ENVIRONMENTAL AND SOCIAL MANAGEMENT SYSTEM MANUAL

AP-ESMS-MAN-001

RESPONSIBILITIES

PHASE	DATE	NAME	FUNCTION
Elaboration	01-10-2024	Vito Saluto	AMEA Power, Head of ESG
Validation			
Approval	01-10-2024	Mahabir Sharma	AMEA Power, CTO

REVISION HISTORY

VERSION	DATE	AUTHOR	COMMENTS
00	01-10-2024	Vito Saluto	First issue

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DEFINITIONS

The definitions of terms below are used in this document.

DEFINITION	MEANING
Affected Parties	Stakeholder(s) who is (are) affected by the Project's activities, both positively and negatively. They may be directly affected and indirectly affected.
Area of Influence	The area likely to be affected by: (i) the Project (examples include the Project's sites, the immediate airshed and watershed, or transport corridors) and the activities and facilities that are directly owned, operated or managed (including by contractors) and that are a component of the Project; (ii) impacts from unplanned but predictable developments caused by the Project that may occur later or at a different location; or (iii) indirect Project impacts on biodiversity or on ecosystem services upon which Affected Communities' livelihoods are dependent (source: IFC PS1).
Associated Facilities	Facilities that are not funded as part of the Project (funding may be provided separately by a client or a third party including the government), and whose viability and existence depend exclusively on the Project and whose goods or services are essential for the successful operation of the Project.
Basic Terms and Conditions of Employment	The requirements as applicable on wage, working hours, labour contracts and occupational health & safety issues, stemming from ILO conventions 26 and 131 (on remuneration), 1 (on working hours) and 155 (on health & safety).
Community Based Organisations	A local community or civil society organisation that is not for profit and can be formal or informal. They often function within a single community or over a small geographic range across several communities.
Consultation	Consultation is purposeful and deliberately seeks input from stakeholders in order to shape relations and the development of programmes. It involves the business, key individuals, organisations and groups affected by or interested in the development and outcomes of the issue/process being discussed. The aim is to ensure mutual understanding and for all parties to be able to manage decisions that have a potential to affect all concerned. A good consultation process needs to be supported by a strong communication programme.
Community Investment and Development Program	The implementation of needs-based programmes designed to deliver positive and sustainable impact to Project communities throughout the investment lifecycle; add to the enabling environment in which the Project Company seeks to invest; enhance the profile of the Project Company, create goodwill for the Project Company, the Project Company's existing and future investments; lay the foundations for ongoing community engagement and development; and add to the resilience of the community to future climate and economic shocks.

DEFINITION	MEANING
Environmental and Social Action Plan (ESAP)	The E&S action plan (ESAP) agreed upon between the Lenders and the Project Company, defining actions, responsibilities, deliverables, compliance indicators, and a timeframe for the measures required to remedy the known non-compliances of the business activities of the Project Company with the E&S Requirements and for any other measure agreed upon, as amended from time to time
Environmental and Social Management System	Means the part of the overall management system of the Fund that includes the policies, organizational structure, planning activities, responsibilities, practices, procedures, and resources for developing, implementing, achieving, reviewing, and maintaining compliance with the E&S Requirements for the purpose of (a) identifying and managing E&S impacts and risks, and (b) supporting and implementing Community Development programmes with the combined objectives of creating an enabling environment for sustainable development, and assisting with originating and holding of Investments, through;
Environmental and Social Requirements	Means the stricter of (i) Environmental Law, (ii) Social Law, (iii) E&S Permits, (iv) Basic Terms and Conditions of Employment, (v) Core Labor Standards, (vi) other requirements set by the Fund's E&S Management System, and (vi) all applicable IFC Performance Standards. Note that the requirements applicable to and which must be adhered to by the Project and the Project Company and include: ▪ Project ESIA Report, the ESMP and related plans. ▪ The Project's ESAP. ▪ National regulatory framework. ▪ Applicable permits and licences. ▪ Contractual agreements and covenants. ▪ IFC Performance Standards (2012). ▪ Good International Industry Practice as set out in the World Bank Group Environmental, Health, and Safety General Guidelines (2007), the sector-specific World Bank Group Environmental, Health, and Safety Guidelines, etc. ▪ ILO Core Labour Standards, the ILO Basic Terms and Conditions of Work, and the UN Guiding Principles on Business and Human Rights. ▪ The requirements described in AMEA Power's ESMS.
Environmental Law	Any law, rule or regulation (including international treaty obligations) concerning environmental matters and natural resource management applicable to any Project Company in any country which is financed by AMEA Power.
ESMS Manual	A document that describes the Project's E&S Management System comprising the Environmental and Social principles, the institutional and organisational arrangements, the control framework and the requirements for monitoring, reporting and auditing.

DEFINITION	MEANING
Free Prior and Informed Consent	A process of consultation with Indigenous Peoples required to be undertaken in special circumstances as described in IFC PS7 (specifically paragraphs 13-17) including when there are impacts on lands and natural resources subject to traditional ownership or under customary use; when there is relocation of indigenous peoples from lands and natural resources subject to traditional ownership or under customary use, and when there are impacts to cultural heritage (source: IFC PS 7 2018).
Gender Based Violence and Harassment	Umbrella term for violence and harassment directed at persons because of their sex or gender or affecting persons of a particular sex or gender disproportionately and includes sexual harassment.
Good International Industry Practice	In the context of ESG means the exercise of professional skill, diligence, prudence, and foresight that would reasonably be expected from skilled and experienced professionals engaged in the same type of undertaking under the same or similar circumstances globally or regionally with the outcome being the employment of the most appropriate risk controls, impact mitigation measures, and technologies relevant to the ESG context (adapted from IFC PS1).
Grievance	A concern, complaint or feedback raised by any stakeholder either affected or interested in company operations. Both concerns and complaints can result from either real or perceived impacts of Project's operations.
Grievance Mechanism	A process for receiving, evaluating, and addressing Project-related grievances from affected persons at the level of the company, or Project and for these to be received and resolved appropriately and in accordance with Principle 31 of the UN Guiding Principles on Business and Human Rights. An internal grievance mechanism is a process implemented for responding to grievances raised by employees or members or the Project Workforce. An external mechanism should be established as a separate process for dealing with grievances raised by communities and other external stakeholders.
High Potential Incidents	Some incidents and near misses may occur at site or at the asset that, under different, plausible circumstances the most serious credible outcome could have been an Accident.
Human Rights	Human rights are inherent in all human beings, whatever their nationality, place of residence, sex, national or ethnic origin, colour, religion, language, or any other status. Every individual is entitled to enjoy human rights without discrimination. These rights are all interrelated, interdependent and indivisible. Human rights are often expressed and guaranteed by law, in the form of treaties, customary international law, general principles and other sources of international law. International human rights law sets out obligations on States to act in certain ways or to refrain from certain acts, so as to

DEFINITION	MEANING
	promote and protect the human rights and fundamental freedoms of individuals or groups. Business can impact all human rights both positively and negatively. Source: https://www.unglobalcompact.org/
Impact	An environmental or social impact is defined as any alteration of existing conditions, adverse or beneficial, caused directly or indirectly by a Project that results in a specific consequence to a resource/receptor.
Incident	An event or chain of events which caused or could have caused injury, illness, loss of assets or potential or actual damage to relationships or reputation.
Indigenous Peoples	A distinct social and cultural group possessing the following characteristics in varying degrees (i) self-identification as members of a distinct indigenous cultural group and recognition of this identity by others; (ii) collective attachment to geographically distinct habitats or ancestral territories in the Project area and to the natural resources in these habitats and territories; (iii) customary cultural, economic, social, or political institutions that are separate from those of the mainstream society or culture; or (iv) a distinct language or dialect, often different from the official language or languages of the country or region in which they reside (source: IFC PS 7).
Project Company	means project investment vehicles initiated, developed and/or managed by AMEA Power and their owned subsidiaries and investment vehicles.
Project Workforce	means direct employees of the Project Company; individuals working for contractors and subcontractors,
Responsible Sourcing	refers to the practice of ensuring that the products and materials a company procures are obtained in a manner that is ethical, sustainable, and socially responsible.
Social Law	Any law, rule or regulation (including international treaty obligations) applicable in the jurisdiction of the Country concerning (i) labour, (ii) social security, (iii) the regulation of industrial relations (between government, employers and employees), (iv) the protection of occupational as well as public health and safety, (v) the regulation of public participation, (vi) the protection and regulation of ownership of land rights (both formal and traditional), immovable goods and intellectual and cultural property rights, (vii) the protection and empowerment of indigenous peoples or ethnic groups, (viii) the protection, restoration and promotion of cultural heritage, (ix) all other laws, rules and regulations providing for the protection of employees and citizens.
Stakeholder	Persons or groups that are directly or indirectly affected by a Project as well as those that may have interests in a Project and/or the ability to influence its outcome, either positively or negatively. This can refer to shareholders, investors, employees, communities, governments, industries and (international) third parties.

DEFINITION	MEANING
Stakeholder engagement	An umbrella term encompassing a range of activities and interactions between Project Company and stakeholders (two-way communication) over the life of a Project that are designated to promote transparent, accountable, positive, and mutually beneficial working relationships
UN Guiding Principles on Business and Human Rights	The United Nations Guiding Principles on Business and Human Rights were published in 2011 as the standard of responsibility for business with regard to human rights. The UNGP are founded on three pillars: (i) the State duty to protect human rights against abuse by third parties, including business, through appropriate policies, legislation, regulations and adjudication; (ii) the corporate responsibility to respect human rights, meaning to act with due diligence to avoid infringing on the rights of others and address adverse impacts with which they are involved; and (iii) the need for greater access to effective remedy, both judicial and non-judicial, for victims of business-related human rights abuse. The focus of the UNGP is on avoiding and addressing negative impacts. Source: https://www.unglobalcompact.org/
The United Nations Sustainable Development Goals	The United Nations Sustainable Development Goals form a core component of the 2030 Agenda for Sustainable Development which was adopted by all United Nations Member States in 2015. They are designed to tackle the wide-ranging social, economic and environmental challenges faced by the planet while providing an opportunity to progress towards sustainable development.
Vulnerable Groups	Individuals or groups within the Project area of influence who could experience adverse impacts more severely than others based on their vulnerable or disadvantaged status. This vulnerability may be due to an individual's or group's race, sex, language, religion, political, opinion, national or social origin, property, birth or other status. Other factors should also be considered including gender, ethnicity, culture, sickness, physical or mental disability, poverty or economic disadvantage, and dependence on unique natural resources.

LIST OF ABBREVIATION

The abbreviations below are used in this document.

ACRONYM	DEFINITION
A&E	Accident and Emergency
AOI	Area of Influence
BESS	Battery Energy Storage System
BMP	Biodiversity Management Plan
CC	Civil Code
CHS	Community Health and Safety
CLO	Community Liaison Officer
COD	Commercial Operation Date
E&S	Environmental and Social
EBRD	European Bank for Reconstruction and Development
EHS	Environment, Health and Safety
EIA	Environmental Impact Assessment
EPC	Engineering, Procurement and Construction
EPRP	Emergency Preparedness and Response Plan
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESMS	Environmental and Social Management System
FC	Financial Close
GBVH	Gender-Based Violence & Harassment
GIIP	Good International Industry Practice
GM	Grievance mechanism
H&S	Health and Safety
HMWWP	Hazardous Materials, Waste and Wastewater Management Plan

ACRONYM	DEFINITION
HR	Human Resources
IFC	International Finance Corporation
ILO	International Labour Organization
IUCN	International Union for Conservation of Nature
LWCMP	Labor and Working Conditions Management Plan
LRP	Livelihood Restoration Plan
MSDS	Material Safety Data Sheets
MV	Medium voltage
NSR	Noise Sensitive Receptors
NTP	Notice to Proceed
NTS	Non-Technical Summary
O&M	Operations and Maintenance
OHS	Occupational Health and Safety
OHSMP	Occupational Health and Safety Management Plan
OHTL	Overhead Transmission Line
PPE	Personal Protective Equipment
PV	Photovoltaic
RoW	Right of Way
SMP	Security Management Plan
SEP	Stakeholder Engagement Plan
SMzP	Site Mobilization Plan
SWMP	Solid Waste Management Plan
SSMP	Subcontractors and Suppliers Management Plan
TrMP	Training Management Plan
TTMP	Traffic and Transportation Management Plan

ACRONYM	DEFINITION
UNCCD	United Nations Convention to Combat Desertification
UNESCO	United Nations Educational, Scientific and Cultural Organization
UNFCCC	United Nations Framework Convention on Climate Change
WAMP	Worker Accommodation Management Plan
WBG	World Bank Group
WMP	Water Management Plan

CONVENTIONS

The list of conventions below are used in this document.

TERM	DESCRIPTION
Shall	The use of the word 'shall' indicates a mandatory requirement
Should	The use of the word 'should' indicate a recommendation, to be implemented whenever possible
May	The use of the word 'may' indicates a permission
Can	The use of the word 'can' indicates a possibility or a capability

1 INTRODUCTION

1.1 Context

AMEA Power is an independent developer and power producer focused on renewable energy generation across Africa, the Middle East, and Asia. The company is involved in the origination, development, structuring, acquisition, and operation of renewable energy projects.

Founded in early 2016, AMEA Power is positioned to capitalize on the region's transition to renewable energy, which has become a competitive power generation source below grid parity. The company targets emerging economies with strong market fundamentals and developed regulatory frameworks. To ensure full capability, AMEA Power has dedicated teams in Business Development, Investment, Project Finance, Delivery, and Operations.

By investing in renewable energy, AMEA Power aims to create value for its shareholders throughout the lifecycle of its Projects. Central to the success of its projects is the effective management of environmental and social (E&S) risks, ensuring positive and lasting impacts for the local communities where the projects are implemented.

1.2 Purpose of this document

This document describes the management system that is implemented by AMEA Power to manage the impacts and risks associated with the Projects under its management (hereafter the 'ESMS'). It describes the requirements, processes and arrangements required to comply with AMEA Power's Policies, and how these arrangements are embedded into AMEA Power's investment lifecycle. It also describes the E&S management measures that need to be adopted by Project Companies that must be developed and implemented.

This document should be considered as the Corporate 'ESMS Manual' which cross-references to the different elements of the ESMS, including supporting policies, plans, procedures and other management system tools and documentation, and other relevant business system and procedures. It is an internal management tool intended for use as a high-level reference source. It forms part of the AMEA Power's overall management system for business risk management.

1.3 Scope of the ESMS

This ESMS manual describes the requirements for dealing with E&S impacts, risks and opportunities in AMEA Power's investment process and the development, construction, operation and decommissioning of Projects in which AMEA Power invests. It also applies to AMEA Power's external stakeholders including the Project Companies. Please refer to Section 2 for more information.

Matters relating to corporate governance including anti-bribery and corruption are described separately in AMEA Power's policy framework including the AMEA POWER Code of Conduct and the Anti-Corruption, Anti-Money Laundering and Know Your Customer Policy and are not included in the scope of this ESMS Manual.

1.4 Applicable Standards

This ESMS Manual has been designed in accordance with the following standards:

- IFC Performance Standard (2012)
- ISO 14001:2015: Environmental management systems
- ISO 45001:2018: Occupational health and safety management systems
- ISO 26000:2010: Guidance on social responsibility
- ILO Core Conventions
- The United Nations Guiding Principles on Business and Human Rights

as well as AMEA Power Policies.

1.5 Structure of this Document

This document is broken down into 8 sections:

- Chapter 2 outlines the context and scope of this ESMS Manual, with a brief presentation of the AMEA Power Project Companies and the potential E&S impacts associated to them, a description of the key stakeholders with their needs and expectations and the scope of application of the ESMS. The following chapters present each of the ESMS components visualised on Figure 1-1.
- Chapter 3 presents the senior accountability in place for oversight of the ESMS, the resources assigned for its implementation with their roles and responsibilities and how the right level of expertise and capacity is ensured.
- Chapter 4 and Chapter 5 describes AMEA Power's policies, principles, commitments and E&S requirements.
- Chapter 6 describes how AMEA Power operationalises its Responsible Investment Policy across the investment cycle through risk management ("Do No Harm") and delivering positive impacts ("Do Good").
- Chapter 7 presents the system in place for monitoring and periodically reviewing the effectiveness of the ESMS, through the definition of E&S performance indicators and impact indicators, audits and management review.
- Chapter 8 outlines the arrangements in place for communication with external stakeholders, including reporting to investors, public disclosure and responsiveness to grievances.

This Summary section provides an overview of the entire system for ease of reference.

1.6 ESMS Review

The ongoing effectiveness of this ESMS and its alignment with investors' requirements is subject to ongoing review through internal audit. It will also be reviewed to reflect changes in applicable legal requirements, changes in international standards and guidance, and in response to lessons learned from accidents and incidents.

1.7 ESMS Disclosure

This document and associated ESMS documentation are shared with all AMEA Power employees, investors, Project Lenders, Project Companies, and others, as required.

The first version of this ESMS Manual was disclosed on 1st October 2024.

FIGURE 1 – OVERVIEW OF THE ESMS COMPONENTS

2 CONTEXT AND SCOPE OF ESMS

2.1 Introduction

The implementation of AMEA Power's ESMS is intended to ensure that all potential E&S impacts, risks and opportunities associated with AMEA Power's Project Companies are fully assessed, understood and managed. This section provides an overview of the Project Companies, AMEA Power's stakeholders, and an overview of the way in contextual E&S impacts are considered in the investment process.

2.2 Project Companies

For each project in which AMEA Power invests, a dedicated Project Company is established. AMEA Power enters into management service agreements with these Project Companies to deliver comprehensive technical, legal, and financial support, ensuring that each project is effectively managed, reducing risks and impacts, and positioned for success.

2.3 Key Stakeholders

AMEA Power's key stakeholders can also be referred to as the interested parties and are those for whom the activities and impacts associated with AMEA Power and the Project Companies are important. AMEA Power's key stakeholders are shown in Table 1 below.

TABLE 1 - KEY STAKEHOLDERS

STAKEHOLDER	DESCRIPTION
Shareholders	Investors and Shareholders are kept informed about the E&S performance of the Project Companies through the quarterly and annual investor reports. In addition, the investors are made aware of all reportable incidents in accordance with the provisions described in this ESMS Manual. Periodic meetings may also be arranged with individual shareholders to provide information relating to specific areas of interest.
Project Lenders	AMEA Power ensures that Project Lenders are kept informed of the Environmental and Social (E&S) performance through regular reporting and compliance updates. This includes providing quarterly and annual reports that outline key E&S metrics, project progress, and any reportable incidents, in accordance with the ESMS Manual. Additionally, during the lifecycle of the Projects, AMEA Power facilitates the Project Companies ongoing dialogue with Lenders through periodic meetings and communications to address specific concerns, ensure compliance with lender requirements, and maintain transparency throughout the project lifecycle. Lenders are also provided with necessary documentation to meet due diligence and funding conditions.

STAKEHOLDER	DESCRIPTION
Project Counterparties	A presentation of AMEA Power's E&S requirements is given to developers at the start of the development process, and to the Project Company at the start of the construction process. In addition, E&S requirements are also communicated to the EPC contractor during the tendering process.
NGOs and CSOs	AMEA Power recognises the important role that is played by national, regional and local governments as relevant, CSOs, development agencies and other local stakeholders active in community development. AMEA Power has established a proactive approach to engagement with NGOs and recognises that this: ▪ Enables AMEA Power to build community support and mutually beneficial relationships. ▪ Helps AMEA Power identify and connect to the partners who can support the Projects in the delivery of community development programs. ▪ Provides for improved coordinated communication and disclosure of information that can contribute to more effective change. ▪ Communicates responsible leadership to external stakeholders including investors, business partners, and civil society.
AMEA Power staff	AMEA Power recognises that its own staff and those who work for Project Companies are a key stakeholder group. AMEA Power's arrangements for engaging with its staff are described in the AMEA Power Human Resources Policy. Arrangements for engagement at the Project level are detailed in the Project's E&S Management System.

2.4 Potential Impacts associated with AMEA Power Project Companies

The setting and context of each of the individual Projects into which the AMEA Power Project Companies operates is highly variable due to the diverse geography covered by AMEA Power's mandate (Africa, Middle East and emerging markets in Asia). The potential E&S impacts of each Project will also vary due to various factors such as the type and size of Project, the location, the baseline environment, the social context and the affected communities. Some E&S impacts are likely to be more relevant to one Project type than another, for instance impacts to birds and bats are likely to be of great importance to wind Projects, whereas impacts on surface water and fishing are likely to be of great importance to water-related Projects.

Impacts from a proposed development will be mainly dependent on two key factors: the sensitivity/importance of the surrounding environment and the magnitude of change caused by the Project. At all stages of the Project lifecycle consideration will be made of the E&S impacts and risks of a Project. Because impacts are context- specific,

it is impossible to fully standardise or predict which impacts are likely to be significant, and which mitigation measures are most appropriate to manage them.

AMEA Power considers each Project on a case-by-case basis and assesses the potential impacts within the context of the Project's area of influence. Mitigation will be defined through the impact assessment process and will be tailored for each Project. AMEA Power also requires all Project Companies to refer to and be compliant with Host Country National Laws and Regulations, Project Lenders Standards, ILO Core Conventions, Good International Industry Practices as defined in various guidance documents including the World Bank Group (WBG) Environmental, Health, and Safety Guidelines[1] (known as the 'EHS Guidelines') among others.

The different types of impacts that may be associated with the types of Projects in which the AMEA Power Project Companies are invested are detailed in the following tabs. Chapter 6 provides a description of the way in which E&S impacts and risks are assessed and integrated into the investment and decision-making process.

TABLE 2 - TYPICAL RESOURCES AND RECEPTORS

RECEPTORS / RESOURCES	
Physical	Land (e.g. landform, landscape)
	Soil (e.g. quality)
	Surface Water (e.g. quality and availability)
	Ground Water (e.g. quality and availability)
	Air (e.g. quality)
	Acoustic Environment (e.g. quality)
	Marine Water and Sediments (e.g. quality)
	Coastal Geomorphology and Processes
	Climate and GHG emissions
Biological	Protected / Sensitive Habitats
	Flora (Aquatic/Terrestrial)
	Fauna (Aquatic/Terrestrial)
	Ecosystem Services
Resource-based Livelihoods	Land, Water or Resource-based Livelihoods (e.g. farming, grazing, fishing)
	Recreation and Tourism
	Economy and Labour
Cultural Heritage	Tangible Cultural Heritage
	Intangible Cultural Heritage
Community	Human Rights
	Vulnerable Groups (e.g. ethnic minorities)
	Indigenous Peoples

[1]https://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/sustainability-at-ifc/policies-standards/ehs-guidelines

	Residential / Private Assets
	Visual Amenity
	Social Cohesion
	Public Infrastructure (e.g. transportation, health care, waste management,
	Public Safety
	Health and Well Being
Workers	Occupational Health and Safety
	Labour and working conditions
Note: Elements of the physical environment are only considered to be resources when they are utilised by human or biological receptors.	

TABLE 3 - CROSS-CUTTING ASPECTS AND IMPACTS

ASPECT	E&S IMPACTS
Pollution of soil and water	▪ Release of hazardous substances during construction (e.g. vehicle spills) leading to soil, surface water, marine or groundwater contamination. ▪ Release of hazardous substances during operation (e.g. chlorine, chlorine dioxide, ozone, monochloramine) leading to soil, surface water, marine or groundwater contamination. ▪ Discharge of construction worker site/camp sewage effluent polluting watercourses. ▪ Loss of soil / sediments and pollution of watercourses, and interruption of drainage patterns, as a result of underground cable laying and ground clearance.
Water resources	▪ Use of surface or groundwater during the construction and operating phases, which could affect existing supply for human communities and ecosystems.
Air emissions	▪ Releases of emissions to air e.g. dust and vehicle emissions – in particular during construction and decommissioning – could affect human health, vegetation and wildlife.
Noise and vibrations	▪ Noise and vibration from equipment, traffic and activities during construction and operation at sites and associated facilities may disturb sensitive noise receptors (human and fauna).
Waste management	▪ Inefficient waste management during construction, operations and maintenance and decommissioning leading to excess materials consumption, generation of wastes/ emissions, soils and water pollution.

ASPECT	E&S IMPACTS
Cultural heritage	▪ Displacement or damage to cultural heritage sites by construction activities, harm to the setting, amenity value, etc. of the site due to construction or operation.
Landscape and amenity value	▪ Damage to landscape value due to visual impacts from the facility. ▪ Direct damage to land surrounding the new treatment plant from destruction by construction trucks and workers activities.
Labour and working conditions	▪ Poor construction management practices may lead to adverse effects on safety, human health and wellbeing. ▪ Poor management of occupational health and safety could lead to accidents, injuries and illnesses among workers, mental health issues may arise due to remote or enclosed living (e.g. in worker accommodation camps). ▪ Differences in nationality, ethnicity, religion, etc. may lead to discrimination and harassment, and differences (perceived or real) in working conditions between workers may lead to resentments. ▪ Direct employment of the local population in the construction workforce, and temporary stimulation of local economy through demand for goods and services will enhance livelihoods and economic activity in local communities but have potentially adverse effects if community relations are not well managed and/or if prices of staple food are artificially increased.
Community health impacts	▪ Interaction between workforce and local communities may increase occurrence of communicable diseases, including HIV/AIDS and sexually transmitted diseases (STDs). ▪ Potential health risks associated with water-borne diseases and water-related diseases (e.g. schistosomiasis, onchocerciasis, malaria). ▪ Real or perceived disruption to normal community life, through the physical presence of a construction workforce.
Socioeconomic impacts	▪ Potential diversification of income generating activities due to a better access to energy and access to fisheries, or socioeconomic dissatisfaction if benefits are not available to all. ▪ Procurement of local goods and services for the Project and workforce could deplete resources available for local communities. ▪ Direct employment of the local population in the construction workforce, and temporary stimulation of local economy through demand for goods and services will enhance livelihoods and economic activity in local communities but have potentially adverse effects if community relations are not well managed and/or if prices of staple food are artificially increased. ▪ Few if any employment opportunities during operation; risk of "Boom and Bust" in local economy.

ASPECT	E&S IMPACTS
Resettlement	▪ Development of Project infrastructure may physically displace people or lead to loss of assets. ▪ Loss of agricultural / livestock / other productive use land. ▪ Disruption of economic activities and livelihoods, particularly those depending on the land to be acquired for the Project and/or natural resources that will be used by the Project (e.g. water resources).
Biodiversity	▪ Land clearance for plant associated infrastructure may cause loss or fragmentation of protected areas and other areas of conservation interest. ▪ Land clearance may cause loss or fragmentation of protected areas and other areas of conservation interest, and degradation following poorly managed rehabilitation. ▪ Construction (and to a lesser extent operational impacts) impacts on habitats and species (e.g. from changes in drainage, soil erosion, pollution of water, soils or air, introduction of invasive species, and general human disturbance). ▪ Construction activities in remote areas could lead to greater demand for bushmeat, stimulate the wildlife trade and facilitate access to hunting areas. ▪ Movement of plant and workforce into areas could introduce invasive species which adversely impact fauna, flora, ecosystems, and crops.

TABLE 4 - PROJECT SPECIFIC E&S IMPACTS ASSOCIATED WITH PROJECT COMPANIES

TYPOLOGY	E&S ASSOCIATED IMPACTS
Wind Projects	▪ Potential safety risks associated with aircraft and shipping, through direct collision or interference with radar systems. ▪ Potential safety risks associated with falling rotor blades or ice formed on rotor blades. The risk of 'blade throw' is very low, and 'ice throw' is only an issue in cold climates or high altitudes. ▪ Although rare, there is a potential safety risk of rotor blade failure, known as "blade throw," where parts of the blades could detach and be thrown from the turbine. This risk, though low, can pose a threat to nearby workers and communities. Additionally, in colder climates or at high altitudes, ice can accumulate on rotor blades and be thrown off as the turbine spins ("ice throw"), posing further safety risks. Both risks necessitate safety exclusion zones around wind turbines. ▪ Safety issues may arise with public access to wind turbines (e.g. unauthorized climbing of the turbine) or to the wind farm substation. ▪ Disruption to normal community life due to shadow flicker and blade glint and electromagnetic interference with telecommunication systems (e.g. microwave, television, and radio).

TYPOLOGY	E&S ASSOCIATED IMPACTS
	▪ Severance of animal migration pathways and flyways and potential for bird and bat collisions with towers and rotor blades. ▪ Underwater noise and vibration from offshore construction—e.g., from piling activity—may adversely impact marine life, including fish, marine mammals, and sea turtles. Mechanical and aerodynamic noise from operation of wind turbines may disturb sensitive noise receptors. ▪ Visual impact associated with the presence and operation of the turbines which may affect the landscape or seascape especially in residential areas and those of value for tourism. ▪ Specific occupational health and safety risks are associated with working on or over water (for nearshore or offshore Projects); working at height, lifting operations, working in confined spaces and working in remote locations. ▪ At the end of their lifecycle, wind turbines must be decommissioned, which can generate significant waste, particularly from turbine blades made of composite materials that are difficult to recycle. Inappropriate disposal of turbine components can lead to environmental contamination, while land used for wind farms may need to be rehabilitated. ▪ Wind projects can create significant local economic benefits, including job creation and infrastructure improvements. However, they can also cause local opposition if communities feel they have not been properly consulted or compensated for land use and disruption. Engaging with stakeholders early in the project development process is critical for obtaining and maintaining the social license to operate.
Solar Projects	▪ Solar power plants could displace animals and disturb their habitats, by direct disturbance during construction and operation (e.g. from noise, light disturbance at night, general human presence). ▪ Solar installations often require vast land areas, which could lead to the conversion of productive agricultural land into solar farms. This can reduce local food production and alter livelihoods for farmers and rural communities. In some cases, the installation may also reduce grazing areas for livestock. ▪ In the case of large solar Projects, severance of terrestrial routes used for migration by fauna and ground-dwelling avifauna or for access to feeding and breeding areas (e.g. by access roads). ▪ Water requirements may be high for large / concentration solar power plants (cooling water is required for solar concentration devices and for cleaning the panels). ▪ Solar panels can create reflective glare, which may affect surrounding areas, particularly roads, airports, or residential zones. This "glint and glare" issue can impact local communities and aviation safety, requiring careful siting and mitigation strategies. ▪ Large solar projects can affect nearby communities, both positively and negatively. On the positive side, they can create job opportunities and provide new infrastructure. However, they can also lead to displacement, land

TYPOLOGY	E&S ASSOCIATED IMPACTS
	acquisition conflicts, and disruption of livelihoods, particularly if community land is used without proper consultation and compensation ▪ Solar projects may be located on or near culturally significant lands, including those of indigenous communities. There is a risk of infringing on sacred sites or traditional land uses if developers do not engage in proper stakeholder consultations. Ensuring free, prior, and informed consent (FPIC) of indigenous groups is essential to avoid conflicts and maintain social licenses to operate. ▪ The large-scale production and eventual decommissioning of solar panels pose waste management challenges. Solar panels contain hazardous materials such as cadmium and lead, which, if not properly recycled or disposed of, can contaminate soil and water. Managing end-of-life disposal and developing recycling options for panels are important to minimize long-term environmental risks. ▪ During construction and operation, communities near solar projects may face issues related to dust, noise, and increased traffic from heavy machinery. These factors can affect air quality and local road safety. Moreover, large-scale installation activities may disrupt local infrastructure and services, potentially leading to negative impacts on community well-being.
Water Desalination Projects	▪ Desalination is energy-intensive, often leading to increased greenhouse gas (GHG) emissions if powered by fossil fuels. This can also contribute to increased operational costs and environmental impacts. ▪ The brine and other liquid wastes from desalination plants may contain high salt concentrations, chemicals used during defouling of plant equipment and pretreatment, and toxic metals. These can have an adverse impact on the environment if discharged without prior treatment. ▪ Large desalination plants may require significant land use, potentially affecting coastal areas and leading to habitat loss. ▪ The disposal of concentrated brine and chemical waste (e.g., from cleaning processes) needs careful management to avoid environmental contamination. ▪ Desalination plants may affect local communities through increased water availability but can also lead to social equity issues if access is limited or unaffordable.
Green Hydrogen Projects	▪ Hydrogen production through electrolysis requires substantial amounts of water, which could strain local water resources, particularly in arid regions. ▪ The production of green hydrogen is energy-intensive, typically relying on renewable energy sources like solar or wind. Ensuring a reliable and sufficient energy supply without impacting local grids is critical. ▪ Large-scale hydrogen production and storage facilities may require significant land, potentially displacing local ecosystems or agricultural land. ▪ Hydrogen is highly flammable, posing risks related to storage, transport, and usage, including potential explosions or fire hazards. ▪ Hydrogen projects can provide employment and economic benefits but may face opposition from local communities due to safety concerns and land use.

TYPOLOGY	E&S ASSOCIATED IMPACTS
Battery Energy Storage System Projects	▪ The production, operation, and eventual disposal of batteries involve hazardous chemicals like lithium, cobalt, and nickel, which can lead to soil and water contamination if not properly managed. ▪ There are risks of fire or explosion due to battery malfunction or overheating, particularly with large-scale energy storage systems. ▪ Depending on the source of electricity used for charging, BESS projects can contribute to either renewable energy integration or increased reliance on fossil fuels. ▪ Large-scale storage facilities may require significant land, impacting local ecosystems or requiring displacement of agricultural or residential areas. ▪ Some BESS facilities can generate noise during operation, which could affect nearby communities or sensitive wildlife.
Geothermal Projects	▪ Geothermal plants often require large amounts of water for cooling, leading to potential depletion of groundwater resources. Additionally, reinjection of water into the earth could lead to contamination of freshwater aquifers if not managed properly. ▪ Geothermal drilling can induce seismic activity, including minor earthquakes, especially in areas with fault lines or high subsurface pressures. ▪ he extraction of geothermal fluids can result in land subsidence, causing structural damage to infrastructure and altering landscapes. ▪ Although cleaner than fossil fuels, geothermal plants can release gases like hydrogen sulphide, CO_2, and methane, which may contribute to air pollution or climate change if not properly controlled. ▪ Construction and operation may disturb local wildlife and ecosystems, especially if located in sensitive areas. Land clearing, noise, and heat emissions can impact species and habitats. ▪ Geothermal projects may affect local communities through land displacement or conflict over resource use, especially in areas where geothermal sites overlap with indigenous lands or culturally significant areas.
Overhead Transmission Line Project (OHTL)[2]	▪ The construction of overhead transmission lines (OHTL) requires the acquisition of land for towers, substations, and right-of-way corridors, which can result in physical and economic displacement of communities. This can impact local livelihoods, agriculture, and access to land for grazing, farming, or other traditional uses. Affected communities may require compensation and resettlement assistance, with special attention to vulnerable groups, to ensure compliance with international standards such as IFC Performance Standard 5 (Land Acquisition and Involuntary Resettlement). ▪ The installation of OHTLs can lead to deforestation and habitat fragmentation, especially in ecologically sensitive areas, including forests, wetlands, and migratory pathways. The creation of access roads and clearing of corridors can disturb flora and fauna, potentially threatening endangered species or disrupting

[2] Usually these are associated facilities as per IFC definition of the projects listed in the tab.

TYPOLOGY	E&S ASSOCIATED IMPACTS
	important ecosystems. Transmission lines crossing bird migratory routes, in particular, pose collision risks for birds. Mitigation strategies may include habitat restoration, the use of bird diverters, and re-routing the line to avoid critical habitats. ▪ OHTLs generate electromagnetic fields, which can lead to public health concerns, particularly for communities located near transmission lines. Although scientific consensus generally finds EMF exposure from transmission lines to be below harmful levels, public perception of health risks (e.g., cancer, reproductive issues) can lead to opposition. To address these concerns, buffer zones are established between transmission lines and residential areas, ensuring that EMF exposure remains within acceptable limits. ▪ Transmission towers and lines often have a significant visual impact, particularly in scenic or culturally significant areas. Communities may perceive OHTLs as unsightly, leading to opposition, particularly in areas reliant on tourism or natural beauty. In densely populated regions, the presence of high-voltage lines can affect real estate values and land use. Visual impact assessments are often conducted to address these concerns, with routing strategies employed to minimize disruption to sensitive landscapes. ▪ OHTLs pose potential safety hazards, including the risk of electric shock, particularly in areas where the public may come into close contact with high-voltage lines. There is also the potential for wildfires if transmission lines or equipment fail or if vegetation management practices (e.g., inadequate tree trimming) are insufficient. Workers involved in the construction, operation, and maintenance of transmission lines face additional safety risks, including working at height, electrical hazards, and lifting heavy components. Strict adherence to occupational health and safety (OHS) standards is critical to prevent accidents and injuries. ▪ OHTL projects may cross lands that are culturally or historically significant, or that hold spiritual or ancestral value to indigenous communities. Construction in such areas can cause irreversible damage to cultural heritage sites or disrupt traditional land uses, leading to social conflict. Engaging with local communities, conducting archaeological surveys, and following the free, prior, and informed consent (FPIC) principles when dealing with indigenous peoples are essential to avoid violations of cultural and property rights. ▪ Large-scale OHTL projects may intersect with other infrastructure developments, such as roads, pipelines, and urban expansion, contributing to cumulative impacts on land use, biodiversity, and communities. Strategic Environmental Assessments (SEAs) are often necessary to understand the combined impacts of OHTL projects in the broader context of regional development. ▪ OHTLs are vulnerable to extreme weather events, such as hurricanes, storms, floods, and wildfires, which can cause severe damage to the infrastructure, resulting in power outages and increased maintenance costs. In some regions,

TYPOLOGY	E&S ASSOCIATED IMPACTS
	climate change is expected to increase the frequency and intensity of these events, requiring the design of resilient infrastructure. This includes using materials and designs that can withstand severe weather conditions and ensuring that emergency response and recovery plans are in place. ▪ Securing a social license to operate is critical for the successful implementation of OHTL projects. Communities affected by transmission lines may resist construction if they feel excluded from decision-making processes or inadequately compensated. Comprehensive stakeholder engagement processes are essential, providing communities with accurate information, ensuring their concerns are heard, and involving them in the planning and mitigation process. ▪ During the construction phase, local communities may be exposed to temporary but significant impacts such as noise, dust, and increased traffic from construction vehicles. These impacts can disrupt daily life, particularly for communities located close to construction sites. Proper construction management plans, including the scheduling of works and the use of dust and noise suppression measures, are necessary to minimize disruption. ▪ The construction, operation, and maintenance of OHTLs involve the use of materials that can generate waste, including construction debris, excess materials, and hazardous substances like transformer oil or batteries used in substations. Proper handling, storage, and disposal procedures are essential to prevent contamination of soil, water, and air. Compliance with hazardous materials management protocols, including spill response and recycling initiatives, is critical for maintaining environmental safety.

3 E&S GOVERNANCE AND ORGANISATION

3.1 Introduction

This section provides an overview of the organisational arrangements in place for the governance of E&S risks, impacts and opportunities associated with the activities of the Project Companies. It also describes the requirements that must be adopted in the Project Companies.

3.2 Overall E&S Governance Arrangements

AMEA Power is committed to the implementation of the commitments of the Policy and upholds these through visible leadership and allocation of resources. AMEA Power takes direct responsibility for the management of E&S related activities related to the Project Companies.

E&S is an integral consideration at all levels of the business. Budgetary requirements for the ongoing implementation of the requirements of this ESMS are defined internally by AMEA Power during the development phase of the Project and then are reviewed periodically, as necessary.

ESG Team: AMEA Power Senior Management has defined and designated the role of Head of ESG to oversee and implement all E&S commitments and responsibilities. The Head of ESG reports directly to the CTO, who is part of the Executive Committee. Reporting to the Head of ESG is a team of ESG professionals. This team can be expanded as necessary to ensure adequate resources are available to implement and oversee ESG requirements on behalf of AMEA Power.

External E&S Advisors: External E&S advisors will be hired as required to support the ESG Team with due diligence, specialist studies, and ongoing monitoring. This support will be defined, facilitated and monitored by the Head of ESG and is commissioned through issue of defined terms of reference.

Community Development Partners: Partnerships with third party organisations can enhance AMEA Power's ability to deliver meaningful and sustainable programmes of community development. Potential partners including development organisations, academic or research institutions, CSOs, and training institutes with experience in the development need or opportunity that has been identified.

3.3 Project Level E&S Organisational Arrangements

On behalf of the Project Companies, AMEA Power typically takes a leading role in the management of E&S performance during the development phase. Once the Project moves into the construction phase, this responsibility transfers to the Project Company. The Project Company is required to manage E&S risks according to the requirements contained in the Project Company's legal documentation and as described in this ESMS Manual. Each Project Company will ensure that they have a Project Company ESMS in place as well as adequate staffing and resources to effectively manage these E&S risks.

AMEA Power's ESG team will work closely together with the Project Company's management to recruit appropriately trained and qualified Project E&S resources. AMEA Power's ESG team will oversee the management of E&S aspects at the Project level and ensure compliance with the requirements of this ESMS and with all other corporate E&S requirements. The Project's E&S resources will be accountable to the AMEA Power ESG Team. An

indicative organisation chart highlighting the E&S responsibilities within Project Companies is presented in Figure 2 below.

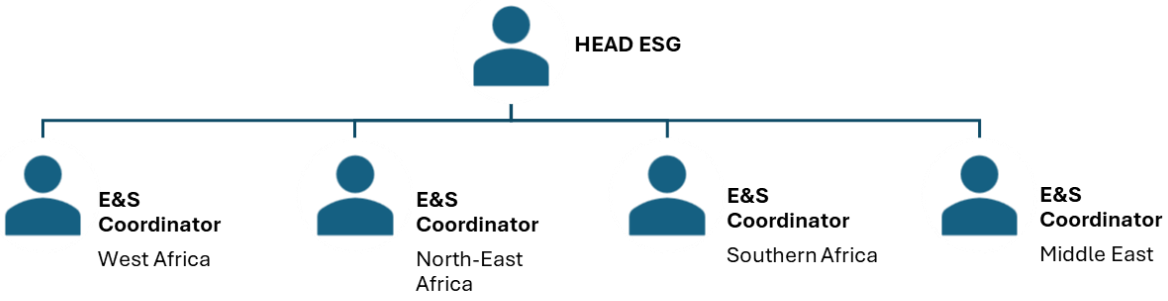

FIGURE 2 - E&S RESOURCES

3.4 Project Company E&S Resources

The typical E&S (Environmental & Social) resources of a project company generally include key roles such as the HSE Manager/Specialist, Social Manager/Specialist, and Community Liaison Officer. These professionals ensure the project's compliance with relevant environmental, social, and health & safety standards.

- HSE Manager/Specialist: Oversees all aspects of health, safety, and environmental compliance. Responsibilities include conducting risk assessments, implementing safety protocols, ensuring adherence to local and international HSE regulations, and managing emergency response plans to mitigate risks during the project lifecycle.
- Social Manager/Specialist: Manages the social impacts of the project. This includes ensuring compliance with social safeguards, addressing stakeholder concerns, overseeing grievance mechanisms, and ensuring alignment with international social standards such as those of the IFC or other lenders.
- Community Liaison Officer (CLO): Acts as the main point of contact between the project and local communities. The CLO maintains open communication, manages public consultations, addresses community concerns, and oversees the implementation of community development initiatives.

In addition to these roles, additional E&S resources may be required depending on the project's specific context, complexity, and requirements. For example, projects with significant biodiversity impacts may require an Environmental Specialist or Ecologist, while projects involving large-scale resettlement could necessitate the inclusion of a Resettlement Specialist. The specific staffing structure is often tailored to ensure that all environmental, social, and safety risks are properly managed throughout the project's duration.

Effective implementation of E&S requirements requires competent staff to be appointed and adequately equipped with knowledge and resources on these requirements. Project Companies are required to:

- Clearly define and communicate HSSE roles and responsibilities.
- Define the HSSE competency and training needs for HSSE specific roles.

- Establish a robust recruitment process for all new Project workers including employees, contractors and sub-contractors.
- Ensure that all new staff are informed of the Project Company ESMS as part of their induction training.
- Periodically provide refresher training on the Project's HSSE requirements.
- Inform staff of any significant updates relating to HSSE management.
- Provide specific and relevant training on HSSE risks, impacts and management

The Project Companies will ensure that any additional training needs are met for the effective management of the Project. As a minimum, all workers will receive general orientation training on site health and safety procedures, social and environmental requirements and Project arrangements through inductions, toolbox talks and weekly refresher sessions. These will be communicated using non-technical language and in the workers language. Additional training specific to individual roles will be identified and arranged for all relevant workers. Any material gaps in training/competency will be identified prior to commencement of construction and addressed as required throughout the construction phase.

4 ENVIRONMENTAL AND SOCIAL PRINCIPLES

4.1 Sustainable Development Impacts

The UN SDGs are a universal call to action to end poverty, protect the planet and improve the lives and prospects of everyone, everywhere. The seventeen UN SDGs were adopted by all UN Member States in 2015, as part of the 2030 Agenda for Sustainable Development which set out a 15-year plan to achieve the UN SDGs3.

AMEA Power recognises that it can play an important role in realising positive sustainable development outcomes which in turn can support host countries in which the Project are located to progress towards achieving the UN SDGs. At the local level, social and environmental investments that aim to support the UN SDGs provide significant opportunities for AMEA Power by improving reputation, attracting talent and supporting goods and services that AMEA Power's Projects rely upon.

In accordance with the ten principles of UNGC, AMEA Power is committed to maximising opportunities for delivering E&S benefits through fund investments, particularly to the local communities in the area of influence of its Projects. The specific UN SDGs that the AMEA Power Project Companies are expected to contribute to are presented in Figure 4-1.

FIGURE 3 – AMEA POWER'S CORE UN SDG

4.2 Climate Change Mitigation and Adaptation

AMEA Power aim to contribute in transformative shift in climate change adaptation and mitigation throughout investments on renewable energy sector in the Africa, Middle East and emerging markets of Asia and thereby contribute to progress towards achieving UN SDG 7.

AMEA Power is also committed to managing its own contribution to climate change and requires all Project Companies to make the same commitment. AMEA Power has established a carbon management programme which includes an inventory of scope 1, 2 and 3 emissions calculated according to the GHG Protocol. The scope 1, 2 and 3 are disclosed on annual basis on the AMEA Power Sustainability Report.

4.3 Human Rights

AMEA Power recognizes the centrality of human rights to sustainable development and ensuring fair distribution of development opportunities and benefits. AMEA Power is committed to operating in accordance with all (international) legal requirements and agreements, including the ILO Core Conventions and the United Nations

[3] https://www.un.org/sustainabledevelopment/development-agenda/

Guiding Principles on Business and Human Rights. AMEA Power's Human Rights Policy Statement details AMEA Power's underpinning commitments relating to human rights.

AMEA Power upholds the principles of accountability and the rule of law, participation and inclusion, and equality and non-discrimination. AMEA Power also ensures the meaningful, effective and informed participation of stakeholders in the formulation, implementation, monitoring and evaluation of its activities.

AMEA Power considers itself an equal opportunity employer and aims to eliminate all forms of unfair discrimination in the recruitment and selection of staff, as well as in relation to all other aspects of labour and working conditions. AMEA Power operates an internal grievance mechanism available to all AMEA Power employees and this is described in the Human Resources - People Policy. In accordance with the Human Resources Policy, AMEA Power requires all aspects of labour and working conditions to be managed in line with IFC PS2 and in compliance with national legislation. All Project Companies are required to put in place equivalent arrangements.

All Project Companies, including contractors and primary suppliers[4] over which the Project Company has control or influence are required to adhere to the same standards. Furthermore, in recognition of the growing awareness of the risk of human rights violations in the supply chain, all prospective Project Companies will be required to provide information relating to their suppliers as part of a due diligence assessment. The focus will be mainly on civil and political rights concerning working conditions; terms of employment; protecting the workforce; worker's grievance mechanism; the right to form unions; potential for child and forced labour; and policies for non-discrimination and equal opportunity. AMEA Power acknowledges that this is an emerging global issue and is committed to adopting guidance and best practices as they are developed as part of its overall approach to responsible investment.

4.4 Gender Equality and Women's Empowerment

AMEA Power's gender policy details the commitments and arrangements for achieving gender equality and women's empowerment both within the business and in relation to the Project Companies. AMEA Power recognises that for the investments it manages to be successful, they must be gender sensitive. The use of the term 'gender' refers to the social relations between women and men; thereby the need to work with women and men to ensure both equitably benefit. It is further recognised that women have as much to gain from its Projects (and particularly from increased access to energy and water and sanitation) as men but given their relative social position, will likely not profit as men from the access to energy, water and sanitation resources.

AMEA Power considers women as employees, end-users and beneficiaries of its investments, both directly and indirectly including through the community development programmes. During the development phase, AMEA Power includes an analysis of the local gender context of each Project as part of the ESIA study and identifies actions that will seek to address the challenges and opportunities for women and girls. AMEA Power requires the actions to be implemented throughout the lifecycle of an asset, from the start of construction, during operation and maintenance, and in decommissioning.

AMEA Power also recognises the issue of gender-based violence and harassment (GBVH) which is often experienced by women and girls more so than male members of the workforce and society at large. In line with best practice guidance[5], AMEA Power requires all Projects to implement measures to safeguard female members of its

[4] Primary suppliers are those suppliers who, on an ongoing basis, provide goods or materials essential for the core business processes of the Project (source: IFC PS2).

[5] Such guidance includes the guidance for the private sector produced jointly by EBRD, IFC and CDC entitled: Addressing Gender Based Violence and Harassment, July 2020

workforce as well as in the broader communities it serves. This includes consideration of the risks associated with GBVH at all stages of the investment lifecycle, adoption of controls to avoid cases of GBVH, and measures to respond to and address reported or suspected cases. The worker grievance mechanism adopted by the Project will make specific provision for a survivor-centred approach to responding to such cases as well as providing the necessary support to witnesses and others such as whistleblowers, with those involved in managing the case receiving appropriate training in line with international guidance.

The community grievance mechanism will make specific provision for cases of GBVH that may be reported by local community members. This provision will ensure a timely and survivor-centred response and access to redress, and ensure appropriate safeguards are in place to protect any witnesses, as well as other stakeholders (e.g. family members). All Project workers responsible for receiving, responding to, and addressing cases of GBVH must receive appropriate training in line with international best practice. Ongoing monitoring of the risks and associated control measures will be required throughout the lifetime of the Project.

4.5 Local employment and procurement

AMEA Power is committed to responsible investments, and seeks to develop, construct and operate all its investments in accordance with the highest international E&S standards. AMEA Power is also committed to maximising the opportunities for E&S benefits particularly to local communities in the area of influence of its Project investments, either in terms of employment or procurement.

This commitment includes:

- Local Employment: AMEA Power prioritizes the hiring of local workforce wherever possible, aiming to create job opportunities and enhance the skills of the local population. Special emphasis is placed on recruiting from disadvantaged or vulnerable groups, including women and youth, and providing training to build capacity and foster long-term employability.
- Local Procurement: AMEA Power strives to source goods and services from local suppliers to support the regional economy. This includes engaging with local businesses, contractors, and service providers in the construction, operation, and maintenance phases of each project. The goal is to foster local enterprise development and create long-lasting economic benefits for the region.

The objective is to ensure that all Projects contribute to society in an impactful way and at the same time enjoy the ongoing support of the host community of which the Project form part and serves. By aligning local employment and procurement practices with international E&S standards, AMEA Power aims to promote inclusive and sustainable development that benefits both the projects and the communities in which they operate.

4.6 Community Investment and Development Programs

Maintenance and retention of ongoing broad community support (also referred to as social licence to operate) is critical to the success of the Project throughout all stages of the investment. During the development phase AMEA Power relies on the Project Company to build positive community relations in accordance with local legal requirements. The Project Company is expected to appoint a Community Liaison Officer (CLO) who, supported by the Social Specialist, engage directly with the host communities and provide updates regarding the progress of the Project. The extent to which the engagement is conducted, and with which stakeholder groups, is context-specific but will normally involve at least the representatives of the community. The preparation and use of key messages

is critical to ensure that consistent and clear messaging is used and to manage expectations. During the construction, operating and decommissioning phases of a Project, the ongoing monitoring will be conducted through the implementation of the SEP.

At AMEA Power, Community Investment and Development Programs are guided by the following set of principles.

- Sustainable – Community development programmes will be designed to contribute to the relevant UN SDGs and will promote self-reliance and avoid dependency whilst creating opportunities for government support and partnerships with other development actors; they will have a clear and sustainable exit strategy.
- Community-Led – Community development programmes will be gender-inclusive, will be designed, planned, implemented and managed in consultation with and participation of community members and beneficiaries, including those identified as vulnerable.
- Inclusive – the development and delivery of programmes will involve engagement with national, regional and local governments as relevant, NGOs and CSOs, development agencies and other local stakeholders active in community development. This will seek to achieve a good fit with existing development activities in the area, and to be replicable across other communities as needed.
- Transparent – The development, implementation and management of all community development programmes will be governed by AMEA Power's RIC and shall be transparent, auditable and open to internal and external scrutiny.
- Measurable – Key Performance Indicators will be established to measure the value that community development programmes give to the intended beneficiaries using outcomes and impact indicators to measure change

The focus of the Community Investment and Development Programs is to maximize opportunities for:

- Good health & wellbeing;
- Quality Education;
- Gender Equality;
- Clean water and sanitisation;
- Rural electrification and renewable energy;
- Decent work and economic growth;
- Climate Change resilience.

Community Investment and Development Programs must be organised and undertaken in accordance with AMEA Power's Community Investment and Development Procedure (ref. AP-QHSE-PRO-022). The Community Investment and Development Programs will be formulated and documented by AMEA Power on behalf of the Project Companies during the development phase, for handover to the Project Company from the start of the construction phase. The responsibility for implementing the programme rests with the Project Company. AMEA Power will conduct ongoing monitoring and evaluation of the impacts of the programs.

4.7 Transparency and Disclosure

AMEA Power is fully committed to the transparency and disclosure of information relating to the sustainability aspects of the Project Companies.

AMEA Power recognizes that it is of utmost necessity to ensure that stakeholders are kept well informed about the Project throughout its life cycle, thus information will be accessible to the public, key stakeholders, and local communities through dissemination of related documents.

Information about the Projects are made accessible to stakeholders and the broad public through a disclosure package, available publicly in English language and in any other relevant language, according to the Project. Typically documents that are disclosed include:

- Environmental and Social Impact Assessment (ESIA);
- Non-Technical Summary (NTS);
- Stakeholder Engagement Plan (SEP);
- ESMS Manual;
- Livelihood Restoration Plan (LRP)
- Resettlement Action Plan (RAP)

The documents mentioned above are accessible through the following channels:

- AMEA Power Website: Available at www.ameapower.com These documents will remain on the website for the duration of the project.
- Hard Copies: Physical copies will be available at project location.
- Soft Copies: Digital versions can be provided to stakeholders upon request.

5 MANAGEMENT SYSTEM FRAMEWORK

5.1 Introduction

This Manual is part of the corporate Environmental and Social Management System, which is structured in four levels. The overall hierarchy of documents that comprises the QHSE Integrated Management System is depicted in the Chart below (figure 4).

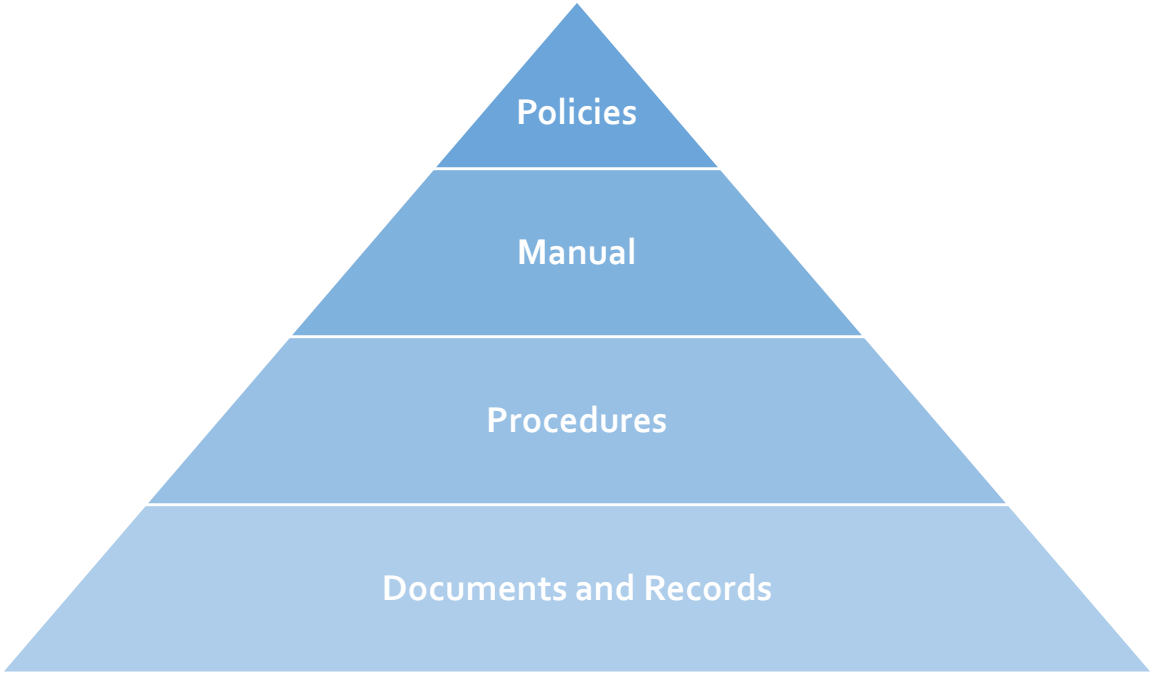

FIGURE 4 - ESMS HIERARCHY

TABLE 5 - ESMS DESCRIPTION

TIER	DESCRIPTION
Policies	Policies are high-level statements that outline an organization's commitment to environmental and social (E&S) responsibility. These set the strategic framework and guiding principles for how the organization will manage E&S risks and impacts. AMEA Power's E&S policies demonstrate the company's dedication to sustainability, health and safety, human rights, and community engagement, ensuring that all operations align with international standards and stakeholder expectations.

TIER	DESCRIPTION
Manual	The E&S Manual provides detailed guidance on how to implement the organization's policies. It outlines the roles and responsibilities, processes, and best practices to ensure that E&S management is effectively integrated into the organization's operations. The manual serves as a reference for employees, contractors, and stakeholders to understand the procedures and expectations for managing E&S risks throughout the project lifecycle, from development to decommissioning.
Procedures	Procedures are step-by-step instructions that describe specific actions needed to carry out the tasks outlined in the E&S manual. They provide detailed methods for managing particular aspects of E&S risks, such as waste management, biodiversity protection, stakeholder engagement, and grievance mechanisms. Procedures ensure consistency and compliance with legal requirements and industry best practices across all projects and operations.
Documents & records	Documents and records are the evidence of how E&S management practices are implemented. Documents include reports, checklists, permits, risk assessments, and training materials, while records capture monitoring data, incident logs, audit results, and compliance reports. These materials are critical for tracking performance, ensuring accountability, and demonstrating compliance with regulatory requirements, internal standards, and external stakeholder expectations.

The present manual, the policies, the procedures and the associated documents and records form the basis of the AMEA Power's Environmental and Social Management System, that enables effective management of E&S risks and opportunities, ensuring that projects are developed and operated sustainably and responsibly. The complete system is subjected to documentation control as described in the appropriate procedures. (Ref. AP-QHSE-PRO-001; AP-QHSE-PRO-002).

The structure, as defined above, provides the necessary information on the scope of AMEA Power ESMS and provides details of procedures and processes and their interaction within AMEA Power.

5.2 Policies

The Policies shall be approved and reviewed annually by AMEA Power's Chairman.

Amea Power Head of ESG shall be responsible for disseminating the Policies across the organisation and AMEA Power ESG Team shall be responsible for disseminating the Policies to the Project Companies. The dissemination channels may be, among others, the following:

- Internal resources-sharing system
- Email

- Projects notice boards
- Training courses

The Policies are available on the company website (www.ameapower.com).

The Policies' contents will also be communicated through the company induction training, the periodic human resources, social, environmental, and OHS awareness training, and by distribution and posting of the policy documents in key locations at AMEA Power's headquarters locations in Dubai's offices, in the subsidiaries' offices, the Projects site, and other relevant facility locations.

The following tab present the AMEA Power Policies with a brief description of each.

TABLE 6 - AMEA POWER POLICIES

TITLE	DESCRIPTION
Code of Conduct	This policy describes the responsibility placed on all AMEA Power staff to uphold the goals and values to which AMEA Power aspires and to conduct business for AMEA Power and AMEA Power project companies in accordance with applicable laws and regulations. It provides an overview of the responsibility that AMEA Power Staff have in respect of upholding AMEA Power's commitment to the highest standard of business conduct and provides a set of expected behaviours that AMEA Power Staff exhibit in their dealing towards others and AMEA Power.
Environmental Policy	This policy guides AMEA Power's actions and decisions on environmental matters, reflecting our commitment to sustainability. It includes goals for minimizing impact, conserving resources, complying with laws, and promoting stewardship.
Occupational Health and Safety Policy	This policy outlines AMEA Power's commitment to ensuring a safe workplace for employees, contractors, and visitors. It includes goals for preventing injuries and illnesses, promoting safety culture, complying with laws, and continuously improving safety performance.
Social Sustainability Policy	This policy outlines AMEA Power's commitment to promoting social well-being in the Projects and their host communities. It includes goals for supporting local development, respecting human rights, fostering social equity, and ensuring that the projects benefit all stakeholders.
Gender Equality Policy	This policy provides governance framework for gender to be incorporated into Project Companies as well as in the AMEA Power workplace. AMEA Power is committed to the mainstreaming of gender[6] throughout the organisation and through its Project Companies. In so doing, AMEA Power

[6] Gender mainstreaming is the systematic process of ensuring that women and men have equal access and control over resources, development benefits and decision-making at all stages of the development process through ensuring that the respective needs, interests and priorities of women and men are integrated into in all policies, programmes and Projects.

TITLE	DESCRIPTION
	seeks to contribute to UN SDG 5 which seeks to achieve gender equality and empowerment of women and girls.
People Policy	This policy defines AMEA Power's approach to managing its workforce, focusing on recruitment, employee development, and well-being. It includes objectives for creating a positive work environment, fostering diversity and inclusion, complying with labor laws, and supporting employee growth and engagement.
Human Rights Policy	This policy establishes AMEA Power's policy regarding the respect for human rights in the course of its business activities and in the project Companies. In line with its E&S Principles, AMEA Power and its Project Companies are required to respect the International Bill of Human Rights[7] in line with the UN Guiding Principles on Business and Human Rights[8].
Anti-Modern Slavery Policy	This policy reflects AMEA Power's commitment to preventing modern slavery and human trafficking in all aspects of our operations and supply chain. It includes objectives for ensuring ethical labor practices, raising awareness, and adhering to legal requirements that protect against forced labor.
Anti-Corruption Policy	This policy guides AMEA Power's efforts to combat corruption and unethical practices in business dealings. It includes goals for ensuring transparency, fostering integrity, complying with anti-corruption laws, and maintaining ethical standards in all transactions.
Anti-Monney Laundering	This policy outlines AMEA Power's approach to preventing money laundering activities within its operations. It includes measures for monitoring financial transactions, reporting suspicious activities, complying with regulations, and ensuring the integrity of financial practices.
Whistleblowing Policy	This policy ensures that employees and stakeholders can report unethical behaviour, fraud, or any misconduct without fear of retaliation. It includes mechanisms for confidential reporting, protection of whistleblowers, and the commitment to investigate all claims thoroughly.

[7] The International Bill of Human Rights includes the United Nations ("UN") Universal Declaration of Human Rights and the International Covenant on Economic, Social and Cultural Rights and the International Covenant on Civil and Political Rights and can be located here: https://www.ohchr.org/documents/publications/compilation1.1en.pdf

[8] https://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf

TITLE	DESCRIPTION
Security Policy	This policy sets the framework for protecting AMEA Power's assets, employees, and operations from security threats. It includes objectives for safeguarding information, ensuring physical security, complying with legal requirements, and promoting a security-conscious culture.
Quality Policy	This policy defines AMEA Power's commitment to delivering high-quality products and services in line with ISO 9001:2015 standards. It includes objectives for meeting or exceeding customer expectations, adhering to industry standards, continuously improving processes, and ensuring compliance with applicable regulations.
Responsible Sourcing	This Policy outlines AMEA Power's commitment to sourcing products and materials in an ethical, sustainable, and socially responsible manner. It serves as a framework for the company to make informed decisions about its supply chain, fostering ethical practices and contributing to sustainability goals.
Supplier Code of Conduct	This policy sets expectations for suppliers working with AMEA Power, ensuring they meet ethical, environmental, and social standards. It includes goals for responsible sourcing, compliance with labor laws, environmental stewardship, and promoting fair business practices.

All Project Companies will implement project-specific E&S Policies that are aligned to AMEA Power E&S Policies. Additionally, Project Companies will include appropriate E&S covenants in the contracts with the EPC Contractor requiring to be in compliance with the AMEA Power's Policies and E&S Requirements as described included into the QHSE Employer Requirements (ref. AP-QHSE-PRO-022).

6 ESG IN THE INVESTMENT PROCESS

6.1 Introduction

This section describes the way in which the E&S impacts and risks are identified, evaluated, and incorporated into each stage of the investment process for the successful design, construction, operation of and exit from a Project. The investment process is presented in Figure 5.

Typically, AMEA Power will invest in a Project at an early stage of development and prior to any construction (i.e. a 'greenfield' Project). Development funding will be invested in such Projects and AMEA Power will manage the process of development. In some cases, an investment may be considered which does not require development funding; for example, a portfolio which includes existing (i.e. 'brownfield') assets, for which only construction equity funding is needed. Consideration of E&S risks and impacts is fully integrated into, and informs, each stage of the investment process.

FIGURE 5 - KEY STEPS IN INVESTMENT PROCESS

6.2 Early development

The potential E&S risks of new investment opportunities are subject to rigorous analysis through the due diligence screening process. The key E&S risk screening activities conducted by AMEA Power at the deal screening stage are described in the below paragraphs.

6.2.1 Country screening

The scope of the Country screening procedure is to proactively identify potential risks and opportunities in each country where AMEA Power has projects in the pipeline, or a country targeted as a potential new business area.

The final objective is to facilitate AMEA Power's risk management process and decision making.

The Country Screening is a high-level assessment aimed to identify the types of E&S risks and issues that need to be considered in a specific country during the development phase.

Country screening will also provide information that will help decide whether a cumulative impact assessment may need to be undertaken for some site locations in the country.

The country screening will be a build-up of information based on:

- Existing reports / third party searches on the E&S situation and priorities in the country
- Review of web sites of government ministries, NGOs, etc.
- Review of press articles on web sites (national and international)
- Discussion with local contacts in the country and other contacts with relevant experience working in the country

The output is a short summary report listing the main E&S risks and opportunities that should be considered when developing projects in the country.

For further information please refer to procedure AP-QHSE-PRO-024.

6.2.2 Project Screening

The scope of the Project screening procedure is to consider all relevant data that are available to AMEA Power including a site visit. In some cases, the screening might require the engagement of an E&S advisor to provide a high-level assessment of specific issues.

The final objective is to facilitate AMEA Power's risk management process and decision making.

The Project Screening is a high-level assessment aimed to identify the types of E&S risks and issues that need to be considered in a specific Project during the development phase.

For further information please refer to procedure AP-QHSE-PRO-025.

6.2.3 E&S Due Diligence

In case of acquisition of Projects, due diligence activities will be undertaken. The nature of the due diligence will vary and is based on the risk categorization. The Project E&S risk categorization will comply with IFC categorization, to reflect the magnitude of risks and impacts.

The purpose of conducting due diligence is to confirm the required activities that will need to be undertaken in the development of the Project along with the required budget to fund these development activities. The due diligence also provides the opportunity to gather additional information and if necessary, revise the risk categorization. External consultant(s) may be appointed to conduct the due diligence assessment. The reference against which all Projects will be assessed is the IFC Performance Standards, along with the requirements of this ESMS, and the local legal framework.

A visit to the Project location(s) and interviews with relevant stakeholders will be undertaken for all Projects.

The due diligence activities are described in Table 7. The scope of the due diligence assessment will cover the aspects detailed in Table 8; additional topics may be added as considered necessary for each individual investment. The findings of the due diligence will be classified in accordance with the categories described in Table 9.

TABLE 7 - DUE DILIGENCE ACTIVITIES

ACTIVITY	DESCRIPTION
Document Review	A review of available information (typically provided in a virtual data room by the Project Developer) will be conducted by the ESG team. This may involve a review of any existing reports such as a 'red flags' report, an ESIA report, etc.
Site visit	A site visit will be conducted by the ESG team and/or an external consultant(s)[9] to further assess the potential E&S risks and impacts of the Project, its Associated Facilities, and any other current or planned activities or developments of which the Project may form part, and to identify 'red flag' issues of concern.
Assessment of Project Developer E&S awareness, capacity and commitment	Interviews with the Project Developer and other key stakeholders to ascertain their internal E&S resources, competence, and aptitude for managing E&S in accordance with AMEA Powe's requirements.
Review of E&S Categorisation	During the due diligence process the E&S risk categorization will be revisited to confirm that it remains appropriate or needs to be modified on the basis of new information that may be generated.
ESAP	The output of the due diligence assessment will be an E&S action plan detailing the necessary actions required to be undertaken during the development phase to address areas of concern.

TABLE 8 - DUE DILIGENCE ASSESSMENT SCOPE OF WORK

ACTIVITY	DESCRIPTION
Overview of E&S legislation	Applicable E&S legislation with which the Project needs to comply with during the planning, installation and operation phases.
Overview of requirements for E&S permits/licences and the process to follow	Identification of the relevant E&S permits required to implement the Project, including requirements and applicability of the regulatory environmental (and social if included) impact assessment (EIA) process to meet applicable regulations.
Associated facilities and activities	Identification of associated facilities and activities (as defined by IFC PS1). Potential impacts of the facilities that are/will be managed by

[9] Only consultancies that have been pre-approved by AMEA Power will be invited to tender for the due diligence assessment. All procurement shall be conducted in accordance with AMEA Power's Procurement Policy.

ACTIVITY	DESCRIPTION
	developer/promoter/counterparty including those that would not fall within the IFC PS1 definition of Associated Facilities but with which an association may present a risk to reputation and/or is contrary to the mandate of the Project Companies.
Project stakeholders	Description of the key Project stakeholders, including confirmation of the ethnicity of the people and potential presence of indigenous peoples, ethnic minorities, and vulnerable persons.
Gender and Human Rights	Overview of gender and human rights issues in the country/region including potential risks associated with the Project workforce and supply chain.
Indigenous People	If the existence of Indigenous People (IP) communities in the Project area is determined during the E&S screening phase, a specialist assessment will be required as part of the due diligence to confirm the presence of IP communities and the potential risk of adverse impact
Resettlement	The due diligence should seek to confirm the presence of residential or other structures on the Project site, and any ongoing livelihood activities, as well as any other uses of the land (including but not limited to use of ecosystem services; spiritual or religious purposes).
Supply Chain	The due diligence assessment shall involve an assessment of the potential risks associated with the Project Company's supply chain with a specific focus on labour, working conditions and human rights. The assessment shall - at a minimum - take into account all different type of workers, including full time, temporary, daily, contractor and supply chain workers as defined in IFC PS2. The key objectives will be to: ▪ understand current and potential labor risks posed by the Project activities (including any high-risk contextual issues). ▪ assess whether the human resources policies, practices and management systems applicable to the Project are in line with IFC PS2 requirements. ▪ assess how the human resources policies and management systems apply across the contracting chain i.e. all (sub-)contractors and core suppliers within Project scope. ▪ opine on the capacity of the EPC contractor to comply with IFC PS2 requirements. ▪ identify mitigation, management and monitoring measures to address the root causes of actual or potential labor issues that (are

ACTIVITY	DESCRIPTION
	likely to) prevent compliance with IFC PS2 requirements, including a timeframe for such measures.
Climate change	Overview of the potential climate change risks and impacts. This will be supplemented by a climate risk and vulnerability assessment which will be conducted during the development phase
Community development opportunities	A separate community needs assessment will be commissioned; however, any community needs and opportunities identified during the course of the due diligence will also be recorded.

TABLE 9 - DESCRIPTION OF INDIVIDUAL ISSUE CATEGORIES

ACTIVITY	DESCRIPTION
Critical Risk / Red Flag	▪ Issues that trigger aspects of the IFC Project Exclusion List/Prohibited Activities; ▪ Issues that are not aligned to international standards and best practices and would have a significant financial implication (> US$ 0.5 million) to mitigate; ▪ Issues that can result in a significant regulatory non-compliance that may have repercussions for operational shut down, significant reputational damage and/or heavy fines/criminal proceedings; ▪ Issues that would have irreversible impacts on ecological and/or social resources or receptors; and/or ▪ Issues that could result in potential reputational and other impacts involving international media/watchdogs.
High Risk Issue	▪ Issues that are not aligned to international standards and best practices and would have a major financial implication (> US$ 0.3 million) to mitigate; ▪ Issues that may have reputational risks for AMEA Power and/or its assets and could lead to conflict with communities/external stakeholders; ▪ Issues that are not aligned to the IFC Performance Standards and would have long-term repercussions in management of E&S performance of the Project (e.g. may extend outside of the typical Project development timeframe advised by AMEA Power); ▪ Issues that are/may result in regulatory non-compliances leading to fines, significant business interruption and potential criminal proceedings in extreme scenarios; and/or ▪ Issues that could result in reputational and other impacts involving national media/watchdogs.

ACTIVITY	DESCRIPTION
Medium Risk	▪ Issues that are not aligned to international standards and best practices and could have a moderate financial implication (> US$ 0.1 million) to mitigate; ▪ Issues that may result in business interruption in the short-term but will not result in long-term implications for the Project; ▪ Issues that may result in a non-compliance and/or enforcement action, but will can be easily remedied and will not result in long-term implications for the Project; and/or ▪ Issues that could result in reputational and other impacts involving local/regional media/watchdogs.
Low Risk	▪ Issues that are a non-alignment with IFC Performance Standards and/or good international industry practice (GIIP) but can be readily addressed at minimal cost and will not attract adverse stakeholder/media/NGO attention.

6.3 Advanced Development

In the development stage, the ESG Team will follow up with a program of activities to evaluate the potential E&S impacts and risks of the Project. Where necessary, this includes commissioning an EIA to achieve compliance with National Regulations and obtain the Environmental Permit; and the ESIA and other specialist studies to achieve compliance with international standards.

The program of activities is determined by the contextual nature of the Project and will be aligned with the requirements described in Table 10.

6.3.1 E&S Studies

TABLE 10 - E&S ACTIVITIES IN DEVELOPMENT PHASE

REQUIREMENTS	DESCRIPTION
ESIA and ESMP	▪ In case of acquisition, if an impact assessment has already been conducted, the prospective Project Company shall provide this to AMEA Power for review and to confirm the extent of alignment to the IFC Performance Standards. Where gaps exist, AMEA Power shall require the prospective Project Company to commission the studies relevant to address them. ▪ AMEA Power will typically oversee and manage the selection of the ESIA consultancy; the ESIA process; review of the ESIA report and any additionally required documents (e.g. resettlement action plan, livelihood restoration plan, biodiversity action or management plan), and will influence and guide the process to ensure that AMEA Power Policies and Procedures, as well as relevant requirements – including

REQUIREMENTS	DESCRIPTION
	the IFC Performance Standards and Project Lenders standards - are met.
Climate Change	▪ All proposed Projects shall be assessed to demonstrate that the Project will (a) make a significant environmental contribution, and (b) will not cause significant harm in relation to the defined environmental objectives.
Indigenous People	▪ Should the existence of IPs in the Project area be confirmed, the Project Company shall establish the arrangements necessary to comply with the requirements described in procedure AP-QHSE-PRO-057. ▪ The consultancy appointed to complete the ESIA shall arrange for the necessary expertise in relation to IP impact assessment, including local knowledge where required. ▪ The scope of the ESIA shall include a specific focus on the IP community, aligned with the requirements of the Indigenous People Planning Framework (IPPF). ▪ If considered necessary on the basis of the ESIA, an IPP will be developed for implementation by the Project Company.
Involuntary Land Acquisition and Resettlement	▪ An assessment of the impacts of any potential economic and or physical resettlement will be included in the ESIA. Should resettlement be required, it shall be managed in accordance with Procedure AP-QHSE-PRO-009 ▪ If considered necessary on the basis of the ESIA, a resettlement action plan (RAP) will be developed for implementation by the Project Company.
Human Rights	▪ In circumstances where Human Rights have been identified as a potential concern either during the screening, a detailed human rights risk assessment will be integrated into the ESIA.
Stakeholder Engagement Plan and Grievance Mechanism	▪ The Consultant shall prepare an IFC-compliant Stakeholder Engagement Plan (SEP) and grievance mechanism. Typically, this will be done as part of the ESIA. ▪ Where IP communities are present, the SEP and grievance mechanism shall include specific arrangements appropriate to their needs. ▪ The grievance mechanism shall incorporate specific and survivor-centred measures for responding to and managing reported cases of GBVH, with such measures also providing for the appropriate safeguarding of any witnesses, and other stakeholders such as whistleblowers.

REQUIREMENTS	DESCRIPTION
	▪ The Project Company will be responsible later to implement the SEP and the Grievance Mechanism. ▪ Stakeholder Engagement Plan and Grievance Mechanism shall be managed respectively in accordance with Procedures AP-QHSE-PRO-008 and AP-QHSE-PRO-007.
Gender Analysis and Action Plan	▪ The Consultant shall prepare a gender analysis and gender action plan for implementation in all phases of the Project. This may be incorporated into the scope of work for the ESIA. The ESIA team will be required to include a gender expert. ▪ The analysis will be required to consider risks associated with GBVH and the required control measures and ongoing monitoring activities. ▪ Gender aspects shall be managed in accordance with procedure AP-QHSE-PRO-038.
Cumulative Impacts	▪ Where relevant for the specific Project context, the ESIA will also consider an assessment and evaluation of cumulative impacts[10] and associated facilities of the Project in accordance with the requirements and guidance of IFC PS1.
Security Risk Assessment	AMEA Power ESG Team will appoint a Security Advisor to produce a Security Risk Assessment for the Project. The main objectives of this Assessments consist of: ▪ Identify inherent (internal) security risks to the Project, considering but not limited the location of the Project site, the socio-economic conditions of the Project area, the humanitarian situation with respect to any vulnerable groups (such as women, youth, persons with disabilities for instance), any potential tribal affiliations to the land within the Project area and any potential community unrest associated with the allocation of local employment and procurement for the Project. ▪ Identify potential security risks created by the Project (external) to local communities within the vicinity of the Project site and the wider region. ▪ In relation to the use of security personnel, identify the most likely security scenarios and how the security personnel are likely to react and respond to those threat scenarios, assess the potential impact from that response (especially on the communities) and identify actions to mitigate and manage those risks in line with IFC PS4 (Par. 12–14 and GN 24-33).

[10] Cumulative impacts are those that result from the incremental impact, on areas or resources used or directly impacted by the Project, from other existing, planned or reasonably defined developments at the time the risks and impacts identification process is conducted.

REQUIREMENTS	DESCRIPTION
	▪ Document the outcome of this process through a Risk-Response Chart or any other similar format (e.g., Risk Register) that captures the potential risks, responses, and impacts. ▪ Identify those risks (to the Project and to the communities) which are of 'highest significance' based on likelihood and severity of impacts and highlighting those as 'priority' for consideration by the Employer, together with associated Recommendations. Once completed, the Security Risk Assessment will be provided to the EPC Contractor who will use it to produce their own Security Management Plan. Security aspects should be managed in accordance with Procedure AP-QHSE-PRO-036.
Additional Studies	▪ Where relevant, and based on the Project context, additional studies may also be required. These will be determined on a case-by-case basis or could be requested by Project Lenders after their ESDD. ▪ The Project Company will be required to adopt and adhere to the requirements of any related documents which may include management plans and policies.
Community needs assessment	▪ Community needs assessment and preparation of a community development plan. ▪ Typically, the needs assessment will be incorporated into the ESIA process and will serve later to prepare the Community Investment and Development Programs (CIDP). ▪ Community needs assessments shall be developed in accordance with the Procedure AP-QHSE-PRO-022.

6.3.2 Project Company E&S Team

In this phase of development, AMEA Power's ESG Team will identify E&S professionals to join the Project Company. This E&S team will be responsible for implementing the environmental and social aspects of the project, including to implement the ESMS and all associated arrangement throughout the construction and operational phases.

The appointment of the ESG Team is subject to approval and review by AMEA Power HR and Project Development Team, as well as Project Company management, if already present.

Typically, the first professionals to be appointed will be a Social Specialist and a Community Liaison Officer (CLO) in order to start an early engagement with Project Stakeholders and manage their expectations, as well as to start implementing the grievance mechanisms and undertake a need assessment, which will serve later to produce the Community Investment and Development Plan (CIDP).

The AMEA Power ESG team will act as the functional reporting line for the Project Company's E&S team and will be responsible for providing them with training.

Training includes but will be not limited to:

- AMEA Power ESG Policies and Procedures;
- Project Context and Background;
- ESIA findings, ESAP requirements (if available);
- Auditing and reporting requirements.

The Project Company E&S Team will be on turn responsible to provide training to the EPC Contractor's E&S Team. Please refer to procedure AP-QHSE-PRO-055.

6.3.3 EPC Contractor screening and selection

The AMEA Power ESG Team will conduct a preliminary high-level analysis of the EPC contractor's track record, focusing on both strengths and weaknesses related to the management of anticipated environmental and social (E&S) risks, as well as the delivery of positive impacts.

This screening process typically occurs during the bidding phase, where each bidder is required to complete the EPC Screening Questionnaire (Ref. AP-QHSE-DOC-081) and submit supporting evidence.

Upon receiving the completed EPC Screening Questionnaire and supporting evidence, the AMEA Power ESG Team will conduct a thorough review to assess the contractor's strengths and weaknesses in managing environmental and social (E&S) risks. This process involves analysing the submitted information to evaluate compliance with regulations and industry standards, identifying potential risks, and recognizing positive impacts from previous projects. Based on their findings, the team may provide recommendations for improvement and may request additional clarification if needed. The results will be documented to inform the overall evaluation of the contractor during the bidding process, ensuring that the selected EPC contractor is well-equipped to deliver positive E&S outcomes.

Additionally, supply chain considerations are a crucial part of this screening process. The AMEA Power ESG Team will assess the contractor's supply chain management practices to ensure that:

- Suppliers and subcontractors are aligned with AMEA Power's sustainability and ethical standards, particularly regarding labor rights, fair wages, and workplace safety.
- The traceability of materials and equipment used in the project is ensured, with a focus on identifying and mitigating risks related to human rights violations, such as forced labor or child labor, as well as environmental degradation.
- Contractors and suppliers are compliant with AMEA Power's Anti-Modern Slavery and Anti-Corruption Policies, ensuring ethical behaviour and transparency across the supply chain.

AMEA Power has a strong commitment to sourcing materials from suppliers who demonstrate sustainable practices, including low carbon emissions, waste reduction, and biodiversity protection. This commitment is reflected in the Responsible Sourcing Policy and Supplier Code of Conduct, specifying zero tolerance of child labour and forced labour and setting out a commitment to the ILO Core Labour Standards, with a requirement for suppliers to cascade down to sub-suppliers.

By integrating supply chain evaluations into the EPC contractor selection process, AMEA Power ensures a more comprehensive approach to managing E&S risks throughout the entire project lifecycle, from construction to operation.

6.3.4 Project ESMS

During the Development phase and prior any commencement of the construction works, the Project should have an Environmental and Social Management System (ESMS) in place.

The ESMS is typically developed by the EPC Contractor, who is ultimately responsible for its implementation. If the AMEA Power ESG team identifies capacity-building gaps within the EPC Contractor's E&S team, they will require the EPC Contractor to appoint a third-party E&S consultant to assist in preparing the management system.

If considered necessary, the EPC Contractor will be required to adopt a ToR prepared by AMEA Power for external consultancy support to assist in the implementation of the E&S Requirements including those detailed in the ESMP and the ESAP.

The requirements of the ESMS are detailed in the QHSE Employer Requirements (Please refer to AP-QHSE-DOC-054).

It is worth noting that the ESMS incorporate also elements of Quality Management because certain plans are functional to harmonize and optimize the whole management system and to ensure compliance to ISO 9001:2015 standards, necessary since AMEA Power is an ISO-certified company.

The Environmental and Social Management System (ESMS) will be composed at least by the documents included in Tab 11.

TABLE 11 - TYPICAL STRUCTURE OF A PROJECT ESMS.

N.	ACRONYM	QUALITY, HEALTH, SAFETY, SOCIAL, SECURITY AND ENVIRONMENTAL MANAGEMENT SYSTEM
		MAIN DOCUMENTS
1	ESMS	ESMS Manual
2	POL	QHSE Policies
3	LEG	Legal Register (Regulatory Framework)
4	PER	Permits Register
		QUALITY
5	ISO	ISO Certifications
6	QMP	Quality Management Plan
7	CSMP	Contractor and Supply Chain Management Plan
8	DCP	Document Control Plan
9	COMM	Communication Plan
10	PMP	Project Management Plan
11	ORG	Organisation Chart (HSSE staff Project Specific)
		HEALTH & SAFETY

N.	ACRONYM	QUALITY, HEALTH, SAFETY, SOCIAL, SECURITY AND ENVIRONMENTAL MANAGEMENT SYSTEM
12	MOB	Site Mobilization Plan
13	OHSP	Occupational Health & Safety Management Plan
14	EPRP	Emergency Preparedness and Response Plan
15	HMMP	Hazardous Material Management Plan
16	CHSP	Community H&S and worker influx plan
17	TMP	Traffic and Transportation Management Plan
18	TRMP	Training Management Plan
19	FSMP	Fire Safety Management Plan
		ENVIRONMENTAL
20	NMP	Noise Management Plan
21	AQDP	Air Quality and Dust Management Plan
22	SGMP	Soil and Groundwater Management Plan
23	WMP	Water Management Plan
24	WMP	Waste and Wastewater Management Plan
25	BMP	Biodiversity Management Plan
		SOCIAL
26	LWCMP	Labour and Working Conditions Management Plan
27	GEP	Gender Equality Plan
28	GBVHMP	Gender-Based Violence and Harassment Management Plan
29	WGM	Worker Grievance Mechanism
30	CGM	Community Grievance Mechanism
31	GBVHGM	GBVH and Modern Slavery Grievance Mechanism
32	ACC	Accommodation Management Plan
33	EPMP	Employment and Procurement Management Plan
34	WDMP	Workers Demobilization Management Plan
35	ARCH	Archaeological Chance Find and Cultural Heritage Procedure
		SECURITY
36	SMP	Security Management Plan

Additional supplementary plans or documents might be requested to be annexed to this Management System, but in any case, will need to be read in conjunction with the plans included in the Management System of Tab 10. Cross-referencing between management plans and any supplementary documents should be implemented to ensure comprehensive understanding and effective implementation.

The Environmental and Social Management System may however require amendment at certain stages through the lifespan of the project. The incidences which may require the amendment of this document include:

- Changes in legislation;
- Results of construction and post-construction monitoring and audit;
- Per instruction from the competent authority; and
- Changes in technology and best practice principles

All the management plans must be project specific and in full compliance with the requirement of the standards, laws and requirements included in the Project-specific Legal Register.

All the management plans shall be reviewed at regular intervals as agreed between the Project Company and each of the Contractors throughout the contract to ensure that it remains current and relevant to the Works.

The Contractors' management plans shall also form the basis by which its management systems may be audited by the Project Company and Lenders.

The Project Company E&S Team shall review and provide feedback on the management plans prior to the commencement of the Works.

6.3.5 Community Investment and Development Programs

During this phase of development, the ESG Team will identify and allocate a budget for the Community Investment and Development Programs, which will be implemented after financial close. A Community Needs Assessment will also be conducted to identify the activities to be included in the program, ensuring that the initiatives align with the specific needs and priorities of the local community.

The objectives of the Community Investment and Development Programs are to:

- Identify, assess and discuss with local stakeholders the list of potential CIDP activities. Develop a list of CIDP actions that reflects stakeholder's priorities, is technically viable, is aligned with AMEA Power strategy and is viable within the established CIDP budget;
- Discuss with affected communities to identify their needs;
- Identify and determine health and education needs in impacted communities;
- Determine the CIDP activities to be carried out in favour of the affected communities;
- Plan and implement CIDP activities that support the livelihoods of the communities and that are aligned to the SDG supported by AMEA Power, including healthcare, education, access to water and gender inclusiveness;
- Support the local communities by providing them skill development, to maximise local employment and building capacity;
- Specifically consider the requirements of vulnerable groups;
- Measure the results by examining tracking and assessing performance indicators, community perception, returns on community investment and proactive participation.

The Project Company will be implementing a Community Investment and Development (CID) that will be guided by the following principles:

Ethics

- Follow honest, transparent, ethical and socially responsible business practices;
- Follow industry norms and best practices in all operations.

Stakeholders

- Maintain constructive dialogue and on-going engagement with all stakeholders to build rapport and contribute to sustainable development;
- Uphold respect, equality and diversity of all stakeholders by maintaining professional and non-discriminatory relationships.

Community

- Reaching out to the greatest number of local community members and target to the greatest extent possible various and diverse stakeholder groups including vulnerable groups identified in the Project area;
- Support the local community in by contributing and investing in initiatives to enhance social, health and economic development programs;
- Establish and maintain partnership with government authorities, businesses, NGOs and communities to promote and strengthen community welfare;
- Share business knowledge and expertise to support educational learning development;
- Aid programme to provide for basic needs including food, clothing and shelter, among others.

Environment

- Utilise cost-effective methodologies for efficient use of energy and resources;
- Safeguard the environment and support sustainable development by implementing environment friendly initiatives.

6.4 Project finance

Project finance is a structured finance solution that AMEA Power uses to:

- Capitalize on the availability of development financing from leading international lending institutions;
- Leverage AMEA Power capital markets strength to bring in additional debt and equity funding.

Once mandated, Project Lenders in conjunction with AMEA Power (Borrower / Sponsor) will appoint a third-party E&S consultancy, Independent E&S Consultant (IESC). Project Lenders will take a lead role in the IESC selection process.

The IESC will undertake the ESDD during the pre-financial close phase and may be agreed between the parties that the same IESC consultant be re-appointed for the post-financial close monitoring phase (construction and operational phases).

The overall objectives of the IESC scope of work during the pre-financial close ESDD are to assess the E&S compliance and capacity of the Project as a whole. This includes assessment of the level of the Project's compliance through review of its design and E&S management documentation and well as interviews with relevant stakeholders; assessment of the E&S management capacity of the Project proponent; confirmation of areas of E&S risks for finance party; identification of corrective actions to resolve any identified compliance issues; and recommendation of measures to manage ongoing/future E&S risks.

During this phase pre-financial close, the AMEA Power ESG Team will support IESC on their functions. This support may take the form of kick-off and periodic progress calls, sharing of dataroom with all Project E&S Studies and documents available, presentation of Project Company E&S Team (if appointed), support on site visit, etc.

The outcome of the ESDD will be the ESDD Report, which will include a proposed E&S Action Plan (ESAP) that describes all the actions required post-financial close to ensure the project's ongoing compliance. The proposed ESAP should be agreed by the finance parties for inclusion in the finance documents. Based on the findings of the ESDD, Project Lenders might identify priorities on action items and decide to include them as Condition Precedents (CP) to achieve the Financial close (FC).

In this case, upon approval of the ESAP, AMEA Power ESG Team and the Project Company E&S Team will work together to complete the pending action items prior to the

In ideal circumstances, prior the ESDD undertaken by the IESC, the Project Company should have its own E&S Team appointed and functional working, the EPC Contractor identified and the ESMS in place. However, this is not the typical case, so it's expected that the ESAP issued by the IESC after the ESDD includes action items linked to Project Company and EPC Contractor E&S capacity building, as well as the preparation and implementation of the full ESMS.

If E&S resources are not in place, AMEA Power will be required to provide evidence of a recruitment plan with agreed milestones to be met which will be tied to disbursements. Recruitment of required resources will typically be a condition precedent to financial close. AMEA Power will be required to share the CVs of existing or proposed resources with Project Lenders for approval.

Following completion of the Final ESDD Report and as part of the Conditions precedent to financial close, the IESC may also be requested to produce an E&S Certificate confirming the status of the Project's compliance including completion of all E&S actions required prior to financial close.

In this phase AMEA Power will negotiate also the ESG terms with the Lenders and incorporate the ESG terms in the shareholder agreement, usually called Common Terms Agreements (CTA) or equivalent. The CTA will clearly outline how ESG matters will be handled during the life of the investment.

A final version of the ESAP will be included in the CTA which details required E&S actions, timelines, deliverables and responsibilities to be committed to by the Project Company. Action deadlines will be linked strategically to disbursements and other relevant milestones. AMEA Power ESG Team will support the Project Company E&S Team to develop the Project in accordance with ESAP requirements and will monitor the progress in the close-out of the ESAP.

6.5 Asset Management: Construction, Operation and Maintenance

Once the financial close is achieved, the Project Company is required to implement the Project-specific ESMS along with the ESIA commitments, the ESMP and the ESAP, and to manage all E&S impacts and risk in compliance with the E&S Requirements as listed in QHSE Employer Requirements (AP-QHSE-DOC-054).

Performance will be closely monitored by and on behalf of AMEA Power through periodic construction phase audits. This is necessary to provide assurance that impacts and risks are being appropriately managed, and to identify non- conformances where they occur. Monitoring and evaluation activities are described in Section 9.

Tab 11 details the construction phase E&S activities and outcomes.

TABLE 12 - CONSTRUCTION PHASE E&S ACTIVITIES AND OUTCOMES

ACTIVITY	DESCRIPTION
Project Company ESMS	▪ The Project Company shall ensure that EPC Contractor implements HSSE Policies, ESMS, ESMP and all other management plans in accordance with the QHSE Employer Requirements, as well as implement actions in compliance with ESAP requirements. ▪ The EPC Contractor shall operate in accordance with the E&S requirements for EPC contractors and all other applicable requirements. The Project Company shall conduct ongoing monitoring to confirm this. ▪ AMEA Power shall continue to monitor HSSE performance in accordance with the arrangements detailed in Tab 13.
Project Company E&S Team	▪ The Project Company shall appoint or retain sufficient E&S resources to implement the ESMS and all associated arrangements. ▪ Where new resources are to be hired, AMEA Power shall be invited to participate in the recruitment process, including in the review of CVs, interviews, and final selection. ▪ The AMEA Power ESG team will also be responsible for training the key E&S staff of the Project Company (typically managers and specialists), who will then train the remaining E&S staff as needed.
Project Company External E&S Advisor	▪ If external consultancy support is retained to assist in the implementation of the E&S Requirements, the deliverables of the work undertaken by the consultancy shall be provided to AMEA Power. ▪ If AMEA Power determines it necessary, the Project Company will be required to involve AMEA Power in the ongoing management and monitoring of activities to be undertaken by the consultancy.
ESAP	▪ Throughout the construction phase AMEA Power will monitor progress in the close-out of the ESAP. The Project Company will be required to provide regular (usually monthly) updates and evidence to support the close-out of actions

ACTIVITY	DESCRIPTION
Community Investment and Development Program	▪ The Project Company shall implement the project Community Investment and Development Program and shall provide AMEA Power with regular updates on progress. ▪ Contractual agreements shall be implemented with the selected delivery partner(s) to deliver the identified community interventions. ▪ The allocated budget for the CIDP shall be managed and disbursed in accordance with the contractual agreement with the delivery partner. ▪ AMEA Power shall conduct or commission periodic monitoring and evaluation to be conducted to monitor the performance of the delivery partner and the program.

6.5.1 KPI

The performance data shall be reported to AMEA Power on a monthly basis. It is ultimately responsibility of the Project Company to design and implement a system that ensures the data that is collected is reliable, accurate and complete. Tab 13 below include a sample of KPI which Project Companies shall report to AMEA Power.

TABLE 13 - KPI

TOPIC	DESCRIPTION
HEALTH AND SAFETY	
Number of fatalities	▪ Number of work-related fatalities in the reporting period. ▪ The EPC Contractor is required to report any incident which involves any member of the Project Workforce and third parties including members of the public.
Number and severity ofinjuries	▪ The injuries to be reported comprises first aid cases, medical treatment cases, lost timeincidents; occupational illness or disease. ▪ A description of incidents resulting in all injuries with the exception of first aid cases shallalso be provided. ▪ The EPC Contractor is required to report any incident which involves the Project Workforce, and third parties including members of the public.
Number and nature of incidents involving damageto plant or property	▪ This refers to incidents that result in damage to plant or property owned or leased by theEPC Contractor and any third-party property damage. In order to avoid double counting, an incident should only be reported in this category ifthere is no injury. If such an incident results in injury as well as damage to plant or property it shall be reported as an incident resulting in injury, with the description of the property damageincluded in the incident report.
Number and nature of nearmisses	▪ An event that, while not causing harm, has the potential to cause injury or ill health to any member of the Project Workforce and/or a third-party

TOPIC	DESCRIPTION
	including members of thepublic.
High Potential Incident	▪ An incident or near miss where under different, plausible circumstances the most serious credible outcome could have been an Accident or reportable Incident.
Number of hazardous situations/safety observations	▪ A set of conditions that have the potential to cause harm, including ill health and injury, damage to property, plant, products or the environment, production losses or increasedliabilities.
Number of persons inducted	▪ Number of members of the Project Workforce who attend induction training. Such induction training shall include information regarding health and safety, emergency.
Number of E&S training sessions	▪ Number of training sessions containing environmental and/or social content attended by the Project Workforce.
Lost time injury frequency rate	▪ This refers to non-fatal work-related injuries resulting in one or more consecutive (working and non-working) days away from work (not counting the day on which theaccident happened). It could be as little as one day or shift. ▪ Lost time injury Frequency Rate (LTIFR) is calculated as follows: no. of LTIs in reporting period / 1 million * no. of hours worked in reporting period.
Lost time injury severity rate	▪ Calculated as: no. of LTIs in reporting period * 200,000 / total hours worked by allemployees during the calendar year. ▪ Note that 200,000 represents the number of hours worked by 100 full-time employees, 40 hours per week for 50 weeks per year. This is the calculation used by OSHA and hasbeen widely adopted.
ENVIRONMENT	
Number and nature of environmental incidents	▪ Refers to any incidents that may result in harm to the environment including but not limited to spills of hazardous liquids, unplanned releases of emissions into the atmosphere; harm or injury to wildlife (flora and fauna).
Energy consumption (kwh)	▪ Energy used in any phase of the Project and generated by any fuel source. Where possible, energy use shall be metered to provide accurate data.
Industrial water consumption (m3)	▪ Water used in any phase of the Project comprising water used by the Project for construction activities (e.g. cement making); operating and maintenance activities; and decommissioning activities. Where possible, water use shall be metered to provide accurate data.
Volume of solid waste disposal (kg)	▪ Solid wastes generated by the Project Company and disposed of rather than recycled. ▪ Comprises hazardous (e.g. industrial wastes, medical, sanitary) and non-hazardous (e.g. office waste, paper, cardboard) wastes.
Volume of solid waste recycled (kg)	▪ Solid wastes generated by the Project Company and taken away for recycling and/or reuse. E.g. packaging wastes, wood.
Liquid effluents	▪ Industrial effluents arising from the Project and discharged to a

TOPIC	DESCRIPTION
discharge (m3)	receiving water (sewer, direct to environment (ocean, river), other).
Emissions to air	▪ For Projects that are expected to or currently produce more than 25,000 tons of CO_2 equivalent annually, the Project Company must quantify direct emissions from the facilities owned or controlled within the physical Project boundary, as well as indirect emissions associated with the off-site production of energy used by the Project. ▪ All Projects in operation shall prepare an annual inventory of their scope 1, 2 and 3 emissions, in accordance with internationally recognized methodologies and good practice.
SOCIAL AND LABOUR	
Numbers of complaints and grievances received by internal and external stakeholders	▪ Refers to the number of complaints and grievances received by the Project Company's internal and external grievance mechanisms. ▪ Information describing the nature of each grievance and the status of it shall also be provided. ▪ The data shall be disaggregated to report separately the number received internally and the number received from external stakeholders. ▪ A survivor-centered approach to cases of GBVH will be adopted, with such cases reported sensitively and anonymously. Expert advice shall be sought when making such reports.
Number of complaints relating to discrimination or to the disciplinary process	▪ Refers to any complaints received from the Project Workforce relating to discrimination or to the Project's disciplinary process.
Average working hours	▪ Average working hours for full-time equivalent employees working a five-day working week (excludes overtime) for the reporting period, disaggregated by gender.
Average wages paid	▪ Average wages paid in the reporting period, disaggregated by management level and gender.
Cases of underaged workers	▪ Includes any incidence of underage workers on site (i.e. <18 years old).
Employee headcount (disaggregated by gender and grade)	▪ Comprises permanent, part-time and temporary members of the Project Workforce and shall be reported as full-time equivalents (FTEs). ▪ The headcount shall be disaggregated to present the total FTEs employed in construction phase activities and operation/maintenance phase activities. ▪ The headcount for each phase shall be further disaggregated into grade as follows: ○ Management grade: includes the Project Director and/or

TOPIC	DESCRIPTION
	those with >20 years of experience; ○ Senior staff: includes employees leading a team and/or those with specialist skills/discipline and generally those with >5 years of experience; and ○ Junior/Support staff: includes generally those with <5 years of experience and/or filling positions requiring limited or no skills.
Total number of new jobs created	▪ New positions created and filled/new hire in place during the reporting period (excludes where a new hire filled a position to replace personnel which left).
Total number of males and females in permanent roles	▪ Number of full-time equivalent permanent positions (i.e. on a permanent contract and not fixed term or temporary) disaggregated by gender.
Number of employees affected by retrenchment in the reporting period	▪ Number of Project Company workers who lose their employment due to retrenchment e.g. as a result of completion of a phase of work; change in Project activities, etc.

6.6 Decommissioning and exit

In support of decision making regarding a planned exit from an investment, and in preparation for it, a plan will be established by AMEA Power in collaboration with the Project Company to ensure that the E&S impacts and risks are identified, evaluated, and managed. This plan will inform the overall decision-making process to be followed by AMEA Power when exiting investments.

AMEA Power is committed to achieving a smooth transition of E&S risk and impact management to the new owner, and to conducting the exit process transparently with respect to all stakeholders. The specific considerations will be defined in advance of any planned future exit and will be formalised in supporting documentation.

AMEA Power ESG Team will be engaged with potential bidders on E&S and will prepare reference materials, including information memorandum on the Project Company E&S performance and improvements over the years and ensuring that the Project Management System is self-sustaining.

7 MONITORING

7.1 Introduction

This section presents the performance and impact monitoring and review activities that are undertaken during the investment lifecycle.

7.2 Project Monitoring

Tab 14 details the monitoring activities conducted during each stage of the investment.

TABLE 14 - PROJECT MONITORING BY PHASE

PHASE	DESCRIPTION
Development Phase - Prior Financial Close	▪ During the development phase, AMEA Power's ESG Team will conduct at least one visit to the Project site. The purpose of the visit will be to form a comprehensive understanding of the E&S context of the Project and to engage with key stakeholders. Typically, this visit is undertaken during the scoping assessment and AMEA Power's ESG Team is accompanied by the appointed E&S Consultant. ▪ If considered necessary, AMEA Power could appoint an independent advisor to provide specialist monitoring expertise including monitoring of the ongoing level of community support. ▪ Another site visit will be conducted during the Environmental and Social Due Diligence (ESDD). During this visit, AMEA Power's ESG Team will participate in the due diligence mission alongside Project Lenders and Lender Advisors to provide support and ensure that all environmental and social considerations are thoroughly addressed and provide clarifications on the Project Company structure, policy, management system and CIDP.
Construction phase	▪ Post financial close, AMEA Power's ESG Team shall conduct monthly reviews with the Project Company to monitor compliance with the E&S Requirements and progress in addressing the ESAP. Such reviews shall be conducted either in-person or virtually. Such monitoring shall continue until such time as all actions have been addressed to the satisfaction of AMEA Power's ESG Team. ▪ For all Projects that are under construction, AMEA Power's ESG Team will ensure that the Project Company conduct monthly HSE and Social audits during the construction phase of the Project to confirm compliance with this ESMS and Project-specific documentation (e.g. the ESAP). AMEA Power will review the monthly HSE and Social monthly report before to submit these to the EPC Contractors, or Lenders (and their Advisors) if required. AMEA Power ESG Team may appoint an External Advisor to conduct internal audits.
Operational Phase	▪ For all Projects that are in operation, at least one audit of E&S performance shall be conducted quarterly, and more often if

PHASE	DESCRIPTION
	considered by the AMEA Power Head of ESG to be necessary on the basis of the E&S risk/impact of the Project. ▪ Regardless of the above, all Project Companies shall monitor and review the E&S performance of its contractors and subcontractors employed at the Project site(s). The outcomes of such activities shall be reported to AMEA Power on request.

7.3 Monitoring Compliance with ESMS

AMEA Power conducts periodic internal audits to assess the extent to which the requirements of this ESMS Manual are applied and adhered to in relation to all investment activities.

8 REPORTING AND EXTERNAL COMMUNICATIONS

8.1 Introduction

This section presents an overview of the requirements for reporting to AMEA Power by the Project Companies, and for AMEA Power to report to its shareholders and Project Lenders.

8.2 Performance Reporting Requirements: Project Company

The Project Companies are required to use the QHSE Statistics (ref. AP-PRO-DOC-077) as main reporting document to collect E&S performance data and information. The QHSE Statistics will include, among others:

- Overall summary of incidents encountered
- Overall summary of non-conformities as well as corrective and preventive measures defined
- Summary implementation of each management plan
- Trainings performed in the reporting period
- Summary of stakeholder engagement activities undertaken for the reporting period
- Summary of grievances submitted and their status (both worker and stakeholder)
- Summary of Key Performance Indicators (KPI) for all management plans

Additionally, the Project Companies will submit to AMEA Power ESG team with the monthly HSE and Social audit report. Project Companies should make plans so that the data and information is complete and accurate and can be reported in a timely manner.

All Project Companies shall compile and report the E&S performance of the Project on a monthly basis.

In addition, all Project Companies shall also prepare a quarterly and/or annual monitoring report (AMR) that outlines the E&S performance of the Project. The annual and quarterly reports to be prepared by the Project Companies shall be prepared in accordance with the requirements detailed in the Common Terms Agreement (CTA) of each Project and in a format specified by the CTA.

The AMR will be submitted to the Project Lenders and shall include for the reporting year the following information:

- status of HSSE implementation
- status of ESAP implementation requirements for the construction and operation phase.

Additional reports (such as the Sustainable Development Indicators – SDI) may be required, according to CTA requirements.

8.3 Performance and Impact Reporting Requirements: AMEA Power

AMEA Power is obliged to submit reports to the Fund investors and donors. The reporting requirements are detailed in Table 15 below.

TABLE 15 - AMEA POWER REPORTING REQUIREMENTS

REPORT	DESCRIPTION
Annual E&S Performance Report	▪ AMEA Power ESG Team shall prepare an annual report to shareholders for each of the Project Company. ▪ AMEA Power ESG Team shall provide an overview of the E&S performance at the annual AMEA Power Board Meeting. However, it should be noted that overviews of the E&S performances could be also required on a quarterly or semi-annual basis. ▪ All Project Companies, irrespective of the phase, are required to submit the requested information in a timely manner using AMEA Power's reporting templates/system.
Annual Sustainability Report	▪ AMEA Power ESG Team shall prepare an annual Sustainability Report for shareholders, detailing the company's sustainability performance and initiatives across all projects during the course of the previous year.

8.4 Accident and Incident reporting

8.4.1 Project Company Requirements

All Project Companies are required to report and investigate all the accident and Incidents, including the near misses in accordance with the requirements specified in the procedure AP-QHSE-PRO-004 (Accident and Incident Management).

8.4.2 AMEA Power Reporting Requirements

AMEA Power shall report all accidents and incidents to its shareholder and Project Lenders in accordance with the arrangements described in Tab 16.

TABLE 16 - INCIDENT REPORTING REQUIREMENTS

REPORT	DESCRIPTION
Initial Notification	▪ As soon as reasonably practicable and in any event within 5 calendar days after becoming aware of the occurrence, AMEA Power shall notify the shareholder and Project Lenders in writing of a Reportable Incident. ▪ This period could differ according to the CTA requirements.
Incident / Accident Investigation Report	▪ As soon as reasonably practicable thereafter, but ultimately within 30 days of the initial notification report to the shareholders and project Lenders, AMEA Power shall provide a detailed report describing the nature of the Reportable Incident, the circumstances, the impact or effect arising or likely to arise there from, and the measures being taken, or planned to be taken, to address them and prevent any future

REPORT	DESCRIPTION
	similar event. This report may also be referred to as an investigation report.
Incident / Accident Progress Report	▪ In severe cases, AMEA Power will keep the shareholders and project Lenders informed on a quarterly basis of the on-going implementation of the measures as defined in the outcome of the Incident/Accident Investigation Report.

8.5 Grievance Mechanisms for External Stakeholders

An external grievance mechanism is provided for external stakeholders on the AMEA Power website, and this is described in the procedure AP-QHSE-PRO-007. It is intended for use by stakeholders such as NGOs and CSOs, government, investors, the general public, etc. to submit feedback, complaints, and grievances. AMEA Power is committed to providing a fair, transparent and constructive process that is survivor-centred and gender-responsive.

A grievance mechanism must also be implemented by each Project Company for use by Project-affected communities and local stakeholders. The grievance mechanism shall provide unimpeded access to judicial or administrative remedies, if available.

Project-level grievance mechanisms will be designed and operated in accordance with the Effectiveness Criteria detailed in Principle 31 of the United Nations Guiding Principles on Business and Human Rights. They will also be gender-responsive and survivor-centred in order to respond appropriately and sensitively to reported cases of GBVH.

8.6 Grievance Mechanism for Internal Stakeholders

AMEA Power provides a grievance mechanism for its workforce, and this is managed by the Human Resources function, in accordance with the Gender Policy, the Whistleblower Policy and the Code of Conduct. In the case of a gender-related complaint or grievance raised by a staff member, including cases of GBVH, external specialist advice and support would be retained.

8.7 Information disclosure

8.7.1 Project Company Disclosure Requirements

Disclosure within Project local stakeholders and host communities is an ongoing process that starts in the development phase and continues throughout construction, operations, and exit.

AMEA Power's Project Companies are committed to continuously engage with local stakeholders and project host communities. All such engagements are conducted in line with the IFC Performance Standards and are documented in a Project-specific stakeholder engagement plan and log.

Project Companies are required to observe local legal requirements when making official public disclosures, and in accordance with the requirements specified hereinafter.

Prior to posting of any information on the Project Company website, approval must be sought from and granted in writing by AMEA Power Board, at which the Project Company will be represented. The following could be disclosed on the Project website:

- Impact of Project (CO_2 emissions avoided, jobs created, installed capacity of renewable energy, access to energy, etc.).
- Description of the Project and HSSE context
- Project local EIA (if applicable), ESIA Non-Technical Summary (NTS), full ESIA report, LRP/RAP and other studies.
- Outline of the Project Company's HSSE management system.
- Grievance mechanism.
- An overview of activities linked to the community development programme.

8.7.2 AMEA Power Disclosure Requirements

AMEA Power discloses information relating to all Projects on its website. AMEA Power also makes disclosures relating to investments in accordance with shareholder and project lenders disclosure requirements.