

Environmental and Social Action Plan – Orange Guinea Bissau (May 2023)

| Number | Action | Deliverable | Deadline |
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| PS 1 | | | |
| 1 | Hire a qualified and dedicated Environmental and Social Manager | CVs of shortlisted candidate before final decision | Prior to contract signing |
| 2 | Develop a site screening procedure that details and screens out high E&S risk items such as biodiversity, land acquisition, indigenous peoples, and cultural heritage | Site screening procedure | Within 2 months after contract signature |
| 3 | Hire a consultant to develop a project level Environmental and Social Management System (ESMS) for construction, operations, and decommissioning, in accordance with MIGA PS1. The ESMS will include the following items: (i) Environmental and Social Policy; (ii) Health and Safety Policy; (iii) organizational capacity, responsibilities and competence; and (iv) Monitoring actions and an overarching system for reporting and tracking non-compliances. | Project level ESMS | Within 6 months after contract signature |
| 4 | Hire a consultant to develop project level Environmental Management Plans (EMPs) in line with MIGA’s PSs and WBG EHS guidelines for all cellphone tower sites that identifies key risks and impacts and mitigating measures, external monitoring of various impacts including cost, time and responsibility of each party in its implementation and share with MIGA | Environmental Management Plans | Within 6 months after contract signature |
| 5 | As part of the ESMS, develop E&S training procedures and content including an on-boarding program, mandatory training on the ESMS, development programs for technical staff and specialists, and competency and certification requirements for staff involved in work with specific occupational health and safety risks | E&S training procedures | Within 6 months after contract signature |
| 6 | As part of the ESMS, develop and implement an Emergency Response Plan (ERP) aligned with Sonatel policies, Guinea Bissau regulations and consistent with the requirements of PS. The ERP will address the facility wide | Emergency Response Plans (ERP) | Within 3 months after contract signature |

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| | risks including fire and other external emergencies for the Project construction and operation and 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. | | |
| 7 | Develop and implement a stakeholder engagement plan (SEP) and a community grievance mechanism which include receipt, recording, and responding to grievances from the public | Stakeholder engagement plan and Community grievance mechanism | Within 4 months after contract signature |
| 8 | Provide annual monitoring reports to MIGA throughout the guarantee period, specifying E&S risks and impacts, management responsibilities, training, and monitoring. | Annual Monitoring Reports | Annually |
| PS 2 | | | |
| 9 | Revise OGB's HR Strategy and related systems to align its policies and procedures within national legislation and PS2 for both OGB staff and contractors, including provision of anonymous grievances, sexual harassment, and equal opportunities. | HR Strategy | Within 6 months contract signature |
| 10 | Develop and implement a project level OHS management system (OHSMS) in line with national legislation and the requirements of PS2. The OHSMS could be integrated with the ESMS. | OHS management system | Within 6 months after contract signature |
| 11 | Develop and implement an OHSMS manual and related procedures including risk assessment and mitigation, roles and responsibilities, monitoring and reporting, near miss systems in Project sites, and training of staff | OHSMS manual and related procedures | Within 3 months after contract signature |
| PS 3 | | | |
| 12 | Develop and implement a water management plan to evaluate alternative cleaning methods to minimize the amount of water used, water quality testing and water quantity estimates | Water management plans | Within 6 months after contract signature |
| 13 | Develop and implement a specific Waste Management Procedure including disposal of lithium waste batteries and broken and 'end of life' | Waste Management Procedure | Within 3 months after contract signature |

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| | panels, in line with MIGA’s PS3 requirements and respective national laws | | |
| | PS 4 | | |
| 14 | Revise the code of conduct to reflect respect for local beliefs and customs and with special attention for risks related to sexual harassment, sexual exploitation and abuse and gender-based violence | Code of conduct | Within 6 months after contract signature |
| 15 | Develop and implement a security risk assessment and security management plan for the Project to align with PS4 including rules of engagement and codes of conduct for security forces | Security risk assessment, security management plan | Within 3 months after contract signature |