**Environmental & Social Action Plan for Escotel Sierra Leone(“SL”) #16605**

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| **No.** | **Performance Standards** | **Due Dates** | **Deliverable** |
|  | **PS1: Assessment and Management of Social and Environmental Risks and Issues** | | |
|  | The Project Enterprise (PE) will require the Engineering, Procurement and Construction and Operations and Management (EPC and O&M) contractor to develop the Project specific Environmental and Social Management System (ESMS) for construction and operations that conforms with Sierra Leone (SL) laws respectively and in line with MIGA PSs as well as applicable WBG Environmental Health and Safety (EHS) guidelines. The ESMS will include the following items: (i) Environmental and Social Policy; (ii) Health and Safety Policy; (iii) management programs and plans; (iv) organizational capacity, responsibilities and competence; and with monitoring actions and an overarching system for reporting and tracking non-compliances. | Within 6 months of the Effective Date | Submit to MIGA the Project’s updated ESMS manual |
|  | The PEs will include specific OHS requirements and E&S risk management clauses in the EPC and O&M contractor contracts to be in line with MIGA’s PSs requirement. | Within 30 days of the Effective Date | Submit to MIGA the EPC and O&M contractor’s contract for MIGA’s review and approval |
|  | The PE and EPC and O&M contractor will develop the HSE Policy as part of the ESMS update to include management of social risks to guide the project to achieve sound environmental and social performance in line with MIGA PS 1. | Within 2 months of the Effective Date | Submit to MIGA the PE and EPC and O&M contractor’s HSE policies document |
|  | PE will require the EPC and O&M contractor to conduct a comprehensive E&S risk assessment of the proposed Project to commensurate with expected E&S risks and impacts and develop a time bound plan to mitigate and manage E&S risks identified. | Within 3 months of the Effective Date | Submit to MIGA the E&S assessment report |
|  | The PE will obtain environmental and operational permits for all sites from Orange, review for their applicability to project operations, and establish measures to implement and comply with the permit’s requirements in line with the national laws and MIGA’s E&S requirements | Within 30 days of the Effective Date | Submit to MIGA copies of environmental and operational permits |
|  | The PE will require the EPC and O&M contractor to develop Project specific Environmental Social Management Plan (ESMP) in line with MIGA’s PS and WBG EHS guidelines for the Project construction and operations phases. | Within 5 months of the Effective Date | Submit the ESMP to MIGA |
|  | The PE will require the EPC and O&M contractor to appoint a qualified Health, Safety and Environment (HSE) Manager and an HSE officers to manage Project E&S risks and impacts in line with the requirements of MIGA’s PS1 during construction and operations phases. | Prior to  MIGA Contract of Guarantee (CoG) signing | Submit to MIGA the appointed HSE Manager and HSE officer’s CVs |
|  | The PE will require the EPC and O&M contractor to develop a comprehensive Emergency Preparedness and Response Plan (EPRP) to address the facility wide risks including fire and other external emergencies for the Project construction and operation. The EPRP will articulate the steps needed to collaborate with nearby communities, local government agencies, and relevant third parties to facilitate response to emergency situations to prevent and mitigate harm to people and/or the environment. | Within 3 months of the Effective Date | Submit to MIGA the Emergency Preparedness and Response Plan |
|  | PEs will require the EPC and O&M contractor to equips all sites with firefighting equipment including adequate fire extinguishers on sites that are regularly inspected and well maintained in line with the national law and with the requirements of MIGA’ PS1. | Within 3 months of the Effective Date | Submit to MIGA photographic evidence of fire extinguishers equipped on Project Sites. |
|  | The PE will require the EPC and O&M contractor to develop a project specific Community Grievance and External Communication Mechanism in line with the requirements of MIGA PS 1 for the Project construction and operation phases. | Within 3 months of the Effective Date | Submit to MIGA the Community Grievance and External communication Mechanism |
|  | **PS2: Labor and Working Conditions** | | |
|  | The PE and EPC and O&M contractor will develop Human Resources (HR) policy and procedures that are Project specific during construction and operation to ensure they are in line with MIGA’s PS2 and SL labor laws. The EPC and O&M contractor will ensure that all direct and indirect employees are aware of its content. PE will also ensure that EPC and O&M contractor apply these to their sub-contractors. | Within 2 months of the Effective Date | Submit to MIGA the PE and EPC and O&M contractor’s HR policy aligned with PS2 and evidence on its dissemination to contractors and employees |
|  | PE and EPC and O&M contractor will develop worker grievance mechanism during the construction and operations in line with MIGA PS2 and ensure the grievance mechanism process is working effectively. | Within 2 months of the Effective Date | Submit to MIGA the workers grievance mechanism |
|  | The PE and EPC and O&M contractor will ensure that all workers and third-party employees such as security officers work within legal and negotiated hours per the national law and MIGA’s PS2. | Within 30 days of the Effective Date | Submit to MIGA contracts with security companies that the Security guards working hours are within the law |
|  | PE will coordinate with Orange and ensure that the security guard’s shelter facilities are refurbished and in good condition and they have access to facilities (such as basic toilets and night light) in line with MIGA PS2. | Within 2 months of the Effective Date | Submit to MIGA photographic evidence that Security guards’ shelter have been refurbished and in good condition. |
|  | The PE and EPC and O&M contractor will develop worker grievance mechanism in line with MIGA PS2 during the Project construction and operations phases and ensure the grievance mechanism process is working effectively. | Within 2 months of the Effective Date | Submit to MIGA the workers grievance mechanism |
|  | The PE will ensure that EPC and O&M contractor develops and implements policies and procedures for third-party workers for managing and monitoring their performance in relation to MIGA PS’s. | Within 2 months of the Effective Date | Submit to MIGA Third party employee policies and procedures |
|  | The PE will ensure that EPC and O&M contractor will develops and implements site-specific Occupational Health and Safety (OHS) procedures for the construction and operations phases detailing out the following issues: These procedures will cover the following issues: i) hazard identification and assessment; ii) construction site safety, iii) specific procedures for hazardous works, worker’s safety and training iv) use of personal protective equipment; v) implement a worker’s health program to screen the health of workers and measures to manage diseases (such as Malaria, Typhoid, Ebola and COVID-19); vi) site supervision and audit procedures; vii) incident investigations and reporting system and intervention measures (medical surveillance programs and first aid etc.). | Within 3 months of the Effective Date | Submit to MIGA the EPC and O&M contractor’s OHS procedures and plan |
|  | PE will update its policies and procedure to addresses the risks and impacts of COVID-19 to workers and communities in line with MIGA PS 1, 2 and 4. | Within 30 days of the Effective Date | Submit to MIGA Updated policies and procedures |
|  | **PS3: Resource Efficiency and Pollution Prevention** | | |
|  | The PE will require the EPC and O&M contractor to develop water management plan which details options available for water sources, water use, treatment requirements, water usage monitoring and estimated consumption during the construction and operations phase. | Within 3 months of the Effective Date | Submit to MIGA Water Management Plan |
|  | The PE will require the EPC to develop a waste management plan for projects in line with MIGA' PS 3 requirements for construction and operations phase. | Within 3 months of the Effective Date | Submit to MIGA waste management plan for construction and operations phase |
|  | PE will develop a procedure for managing the disposal of broken and ‘end of life’ modules, which will be in line with MIGA’s PS3 requirements and SL laws. | 120 days post CoG | Submit to MIGA procedure for managing the disposal of broken and ‘end of life’ modules 120 days post CoG. |
|  | The PE will require the EPC and O&M contractor to develop a comprehensive Hazardous Material (HAZMAT) procedure that clearly explains the process of managing hazardous materials and waste including but not limited to: disposal and storage of used oil, used oil filters, old batteries, broken solar panels, material safety data sheets, secondary containment during storage, labelling, and local emergency intervention measures (spill kits etc.). | Within 3 months of the Effective Date | Submit to MIGA a copy of the Hazardous Material procedure |
|  | **PS4: Community Health, Safety and Security** | | |
|  | The PE will require the EPC and O&M contractor to develop and implement the following plans and ensure to capture key elements of MIGA’s PS4:   1. Security Risk Assessment; and 2. Security Management Plan | Within 3 months of the Effective Date | Submit to MIGA the following plans:  a) Security Risk Assessment and  b) Security Management Plan |