

South Africa - Mulilo Sonnedix Prieska Solar Photovoltaic Project

Environmental and Social Action Plan (ESAP)

	<i>Action Required</i>	<i>Deliverables</i>	<i>Timeline</i>
<i>No.</i>	<i>PSI Assessment and Management of Environmental and Social Risks and Impacts</i>		
1	Develop a Project Environmental and Social Management System (ESMS) and associated management plans in line with the requirements of MIGA's PSs and South African regulations, for the operations phase which will be reflected in the O&M contractor's ESMS	Project operations and maintenance ESMS manuals and supporting E&S management plans and procedures, including monitoring	Within 60 days of the Effective Date ¹
2	Submit a decommissioning and site rehabilitation plan in line with the requirements of the PSs.	Project decommissioning and rehabilitation site closure plan	At least 6 months prior to commencing decommissioning activities
3	Develop a legal register reflecting requirements of MIGA's PSs and South African regulations for operations	Legal register and commitment register for operations	Within 30 days of the Effective Date
4	Update the Emergency Action Plan to incorporate guidance on how to respond to a protest/riot that may affect the access to the Project	Updated Emergency Action Plan	Within 30 days of the Effective Date
5	Provide additional firefighting capabilities including the provision of a water tank and associated firefighting training to manage and mitigate the risk of wildfires	Training Records	Within 60 days of the Effective Date

¹ Effective Date means the effective date of the relevant Contract of Guarantee, which the guarantee holder plans to have on or after the date of the acquisition/investment.

6	Improve the Annual SHEQ Audits by: <ul style="list-style-type: none"> - ensuring the contractor defines the audit reference framework, the methodology followed, and corrective actions for any non-compliances - defining a remote audit procedure in order to ensure quarterly SHE Audits continue on an ongoing basis. 	Annual Audit Report Remote Audit Procedure	Within 30 days of the Effective Date
7	Develop a Stakeholder Engagement Plan (SEP) to identify and map all stakeholders and institute and engagement plans commensurate with the stakeholder/community risks faced by the Solar PV Plant.	SEP	Within 60 days of the Effective Date
<i>PS2 Labor and Working Conditions</i>			
8	Develop a Project-level Grievance Mechanism and communicate to workers including the O&M on how to access it and lodge a grievance	Evidence of project level Grievance Mechanism	Within 30 days of the Effective Date
9	Incorporate labor and HR provision (i.e., in line with the O&M Contract) into the internal auditing procedures of the Project and O&M contractor.	Internal Audit Reports	Within 30 days of the Effective Date
10	Develop a Responsible Procurement Policy that will extend to the future procurement of solar panels and parts in line with the Performance Standards	Responsible Procurement Policy	Within 90 days of the Effective Date
<i>PS3 Resource Efficiency and Pollution Prevention</i>			
11	Review and update the Resource Efficiency Plan to include KPIs and associated monitoring and reporting requirements.	Updated Resource Efficiency Plan	Within 30 days of the Effective Date
<i>PS6 Biodiversity</i>			
12	Undertake an additional round of bird monitoring during the breeding season (April - November) to assess the status of the Martial Eagle.	Bird Monitoring Report Bird Monitoring Action Plan	31 December 2022

	Implement mitigation measures proposed by the avifauna specialist.		
<i>PS8 Cultural Heritage</i>			
13	Develop a Chance Find Procedure that outlines what process should be followed if previously unknown heritage resources, particularly archaeological resources, are encountered during operations.	Chance Finds Procedure	Within 30 days of the Effective Date