Total) and sold under cheaper brands; spent batteries returned to Orange warehouses (as the current owner of the batteries), though the final waste disposal destination of the wastes has not been verified. Under the current agreement, as sites are modernised Sagemcom DRC will become responsible for the battery wastes. No new batteries (installed since 2018) have required replacement and therefore no battery waste to be managed by Sagemcom DRC generated. Procedures to handle oil waste, waste oil and fuel spills on sites has been established, providing steps on prevention spills at site, and transporting the waste to the supplier. The HSE management system manual briefly describes waste management measures, including application of the waste hierarchy, removal and disposal of waste by competent and authorised service providers and maintenance of waste records.

At present no options have been identified for recycling of batteries (all countries), and management of waste and waste (Sierra Leone). With the exception of managing waste on-site at DRC sites, the waste management processes does not provide for proper management to ensure wastes are identified, classified, transported, stored and ultimately disposed of or recycled in a manner compliant with local legislation and international standards, specifically to ensure proper handling, storage, transport and ultimately disposal of all wastes, and a document manifest system to ensure there is supporting evidence (see **ESAP #24**).

Greenhouse Gas Emissions Monitoring and Reporting

Through the modernisation of the energy systems, including implementation of photovoltaic (PV) solutions where grid electricity is unreliable or unavailable, it is expected that the businesses will achieve a major overall reduction in Greenhouse Gas emissions (GHGs).

At present, fuel and associated energy consumption is recorded, however there has been no quantification of GHGs. Accordingly, the business units have not determined whether GHGs exceed the IFC threshold of 25,000 tons of CO₂-equivalent annual, which triggers the PS3 requirement to conduct annual quantification, although this is unlikely (see **ESAP #25**).

Community Health and Safety

Risk to community health and safety from business units' operations include potential for fire and accidental exposure to electrical equipment. Risks are minimised by restricting access to the sites and to hazardous equipment through physical security (e.g. fencing) and 24-hour security guarding. Fires are rare but sites are fitted with fire extinguishers and security guards are trained in fire extinguisher use. Business operations involve road travel but not in significant amounts nor involving transport of heavy load or dangerous goods.

Security

Security incidents reported include muggings, petty crime involving theft of fuel, theft of tools and personnel items (e.g. laptop and phone), and one incident where a security guard was assaulted and sustained a fracture to his finger. The sites

and assets are secured by fencing and controlled access and guarded 24 hours per day by security guards. The security guards play a significant role in managing site security. The security guards are not armed. Local police or security company backup are called to deal with emergency situations.

Security services are outsourced to private security companies registered by the relevant country authorities to provide such services. The scope of work for security services is documented in service contracts for Liberia and Sierra Leone. In DRC contract agreements are still being drafted, though site security processes have been established that detail procedures and provided guidance in terms of undertaking security guards tasks. These included limited detail regarding their powers of authority, for example prohibiting engaging in fights or threatening members of the public by use of any weapons.

Service providers' systems have not been verified by the business units to verify that guards are trained in the requirements of international standards, including the UN Voluntary Principles on Security and Human Rights and related safety and security protocols (see **ESAP #26**).

REPUTATIONAL RISK REVIEW SUMMARY

The Reputational Risk Review's (RRR) objective is to assess a company's E&S reputational issues using free public sources of information (i.e. the internet) in a methodological way. This includes:

- Google search using key words (such as "Sagemcom" + "Orange" + land grabbing, + pollution + human rights etc.); and
- The screening of a set of strategic web sites (Land Matrix, Environmental Justice Atlas, Global Forest Watch, WWF, Greenpeace, Human Rights Watch, Amnesty International etc.).

The RRR classifies hits as Direct or Indirect. Where Direct hits concern the Project (i.e. New ESCO, Sagemcom DRC, Sagemcom Liberia, and Sagemcom Sierra Leone) and Indirect concern the broader sector or geography of the Project. The full results of the RRR are presented in *Annex A* of this report.



The main findings of the RRR for Sagemcom and Orange are as follows:

- There are no direct or indirect results relating to Sagemcom, only results directly for Orange.
- There were no findings related to Sagemcom or Orange on any of the strategic websites mentioned above.



0 DIRECT HITS

0 INDIRECT HITS



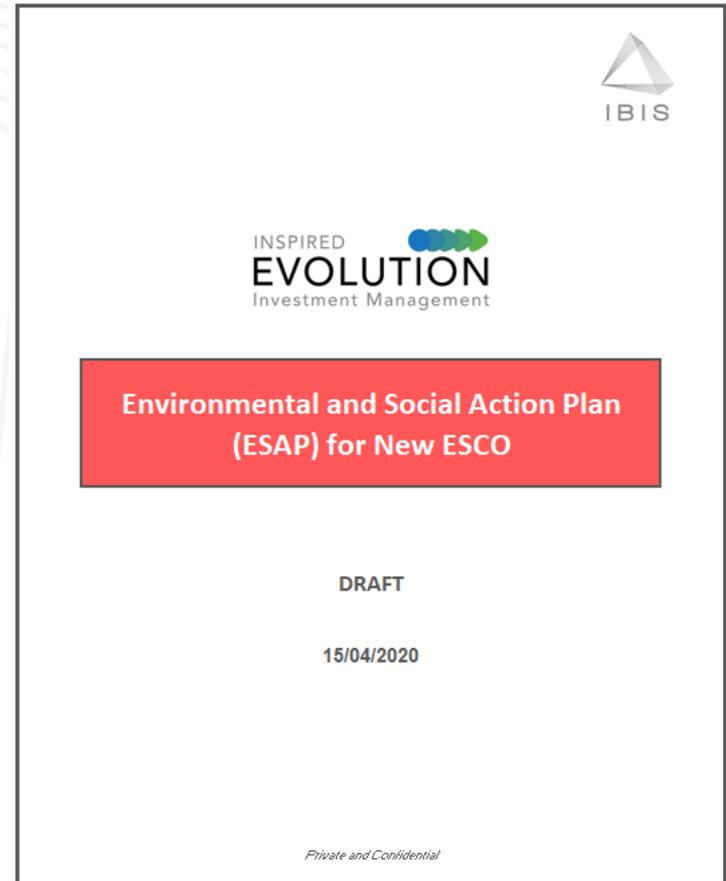
1 DIRECT HITS

Accident involving Orange owned telco tower. Tower collapse killed two people.

5 INDIRECT HITS

Government enforced internet restrictions as a result of anti-government protests and sentiment in Liberia and DRC. Orange has to abide by government orders leading to criticism that they were complicit in curbing freedom of speech.

Provided as a separate Excel file.





ANNEX A-REPUTATIONAL RISK REVIEW

Web Sites	Findings
<p>Result of Google search using the below key words (first 10 results):</p> <ul style="list-style-type: none">• Sagemcom Orange telecommunication Sierra Leone/Liberia/DRC conflict• Sagemcom Orange telecommunication Sierra Leone/Liberia/DRC pollution• Sagemcom Orange telecommunication Sierra Leone/Liberia/DRC human rights• Sagemcom Orange telecommunication Sierra Leone/Liberia/DRC land grabs• Sagemcom Orange telecommunication Sierra Leone/Liberia/DRC accident	<p>Liberia (8 June 2019): Internet restrictions due to anti-government protests (human rights issue). <i>Orange apologizes for difficulties in using some social media platforms on the internet on 7th June due to restrictions on services ordered by the Government of Liberia for national security reasons.</i> https://www.africanstar.org/internet-provider-orange-apologizes-to-customers-blames-liberian-govt/</p> <p>Liberia (08 November 2019): Financial fine for irregular reporting (regulatory oversight). <i>Liberia government fined Orange-Liberia for or failing to file no Suspicious Transaction Report for the period of two years.</i> https://frontpageafricaonline.com/front-slider/financial-intelligence-unit-fines-orange-liberia/</p> <p>DRC (11 August 2017): Internet restrictions due to anti government protests (human rights issue). DRC ordered Orange to slow internet capacity to make it hard to transmit images on social media. https://www.accessnow.org/democratic-republic-congo-orders-orange-cameroon-slow-internet-capacity/</p> <p>DRC (03 January 2019): Internet restrictions due to anti government sentiment during elections (human rights issue). Internet connectivity in the vast central African state was disrupted following DRC's long-delayed presidential election. Affected networks included Orange. http://www.rfi.fr/en/africa/20190102-dr-congo-restricts-internet-press-presidential-results-trickle</p>

ANNEX A-REPUTATIONAL RISK REVIEW

Web Sites

Result of Google search using the below key words (first 10 results):

- Sagemcom orange Sierra Leone/Liberia/DRC conflict
- Sagemcom orange Sierra Leone/Liberia/DRC pollution
- Sagemcom orange Sierra Leone/Liberia/DRC human rights
- Sagemcom orange Sierra Leone/Liberia/DRC land grabs
- Sagemcom orange Sierra Leone/Liberia/DRC accident

Findings

DRC (10 August 2017): Internet restrictions due to anti government sentiment during elections (human rights issue). *Reporters Without Borders (RSF) condemns this violation of freedom of information by the DRC's authoritarian government and calls on telephone operators (Orange) to resist such demands.*

<https://rsf.org/en/news/orange-must-resist-drc-governments-censorship-requests>

DRC (06 October 2019): Two people killed by a fallen telco tower (accident). *Two people were killed in the collapse of a communication installation pole owned by Orange in eastern Democratic Republic of Congo, according to a report from the French mobile phone operator.*

<https://www.africanews.com/2019/10/06/drc-two-nuns-killed-by-a-fallen-antenna-in-uvira/>

ANNEX A-REPUTATIONAL RISK REVIEW

Web Sites

Findings

Screening of large organization web sites

Environment Justice Atlas : The environmental justice atlas documents and catalogues social conflict around environmental issues. It allows to assess potential conflict with communities surrounding the project
<https://ejatlas.org>

Nothing Highlighted

Land Matrix: The Land Matrix is a global and independent land monitoring initiative that promotes transparency and accountability in decisions over land and investment. <http://www.landmatrix.org/>

Nothing Highlighted

GreenPeace is an independent campaigning organisation, which uses non-violent, creative confrontation to expose global environmental problems, and to force the solutions which are essential to a green and peaceful future. – www.greenpeace.org

Nothing Highlighted

Human rights watch is a human rights non-governmental organization headquartered in the USA – www.hrw.org

Nothing Highlighted

Centre for Research on Multinationals (SOMO) is a critical, independent not-for-profit knowledge centre on multinationals www.somo.nl

Nothing Highlighted

ANNEX B - INTERVIEW LIST

COMPANY	NAME	Position	DATE
Sagemcom Liberia	Moise Kouame	Operations Manager	30 March 2020
Sagemcom Sierra Leone	Marius Edibroussie	Operations Manager	30 March 2020
Sagemcom Sierra Leone and Liberia	Marc Le Burlout	Country Manager	31 March 2020
Sagemcom DRC	Madani Baktache	Country Manager	31 March 2020
Sagemcom DRC	Herve Bwanasura	Operations Manager	31 March 2020
Sagemcom DRC	Chancelvie Bakebe	EHS Manager	01 April 2020

ANNEX C-DOCUMENT REVIEW LIST

#	Title	Date
1.0	VDR	NA
1.1	ESCOTEL	NA
1.1.1	Escotel - Corporate Structure	NA
1.1.2	Mauritius	NA
1.1.2.1	Constitution	2019/12/04
1.1.2.2	Certificate of Incorporation	2020/01/14
1.1.2.3	FSC Licence	2020/01/14
1.1.3	Liberia	NA
1.1.3.1	ESCOTEL LIBERIA-BUSINESS REGISTRATION DOCUMENTS	2020/02/06
1.1.4	Sierra Leone	NA
1.1.4.1	Escotel (SL) - NASSIT AND NRA TIN	NA
1.1.4.2	Escotel (SL) Ltd certificates of Incorporation and registration	2020/02/20

ANNEX C-DOCUMENT REVIEW LIST

#	Title	Date
1.2	SAGEMCOM	NA
1.2.1	Financials	NA
1.2.1.1	Sagemcom - Rapport sur les comptes consolidés 31.12.2017 - VF	31/12/2017
1.2.1.2	Sagemcom SAS - consolidated financial statements 2018	2018
1.2.1.3	Sagemcom SAS - Rapport sur les comptes consolidés - 31.12.2.2018	31/12/2018
1.2.1.4	Sagemcom SAS- Auditors Report on consolidated FS - FY2017 - VF	2017
1.2.1.5	DRC	NA
1.2.1.5.1	CPT 2018 2eme VOLET	2018
1.2.1.5.2	CPT 2018 RDC1er VOLET	2018
1.2.2	KYC	NA
1.2.2.1	ID documents	NA
1.2.2.1.1	Passeport E. Rieul - validité 06 12 27	NA
1.2.2.1.2	Passeport P SEVIAN - N 16AZ98140 - Exp 06 06 2026 (3)	NA

ANNEX C-DOCUMENT REVIEW LIST

#	Title	Date
1.2.2.2	AML Letter	NA
1.2.2.2.1	CCP X - AML - comfort letter - Sagemcom - 27.08.2019	27/08/2019
1.2.2.3	AoA	NA
1.2.2.3.1	2018 04 19-SC EetT Statuts UK	19/04/2018
1.2.2.4	Certificate of Incorporation	NA
1.2.2.4.1	2019 12 18-SC EetT- extrait KBIS EN	18/12/2018
1.2.2.5	Tax Clearance	NA
1.2.2.5.1	2020-01-09 Attestation REGULARITE FISCALE SAGEMCOM SAS	2020/01/09
1.2.2.5.2	2020-01-09 Attestation REGULARITE FISCALE E&T	2020/01/09
1.2.2.6	Certificates	NA
1.2.2.6.1	RADD_Sagemcom_2018_FR	2018
1.2.2.7	Corporate Structure	NA

ANNEX C-DOCUMENT REVIEW LIST

#	Title	Date
1.2.2.7.1	Organigramme SAGEMCOM Group hors filiales 12 2019	Dec-19
1.2.2.7.2	Organigramme SAGEMCOM Group avec filiales 12 2019	Dec-19
1.2.2.7.3	CCPX - Sagemcom - abridged str chart - 27.08.2019	2019/08/27
1.2.2.8	Sagemcom Liberia	NA
1.2.2.8.1	SAGEMCOM LIBERIA AOI	2019/04/01
1.2.2.8.2	SAGEMCOM LIBERIA BUSINESS CERTIFICATE	2019/04/25
1.2.2.9	Sagemcom Sierra Leone	NA
1.2.2.9.1	Memorandum and Articles	NA
1.2.2.9.2	SAGEMCOM-CERTIFICATES OF INCORPORATION AND REGISTRATION	2019/01/04
1.3	Insurance	NA
1.3.1	MIGA	NA
1.3.1.1	MIGA Coverages Presentation (simple PRI)	NA

ANNEX C-DOCUMENT REVIEW LIST

#	Title	Date
1.2.2.7.1	Organigramme SAGEMCOM Group hors filiales 12 2019	Dec-19
1.2.2.7.2	Organigramme SAGEMCOM Group avec filiales 12 2019	Dec-19
1.2.2.7.3	CCPX - Sagemcom - abridged str chart - 27.08.2019	2019/08/27
1.2.2.8	Sagemcom Liberia	NA
1.2.2.8.1	SAGEMCOM LIBERIA AOI	2019/04/01
1.2.2.8.2	SAGEMCOM LIBERIA BUSINESS CERTIFICATE	2019/04/25
1.2.2.9	Sagemcom Sierra Leone	NA
1.2.2.9.1	Memorandum and Articles	NA
1.2.2.9.2	SAGEMCOM-CERTIFICATES OF INCORPORATION AND REGISTRATION	2019/01/04
1.3	Insurance	NA
1.3.1	MIGA	NA
1.3.1.1	MIGA Coverages Presentation (simple PRI)	NA

ANNEX C-DOCUMENT REVIEW LIST

#	Title	Date
1.3.1.2	MIGA Equity Investments Template October 2018_1	Oct-18
1.4	CSR	NA
1.4.1	Global Compact signed PS	2010/12/13
1.4.2	Rapport RSE SAGEMCOM FR	2016
1.4.3	Sagemcom comitments	NA
1.4.4	Sagemcom supports the Global Compact	NA
1.4.5	ISO 14000	2020/01/01
1.4.6	ISO 9001	2020/01/01
1.4.7	SAGEMCOM EcoVadis Certification	2019
1.4.8	Manuel Management Qualité	NA
1.5	Contracts	NA
1.5.1	Liberia	NA

ANNEX C-DOCUMENT REVIEW LIST

#	Title	Date
1.5.1.1	Orange Contract	NA
1.5.1.1.1	ESCO Liberia Main Body and annexes	2019/12/05
1.5.1.1.2	20191205 Binder OLIB SC	2019/12/05
1.5.1.1.3	Annex 10 Reversibility Processes and Conditions of Purchase OLIB AGREED	2019/12/05
1.5.1.1.4	Annex 11 Reporting OLIB AGREED	2019/12/05
1.5.1.1.5	Annex 12 Register of the Equipment on Managed Sites OLIB AGREED	2019/12/05
1.5.1.1.6	Annex 1 List of Sites and Priorities OLIB AGREED FV1812	2019/12/05
1.5.1.1.7	Annex 2 Description of the Services OLIB AGREED	2019/12/05
1.5.1.1.8	Annex 3 KPI and Penalties OLIB AGREED	2019/12/05
1.5.1.1.9	Annex 4 Fees and indexation OLIB Agreed	2019/12/05
1.5.1.1.10	Annex 5 Technical Specifications OLIB AGREED	2019/12/05
1.5.1.1.11	Annex 6 Spare Parts Inventory OLIB AGREED	2019/12/05

ANNEX C-DOCUMENT REVIEW LIST

#	Title	Date
1.5.1.1.12	Annex 7 Preparation Principles OLIB AGREED	2019/12/05
1.5.1.1.13	Annex 8 Governance OLIB AGREED	2019/12/05
1.5.1.1.14	Transfer ESCO Liberia 200311sc	2020/03/11
1.5.2	Sierra Leone	NA
1.5.2.1	Orange Contract	NA
1.5.2.1.1	Esco Contract OSL - Sagemcom	2020/01/20
1.5.2.1.2	OSL Annex 1 List of Sites and Priorities 011320 AGREED	2020/01/20
1.5.2.1.3	OSL Annex 10 Reversibility Processes and Conditions of Purchase 011320 AGREED	2020/01/20
1.5.2.1.4	OSL Annex 11 Reporting Revised OSL 011320 AGREEDv2	2020/01/20
1.5.2.1.5	OSL Annex 12 Register of the Equipment on Managed Sites 011320 AGREED	2020/01/20
1.5.2.1.6	OSL Annex 2 Description of the Services 011320 AGREED	2020/01/20
1.5.2.1.7	OSL Annex 3 KPI and Penalties 011320 AGREED	2020/01/20

ANNEX C-DOCUMENT REVIEW LIST

#	Title	Date
1.5.2.1.8	OSL Annex 4 Fees and Indexation 060220 AGREED	2020/01/20
1.5.2.1.9	OSL Annex 5 Technical Specifications 011320 AGREEDv2	2020/01/20
1.5.2.1.10	OSL Annex 6 Spare Parts Inventory 011320 AGREED	2020/01/20
1.5.2.1.11	OSL Annex 7 Preparation Principles 011320 AGREED	2020/01/20
1.5.2.1.12	OSL Annex 8 Governance 011320 AGREED	2020/01/20
1.5.2.1.13	OSL MAIN BODY 16012020 AGREED	2020/01/16
1.5.2.1.14	Transfer ESCO SL 200311sc	2020/01/20
1.5.2.2	Sagemcom Contracts	NA
1.5.2.2.1	ESCO EPC SL Installation Contract 200310	2020/03/10
1.5.2.2.2	ESCO EPC SL OM 200312	2020/03/12
1.5.2.2.3	ESCO EPC SL Supply Contract 200316	2020/03/16
1.6	Presentation Documents	NA

ANNEX C-DOCUMENT REVIEW LIST

#	Title	Date
1.6.1	Power Telecom Africa IM feb2020	Feb-20
1.9	Technical and Operational	NA
1.9.4	Sites Documentation	NA
1.9.4.2	Sierra Leone	NA
1.9.4.2.1	Synoptiques ingenierie OSL ESCO	NA
1.9.4.2.2	Wiring Schemes_OSL_New Sites Ed1 2019	2019
1.9.4.3	DRC	NA
1.9.4.3.1	DRC - Site Plan - banta mokele	2019
1.9.4.3.2	DRC - Site Plan - BLAMA MASSAQUOI	2019
1.9.4.3.3	DRC - Site Plan - BOAMA KOYA	2019
1.9.4.3.4	DRC - Site Plan - BRAFORD	2019
1.9.4.3.5	DRC - Site Plan - BUMPET PERRI	2019

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#	Title	Date
1.9.4.3.6	DRC - Site Plan - GANDOHUN	2019
1.9.4.3.7	DRC - Site Plan - GBAP	2019
1.9.4.3.8	DRC - Site Plan - GBENDEMBU	2019
1.9.4.3.9	DRC - Site Plan - GEGBWEMA	2019
1.9.4.3.10	DRC - Site Plan - KAMIANDOR	2019
1.9.4.3.11	DRC - Site Plan - KODEMBAYA I	2019
1.9.4.3.12	DRC - Site Plan - KOINDU KURA	2019
1.9.4.3.13	DRC - Site Plan - KPETEWOMA	2019
1.9.4.3.14	DRC - Site Plan - MAKARANKAY	2019
1.9.4.3.15	DRC - Site Plan - MOSENESSI JUNCTION	2019
1.9.4.3.16	DRC - Site Plan - PLAN HEREMAKON	2019
1.9.4.3.17	DRC - Site Plan - RORUKS-S.I.D	2019

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#	Title	Date
1.9.4.3.18	DRC - Site Plan - Talia	2019
1.9.4.3.19	Synoptiques ingenierie ORDC ESCO	2020/03/09
1.9.4.3.20	Dossier recette ESM POWER ESCO RDC	NA
1.9.4.3.21	APD_BAGATA HYBRID SOLAR S1	2018
1.9.4.3.22	APD_BOMA CITY BAD GRID	2018
1.9.4.3.23	APD_TENDA HGB	2018
1.9.4.3.24	DESIGN HYBRID SOLAR S1 2kW	2020/03/20
1.9.4.3.25	DESIGN HYBRID SOLAR S3 2kW	2020/03/20
1.9.5	Governance Meetings	NA
1.9.5.1	Governance SL	NA
1.9.5.1.1	Governance February	Feb-20
1.9.5.1.2	Governance January	Jan-20

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#	Title	Date
1.9.5.1.3	Governance November	Nov-20
1.9.5.1.4	Governance October	Oct-19
1.9.5.1.5	Governance September	Sep-19
1.9.5.1.6	Governance WK52 (End December)	Dec-20
1.9.5.2	Governance Liberia	Mar-21
1.9.5.2.1	february Monthly Governance Meeting Liberia_110320	2020/01/20
1.9.5.2.2	January monthly governance meeting liberia_V2	Jan-20
1.9.5.3	Governance DRC	NA
1.9.5.3.1	Monthly Meeting ORDC - 10-01-2020	2020/01/10
1.9.6	NOC Extracts	NA
1.9.6.1	2020-02-01_2020-02-29_ESCO_report ORDC	2020/02/29
1.9.6.2	20200309_20200315_ESCO_report OSL	2020/03/15

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#	Title	Date
1.9.7	Certificates of conformity	NA
1.9.7.1	70.406.16.171.03-02CERT_TUV_MARK_盐雾_mono	2018
1.9.7.2	70.406.16.171.04-02CERT_TUV_MARK_盐雾_poly	2018
1.9.7.3	Certificate of Compliance Classic OPZS SOLAR cells IEC 61427	2011
1.9.7.4	Certificate of compliance OPzS cells IEC,DIN,ISO 2016	2011
1.9.7.5	DECLARATION LETTER-Sagemcom	2020/04/10
1.9.7.6	Garantie EXIDE	NA
1.9.7.7	Point Certificat Conformité RevEO	NA
1.9.7.8	VERTIV EN 300 132 1 2	2020/04/02
1.9.7.9	Warranty Letter for Shoto LLC Series Battery_2 years	NA
~	Bonne Conduite et Prevention De La Corruption	2020-04-06
~	Contrat 1 (Sesomo).pdf	2020-04-13

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#	Title	Date
~	Contrat 2 (Sesomo).pdf	2020-04-06
~	Contrat 3 (Servtec).pdf	2020-04-13
~	Contrat 4 (Servtec).pdf	2020-04-06
~	HR 03-SAGCONGO au 31-03-2020	2020-04-06
~	Investors Audit Docs - HR.rar	2020-04-09
~	Ouvre Sociale.pdf	2020-04-09
~	Reglement Interieur Vise [Internal Rules- HR Policy].pdf	2020-04-07
~	Suivis Heure De Travail [working hours].pdf	2020-04-06
~	Appendix 1 Rev 00-HR_Form_Accident_Report	2020-04-04
~	Appendix II Rev 02-HR_Form_Accident_Analysis_And_Investigation	2020-04-04
~	Appendix III Rev 00-HR_Form_Personal_Protective_Equipment_&_Work_Equipment Control	2020-04-04
~	Appendix IV Rev 00 HR Form Collective Protective Equipment & Work Equipment Control	2020-04-04

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#	Title	Date
~	Appendix IX Rev 00 PPE Inspection Forms	2020-04-04
~	Appendix V Rev 01 HSE Monthly Report	2020-04-04
~	Appendix VI Rev 00 Site HSE Audit Forms	2020-04-04
~	Appednix VII Rev 00 First Aid Kit Monthly Inspection	2020-04-04
~	Appendix VIII Fire Prevention on and Extinguisher Audit Form	2020-04-04
~	Appendix X rev 00 Ladder Audit Form Rev 00	2020-04-04
~	Appendix XI Rev 00 Procedures to handle oil Waste	2020-04-04
~	Appendix XII CSR Form Preventive and Corrective Actions Plan 2019 Mar 01	2020-04-04
~	SAGEMCOM RDC Procedure de Securire	2020-04-04
~	SAGEMCOM RDC Security Processes	2020-04-04
~	SGRDC HSE 001 SAGEMCOM RDC - MS MANUEL	2020-04-04
~	SGRDC HSE 003 Rev 02 Emergency Response Plan Sagemcom RDC	2020-04-04

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#	Title	Date
~	SGRDC HSE 004 Rev 02 Accident Reporting and Investigation	2020-04-04
~	SGRDC HSE 006 Rev 02 Work at Height S.O.P	2020-04-04
~	SGRDC HSE 007 Rev 02 Working with electricity S.O.P	2020-04-04
~	SGRDC HSE 008 Rev 02 SAGECOM RDC PPE Requirements	2020-04-04
~	SGRDC HSE 010 Rev 02 HR Form Risks Assessment	2020-04-04
~	SGRDC HSE 011 SAGEMCOM RDC Training Matrix	2020-04-04
~	SGRDC HSE 012 Rev 01 ASAGEMCOM RDC Rules to take while driving	2020-04-10
~	4101 Kakumba Site Candidat A 15mX15m Orange Drawing	2020-04-10
~	Acte d'engagement EPI [Act of Commitment to the wearing of PPE].pdf	2020-04-10
~	Acuse reception lecture politique Rayon Vert [acknowledgment of QHSE Policy Receipt]	2020-04-10
~	Certicat Habilitation Electrique [electrical compliance training certificate]	2020-04-10
~	Certicat travaux en hauteur [working at heights training certificate].pdf	2020-04-10

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#	Title	Date
~	Communication de la Politique QHSE Sagemcom DRC par ELMS [QHSE Policy Receipt].msg	2020-04-10
~	Communication de la Politique QHSE Sagemcom DRC par Global Maintenance [QHSE Policy Receipt]	2020-04-10
~	Acte d'engagement EPI [Commitment to Wearing PPE]	2020-04-06
~	Cartouches usees	2020-04-06
~	Charte d'utilisation des vehicules de societe [Company Charter Vehicle]	2020-04-06
~	Clauses HSE SAGEMCOM DRC ET SES SOUS [HSE SAGECOM DRC CLAUSES AND ITS SUBCONTRACTORS]	2020-04-06
~	Filtres Usager	2020-04-06
~	Huile Usee	2020-04-06
~	Notes internes et instructions [Preventitive Means for working at Heights]	2020-04-08
~	Permis D'Exploitation D'un Etablissement De Traitement Phyto [pest control permit]	2020-04-08
~	Permis D'Exploitation Des Etablissements Dangereux, Insalubres ou Incommodes [operting licence]	2020-04-08
~	Plan de reponse d'urgence [emergency responist summary]	2020-04-06

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#	Title	Date
~	Procedure d'intergration v1 [intergration new employee-medical and HSE induction]	2020-04-06
~	Procedure de formation [training procedure]	2020-04-06
~	Procedure de situation d'urgence Sagecome [Emergency Procedure]	2020-04-06
~	Regles Absolues de Sagemcom rdc [HSE absolute rules]	2020-04-06
~	Volume et type de detchets generes	2020-04-06
~	I,2 [Tax Payment]	2020-04-06
~	I,1 (HSEQ Policy)	2020-04-08
~	I,5 [list of haz materials]	2020-04-06
~	II.11.PDF	2020-04-06
~	II.5 [Risk Assessment]	2020-04-06
~	II.2 [Env Certificate - Orange]	2020-04-08
~	11.3 [Fire Fighting and First Aid Training Plan 2020]	2020-04-06

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#	Title	Date
~	11.4 [Accident Incident Register]	2020-04-13
~	11.6.pdf	2020-04-06
~	III.2. [accidents incident register 2019]	2020-04-06
~	Numerotation documents du fichier [document numbering]	2020-04-06
~	Registre Veille Reglementaire Sagemcom rdc et evaluation de la conformite [legal register]	2020-04-06
~	PWC Engagement Letter for Tax and Immigration Services	2019-10-04
~	Service Contract Agreement between Jobsearch 'The Supplier' and Sagemcom 'The Client'	2019-01-30
~	Modification to HR Management Services Agreement Sagemcom and Jobsearch	2020-01-10
~	2017/2018 CSR Report	2018

ANNEX C-PHOTOLOG (SIERRA LEONE)



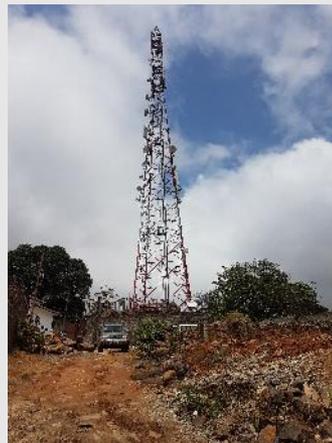
Example of access control



Example of site security fencing



Example of a tower in a residential area



Example of a tower on the outskirts of Freetown

ANNEX C-PHOTOLOG (SIERRA LEONE)



Example of tower infrastructure



Example of safety signage



Example of ablution facilities



Example of a diesel generator with fire extinguisher

| THANK YOU

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