

Environmental and Social Action Plan – Turaco (Ethiopia) May 2021

Item	Action	Deliverable	Timeline
PS 1 Assessment and Management of Environmental and Social Risks and Impacts			
1.1	Develop and implement an integrated E&S management system (ESMS) aligned to the Performance Standards (PS) as well as international certification standards ISO14001 and ISO 45001. The ESMS should include, but not be limited to:		30-Jan-22
	<ul style="list-style-type: none"> Provisions for PS compliant ESIA's to be conducted for any new project; 	<ul style="list-style-type: none"> Integrated management system manual 	
	<ul style="list-style-type: none"> A Group level EHS Policy that is rolled out across all underlying businesses and sites, and include EHS plans procedures relevant to the Company, such as: 	<ul style="list-style-type: none"> Integrated management system manual 	
	<ul style="list-style-type: none"> Assessment of EHS hazards and risks at each site; 	<ul style="list-style-type: none"> Hazard and risks register for each site 	
	<ul style="list-style-type: none"> Assessment of EHS legal and other requirements at each site; 	<ul style="list-style-type: none"> Legal register for each site 	
	<ul style="list-style-type: none"> Environmental plans and procedures relating to energy and water consumption, stormwater management, effluent management, solid waste management, air emissions, chemical management, etc.; 	<ul style="list-style-type: none"> Environmental plans and procedures 	
	<ul style="list-style-type: none"> OHS plans and procedures relating to lock out tag out, electrical safety, working at height, hot work, ATEX, machine safety, chemical safety, asbestos management, legionella risk management, etc.; 	<ul style="list-style-type: none"> OHS plans and procedures 	
	<ul style="list-style-type: none"> Fire Safety Plan; 	<ul style="list-style-type: none"> Fire Safety Plan 	
	<ul style="list-style-type: none"> Stakeholder Engagement Plan for each site; 	<ul style="list-style-type: none"> Stakeholder Engagement Plan 	
	<ul style="list-style-type: none"> External Grievance Management Mechanism; and 	<ul style="list-style-type: none"> External Grievance Management Mechanism 	
	<ul style="list-style-type: none"> EHS monitoring and reporting framework for each site 	<ul style="list-style-type: none"> EHS Monitoring and reporting framework 	
	<ul style="list-style-type: none"> Implement a programme of EHS training and awareness for management level staff and other employees, including development of a training matrix and management of training records. 	<ul style="list-style-type: none"> Record of EHS training 	
1.2	Publicly disclose the EHS Policy on BBHL's website	Publicly disclose the EHS Policy on BBHL's website	Within 60 days of the Effective Date
1.3	Develop Emergency Response Plans (ERPs) for each of the sites.	ERP in place and one drill undertaken at all sites	30-Sep-2021
1.4	Undertake mapping of E&S risks in the primary supply chains for HCFM and ZAK	Supply chain mapping	Within 60 days of the

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			Effective Date
1.5	At the corporate level, develop a risk-based procurement policy for sourcing raw materials from third-party suppliers.	Procurement Policy	Within 60 days of the Effective Date
1.6	For HCFM, develop a procurement procedure that defines i) process for evaluating E&S risks within the primary supply chain based on production material; (ii) evaluation of suppliers and source of raw material inputs; (iii) assessment of suppliers E&S systems and capacity to manage risks; and (iv) process for annual reviews of suppliers/source of product based on material production input supply risk assessments	Procurement Procedure	30-Dec-2021
1.7	Develop a strategy for procuring soap noodles made with Roundtable on Sustainable Palm Oil (RSPO)-certified (or similar certification for gaining assurances of sustainability) palm oil. Strategy will include specific steps to be taken and interim targets.	Sustainable Soap Noodle Procurement Strategy	Within 60 days of the Effective Date
1.8	Obtain from the supplier a detailed plan for making soap noodles that are produced with RSPO-certified (or similar certification) soap noodles.	Transition Plan	Within 1 year of the Effective Date
1.9	Update strategy for procuring soap noodles made with RSPO-certified (or similar certification) palm oil based on plan from the supplier.	Updated Sustainable Soap Noodle Strategy	Within 18 months of the Effective Date
1.10	Procure soap noodles made with RSPO-certified (or similar certification) soap noodles.	Evidence of certification of the soap noodles	Within 3 years of the Effective Date
PS 2 Labor and Working Conditions			
2.1	Implement corrective measures resulting from occupational health surveys for noise, illumination (internal and external), heat stress and ventilation at all the sites, and provide validation reports confirming all identified issues have been corrected.	OHS surveys completed and action plan in place Detailed document providing evidence of adequate resources, budget and timeline to implement the corrective actions	CP to second disbursement
2.2	Prepare an asbestos management plan. The asbestos management plan would have to include (not limited to): <ul style="list-style-type: none"> • Description of abatement works considered • Detailed planning of OHS provisions • Asbestos-containing waste materials disposal options considered • Budget • Timeline to implement the corrective actions Conduct an asbestos survey at all the other Turaco premises and develop asbestos management plans (no	Satisfactory asbestos survey done and, if required, asbestos management plan drafted by a licensed specialist. Asbestos survey and management plans if required	Within 6 months of the Effective Date

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	removal required unless health risks are associated due to asbestos-containing materials condition, location, etc.)		
2.3	Develop and implement a legionella risk management plan including: -periodic bacterial treatment -Identification of networks areas prone to bacterial development (e.g. dead arms, corroded piping sections) and conduct appropriate repair/modification works.	Procedure for bacterial treatment Networks survey report and upgrade works plan	Within 6 months of the Effective Date
PS 3 Resource Efficiency and Pollution Prevention			
3.1	Contact local authorities to apply for Water Permits required at ZAK (for the borehole and wastewater discharge), HCFM 2 (wastewater discharge) and Gullele (wastewater discharge). Water permit for the solvent extraction plant.	Permits	Within 6 months of the Effective Date
3.2	If monitoring identifies it's necessary, upgrade the effluent treatment plant at HCFM2 to ensure compliance with WBG EHS Guidelines and Ethiopian legislation	Evidence of upgraded equipment and monitoring results that indicate effluent in compliance with WBG Guidelines and Ethiopian legislation	If needed
3.3	Undertake an initial monitoring campaign of stack emissions of boilers and generators be conducted by a qualified laboratory to determine which pollutants are present and the quantities emitted. Develop a periodic monitoring process.	Monitoring results and periodic monitoring process	Within 6 months of the Effective Date
PS 4 Community Health, Safety and Security			
4.1	Prepare site specific community health management plans for HCFM, ZAK and the solvent extraction plant.	Community health management plans	Within 6 months of the Effective Date