

NEW BUGESERA INTERNATIONAL AIRPORT

ENVIRONMENTAL AND SOCIAL MANAGEMENT SYSTEM (ESMS) MANUAL

(Working draft pending approval by the Bugesera Airport Company Board)

DOCUMENT CONTROL SHEET

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1 INTRODUCTION

The Bugesera Airport Company (BAC) has been established between the Mota-Engil Group (75% shareholding) and the Rwandan Government entity, Aviation Travel and Logistics Holding Limited (ATL), which holds a 25% share in the company. BAC was established with the aim to design, construct and operate the New Bugesera International Airport (NBIA), within the Bugesera district in Rwanda, east of the capital city, Kigali.

The Airport will be constructed in five phases, of which the first phase is to be finalised by 2020 to allow the Airport to become operational. The final phase is due to be completed in 2045. The Project will be financed by BAC as well as International Lenders.

The Project will be developed in five phases and includes the development, construction and operation of a new Airport and associated structure, including the following infrastructure:

- A temporary 5 km Water Pipeline from Lake Kidogo to the Airport site to supply water for the construction phase;
- Upgrades to the road linking an existing and permitted quarry site northeast of the proposed Project to the Airport Area for the supply of aggregates during construction; and
- A 14.5 km Expressway to link the Airport to the national KK-15 Road from Kigali.

The Airport Area comprises approximately 2,500 ha, of which the actual Airport footprint will only be approximately 360 ha within this. This Airport footprint will comprise of the following: a runway, taxiways, aprons, helipads, terminals (presidential, passengers and general aviation), airplane hangars, cargo area, vehicle parking areas, ground service equipment, airport maintenance areas, rescue and firefighting services, control tower, fuel farm, wastewater treatment and waste management facilities. The Airport Area will be used to develop an Aerotropolis.

There will also be Associated Facilities, which include the infrastructure for the permanent supply of power and water during the operational phase. The construction of these utilities and infrastructure will be the responsibility of the Rwanda Energy Group (REG) and the Rwanda Water and Sanitation Corporation (WASAC) respectively. Separate environmental and social impact assessments, if required, will need to be undertaken for these Associated Facilities.

2 PUPROSE AND SCOPE OF THE ESMS

This document aims to set out the Environmental and Social Management System (ESMS) developed by BAC in accordance with the IFC Performance Standard 1, the ISO 14001:2015 Environmental Management and OHSAS 18001:2007 Occupational Health and Safety Standards, as well as the relevant Lender and other compliance obligation requirements applicable to the NBIA Project.

This ESMS will be applicable to the design and construction phase of the NBIA only. It will be adapted for the operational phase at a later date. The ESMS will filter into various procedures, plans and registers, including a contract specific Construction Environmental and Social Management Plan (C-ESMP) that has been drawn up for the NBIA construction phase. It should be noted that this ESMS may be revised during the operational phase to include the operational components, or alternatively a separate ESMS Manual will be developed which will cover all operational facets of the Airport.

The purpose of this document is to demonstrate that the BAC ESMS meets all the environmental, social, health and safety requirements of ISO the ISO 14001:2015 and OHSAS 18001:2007 Standards, the Equator Principles, the IFC Environmental and Social Performance Standards and the nine (9) elements as set out in the IFC ESMS implementation handbook.

Even though this ESMS follows the outline and requirements as set out in ISO 14001:2015 and OHSAS 18001:2007 Standards, BAC may not necessarily obtain certification for this Project during the fast track construction phase, but may only consider certification during the operational phase.

This document should be seen as a “live” document and will continue to be developed and evolve in order to respond to the various facets of the Project as they are implemented, as well as any potential unforeseen changes that may occur during the design and construction phase.

3 ABBREVIATIONS AND DEFINITIONS

ABBREVIATIONS

Abbreviation	Definition
ATL	(Rwanda) Aviation, Travel and Logistics Holding Limited
BAC	Bugesera Airport Company
C-ESMP	Construction Environmental and Social Management Plan
E&S	Environment and Social For the sake of simplicity, the acronym E&S is used throughout this document, but the E&S Management System is developing to address all aspects of “sustainability”, as encompassed by the IFC Performance Standards i.e. environment, social, occupational health and safety, human rights and labour aspects.
EPRP	Emergency Preparedness and Response Procedure
ESIA	Environmental and Social Impact Assessment
ESMS	Environmental and Social Management System
HR	Human Resources
HSSE	Health, Safety, Social and Environment
IFC	International Finance Corporation
ISO	International Standards Organisation
IT	Information Technology
OHS	Occupational Health and Safety
OHSAS	Occupational Health and Safety Standard
PDCA	Plan – Do – Check – Act
PEP	Project Environmental Plan
RDB	Rwanda Development Board
REG	Rwanda Energy Group
REMA	Rwanda Environment Management Authority
WASAC	(Rwanda) Water and Sanitation Corporation

TERMS AND DEFINITIONS

Term	Definition
Associated Facilities	Associated Facilities (AFs) to the Project are those infrastructures that would not have been constructed or expanded if the Project did not exist and without which the Project would not be viable.
Audit	Systematic, independent and documented process for obtaining audit evidence and evaluating it objectively to determine the extent to which audit criteria are fulfilled
Contractor (“the Contractor”)	Includes the main Engineering, Procurement and Construction (EPC) Contractor and its sub-contractors
Incident	A work-related event in which injury or ill health or harm to the environment or people did occur, or could have occurred.
Lenders (“the Lenders”)	A consortium of financial institutions which may include the African Development Bank (AfDB), the Africa Finance Corporation (AFC), the Africa Export-Import Bank, the KfW/DeG German Development Bank and others.
Management Plan	A documented plan or process that sets out the means to manage one or more E&S impacts or hazards.

Term	Definition
Management System	A set of inter-related elements used to establish and implement policy and achieve stated objectives. It includes organizational structure, planning activities (including, for example, risk assessment and the setting of objectives), responsibilities, procedures and resources.
Policy	A statement of the overall intentions and direction of the organisation as formally expressed by top management. It provides a framework for action and for the setting of objectives. For this Project, there are three policies developed by the Bugesera Airport Company: <ul style="list-style-type: none"> • E&S Policy; • Human Rights and Human Resources (HR) Policy; and • Community Grievance Policy.
Procedure	An established way to carry out an activity or a process. Note: Procedures can be documented or not.
Project ("the Project")	The construction of the New Bugesera International Airport (NBIA) and associated infrastructure within the Bugesera District in the Eastern Province of Rwanda near Kigali.
Project Personnel	All persons working for, or on behalf of the Project, including contractors and sub-contractors.
Project Standards	The Project Standards, to which the Bugesera Airport Company has committed, comprise: <ul style="list-style-type: none"> • All relevant legislation, including international legislation to which Bugesera Airport Company subscribes, national legislation and project permits; and • The Equator Principles, IFC Performance Standards (PS) AfDB Operational Safeguards and international good practice.

4 ENVIRONMENTAL AND SOCIAL MANAGEMENT SYSTEM

4.1 Overview of the ESMS structure

This ESMS should be seen as a dynamic and continuous process initiated and supported by BAC top management, and involves the engagement between BAC, its workers/contractors, the local communities directly affected by the company's activities, Government Authorities and, where appropriate, other stakeholders. The ESMS draws on the elements of the established business management process of Plan-Do-Check-Act, and follows a structured approach to managing environmental and social matters on an ongoing basis. The ESMS was designed, taking into account the nature and scale of the Project's E&S risks and impacts, to facilitate improved environmental and social outcomes.

The ESMS has been structured using the ISO 14001:2015 Standard headers/clauses. It, however covers the following elements:

- BAC's Policies on HSE and Social and Community;
- The process of identifying E&S risks and impacts;
- BAC's capacity and competency;
- BAC's management programmes;
- Emergency preparedness and response;
- Stakeholder engagement; and
- Monitoring and review of its E&S performance.

Each section of the Manual provides a statement expressing BAC's obligation to implement/meet the basic requirements of the specific management system section. It will provide information describing the method which will be followed to meet the specific requirements or may reference BAC procedures which outlines the intended methodology to follow.

4.2 Leadership

4.2.1 Leadership Commitment

The top management of BAC provides positive leadership for the implementation and maintenance of the ESMS through the establishment of policies, objectives and targets in line with the company's business objectives and commitments. They will provide accountability and governance for all activities related to the Project lifecycle by defining the appropriate responsibilities, authorities, and communication routes to ensure the safe and effective execution of all activities associated with the NBIA.

Top management will ensure that all employees, contractors or any other parties who perform work for, or operate in the name of BAC, will be fully aware with the requirements as set out in this document in order to meet BAC commitments and stakeholder expectations. It will be ensured that the top management commitments are periodically reviewed to ensure that all commitments, performance indicators and expectations are continually improved and in line with the Project risks.

It will be ensured by top management that the appointed ESMS representative will have the necessary financial, technological and organisational resources available to ensure the effective monitoring and maintenance of the ESMS.

The top management of BAC has expressed their commitment to the ESMS and its continual improvement in the following ways:

- Through establishing and reviewing various policies;
- Defining SHE Objectives and Targets;
- By considering the projects Hazards/Impacts and Aspects;
- By appointing an ESMS representative and assigned authority to this person with regard to all SHE matters;
- Through continual and systematic evaluation and involvement in the Projects' management processes;
- By organising and conducting ESMS performance reviews and site walk-about; and
- By supporting the implementation of innovative measures during the design and construction phases of the NBIA.

4.2.2 Policy

As part of BAC's commitments, it has established the following policies, as detailed in the sections below, taking into account the nature and scale of the NBIA Project and its associated risks. The policies have been developed to align with, all regulatory requirements, international standards and good practices, including IFC Performance Standards, and communicate BAC's expectations with respect to environmental, social and safety management. It will be the main driver for the ESMS and will provide the framework for setting and reviewing E&S objectives.

All contractors working for, or on behalf of BAC shall adopt these policies directly, and/or establish and maintain policies that are aligned with the vision, objectives and minimum requirements set out in the BAC policies.

The policies will be reviewed annually, as part of management review processes or as the need arises.

4.2.2.1 Health, Safety and Environmental Policy

BAC top management has establish and endorsed a Health, Safety and Environmental (HSE) Policy specific to the NBIA project. The HSE Policy express the BAC commitments to protect the environment, health and safety of its workers, contractors and surrounding communities, and includes their commitment to prevent pollution, and other commitments relevant to the social aspects of the NBIA Project and its compliance obligations.

The following statements with regards to HSE are contained within the BAC HSE policy. BAC will:

- Establish an ESMS, to address the environmental, social, occupational health and safety issues with a view to minimise its impacts and risks associated with the NBIA Project, while ensuring continual improvement of its ESMS;
- Ensure that all its employees and any persons/contractors who operates on behalf of them, as well as any other external contractors and visitors to the site, understand and adhere to its HSE policies, programmes and procedures;
- Ensure that it meet all applicable national, international and legal requirements and standards as determined for this Project;
- Identify, assess and effectively manage risks to employees, business partners, the environment and local communities;
- Mitigate environmental impacts and prevent pollution through the establishment of various environmental management plans specific to the identified risks and impacts;
- Actively promote sustainable utilisation of natural resources such as fuel, water and energy, and the protection of local biodiversity;
- As far as practical, avoid or minimize the generation of waste by actively promoting reuse and recycling of wastes generated. All wastes will be disposed of in a responsible manner;
- Manage hazardous substances so as to minimize associated risks to human and environmental health;
- Establish a work place which is safe and not harmful to the safety and well-being of all;
- Identify health and safety risks and implement measures to eliminate, reduce or avoid such risks;
- Develop and implement a comprehensive HSE monitoring programme, and conduct regular reviews to ensure that the objectives and targets as set for BAC are met;
- Provide adequate resources and training to fulfil the commitment given in this policy and to achieve continuous improvement;
- Promote the understanding and participation of local communities in HSE issues through information, regular community consultation and communication and by establishing a Community Grievance mechanism; and
- Ensure open communication with employees, authorities, the public and other stakeholders about its HSE performance.

The policy will be made available to interested parties through the BAC website, and shall be displayed in prominent communal locations throughout the NBIA construction site.

4.2.2.2 Human Resources Policy

BAC has established a Human Resources Policy that outlines the approach that will be followed to ensure the following:

- Secure, fair, stable and sustainable working conditions and promote and encourage the access to knowledge, in order to contribute to maximizing productivity;
- Ensure compliance with all local laws, rules and procedures with regards to employment and working conditions;
- Respect individual freedom of each employee, ensuring his/her protection against any type of victimization during their employment;
- Ensure and promote fairness and equity in the relationship between the employer and the employee, as well as ensure non-discrimination by gender, race, religion or any type of other activity, performed outside of working hours (e.g. being a member of an organization);
- Ensuring transparency in all communications and actions with the employees, and also promoting the knowledge of all the rules and procedures defined by BAC;

- Ensuring all necessary resources, training, skills, equipment and physical working conditions and personal protective equipment (PPE) are available to ensure the employees are capable of performing their duties to the optimum performance as required by the company;
- Ensure a healthy and safe work environment;
- Ensure that the risks associated with the NBIA Project have been identified and communicated to the workers;
- That all employees, contractors, visitors and stakeholders are protected against these identified risks; and
- Actively implement and communicate a Grievance Mechanism through which employees may lay grievances.

4.2.2.3 Drug and Alcohol Policy

As part of BAC's social responsibility, it has established a Drug and Alcohol Policy that outlines the following:

- All employees, contractors and visitors must be free from the influence of any drugs or alcohol whilst on the BAC premises during working hours, in order to ensure the health and safety of the employees and others are not negatively affected;
- All employees must notify their direct supervisor, should they be taking prescribed medication which may hinder them from performing their duties safely;
- The management measures that will be implemented to identify work related risks factors, which may lead to substance abuse, and communicate and educate employees on these;
- The procedure that will be followed for random voluntary testing by employees, as well as the procedure which will be followed in the event of a positive outcome during voluntary testing (disciplinary procedure); and
- BAC's commitment to creating awareness among its employees, contractors and visitors with regards to this policy and to provide regular training and information on drug and alcohol abuse on personal and work health and safety.

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4.2.2.4 HIV & AIDS Policy

The objectives of the BAC HIV & Aids Policy are:

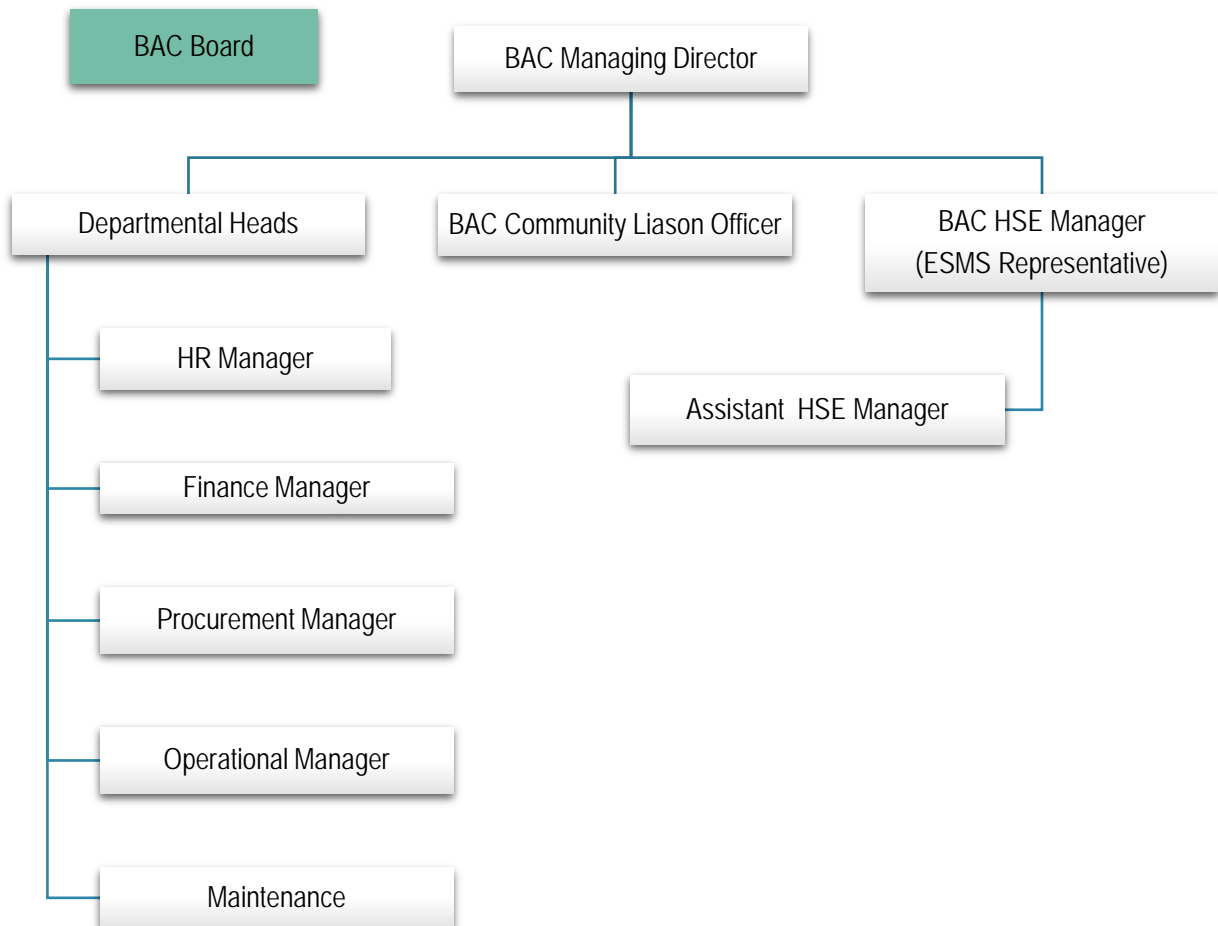
- To facilitate the prevention of new infections by providing information about HIV & AIDS, as well as support and training for all employees;
- To ensure that individuals living with HIV & AIDS are not unfairly discriminated against in the workplace;
- To encourage employees to take up voluntary counselling and testing and to access care, support and treatment as soon as possible if they test HIV positive;
- To maintain maximum stability and productivity in the workplace by keeping employees healthy and productive;
- To ensure that confidentiality will be maintained in all employee related matters;
- To provide management and employees with a framework within which to identify, prevent, understand and come to terms with dealing with HIV & AIDS;
- To create a work environment that will facilitate disclosure and access to benefits for care and support, and;
- To identify and implement an HIV/ AIDS programme as part of BAC's corporate and social responsibilities.

4.2.3 Organisational Roles, Responsibility and Authority

The lines of responsibility and reporting for all BAC personnel are documented in the interim BAC organisational chart as depicted below. The BAC organisational chart will be finalised pending any changes to BAC's shareholding and input from the equity investors. The organisational chart is deemed sufficient for the current level of activities (construction) undertaken at the Project site.

It remains the responsibility of the BAC top management to ensure that the necessary resources (human, technology, infrastructure and financial) are available to ensure the effective implementation of the ESMS. Top

management will ensure that the responsibilities and authorities for the relevant roles are assigned and communicated within the organisation. In order to ensure that personnel understand their authorities and responsibilities associated with the ESMS, additional responsibilities have been documented within the various procedures and plans.



The section below stipulates the overall roles and responsibilities in terms of the interim organogram and meeting the requirements of the ESMS. It should be noted that the organogram and some of the allocated positions below will be amended as the Project progresses and the need for additional resources arise:

Designation	Responsibilities
BAC Board Members	- Endorsing the BAC Policies and the ESMS.
BAC Managing Director	- Signing off on the BAC policies and ensuring that they are communicated to all employees, contractors, stakeholders and the public.

	<ul style="list-style-type: none"> - Allocate adequate human and financial resources to enable effective functioning and continual improvement of the ESMS and compliance with the IFC Performance Standards. - Define, document and communicate environmental and social management roles, responsibilities and authorities. - Hold personnel responsible for meeting their assigned responsibilities. - Report on the ESMS performance to the BAC Board.
BAC Community Liaison Officer	<ul style="list-style-type: none"> - Assist the HSE Manager with on-going reporting to stakeholders on ESMS and supporting management plans, and progress with implementation of management measures. - Assist with stakeholder communication where awareness and/or co-operation of stakeholders are required to implement management measures. Manage the Grievance Mechanism. - Evaluate and address stakeholder grievances as stipulated within the Grievance Mechanism.
BAC Interim HSE Manager/ESMS Representative	<ul style="list-style-type: none"> - Establish the ESMS in line with the IFC Performance standards, with assistance from the top management, division managers and Community Liaison Officer - Liaise with division managers regarding environmental management roles, responsibilities and authorities throughout operational divisions - Co-ordinate monitoring and evaluation activities and confirm corrective actions (an action taken to address a non-conformance) are taken to address incidents and non-conformances (a failure to comply with the ESMS). - Report progress in implementation and functioning of the ESMS to top management, development financiers, regulatory authorities and stakeholders. - Confirm necessary authorisations (licences/ permits) have been obtained for the NBIA construction and operational phases. - Confirm compliance with legal requirements and other obligations pertaining to environmental and social management. - Commit contractors and suppliers to meeting relevant environmental and social obligations by means of specific conditions in their contracts of appointment. - Provide leadership in the pursuit of environmental and social management. - Review monitoring results, incidents and corrective actions taken. - Evaluate adequacy and effectiveness of awareness and skills training programmes pertinent to environmental and social management. - Review the ESMS periodically to determine its suitability, adequacy and effectiveness. - Support action to enhance the ESMS and make improvements in environmental and social management performance.
BAC Assistant Interim HSE Manager	Support the Interim BAC HSE Manager in achieving his responsibilities.
Departmental Heads	<ul style="list-style-type: none"> - Confirm the ESMS and C-ESMPs are established, communicated, implemented and maintained in their respective areas of responsibility.

	<ul style="list-style-type: none"> - Provide leadership in the pursuit of the ESMS requirements applicable to their disciplines. - Identify ways to improve E&S performance associated with their operations through regular monitoring of their activities and evaluating implementation. - Maintain internal communication of E&S matters between the Environmental Manager, Community Liaison Officer and other personnel, and promote environmental and social awareness. <p>Examples of key responsibilities of specific Division Managers include:</p> <p>Human Resources: Organise in association with the Environment Manager and Community Liaison Officer environmental and social related training and maintain linkages between the ESMS and human resources management systems, as necessary.</p> <p>Ensure compliance with the IFC Performance Standard 2 relating to labour and working conditions.</p> <p>Finance: Track budget/spend data used in implementing and maintaining ESMS in association with the Environment Manager and Community Liaison Officer.</p> <p>Operations: With the support of environment and community relations teams, identify environmental and social aspects requiring management, opportunities for pollution prevention and sustainable use of natural resources, energy conservation, waste reduction etc.</p> <p>Procurement: With the support of the HSE Manager, assess contractors' and suppliers' environmental and social compliance and control purchase and disposal of hazardous materials.</p> <p>Maintenance: Implement preventive maintenance programmes for equipment.</p> <p>Health, Safety and Security: With the support of the Community Liaison Officer, confirm safeguarding of personnel and property is carried out without adverse impacts on local communities.</p>
<p>BAC Employees</p>	<ul style="list-style-type: none"> - Comply with BAC policies, site standards and applicable legal requirements. - Work in accordance with the ESMS and C-ESMPs. - Report problems or deviations from the ESMS or C-ESMPs to division managers and/or SHE Manager, as instructed. - Report and react swiftly to accidents and incidents.

In addition to the roles and responsibilities as indicated above, BAC will set specific responsibilities for its contractors and or any other person acting on their behalf. These will be stipulated within the C-ESMP as well as the various contractual agreements of the contractors, service providers etc.

4.2.4 Management of Change

The Management of Change Procedure (**BAC-ESM-PRO-001**) in Appendix A addresses both physical changes and changes in policies, standards and work instructions. It is a procedure, which allows for the development and amendment of policies and standards and determines their impact on their specific operation. This is a key aspect in the implementation of a Safety, Health, Environment and Quality (SHEQ) Management System that provides the bridge between the global policies and standards and the specific instructions that provide guidance to workers at lower levels.

The Management of Change Procedure ensures that when a change is made to an organisation's activities, operations or services, the associated changes to SHEQ aspects and impacts are identified at, or preferably

before, the time at which changes are made. All these factors are considered within the context of determining whether the changes require a change in SHEQ objectives and targets and an overall change in the SHEQ Management Programme.

4.3 Planning

4.3.1 Compliance Obligations

BAC will ensure that the compliance obligations related to the NBIA Project are identified, and taken into account when establishing, implementing and continually improving the ESMS. The process which will be followed to establish, maintain and implement the compliance obligations for the NBIA Project is outlined in the BAC Compliance Obligations Procedure (**BAC-ESM-PRO-002**) in Appendix A. BAC is developing an initial register of compliance obligations from the ESIA phase which documents all legal obligations and other commitments applicable to the NBIA Project.

BAC requires the EPC Contractor to establish processes to proactively identify legislation and other standards/requirements relevant to their activities, and put measures in place to ensure all sub-contractors are aware of all these requirements and adhere to them. It will be the responsibility of the EPC Contractor to document the compliance obligations relevant to their activities, and make the information available to the BAC and the Lenders representatives.

Compliance with the requirements as set out in the register of compliance obligations will form part of the performance evaluation process, which will be conducted by the BAC HSE Manager.

4.3.2 Identification of Risks, Hazards and Impacts

The top management of BAC will ensure that all risks and opportunities are identified and that the organisation has the necessary capabilities and resources to effectively and efficiently take advantage of these opportunities and to mitigate the identified risks as best as possible.

Risk and opportunities will be identified by assessing the internal and external factors which may affect BAC, the needs and expectations of interested parties and stakeholders as well as those identified through BAC's compliance obligations and Lender requirements.

BAC top management will ensure that risk based thinking forms an integral part of the BAC organisation's culture. This includes the establishment of risk management policies and targets to ensure effective implementation of risk and opportunity management principles and activities by:

- Providing sufficient resources to carry out risk and opportunity management activities;
- Assigning responsibilities and authorities for risk and opportunity management activities, and;
- Reviewing information and results from audits and risk and opportunity management activities.

Risk and opportunity management is undertaken as part of the BAC's day-to-day operations and is captured at the various levels of the organisation. By capturing the risks and opportunities at the various levels of the organisation, it can be ensured that it is managed at the most appropriate level within the organisation.

The initial HSE risks, aspects and impacts associated with the NBIA Project have been established during the ESIA phase of the Project.

Further to this, BAC has developed a HSSE Aspects and Risks Procedure (**BAC-ESM-PRO-003**) in Appendix A for identifying, assessing and managing risk on an on-going basis through the Project life cycle. The intent of the HSSE Aspects and Risks procedures is to address:

- HSSE aspects, hazards and risks not covered by the ESIA;
- Any impacts arising that was not predicted by the ESIA or did not develop as predicted by the ESIA;

- Any changes in the Project or new developments arising subsequent to the completion of the ESIA; and
- The requirement of third parties/suppliers and service providers to provide documented evidence on the risks, aspects and impacts associated with their activities.

4.3.3 Objectives and Planning to Achieve Them

BAC will sets out its HSSE objectives and targets on a regular basis at the various levels of the organisation during management review meetings. The details of HSSE objectives program, target dates and responsibilities will be defined during these meetings.

When setting its HSSE objectives and targets, BAC will ensures that the objectives are consistent with the needs and expectations of the interested parties, the context of the organisation, the companies policies and the IFC Performance Standard requirements.

Project targets and objectives will be captured in the Objectives Register (**BAC-ESM-REG-003-01**) which is under development and that will be communicated to all employees, contractors and any other persons acting on behalf of BAC. All employees, contractors etc. are responsible for fulfilling the requirements as set out in the BAC policies and subsequent objectives. Division managers and contractors will be obliged to develop HSSE objectives for their operations in line with those set by BAC.

It should be ensured that all technological options, financial, operational and business requirements are considered when establishing the targets and objectives within the various levels of the organisation. In order to determine whether the set targets and objectives are being met, the measurements and monitoring of these are evaluated during the contract performance evaluation process and during periodical reviews within the various levels of the organisation.

4.4 Support

4.4.1 Resources

Resources include human resources, specialised skills, infrastructure, technology, work environment and financial resources. BAC top management ensures that resource requirements are identified and that adequate resources and trained and competent personnel are in place to ensure the effective execution of this ESMS.

BAC top management ensures that the facilities are maintained appropriately to achieve conformity with local requirements with regards to work place conditions and to ensure an efficient and productive work environment for all its employees and contractors. This includes workspaces, equipment, software and any supporting services required to perform optimally. BAC will ensure that the appropriate human and physical factors of the work environment are considered and provided. Consideration of such factors includes safety, health and environmental conditions, work methods, handling methods and ambient working conditions and luminaires.

The resource requirements of the NBIA Project will be periodically reviewed and assessed to ensure that it remains adequate to the needs of the NBIA project life cycle. Documented evidence in terms of asset registers etc. will be kept to show compliance.

Any additional resources needs and requirements associated with the any contractor's activities, will form part of their responsibilities. Contractors will be required to indicate their resources needs analyses and provide evidence that the necessary resources for proper execution of their activities have been put in place.

4.4.2 Competency

To ensure competence of BAC personnel, detailed job descriptions have been prepared identifying the qualifications (education and skills), experience and responsibilities that is required for each position within the NBIA Project. A person will be deemed competent if they have the desired qualifications and skills to fulfil a certain position.

The competency of employees will be assessed when an employee changes position, the requirements for the position changes and/or upon recruiting of a new employee. The Human Resources department will maintain up to date records of employee qualifications and competencies as part of their employment pack. If there is a discrepancy between the employee's qualifications and the requirements for a specific job, the HR department will undertake the required training needs analyses and identify the training for the employee necessary to meet the required competence. All training needs and the analyses thereof will be documented in an ESMS Training Matrix (**BAC-ESM-PRF-004-01**) which is under development.

All BAC employees and contractors are made aware of the relevance and importance of their activities and how it contributes to the achievement of the BAC policies and objectives. BAC has a documented Training and Awareness Procedure (**BAC-ESM-PRO-004**) – see Appendix A - to ensure that all employees within the organisation are adequately trained to enable them to understand BAC's environmental and social aspects, safety hazards and to perform their assigned duties.

The Human Resources department maintains and reviews the training records to ensure completeness and to identify possible future training needs. Training records are maintained and include as a minimum: copies of certificates for any training undertaken to date, current job description and curriculum vitae.

The competency of contractors, suppliers and service providers will be evaluated as part of the procurement and supply chain process. Contractors, suppliers and service providers will be evaluated based on their performance track record and commitment to environmental, social, health and safety aspects. The contractors, suppliers and service providers will periodically be evaluated on their competency, and will be required to provide documented evidence.

4.4.3 Awareness

BAC top management has the responsibility for building awareness and motivating employees by promoting the organisation's values and how they can contribute towards BAC's business strategies.

All employees are trained on the relevance and importance of their activities and how they contribute to the achievement of the commitments as set out in the BAC policies and objectives. The Human Resources department assesses each employee's experience and competency to ensure that all employees within the company are adequately trained to enable them to perform their assigned duties.

Where required; awareness training and monitoring is conducted in-house, although for more specialist skills, external courses are utilised. BAC's induction includes an introduction to the policy statements and objectives, the significant environmental impacts, social aspects and safety hazards associated with the NBIA Project. Further awareness training will be conducted in the form of posters, newsletters/bulletins and as part of meeting agendas.

BAC will ensure that all contractors and visitors are properly inducted. Contractors will be required to establish methods on creating awareness among their employees and sub-contractors with regards to the E&S aspects and safety hazards associated with their scope of work. The implementation and effectiveness of the contractors training and awareness programmes will be monitored during the performance evaluation process.

An additional community awareness programme may be required on a project specific activity. Community awareness will be the responsibility of the Community Liaison Officer in conjunction with the relevant contractor.

Community awareness will be conducted in a media and language suitable for the community in which BAC operates. The Community Liaison Officer and contractor will be required formalise a community awareness programme based on the needs of the Project and to keep documented records of any community awareness training conducted.

4.4.4 Communication

BAC recognises the importance of effective communication on both an internal and external level, and has therefore established an Internal and External Communication Procedure (**BAC-ESM-PRO-005**) in Appendix A. The procedure stipulates the need for communication on the various levels within BAC with regards to the HSSE aspects of the ESMS and the NBIA Project.

4.4.4.1 Internal Communications

BAC communicates information internally regarding the ESMS and its effectiveness, through documented training, internal audit reports and continual improvement processes. All division managers are responsible for establishing regular formal and informal communications as needed.

Communications regarding how employees contribute to the achievement of objectives are conveyed and reinforced during team meeting and one-on-one sessions. Issues pertaining to the ESMS that may be communicated internally include:

- Day-to-day operations and general awareness;
- BAC's policies;
- Information on achieving objectives and targets;
- Environmental and social aspects;
- Safety hazards;
- Risk and opportunities; and
- Incidents and lessons learnt.

Internal communication occurs on an on-going basis and is achieved through various mechanisms as appropriate:

- Regular meetings and briefings;
- Training sessions and training material;
- Display boards, memorandums, and letters;
- Website, intranet, internal e-mails;
- Product and process performance data analysis and audit results;
- Targets, objectives, scorecards, KPIs, ESMS Manual and procedures;
- Corrective action and non-conformance reports; and
- Minutes of ad-hoc and scheduled meetings.

A procedure has been established for employees to lay internal grievances and complaints. These will be captured by the HR department on an Internal Complaints Register (**BAC-ESM-REG-006-01**) which is under development and will be addressed in accordance with the method as set out in the Internal Complaints Procedure (**BAC-ESM-PRO-006**) in Appendix A.

4.4.4.2 External Communications

BAC determines the need to communicate information externally to our stakeholders and affected communities, regarding the ESMS. In most instances, external interested parties (such as consumers, stockholders, affected communities, interested parties etc.) are the main driving force for the ESMS.

The Community Liaison Officer will be responsible for ensuring the effectiveness of the external communication process. A formal method of laying grievances has been established and documented in the External Grievance Procedure (**BAC-ESM-PRO-007**) in Appendix A. This Grievance Procedure will be communicated to the affected community in a method and language appropriate to the community, in order to ensure the procedure is understood. The Community Liaison Officer will ensure that all grievances received from the community are captured in the Grievance Register (**BAC-ESM-REG-007-01**), which is under development, and addressed accordingly.

4.4.5 Documentation

BAC has established a Control of Documented Environmental Information Procedure (**BAC-ESM-PRO-008**) in Appendix A which depicts the procedure to follow in order to ensure documentation and records are properly controlled. The procedure outlines the allocation of unique document identification numbers, prescribes the look and layout of the document and the allocation and management of revisions.

All documentation and records will be controlled and made available on a centrally controlled digital platform. This will allow for adequate updating of superseded information and ensure that the appropriate documentation and records are readily available when needed. All contractual correspondence and documentation will be controlled through the same digital platform, which will allow for adequate traceability and record keeping. Documentation from external origin, which are determined by BAC management to be relevant to the planning and execution of the BAC ESMS will be identified, as appropriate, and controlled accordingly.

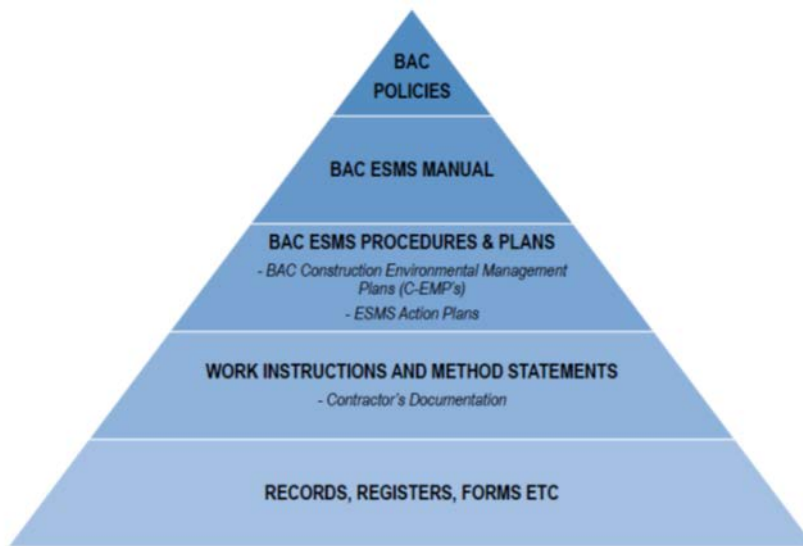
BAC will maintain appropriate levels of documentation and records to demonstrate compliance with ESMS, compliance obligations and IFC Performance Standard requirements as set out in this document. The release of any project related documentation will be approved by BAC top management and the Lenders representatives prior to such release into the public domain.

4.5 Operational

4.5.1 Operational Planning and Control

As part of the NBIA development, an ESIA process was undertaken. The ESIA has essentially undertaken most of the initial planning aspects required by an ESMS by identifying the E&S impacts associated with the NBIA Project, and formulating the various management plans required to mitigate the identified impacts. BAC will continue to identify its E&S impacts and safety risks as described in Section 4.3.2, in order to ensure impacts/risks are continuously identified and mitigated.

The BAC ESMS will therefore form the overarching document which will translate into the various policies, procedures and management plans.



Nine (9) detailed management plans have been identified, during the ESIA phase and have been drawn up in line with the IFC ESMS implementation handbook requirements for management plans. Details with regards to these plans have been outlined in the C-ESMP (**BAC-ESM-PLN-001**) and the supporting more detailed nine management plans.

The nine (9) management plans developed for the construction phase of the NBIA are as follows:

- Labour, working conditions and employment management plan;
- Waste management plan;
- Biodiversity management plan;
- Community health, safety and security plan;
- Storm water management plan;
- Soil management plan;
- Traffic management plan; and
- Cultural and heritage management plan.

Additional management plans will be developed based on the continual assessment of the NBIA Project E&S impacts, safety risks, outcomes of the management reviews, and once the airport becomes operational. As previously mentioned all operational facets will be dealt with as part of an amendment to this ESMS or in a separate ESMS. This will be initiated when the construction phase of the Project is nearing an end.

BAC will evaluate its performance against the criteria set out in the management plans by setting clear key performance indicators. The key performance indicators are outlined in the Monitoring and Measurement Procedure (**BAC-ESM-PRO-009**) in Appendix A and as discussed in Section 4.6.

4.5.2 Emergency Preparedness and Response

BAC has developed an Emergency Preparedness and Response Procedure – EPRP - (**BAC-ESM-PRO-010**) in Appendix A based on the identified HSSE risks associated with the NBIA Project. The EPRP will cover all potential emergency situations (environmental and safety) which may occur at the NBIA as well as make provision for disaster management in terms of severe storms, flooding, earthquakes, fires which started outside of the NBIA property, explosions, bomb scares, terrorist attacks and civil unrest.

The EPRP addresses the following:

- The procedures to follow in order to respond to any emergency situations. This will include any emergency shut down, rescue and evacuation procedures;
- A clear outline of the method which will be used to inform employees of an emergency situation (alarms etc);
- A detailed emergency evacuation plan indicating the location of emergency response equipment (fire-fighting, spill response, first aid kits, personal protection equipment for emergency response teams), evacuation routes and muster points and a list of the relevant persons contact details;
- Protocols for the use of the emergency equipment and facilities;
- A schedule outlining the periodic inspection, testing and maintenance of emergency equipment;
- Details of the periodic emergency drills and formal training for emergency response personnel which will be required;
- The communication protocol with regards to any emergency situation and the interaction if needed with outside emergency services; and
- When and by whom the Emergency Preparedness Response Procedure will be reviewed and updated.

4.5.3 Incidents, Accidents and Near-miss Reporting

The BAC Incident, Investigation and Reporting Procedure (**BAC-ESM-PRO-011**), in Appendix A, defines the responsibility and authority for handling and investigating accidents, incidents, near misses, environmental impacts and non-conformances to legislation, regulations, and IFC Performance Standards and the applicable International Standards (ISO 14001:2015 and OHSAS 18001:2007).

Appropriate actions will be initiated to mitigate consequences arising from accidents, incidents, near misses, impacts or non-conformances as well as initiation and the completion of corrective and preventive actions taken. The effectiveness of corrective and preventative actions taken will be confirmed and reviewed through the risk assessment process prior to implementation as described in the procedure.

All corrective and preventative actions taken to eliminate the root causes of the actual and potential non-conformances will be appropriate to the magnitude of problems and commensurate with the occupational health and safety risks as well as quality aspects or impacts encountered.

4.6 Performance Evaluation

4.6.1 Monitoring, Measurement, Analysis and Evaluation

The BAC policies and project risks identified through the aspects of the ESMS and its associated management plans will be monitored, measured and evaluated. The Monitoring and Measurement Procedure (**BAC-ESM-PRO-009**) in Appendix A provides details with regards to what aspects of the ESMS will be monitored, when and by whom the monitoring will be carried out.

The frequency and methods by which BAC processes are monitored, measured and evaluated is determined and informed by:

- Compliance obligations and stakeholder requirements;
- BAC policy commitments and set objectives;
- Level of risk and types of control measures;
- Performance and audit results;
- Trends in non-conformities or corrective actions; and
- Outcome of stakeholder/community interviews and grievances.

All monitoring, measuring and evaluation outputs are documented and analysed to determine the effectiveness of the ESMS, BAC compliance in terms of its policies and commitments, and IFC Performance Standards and statutory requirements to identify opportunities for improvement.

4.6.2 Compliance Requirements and Audits

Both internal and external audits will be conducted at planned intervals to determine that the implementation of the ESMS conforms to the requirements of ISO 14001:2015, OSHAS 18001:2007, the IFC Performance Standards and HSE Guidelines and any other legal compliance obligations. The outcome of the audits will be communicated to BAC top management and other relevant identified parties. The procedure which will be followed for initiating and conducting these audits are stipulated within the BAC Audit Procedure (**BAC-ESM-PRO-012**) in Appendix A.

4.6.2.1 Internal Audits

Internal audit results are critical inputs that help to assess the effectiveness of the BAC ESMS. BAC's internal audits use risk based thinking and the notion of continual improvement as the main drivers. Internal audits are conducted at planned intervals to determine conformance to the requirements of ISO 14001:2015, OSHAS 18001:2007, the IFC Performance Standards and HSE Guidelines as well as the mitigation measures stipulated in the management plans (Section 4.5.1).

BAC's internal audit programme is based upon a strategy that considers the level of risk exposure. The audit frequency is based upon the factors as set out in Section 4.6.1.

BAC will ensure that all internal audits are conducted by suitable competent auditors, and will source external specialist assistance to assist with evaluating compliance should the need arise.

BAC will require contractors to conduct internal audits, and to inform BAC of the outcomes and the intended actions to be taken in order to improve or rectify areas of non-conformity.

4.6.2.2 External Audits

BAC will appoint a suitable qualified and independent Environmental and Social auditor to undertake an evaluation and prepare an Environmental and Social Monitoring Report outlining BAC compliance against all Lender requirements, progress made in terms of the implementation of the C-ESMP and action plans. This report will be distributed to BAC top management and Lenders representatives. An action plan will be drawn up for those aspects which do not meet all Lender requirements to ensure it is brought to the attention of BAC and for action accordingly.

BAC may determine the need for additional external and independent audits to be conducted as the need arises based on the Lenders requirements etc. The frequency of these audits will be determined based on the level of risk the aspect to be audited poses to BAC.

4.6.3 Management Review

During Management Review meetings, BAC top management review current performance and improvement opportunities arising from the results of internal audits, customer Grievance Mechanism feedback, process performance/trends, conformance, the status of corrective and preventive actions and follow up items from previous meetings.

The BAC policies and objectives are also reviewed for their continuing suitability. Data gathered through measurement and monitoring activities is analysed to determine the effectiveness of the ESMS. Analysis is also applied to data relating to grievances, outcomes of community meetings, contractor and suppliers performance.

The review process will further include ESMS planning to ensure that changes in any of the activities and/or operations of the NBIA Project are evaluated and that the system requirements are adequately amended to address the risks and opportunities of these changes prior to their implementation. As a minimum the management review process will include the following topics:

- Status of previous action items;
- Changes
 - External and internal changes;
 - Compliance obligations;
 - Significant environmental/social aspects and safety hazards; and
 - Interested parties/community needs and expectations.
- HSSE performance review:
 - HSSE objectives;
 - Monitoring, measurements and audit results;
 - Non-compliance and corrective actions trends;
 - Progress on action plans;
 - Grievances;
 - Compliance (legal) results;
 - Incidents and close outs; and
 - Performance of contractors, service providers and suppliers.
- Adequacy of the HSSE resources;
- Risks and opportunities; and
- Opportunities for continual improvements.

The outcome of the management system reviews results in the creation of corrective action plans and in decisions being made. This will enable BAC to consider opportunities for improvement or changes to be made to the ESMS.

These changes will enhance the effectiveness of the ESMS, result in the generation of new procedures, lead to improvement of its E&S performances and the identification of resource needs.

4.7 Improvement

4.7.1 General

BAC ensures that opportunities for improvement from regular feedback on operational performance are evaluated through the corrective action system. Opportunities for improvement from analysis of longer-term data and trends are evaluated and implemented through the management review process and are prioritized with respect to their relevance for achieving BAC policies, objectives and commitments.

4.7.2 Non-conformity and Corrective Action

BAC has established a Procedure (**BAC-ESM-PRO-013**) for Recording and Reporting of Non-conformances in Appendix A to the requirements as set out in the ESMS and its associated management plans.

Where a non-conformance occurs, BAC shall:

- React to the non-conformance and –

- Take action to control or correct it;
- Deal with the consequences, including mitigating adverse HSE impacts which may have resulted from it;
- Evaluate the need for action to eliminate or mitigate the cause of the non-conformance to prevent it from re-occurring by -
 - Determining the root cause of the non-conformance;
 - Identifying the necessary corrective and preventative measures,
- Implement any actions needed;
- Review the effectiveness of any corrective actions taken; and
- Make changes to the applicable procedures or plans, where necessary..

4.7.3 Continual Improvement

BAC will strive to ensure the continual improvement of its E&S performance during the life cycle of the NBIA Project. The continual improvement process will be driven through the management review, and performance evaluation processes.

APPENDIX A

Document Number	Document Name
BAC-ESM-PRO-001	Management of Change Procedure
BAC-ESM-PRO-002	Compliance Obligations Procedure
BAC-ESM-PRO-003	HSSE Aspects and Risks Procedure
BAC-ESM-PRO-004	Training and Awareness Procedure
BAC-ESM-PRO-005	Internal and External Communication Procedure
BAC-ESM-PRO-006	Internal Complaints Procedure
BAC-ESM-PRO-007	External Grievance Procedure
BAC-ESM-PRO-008	Control of Documented Environmental Information Procedure
BAC-ESM-PRO-009	Monitoring and Measurement Procedure
BAC-ESM-PRO-010	Emergency Preparedness and Response Procedure
BAC-ESM-PRO-011	Incident Investigation and Reporting Procedure
BAC-ESM-PRO-012	Audit Procedure
BAC-ESM-PRO-013	Recording and Reporting of Non-conformances Procedure

NEW BUGESERA INTERNATIONAL AIRPORT

MANAGEMENT OF CHANGE PROCEDURE

BAC-ESM-PRO-001

REV AA

DOCUMENT CONTROL SHEET

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1 Purpose

The purpose of this procedure is to identify changes (permanent, incremental or temporary) that have the potential to adversely affect people, the environment, community, plant or property and to assess the risks associated with these changes.

This shall include, but not be limited to, modifications/changes related to:

- Legislation;
- Project scope and related design;
- Operating procedures;
- Organisational structure;
- Supplier/Service providers; and
- Office/Labour accommodation establishment.

2 Scope

This procedure applies to the construction phase of the NBIA Project and will be amended for the operational phase nearing completion of the construction contract.

3 Definitions, Acronyms and Abbreviations

ESMS	-	Environmental and Social Management System
BAC	-	Bugesera Airport Company
NBIA	-	New Bugesera International Airport
HSSE	-	Health, Safety, Social and Environmental
MoC	-	Management of Change

4 Responsibilities

The senior staff member responsible for the contract has to ensure that BAC/contractors comply with the requirements with respect to this procedure and to ensure the implementation of the approved MoC where applicable.

MoCs shall be approved by the relevant BAC top management or contractor project manager once the level of risk has been demonstrated to be acceptable.

Any person working at the BAC/contractor may initiate a modification/change.

The ESMS representative/Contractor HSE Manager is responsible for the monitoring of MoC implementation/close-out.

5 Procedure

The Management of Change ("MoC") Procedure is designed to assure that all modifications/changes are appropriately reviewed and approved, resulting documentation either created or updated, and affected personnel trained or communicated on the change and the locations of the information.

Where required, changes shall be reported to the appropriate authority and carried out in accordance with the applicable statutory requirements.

Proposed and approved changes shall be communicated to all those who may be affected by the changes.

In the event of major organisational/functional modification/changes within BAC, the completion of HSSE Aspects and

Risk Assessment Procedure is required, as well as the Management of Change Evaluation Form (**BAC-ESM-PRF-001-01**) has to be completed, assessed and approved.

The top management responsible for the contract shall complete and present the following documents to the BAC Risk Assessment Team for review and recommendation:

- Management of Change Evaluation Form;
 - A completed HSSE Aspects and Risk Assessment, where applicable; and
 - Any other relevant forms/information supporting the proposal.
- The **Risk Assessment Team** members would typically consist of (but are not limited to):
 - Senior staff member on the project/ company;
 - Contractors' Project Managers;
 - Supervisory staff;
 - BAC ESMS Representative;
 - Contractor HSEQ Manager (where applicable); and
 - Employee representative (involved with activity).
 - The senior staff member responsible for the contract completes an HSSE Aspects and Hazard Assessment of the implementation risk (the risk of doing the modification/change itself) and a Residual Risk Assessment of the modification (as if that modification/change has been completed and is operational). This is done to ensure that introducing the modification will not increase the risk to the HSSE components of the contract.
 - The Management of Change Evaluation Form shall be used to determine if the outcomes should require any further detailed investigations. The outcome is to be approved by the ESMS Representative/Contractor HSE Manager for recommendation and final approval by the BAC Management/Contractors' Project Manager.
 - The modification shall be raised on a form that documents the requirement, approval and close-out. Additionally an Aspects and Risk Assessment needs to be performed for each modification.
 - A modification may be initiated by any person working at BAC.
 - The reasons for requiring a modification shall be clearly stated.
 - The senior staff member responsible for the contract shall be the single reference point for that modification/change and will also promote and champion the modification/change from beginning to close-out.
 - The ESMS Representative/Contractor HSE Manager is responsible for the monitoring of MoC implementation/close-out.
 - The modification shall be adequately funded from an approved funding source (if required).
 - Management of the implementation of the modification/change shall be appropriate to its complexity and be determined by the Risk Assessment Team.
 - The modification shall be recorded. Copies of all documentation and drawings related to the modification shall be made and filed as a record.
 - Completed MoC's shall be submitted to the ESMS Representative/Contractor HSE Manager.

6 Records

BAC-ESM-PRF-001-01 Management of Change Evaluation Form

NEW BUGESERA INTERNATIONAL AIRPORT

COMPLIANCE OBLIGATIONS PROCEDURE

BAC-ESM-PRO-002

REV AA

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1 Purpose

The purpose of this document is to describe the process for identification of applicable compliance obligations to which BAC subscribes related to its environmental, social, health and safety aspects, and to periodically evaluate compliance with these.

2 Scope

This procedure applies to all BAC operations.

3 Definitions, Acronyms and Abbreviations

ESMS	-	Environmental and Social Management System
BAC	-	Bugesera Airport Company
NBIA	-	New Bugesera International Airport
HSSE	-	Health, Safety, Social and Environmental

Compliance Obligations –

Obligations made up of both mandatory and voluntary requirements (previously “legal and other requirements”) related to the NBIS Project’s environmental aspects and activities.

Mandatory Compliance Obligations –

Are legal requirements promulgated and enforced by the state or local government authorities. Examples include requirements to obtain an environmental permit.

Voluntary Compliance Obligations –

Are other requirements to which BAC may subscribe such as organizational requirements (administrative directives), agreements with customers, voluntary non-regulatory guidelines, and community and trade groups guidelines.

4 Responsibilities

BAC top management is responsible to ensure that sufficient resources (financial, human and other) are available to ensure the effectiveness of this procedure.

The appointed ESMS representative is responsible for the following:

- reviewing and analysing the compliance obligations associated with environmental regulations and other documents that have the potential to affect the environmental aspects of BAC activities.
- assisting affected BAC departments with written/oral comments to proposed HSSE regulations affecting BAC activities.
- assisting BAC departments with the implementation of HSSE regulatory requirements.
- notifying affected BAC departments of newly proposed HSSE regulatory requirements.
- subscribing to a legal/regulatory service, if required, to track changes in HSSE regulations and/or legislation, and providing relevant information on the changes to affected departments.
- assisting with identifying and/or offering appropriate HSSE training.
- analysing HSSE compliance obligations for all BAC operations.

- implementing corrective actions generated from HSSE compliance audits.
- ensuring that compliance obligations related to BAC's HSSE aspects are considered when establishing, implementing and maintaining the ESMS.

5 Procedure

5.1 Identification of Compliance Obligations

BAC will utilize the following sources to identify environmental regulations, legal and/or other requirements affecting its activities and environmental aspects:

- Subscription to legal/regulatory services;
- The Environmental and Social Impact Assessment (ESIA) undertaken for the project;
- Notifications from the Rwanda government;
- Consultants and specialist reports; and
- Previous compliance assessments, audits and inspections.

The ESMS representative will review all applicable legislation and will highlight those which may have a risk/implication for the Project HSSE components. These will be communicated to BAC top management and/or relevant departmental heads and will be further investigated.

The compliance obligations as identified in the ESIA and various environmental authorisations will be reviewed and used as a guide to determine the relevant legislation and other requirements. Each departmental head must determine if and how the HSSE compliance obligations apply to their department's aspects.

A Compliance Obligations Register (**BAC-ESM-PRF-002-01**) under development will be drawn up listing all applicable compliance obligations which should be adhered to. This register will be a live document and will be reviewed and updated on a regular basis.

5.2 Responding to Proposed Draft Regulations/Legislation

The ESMS representative will identify the relevant departments which may potentially be impacted by a proposed draft regulation/legislation and will distribute the proposed regulation/legislation to the affected departmental head for review.

After review, the ESMS representative and the affected departmental head will determine if BAC will comment on the proposed regulation/legislation and which department will be assigned the lead response. The lead department will coordinate comments and compile a formal response to the relevant local authority, if required.

5.3 Incorporation of Promulgated Regulations/Legislation

Upon the promulgation of a new Regulation/Act applicable to the operations of BAC, the ESMS representative together with the affected departmental head will review the relevant documentation to incorporate the new legislative requirements. Upon request, the ESMS representative will provide assistance to the affected departments to assist with updating of written documentation, conducting/co-ordinating training and/or provide any other assistance to achieve compliance.

5.4 Project Specific Licences/Permits and Other Environmental Permissions

Any license/permit or environmental authorisation required for the construction phase of the project will be obtained. The documents will be indicated on an Environmental License and Permits Register (**BAC-ESM-PFR-002-02**), under development, indicating the license/permit number, the date of issue and expiry date.

Any license/permits or other environmental authorisation needed for any activities undertaken by a contractor, supplier/service provider will be obtained by them.

5.5 Voluntary Compliance Obligations

BAC is identifying the relevant HSSE voluntary compliance obligations, which they intend to comply with during the operations of the NBIA Project.

Each department will additionally identify any other voluntary compliance obligations applicable to them, which BAC top management agree to.

The voluntary compliance obligations will be documented in the compliance obligation register (**BAC-ESM-PRF-002-01**) under development will be regarded and dealt with the same as mandatory requirements.

5.6 Compliance Obligations Library

A Health, Safety, Social and Environmental (HSSE) library will be established with folders containing all relevant HSSE reference documentation pertaining to the local authority HSE legislative requirements. This will be established for relevant BAC operations.

The HSSE reference library will be established and filed (electronically) as part of the BAC ESMS with typical folders covering the following:

- Mandatory Compliance Obligations:
 - Local Authority Labour Law (where applicable);
 - Local Authority Ministerial Orders, Local Orders and Information Bulletins (where applicable);
 - Local Authority Code of Construction Safety Practice (where applicable);
 - Local Authority Technical Guidelines (where applicable); and
 - Local Authority Environmental Legislation (where applicable).
- Voluntary Compliance Obligations:
 - IFC Performance Standards;
 - World Bank Requirements;
 - African Development Bank Safeguards;
 - Other Lender Requirements.

The HSSE reference library will be maintained and updated by the ESMS representative.

5.7 Evaluation of Compliance

BAC has established an Audit Procedure (**BAC-ESM-PRO-012**) for the periodic evaluation of its performance. The ESMS representative will conduct periodic environmental compliance evaluations of the BAC operations and its contractors. The audits are used as a tool to continually review and identify environmental compliance obligations. To ensure each department in BAC conforms to the identified compliance obligations and to satisfy all legal requirements; each department should conduct their own periodic internal environmental compliance reviews. The compliance obligation register, under development, should be used as a guide for planning, developing and implementing departmental compliance reviews. The department shall keep records of their compliance reviews and appropriate corrective action progress.

6 Records

BAC-ESM-PRF-002-01 Compliance Obligations Register

BAC-ESM-PRF-002-02 Environmental License and Permits Register

NEW BUGESERA INTERNATIONAL AIRPORT

HSSE ASPECTS AND RISK ASSESSMENT PROCEDURE

BAC-ESM-PRO-003

REV AA

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1 Purpose

The purpose of this procedure is to identify the Health, Safety, Social and Environmental (HSSE) aspects and hazards of BAC activities, operations, processes, products, and services (herein "activities") and to determine which of these HSSE aspects and hazards are significant. Significant HSSE aspects and hazards will be managed within the ESMS.

2 Scope

BAC shall assess all normal, abnormal and emergency situations associated with its activities, products and processes under their control which may cause significant impacts, positively or negatively on the health, safety, social environment or natural environment.

BAC will require all contractors to follow a similar process in identifying the HSSE impacts and hazards associated with their specific scope of work.

3 Definitions, Acronyms and Abbreviations

EMS – Environmental Social Management System

HSSE – Health, Safety, Social and Environmental

BAC – Bugesera Airport Company

TBT – Toolbox Talk

Acceptable Level of Risk –

Risk that has been reduced to a level that can be tolerated by BAC, having regard to its legal obligations and its own policies and objectives.

Corrective Action –

Identified action or plan of action to correct sub-standard performances.

Environment –

Surroundings in which BAC operates, including air, water, land, natural resources, flora, fauna, humans and their interrelation.

Environmental Aspect –

Elements of BAC operations, processes, products or services that can interact with the environment.

Environmental Impacts –

Any change to the environment whether adverse or beneficial, wholly or partially resulting from BAC's environmental aspects.

Social Impact –

The effect an organization's actions have on the well-being of the community.

Continuous Risk Assessment -

The continuous assessment and monitoring of the controls that have been put in place to mitigate/eliminate the identified hazards and risks.

Incident -

An unplanned, undesired event that results in an accident or could have resulted in injury, illness, damage, product

loss and interruption of work or has a detrimental impact on the environment (near miss).

Hazard -

A potential source or exposure that may cause harm or loss.

Hazard Identification -

A process of recognizing that an existing or expected hazard may exist, that may affect the health and safety of persons and cause possible damage to property and defining its characteristics by identification and documentation.

Risk -

The exposure to the consequences of uncertainty and the probability that an injury or damage to property may occur. It has two dimensions: the likelihood (frequency and probability) of something happening and the impact and severity if it were to happen.

Risk Assessment -

A process used in order to identify hazards and the steps needed to be taken to remove, reduce, transfer or any risk associated with any hazard at the workplace/premises.

4 Responsibilities

The BAC ESMS representative is responsible for the overall implementation, compliance monitoring, monitoring of control measures and review of this procedure.

The BAC management and its contractors are responsible for the implementation of this procedure within the area of operations.

The BAC ESMS representative is responsible for checking that the system is implemented, as required in the procedure, and ensures that records are kept in the BAC/Contractor HSE file to allow auditing to be carried out.

It is the individual responsibility of each employee and worker to ensure that the environmental impacts associated with their activities are assessed and mitigated appropriately and that their activities and actions do not cause unnecessary pollution to the health, safety social and environmental aspects of the Project.

5 Procedure

5.1 HSSE Impact and Risk Assessment

BAC and its contractors will identify the HSSE hazards/aspects within the scope of its activities, taking into account the inputs and outputs (both intended and unintended) associated with its current and relevant-past activities, products and services, planned or new developments, or new or modified activities, products and services.

The assessments will consider normal and abnormal activities as well as reasonably foreseeable emergency situations which may have significant impacts or hazard.

5.1.1 Assessment Process

Prior to the commencement of work, the contractor will be required to undertake an assessment of the proposed impacts their activities might have on the receiving environment. Examining the state, especially the sensitivity, of the receiving environment is a pre-requisite to an accurate and effective impact assessment. The objective is to assess the entire planning and construction process flow, and must include all supporting functions and processes.

The aspects/ hazards associated with the operational phase of the NBIA will be assessed by the BAC ESMS representative upon finalization of the construction phase.

5.1.2 Related Activities

In addition to the HSSE aspects/hazards that BAC can control directly, assessments will include aspects/hazards that BAC's operations cannot influence, e.g. those related to goods and services used by them and those related to products and services that it provides.

The process of identification and evaluation of HSSE aspects/hazards should take into account the location of activities, cost and time to undertake the analysis, and the availability of reliable data and resources. The identification of environmental and social aspects does not require a detailed life-cycle assessment. Information available from the ESIA process will be utilized as a baseline/guidance for the aspects/hazard identification process.

5.2 Criteria for Environmental Aspects & Hazard Evaluation

The interactions of activities with the environment are known as Environmental Aspects (aspects) and the harmful exposures to personnel from activities are known as Health and Safety Hazards (hazards). Any environmental changes that occur as a result of these interacting activities are designated as Environmental Impacts (impacts) while any employee illnesses, injuries or deaths that occur are designated as Health and Safety Risks (risks).

The primary focus of BAC ESMS is to manage BAC's significant aspects and hazards, and secondarily (as necessary) to manage their potential impacts and risks. The management of aspects and hazards is intended to prevent the potential impacts and risks from occurring.

The following steps will assist in the proper identification of BAC and its contractors' significant HSSE aspects and hazards. The steps will be completed on the HSSE Aspects and Hazard evaluation sheet (**BAC-ESM-PRF-003-01**):

- Step 1** Identify all the various "HSSE Aspect and Hazards", that is an activity, product, resource, service, and agent which can interact with the environment or cause harm to humans.
- Step 2** Document the associated "HSSE Impact or Risks" by detailing the current interaction or change that takes place in the environment or harm that can be caused to humans as a result of the identified aspect or hazard.
- Step 3** Determine the "Significance Rating" of the aspects or hazards by taking into consideration the Likelihood (Table in Section 5.2.1) and the Severity (Table in Section 5.2.2) without having any control measures been put in place.
- Step 4** Complete the "Controls and Mitigation" fields by a subjective assessment of existing practices and controls measures, taking into consideration eliminating, substitution, engineering controls, administrative controls and/or protection. Control and mitigation measures as identified in the ESIA should be considered along with the BAC policy commitments and compliance obligations of the area in which they operate.
- Step 5** Re-assess the "Significance Rating" of the aspect or hazards by taking into account the relevant controls and mitigation listed. Items which are a legal obligation will be automatically classified as significant. The Significance Rating Evaluation Matrix (Table in Section 5.2.3) determines the significance of the related aspect or hazard.
- Step 6** If the final Significance Rating Evaluation outcome is high or medium, it is regarded as being significant.

Step 7 Once the Significant Aspects and Impacts (Medium and High) have been identified. An action plan will be put in place, which will identify how the significant aspects and hazards will be mitigated and monitored. These will form part of the HSSE key performance areas.

5.2.1 Determine the Likelihood/Probability (Frequency of Exposure) of an aspect occurring by the following criteria:

Rating	Likelihood/Frequency
1	Extremely low – highly unlikely (<1 incident per year)
2	Low – improbable but possible (Annually)
3	Moderate – rarely occurs (Monthly)
4	High – occurs now and then (Weekly)
5	Very high – occurs regularly (Daily)

5.2.2 Determine the Severity (Consequence) of the impact on the environment based on the following criteria:

Risk Level	Severity/Consequences	Explanation of environmental impact
1	No impact	No harm to the environment. No financial consequences. Operations to continue as normal. Near-miss.
2	Negligible/temporary impact	Minor environmental damage, remaining within the immediate area of operations. Negligible financial consequences. No impact on operations. Slight damage to property, equipment or minor injury.
3	Slight impact (easily manageable on site)	Pollution or emission serious enough to cause harm to the environment, but without any long term impact. Can be easily cleaned up and managed on site. One-time violation of client/group requirements, or a single complaint. Reportable injury, moderate loss of operations or limited damage to property.
4	Considerable impact (requires external assistance)	Limited emissions, but with influence on neighbouring properties or downstream users, long term damage to the environment. Requires assistance from external specialist for remediation. Repeated exceedance of limits or repeated complaints or non-conformances. Legal requirement. Major injury, single fatality, critical loss of operations and serious damage to property.
5	Major impact (long term monitoring requirements)	Severe environmental damage requiring extensive clean-up and long term monitoring measures. Continual exceedance of limits and/or widespread nuisance and/or long-term environmental damage. Violation of legislative or regulative requirements. Multiple fatalities, catastrophic business operational loss and integrity impairment.

5.2.3 Complete the Significance Rating" (SR) field using the evaluation matrix below:

Significance Rating (SR) Evaluation Matrix –

SIGNIFICANCE RATING (SR) = LIKELIHOOD X SEVERITY			LIKELIHOOD (L)				
			Extremely Likely	Very Likely	Likely	Unlikely	Not Likely
			5	4	3	2	1
SEVERITY (S)	Extreme	5	25 - High	20 - High	15 - High	10 - Medium	5 - Low
	Serious	4	20 - High	16 - High	12 - Medium	8 - Medium	4 - Low
	Moderate	3	15 - High	12 - Medium	9 - Medium	6 - Medium	3 - Low
	Minimal	2	10 - Medium	8 - Medium	6 - Medium	4 - Low	2 - Low
	Insignificant	1	5 - Low	4 - low	3 - Low	2 - Low	1 - Low

5.2.4 Reviewing of the Aspects and Hazard Register

The aspects and hazards register will, at a minimum, be reviewed annually and/or when activities, products or services change or after the occurrence of a HSSE incident. The progress of significant aspects/ hazards against will be monitored on a three monthly basis.

6 Records

- BAC-ESM-PRO-003-01 - HSSE Aspects and Hazards Evaluation Sheet

NEW BUGESERA INTERNATIONAL AIRPORT

TRAINING AND AWARENESS PROCEDURE

BAC-ESM-PRO-004

REV AA

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1 Purpose

This procedure covers the environmental training policy followed by BAC for all staff. The Company shall ensure that new and existing personnel are adequately trained to perform the tasks assigned to them without leading to environmental or personal harm. It covers the provision of two types of training - 'competency' and 'awareness'.

2 Scope

This procedure applies to all BAC operations.

3 Definitions, Acronyms and Abbreviations

ESMS	-	Environmental and Social Management System
BAC	-	Bugesera Airport Company
NBIA	-	New Bugesera International Airport
HSSE	-	Health, Safety, Social and Environmental

Induction –

Introduction to the overall company and its operations.

Competence Training -

The training of employees to enable them to fulfil their duties in a competent manner and consistent with the aims of the BAC policies and management system.

Awareness Training -

Raising the environmental awareness of BAC employees to increase their understanding of environmental issues and the relevance of those issues to the Company's activities, products and services.

4 Responsibilities

Top Management

Responsible for ensuring adequate budget for training.

Departmental Heads

Responsible for allocating time and resources to allow training of employees to be carried out.

Human Resources Manager

Organises induction training for new employees on environmental, quality and health & safety issues.
Keeps signed checklists confirming that induction and on-going training have been completed.

ESMS Representative

Identifies the training needs of employees with respect to the ESMS and emergency preparedness.
Ensures that contractors working on site have the necessary experience and competence with regard to HSSE issues.
Informs contractors about BAC policies and gains their signed acceptance of the policy whilst working on site.

5 Procedure

5.1 ESMS Training

The appointed ESMS representative, in collaboration with the respective departmental heads, is responsible for the development and implementation of an ESMS training matrix.

The ESMS training matrix will specify which staff positions are to be trained in which respective sections of the ESMS and its relevant procedures.

The respective department head will be responsible for the facilitation of the training relevant to his/ her department accordance with the ESMS Training Matrix (**BAC-ESM-PRF-004-01**) that is under development.

The HR manager is to ensure that in the event of a new staff member joining BAC, that all relevant departmental heads are notified of such appointment and to schedule induction and ESMS training with the respective new employee(s).

Proof of training records are to be submitted by the relevant departmental heads to the HR manager, who in turn will record the training as completed in the training plan.

The following training material is applicable:

- Safety, Health & Environmental Awareness Training Module;
- ESMS Training Module;
- Hazard and Aspects Identification and Risk Assessment Procedure Training Module;
- Compliance Obligation Procedure Training Module;
- Audits Procedure Training Module; and
- Control of Non-conformances Procedure Training Module.

5.2 Project SHEQ Training Planning

Upon award of a contract to a contractor, BAC requires the contractor to identify all training needs required in line with a needs analysis and based on the contract training requirements as specified in the tender documentation.

The contractor responsible for the project is to draft a project training matrix prior to contract commencement in collaboration with the project HSE Manager, which defines both formal and informal training requirements and submit this to the BAC ESMS representative and contractor HR Manager. The BAC ESMS representative and the contractor will review the training matrix and assess if the training requirements are reasonable and deliverable.

The contractor must meet with both the senior staff member responsible for the project and the project HSE Manager to review and agree training requirements and to set the time frames by when the training deliverables must be met. Once the training deliverables, timeframes and numbers to be trained have been agreed, the contractor HR manager will be in a position to prepare the training material and test pieces if required.

Results of training test sessions must also be recorded and kept on file to ensure that the staff employed has been assessed as competent to perform their required tasks. The project HSE manager is required to report on the monthly training performance during the contract progress meeting.

5.3 Induction Training (All Staff)

The top management, HR Manager and the ESMS representative, as the responsible person(s), have to ensure that all permanently employed personnel, contractors and visitors are inducted prior to commencing work.

Visitors and suppliers will be trained using a visitors induction programme and will be required to sign the visitor's induction or Attendance Register, which is under development, as proof of induction (**BAC-ESM-PRF-004-02**).

The contractor is to ensure that all visitors and sub-contractors who may be exposed to high-risk areas on site are properly inducted regarding the hazards to be found on site and the precautions to be taken to alleviate the risk.

The contractor is required to conduct the HSE induction training before commencement of work and thereafter a minimum of once per year for projects, which exceed 12 months in duration.

The induction training should cover at least the following topics:

- BAC policies and objectives for the contract;
- The importance of having to comply with the project environmental authorisations;
- The project HSSE risks, hazards and impacts;
- The procedure for emergency preparedness and evacuation;
- The procedure for reporting incidents; and
- The grievance procedure.

Where needed, a translator should be used for employees who may not understand English.

All persons who attended the training need to sign an induction training register.

5.4 Training Related to Construction

5.4.1 Risk Assessment Training

BAC and its contractors must ensure that all employees working for or under them are properly trained with regards to the hazards and impacts associated with the activities they are about to undertake.

5.4.2 HSE Toolbox Talks

The contractor is to ensure that:

- The site supervision conduct HSSE toolbox talks at least once per week with their team.
- The topics of the tool box topics should be relevant to the types of hazards and aspects being found in the workplace or areas of concerns observed on site.
- The team signs the attendance register and that the signed registers are kept by the project HSE Manager.

Toolbox talks are to be brief and to the point (not to exceed 10-15 minutes).

5.4.3 Emergency Preparedness/Evacuation – Drills and Mock Scenario Training

BAC and its contractors are to ensure that all employees and visitors are made aware of the emergency preparedness and response requirements for the contract, by including it as part of the induction programme and by conducting regular emergency preparedness and response drills.

Drills will be carried out at the discretion of the contract's manager to a minimum of once in every four (4) months for duration of the contract.

Planned drills to be undertaken by the contractor must be communicated to the BAC contract representative and the ESMS representative prior to activation (at least 24 hours in advance). The date and shift must be agreed with all parties, but the timing need not be specified so that an element of surprise and reality can be maintained.

The contractor HSE Manager will be required to document the outcome of the emergency drill. Any lessons learnt must be conveyed to the workforce to enhance improvements for the next drill or event. In addition, the effectiveness of the corrective actions should be checked.

5.5 Environmental Training

The contractor should ensure that environmental training is given to all employees working on the contract to ensure:

- that all employees are made aware of the BAC and the contractors policies and the implication thereof;
- that all employees whom in the work phase might impact on the environment be appropriately trained;
- that all employees are trained in respect of their role in the ESMPs; and
- that all employees and first level contractors are trained in the consequences of not conforming to the ESMPs' requirements, and improve skills to handle environmental emergencies.

Environmental awareness training will be provided during the initial stages of the contract to all site management and site supervision associated with the contract, to familiarise them with the specific ESMP requirements for the contract.

On-site environmental training needs to be conducted by the contractor through toolbox talks on at least a weekly basis. Records of training attendance will be kept on site.

Toolbox talks and the initial environmental awareness training will address the following topics/themes:

- Explanation of the importance of complying with the ESMPs;
- Discussion of the potential environmental and social impacts of the construction activities;
- Background on the sensitivity of the environment and the slow ecosystem recovery period;
- Explanation of the mitigation measures that must be implemented when performing their duties ; and
- Explanation of the specifics of the ESMPs and sensitive areas (no-go areas, etc.).

5.6 Social Training Programme

The main contractor will be required to undertake awareness training to promote knowledge on the transmission of HIV/Aids to the entire workforce employed by the contractor. Distribution of condoms will take place and literature will also be posted on all notice boards on the site. A policy of total openness will be applied with regards to this disease as far as training and development is concerned. This policy will also apply to any other sexually transmitted diseases.

6 Records

BAC-ESM-PRF-004-01	Training Matrix
BAC-ESM-PRF-004-02	Attendance Register

NEW BUGESERA INTERNATIONAL AIRPORT

INTERNAL AND EXTERNAL COMMUNICATION PROCEDURE

BAC-ESM-PRO-005

REV AA

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1 Purpose

The purpose of this procedure is to ensure that all health, safety, social and environmental related matters regarding internal and external communication are handled in a proper manner and ensuring appropriate participation and consultation.

2 Scope

This procedure applies to all employees and contractors of the NBIA Project.

3 Definitions, Acronyms and Abbreviations

ESMS	-	Environmental and Social Management System
BAC	-	Bugesera Airport Company
NBIA	-	New Bugesera International Airport
HSSE	-	Health, Safety, Social and Environmental

4 Responsibilities

It is the responsibility of the main contractor and sub-contractors to familiarise him/herself with the requirements of this procedure.

5 Procedure

5.1 Internal Communication

Senior management shall ensure that communication takes place regarding the effectiveness of the ESMS. Staff and workers will be informed of BAC policies, requirements, objectives and accomplishments throughout the organisation by means of the following communication methods:

- **Notice Boards:** Notice Boards shall be erected on site and display information such as BAC Policies, Objectives and Targets, Performance of HSSE Objectives and Targets, Emergency and Evacuation Procedures (e.g. evacuation routes, emergency number list, the site emergency/accident flowchart, names and contact numbers of supervisors, first aiders and fire wardens), Best Practice Bulletins, HSE Alert Notices, etc.
- **Signage and Posters:** Signage and posters shall be erected and strategically placed, where required, and display safety, health and environmental information such as the wearing and use of PPE, danger areas, no-go or restricted areas, speed limits, hazardous substances, location of fire equipment, assembly points, etc.
- **Job Descriptions:** Defining roles and responsibilities through written appointments. Job descriptions are established/documented for each function within BAC, approved by top management and communicated to the respective functions.
- **HSE Induction:** All BAC personnel, visitors and contractors will be required to undergo HSE Induction & Orientation Training prior to commencing work on site. Records of attendance shall be kept.
- **Pre-start Reviews:** Prior to the commencement of any activity, the Supervisor and his team shall conduct a risk assessment to ensure that every team member understands the job and task requirement as well as what the inherent activity risks are and what controls are required and to be adhered to.
- **Toolbox Talks:** The contractor shall ensure all employees actively participate in weekly Toolbox Talks with specific topics relating to project activities and focusing on continual improvement. A register of subjects discussed, attendees and the person conducting the meeting shall be kept.

5.2 Communication between Contractor and BAC

Communication on environmental matters with BAC shall be ensured during the execution of the project through meetings and reports.

Meetings

The following meetings are envisaged between BAC and a contractor:

- Contractor kick-off meeting (with the possible participation of BAC and suppliers) before commencing Project activities or specific construction activities on the site;
- Weekly and monthly meetings between a contractor and BAC. Project managers, environment/site project managers and relevant key personnel shall participate in these meetings. These meetings will take place from the design engineering phase until the completion of commissioning,
- Particular HSSE meetings between BAC and a contractor (and possibly third parties) as required for the progress on Project activities and as per decisions made by BAC and contractor project managers (e.g. Environment Committee Meetings).

For each of these meetings, a report including actions points shall be prepared and distributed to the relevant personnel under the responsibility of a contractor's project manager at the end of each meeting. The corresponding minutes, issued on a weekly and monthly basis, will constitute the action tracking system for the ESMS.

Reporting from Contractor to BAC

A contractor will be required to report on the following:

- A monthly environmental report stipulating all significant issues with an explanation of their cause and corrective/preventive actions undertaken during the past month This report shall be integrated into the project monthly status report;
- Corrective action and preventive action reports;
- Audit reports; and
- Incident reports in the event of any significant environmental incident. In this case the Project environment manager shall immediately report to the Project manager who will inform BAC within 12 hours.

5.3 External Communication with Third Parties

All external communication regarding HSSE aspects and relevant decisions shall be carried out through the Contractor's Project Manager, in coordination with/through BAC management and the Community Liaison Officer.

This communication includes the information originating from and submitted to local authorities, and other relevant persons or organisations and this shall be managed in coordination with BAC.

6 Records

None

NEW BUGESERA INTERNATIONAL AIRPORT

INTERNAL COMPLAINTS PROCEDURE

BAC-ESM-PRO-006

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1 Purpose

This procedure describes the method which will be followed in order to effectively assess and close out any internal complaints received.

2 Scope

This procedure applies to the construction phase of the NBIA Project and will be amended for the operational phase nearing completion of the construction contract.

3 Definitions, Acronyms and Abbreviations

ESMS	–	Environmental and Social Management System
BAC	–	Bugesera Airport Company
NBIA	-	New Bugesera International Airport
HSSE	-	Health, Safety, Social and Environmental

4 Responsibilities

HR Manager

- Inform the employees of the complaints procedure ascribed in this procedure (specifically related to environmental issues);
- Inform BAC management of complaints by submitting details of the complaints, of which records are kept on file.
- Contact the responsible contractor and initiate corrective action;
- Review the response and corrective action from the contractor; and
- Initiate a follow-up control system.

Contractor

- Initiate corrective action;
- Forward the details of the response to HR Manager/Community Liaison Officer; and
- Keep records of corrective action for audit purposes.

5 Procedure

Receiving and Recording Complaints

Complaints can be raised verbally or via written letters, to the supervisor or departmental head.

The receiver of the complaint shall prepare a report, in the provided format, of the confirmed complaint.

The report will be sent to the HR Manager/Community Liaison Officer for capturing in the internal complaints register (**BAC-ESM-PRF-006-01**), which is under development, and send a copy to the relevant departmental head to address.

Responding to the Complaint

The relevant assigned person shall within one working day prepare a response to the complaint or incident, noting the nature, reason for and action taken or to be taken to address the environmental impact.

The response shall be communicated to the relevant HSE Manager.

The relevant manager shall review the effectiveness of the response and so communicate to the responsible Community Liaison Officer/HR Manager.

Communication of the Response

The Community Liaison Officer/HR Manager will respond to the complainant with regards to the corrective actions taken to resolve the concern.

Should the corrective actions be acceptable to the complainant, the issue will be closed-out in the internal complaint register, by logging the corrective measures taken and the date it was closed.

Should the corrective actions not be accepted, the Community Liaison Officer will redirect the matter to the relevant division head or escalate the matter to top management.

6 Records

BAC-ESM-PRF-006-01 Internal Complaints Register

NEW BUGESERA INTERNATIONAL AIRPORT

EXTERNAL GRIEVANCE PROCEDURE

BAC-ESM-PRO-007

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1 Purpose

The purpose of this document is to formalize the management of grievances from BAC stakeholders to minimize the social risks to the business. The grievance process, outlined in the document, provides an avenue for stakeholders to voice their concerns and gives transparency on how grievances will be managed internally, which aims to reduce conflict and strengthen relationships between external stakeholders.

2 Scope

The grievance mechanism procedure applies to all external stakeholders of the NBIA Project. Specific and localised grievance mechanisms may need to be put in place for future development projects, which take into account local language and customs.

3 Definitions, Acronyms and Abbreviations

ESMS	–	Environmental and Social Management System
BAC	–	Bugesera Airport Company
NBIA	-	New Bugesera International Airport
HSSE	-	Health, Safety, Social and Environmental

Grievance

An issue, concern, problem, or claim (perceived or actual) that an individual or community group wants addressed by the company in a formal manner.

Grievance Mechanism

A formalized way to accept, assess, and resolve community complaints concerning the performance or behavior of the company, its contractors, or employees. This includes adverse economic, environmental and social impacts.

Internal Stakeholders

Groups or individuals within a business who work directly within the business, such as employees and contractors.

External Stakeholders

Groups or individuals outside a business who are not directly employed or contracted by the business, but are affected in some way from the decisions of the business, such as customers, suppliers, communities, the general public, NGOs and the government.

4 Responsibilities

BAC Top Management -

Employee investigating the grievance and liaising with the external stakeholder/s.
Developing resolutions and actions to rectify any issues.
Follow up and track progress of grievances.
Document any interactions with external stakeholders.

Community Liaison Officer -

Receive grievances.
Makes sure the grievance mechanism procedure is being adhered to and followed correctly.
Maintains grievance register and monitors any correspondence.
Monitor grievances/trends over time and report findings to the BAC top management or relevant project committee.
Raise internal awareness of the grievance mechanism among employees and contractors.

Employees

Receive grievances in person.

Report grievances to the Community Liaison Officer, by completing the Grievance Form (BAC-ESM-PRF-007-01) under development.

Provide information and assistance in developing a response and close-out of a grievance.

5 Procedure

5.1 Grievance Reporting Channels

BAC will communicate this procedure to its external stakeholders to raise awareness and offer transparency of how stakeholders can voice their grievances. Various channels for external stakeholders to vocalize their grievances formally include:

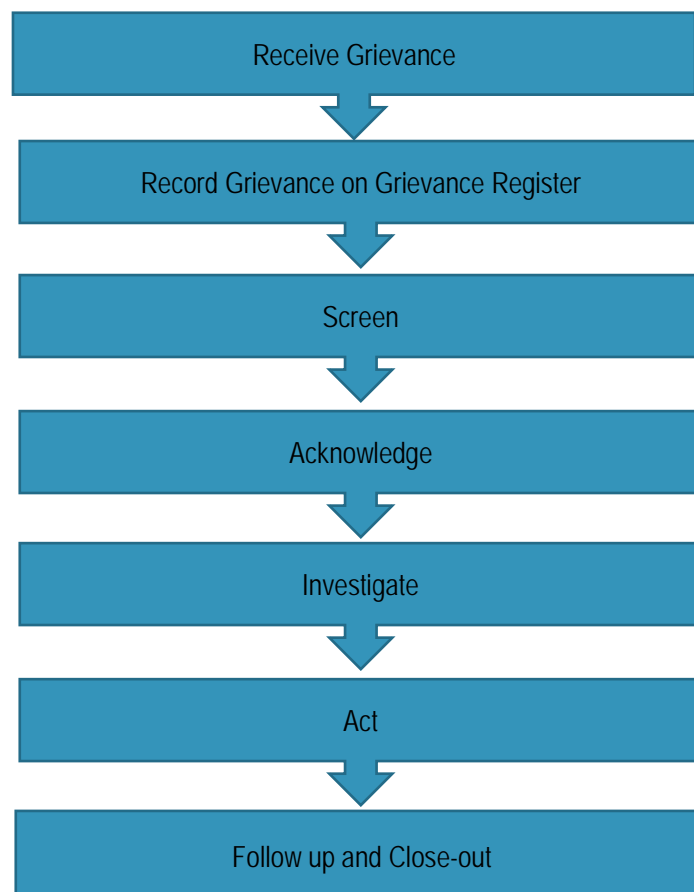
Telephone: Stakeholders can call BAC on a dedicated telephone line and request to speak to the Community Liaison Officer,

In writing: Grievances can be sent to BAC in a formal letter or via email.

Face to face: Stakeholders can voice their grievance to any BAC employee who will then escalate it using the correct process.

5.2 Grievance Mechanism Process

The figure below describes the process that will be used to resolve any grievances:



5.3 Receive Grievance

In Person/Over the Phone

If a grievance is received face to face or over the phone and the stakeholder wishes to address the grievance formally, it is the responsibility of the employee who receives the grievance to complete a grievance form. Once the form is completed the employee will then pass the form on to the Community Liaison Officer for processing.

Electronic

The Community Liaison Officer receives all grievances that come through a formal letter or via email. The Community Liaison Officer will review the grievance form and process the grievance in accordance to this procedure.

Recording

All formal grievances will be logged in the Grievance Register (**BAC-ESM-PRF-007-02**) and via Grievance Forms (**BAC-ESM-PRF-007-01**), under development, and will be kept by the HR manager for the record of correspondence.

5.4 Screening

The Community Liaison Officer is responsible for assigning a grievance owner to liaise with the external stakeholder/s and work on a resolution. Grievances will be screened depending on the level of severity in order to determine who the grievance owner will be and how the grievance is approached. See below table for categorizing the different levels:

Category	Description	Grievance Owner
Level 1	When an answer can be provided immediately and/or BAC are already working on a resolution. Grievance requires no input from management or higher levels	Community Liaison Officer
Level 2	Grievances which require investigation, an action plan and/or input from various departments, but will not damage the reputation of BAC.	Supervisor, departmental head or above
Level 3	Repeated, extensive and high profile grievances that may jeopardize the reputation of BAC, cause community upset or employee upset.	Executive level

5.5 Acknowledgement

A grievance will be acknowledged, by the grievance owner, within two working days of a grievance being submitted. Communication will be made either verbally or in written form (stakeholders will outline their preferred method of contact on the Grievance Form (**BAC-ESM-PRF-007-01**) which is under development.

The acknowledgement of a grievance should include a summary of the grievance, method that will be taken to resolve the grievance and an estimated timeframe in which the grievance will be resolved. If required, the acknowledgment provides an opportunity to ask for any additional information or to clarify any issues.

5.6 Investigation

The grievance owner is responsible for investigating the grievance. The investigation may require the grievance owner to make site visits, consult employees, contact external stakeholders and complete other activities. Records of meetings, discussions and activities all need to be recorded. Information gathered during the investigation will be analysed and will assist in determining how the grievance is handled and what steps need to be taken in order to resolve the grievance.

5.7 Action

Following the investigation, the grievance owner will use the findings to create an action plan outlining steps to be taken in order to resolve the grievance. The grievance owner is responsible for assigning actions, monitoring actions undertaken and making sure deadlines are adhered to. Once all actions have been completed and the grievance owner feels the grievance has been resolved, they will then formally advise the external stakeholder via their preferred method of contact.

5.8 Follow up and Close-out

The grievance owner will make contact with the external stakeholder/s three weeks after the grievance is resolved. When contacting the external stakeholder, the grievance owner will verify that the outcome was satisfactory and also gather any feedback on the grievance process. A record of the meeting will be kept and saved in the grievance register

If required, the grievance owner may need to follow up with the external stakeholder on numerous occasions to confirm all parties are satisfied.

5.9 Appeal

If the external stakeholder is unhappy with the resolution and/or does not agree with the proposed actions, then the grievance owner needs to escalate the matter to the executive management team. The executive team will review the grievance and all documentation gathered throughout the investigation and determine whether further actions are required to resolve the grievance. BAC are fully committed to resolving an external stakeholder's grievance so if BAC are unable to resolve a complaint or a stakeholder is unhappy with the outcome, BAC may seek advice from other independent parties.

5.10 Reporting

The project management committee will receive quarterly updates on stakeholder grievances. Information outlining the number of grievances, time to resolution and outcomes of grievances will be communicated.

5.11 Retaining of Grievance Documentation

All records, including grievance forms, investigation notes, interviews and records of meetings will be securely filed by the HR Manager to ensure privacy and confidentiality is maintained for all parties involved.

6 Records

BAC-ESM-PRF-007-01 Grievance Form
BAC-ESM-PRF-007-02 Grievance Register

NEW BUGESERA INTERNATIONAL AIRPORT

CONTROL OF DOCUMENTED ENVIRONMENTAL INFORMATION

BAC-ESM-PRO-008

REV AA

DOCUMENT CONTROL SHEET

Rev No.	Date	Reason of Issue	Drafted by:	Reviewed by:	Approved by:

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1 Purpose

This procedure describes the intended method which BAC will use to control the drafting of new environmental documentation, changes to existing documentation, the approval of new or amended documentation, the issue of documentation, and the removal of obsolete documentation, in order to:

- Establish a uniform and consistent method for the compilation of environmental documentation;
- Determine methods of control and maintenance of documentation;
- Ensure that all procedures, documents, records and communications are traceable, current and retained for legal and knowledge preservation;
- Provide an accurate historical record and archive of all BAC environmental documentation; and
- Identify the location of the controlled copies of documentation.

2 Scope

This procedure is applicable to all documented environmental information relevant to BAC.

3 Definitions, Acronyms and Abbreviations

CDC	–	Custodian of Documentation
DPC	–	Department / Process Custodian
ESMS	–	Environmental and Social Management System
MAS	–	Management System
BAC	–	Bugesera Airport Company

Responsible Person

A person other than an originator, or designated by the team as responsible for managing the document through the document control process and securing the necessary concurrence and approvals.

Originator

The originator is the person that creates or publishes a document. This may include a person designated by a cross-functional team who is developing the document. If a responsible person is not appointed, then the originator is responsible for managing the document through the review process and securing the necessary concurrence and approvals. The originator is stated on the front page of the document. It is not necessary to re-write the document or change the name of the originator in the document, if that person leaves the employ of BAC.

Editorial Changes

Any change that does not add information to, delete information from, or change the meaning or interpretation of a procedure will be considered as an editorial change. A document that has had an editorial change does not need to be re-approved or its revision status to be revised.

Original Issue

The first time a particular document is released.

Review

The means and process by which documents are evaluated for correctness and completeness inclusive of the feedback comments, criticisms and recommendations.

Revision

Any substantive change in the contents of a document which has already been released.

Controlled Document

A document that is maintained and updated. Controlled documents are formally approved and their distribution is

traceable to enable changes to be executed.

Externally Generated Documentation

A category of documentation produced by other companies or individuals outside of BAC, including but not limited to, Specialist Reports, Customer Documentation and Engineering Standards.

Guide/Manual

A reference or instruction document.

Policy

A policy describes the rules that establish what will or will not be done and can range from a broad philosophy to specific rules. It includes what the rule is, why it exists, when it applies and who it covers.

Procedure

A set of established steps, methods, or actions that describe how to perform, effect, or conduct an act of business. A procedure either spans several functional organisations or can be used by more than one functional organisation. It is repeatable and measurable. Corrective action is used to correct procedure problems and improve procedure performance.

Process Flow Diagram

A graphical representation of a procedure, depicting inputs, outputs and units of activity to allow analysis, measurement and optimisation of workflow.

Work Instruction

A work instruction addresses a single process and how to undertake it.

4 Responsibilities

It is the responsibility of the ESMS representative and the relevant departmental heads to ensure compliance with this procedure, and to ensure that it is communicated to their respective subordinates. All records will be maintained by them as stipulated in this document.

5 Procedure

5.1 Numbering System

The numbering system has been devised to provide the following:

- Identification of environmental documentation related to BAC and its respective departments within the company;
- Traceability of documents through the different document tiers;
- Indication of the revision level; and
- Identification of associated forms related to specific documents.

Document Numbering:

The intended document numbering will consist of the following:

AAA-BBB-CCC-000,

Where **AAA** will identify that the document belongs to the Bugesera Airport Company. The first abbreviation will therefore will always be BAC.

BBB indicates the division of origin of the document namely:

ENV	-	Environmental
HIR	-	Human Resources and Industrial Relations
LEG	-	Legal
ESM	-	Environmental and Social Management System
MON	-	Monitoring
RSK	-	Risk
SHE	-	Safety, Health and Environment

CCC indicates the type of document, namely:

CHL	-	Checklist
EMP	-	Environmental Management Plan
PRF	-	Procedural Forms
GUI	-	Guidelines
PLN	-	Plan
MST	-	Method Statement
MTX	-	Matrix
PRO	-	Procedure
REG	-	Register
RPT	-	Report
SOP	-	Site Operating Procedure
SWP	-	Safe Work Procedure
SWF	-	Safe Work Form

The abbreviations will be followed by the unique sequential numerical number: e.g 001, 002, 003....

The revision number needs to be indicated and will be issued as follows:

- AA, BB, CC = Draft Copy;
- 00 = First Issue (after approval);
- 01 = First Revision; and
- 02 = Second Revision.

5.2 Initiating a New Document

In the event that a new document is to be drafted, the originator will notify the ESMS representative/CDC who will issue the originator with the correct numbering of the document and format (**BAC-ESM-TEM-008-01**).

The draft document is put into a standard format, assigned a document number, clearly marked "DRAFT" and given the revision status code number Rev. AA. The draft is reviewed by the Document Custodian and appointed ESMS Representative/relevant departmental head (focus area expert).

Changes and/or corrections that may be requested as a result of the review are then carried out. The corrected draft is then resubmitted for final review and approval. Evidence of approval of a document is by means of a signature on

the document control page of the document.

Once approved, this document becomes the master control document and will be retained by the ESMS representative (procedure level) or relevant departmental head (discipline/work instruction).

This approved document will then be given a revision status number Rev 00 for first issue. The document will be recorded on the master document register (**BAC-ESM-TEM-008-03**).

5.3 Changes to Existing Documents

Any person in the company may request a change to an existing document, by submitting a request to the ESMS representative and/or the relevant departmental head to which the document belongs. The ESMS representative and/or departmental head will review the request and if found to be valid will initiate the change request process.

The document will be sent for review to all relevant parties, and once approved, the revision number of the document will be given the next sequential revision number.

This document will then become the master document. The previous document will be clearly marked obsolete. All obsolete documentation needs to be removed from operation, when the new revision document is to be issued.

5.4 Issuing of Documentation

Electronic and hard copies of the documents are held by the ESMS representative and/or relevant departmental head.

Where a controlled copy of a document is issued, the issuer (ESMS representative/relevant departmental head) will issue such document with a transmittal note (**BAC-ESM-TEM-008-04**), indicating the document number, name and the current revision. The receiver of the document will sign the transmittal and send it back to the issuer. The transmittal note will be kept as proof of the document being transmitted.

All printed documentation will be regarded as uncontrolled and labeled "Uncontrolled Copy".

Once a new document or revision has been issued, it is the responsibility of the holder of the document or the departmental head to ensure all absolute documentation is destroyed and/or taken out of circulation.

Where obsolete documents are retained for history or legal purposes they must be stamped/marked "Obsolete" by the person responsible for their issue or retention.

5.5 Project Document Issue and Amendment

A contractor will be required to keep detailed records of the following information.

Registers of the various Plans, Procedures, and Method Statements etc. shall be established by the Document Controller to track all submission and approval progress/status.

The register will provide a detailed report on the history and status of each drawing/report/submission. Information recorded on the register should include:

- Document number;
- Title and revision number;
- Date of issue;
- Party issuing the drawings/documents and relevant distribution as instructed by the Project Manager;
- Date submitted and date comments returned;
- Approval status of documents; and
- Reason for issue.

5.6 Documentation Storage

Management system documentation will be stored on a secure server.

5.7 Control of Externally Generated Documents

Externally generated documents are to be controlled by the respective departmental head. Upon receipt of the document, it must be recoded on an external document register, and a copy of the document forwarded to the relevant personnel.

5.8 Control of Records

It is the responsibility of each person or departmental head to ensure the safeguarding of records through the implementation of a documented filing system.

5.9 Filing of Records

It is the responsibility of the relevant departmental head to develop a filing system and filing index (**BAC-ESM-TEM-008-02**) suitable for the filing, archiving and retrieval of documents and records pertaining to his/her area of responsibility.

Filing will be performed in such a manner that it ensures all records are clearly identifiable and readily retrievable.

All electronic records and information are to be stored on the BAC central server

Electronic records are to be backed up on a secure external server/hard drive and stored accordingly.

5.10 Retention of Records

The retention periods of the documentation will be determined based on the legislative requirements and as stipulated by the relevant departmental head.

5.11 Disposal of Records

Only the relevant departmental head may give permission for the disposal of records as stipulated by him/her in the departmental filing system.

6 Records

BAC-ESM-TEM-008-01	-	Document Template
BAC-ESM-TEM-008-02	-	Filing Index Template
BAC-ESM-REG-008-03	-	Master Document Register
BAC-ESM-PRF-008-04	-	Transmittal Note

NEW BUGESERA INTERNATIONAL AIRPORT

MONITORING AND MEASUREMENT PROCEDURE

BAC-ESM-PRO-009

REV AA

DOCUMENT CONTROL SHEET

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1 Purpose

This procedure describes the overall requirements for monitoring and measurement as part of BAC's ESMS requirements to ensure that there is adequate control on significant environmental aspects, compliance with legal and other requirements, and to achieve objectives and targets.

2 Scope

This procedure applies to the construction phase of the NBIA Project and will be amended for the operational phase nearing completion of the construction contract.

3 Definitions, Acronyms and Abbreviations

ESMS	–	Environmental and Social Management System
BAC	–	Bugesera Airport Company
NBIA	-	New Bugesera International Airport
HSSE	-	Health, Safety, Social and Environmental

4 Responsibilities

ESMS Representative

The ESMS representative shall work with the contractor to define the monitoring requirements and evaluation of compliance, and have the overall responsibility for ensuring that the requirements of this procedure are implemented.

Contractor

The contractor shall ensure that the requirements as set out in this document are properly executed and that the necessary records and compliance can be proven. The contractor will inform BAC in the event of non-compliance or measurements outside of the set parameters.

5 Procedure

The ESMS representative, in consultation with the contractor and the relevant BAC departmental heads, if necessary, shall establish monitoring criteria in the following areas:

- The achievement of HSSE objectives and targets and the progress of programmes.
- The effectiveness of operational control procedures for controlling the significant environmental aspects of Project activities including the control and monitoring of contractors' environmental performance.
- The conformity of environmental legislation and other requirements related to BAC's environmental aspects.

Monitoring criteria shall include the monitoring/measuring frequency, methods, responsibilities and records or reports that shall be kept. The monitoring criteria shall be documented or integrated into the respective environmental management plans. The responsible contractor shall ensure that the monitoring requirements are carried out and report any environmental non-conformities to the ESMS representative.

The BAC ESMS representative and the contractor shall hold regular meetings (approximately every 3 months or as required) and maintain records to:

- discuss and review the achievement of the objectives and targets and the progress of relevant programmes;
- review the monitoring data (e.g. inspection checklists) to check whether the monitoring and environmental management plans are implemented properly;
- review information to evaluate whether BAC and its contractors' activities comply with applicable environmental legislation and other requirements to which BAC subscribes; and

- review any environmental non-conformities, and the corresponding corrective action and preventive action.

In case of non-conformities, the relevant contractor shall investigate the causes of non-conformities and establish appropriate corrective and preventive actions. The corrective and preventive actions shall be verified by the Function/Departmental Manager and be endorsed by the ESMS representative.

The monitoring criteria shall be reviewed and revised according to changes in legislative requirements and the practical situations in BAC with the aim of continual improvement in environmental performance.

Whenever necessary, calibration of measuring equipment shall be defined clearly in terms of calibration methodology, calibration frequency, acceptance criteria and responsible personnel.

BAC shall record the results (and maintain the records) of the periodic evaluation of compliance and these shall be considered at the management review meetings.

6 **Records**

As per the various Environmental Management Plans.

NEW BUGESERA INTERNATIONAL AIRPORT

EMERGENCY PREPAREDNESS AND RESPONSE PROCEDURE

BAC-ESM-PRO-010

REV AA

DOCUMENT CONTROL SHEET

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1 Purpose

The purpose of this procedure is to establish guidelines for the identification, assessment and providing basic information and guidance for response to emergency situations. It is not, nor is it intended to be, a substitute for good common sense, which must prevail, in any given emergency situation.

While it is recognised that all situations cannot be covered, the overall guidance is for BAC to provide documented systems, tailored for location specific emergencies, drills, and evacuation procedures as well as how to communicate them to the required people.

2 Scope

This procedure applies to the construction phase of the NBIA Project and will be amended for the operational phase nearing completion of the construction contract.

3 Definitions, Acronyms and Abbreviations

ESMS	-	Environmental and Social Management System
BAC	-	Bugesera Airport Company
NBIA	-	New Bugesera International Airport
HSSE	-	Health, Safety, Social and Environmental

Medical Emergency –

A medical emergency is any incident that involves either serious injury (requiring urgent medical aid) or a trapped person(s) who's health or safety are in immediate danger.

Fire Emergency –

A fire emergency is any situation where an uncontrolled fire threatens life and/or property.

Toxic Gas Release Emergency –

Incident involving an uncontrolled release of toxic gas such as Hydrogen Sulphide (H₂S) or Sulphur dioxide (SO₂).

Natural Disaster –

Natural disaster emergency situations include earthquake, landslide or flooding where there is imminent danger to the safety of people or property.

Environmental Emergency –

An accident or incident in the workplace that has led to, or may result in, a pollution event categorised on a local, national or international scale.

Evacuation –

Moving, in a controlled manner, to a safe location away from a common danger or hazardous situation.

Accident –

Means any unexpected, unplanned event or a sequence of events that occurs through a combination of causes and results in serious injury (to an individual or multiple people) or serious damage to property, plant or equipment. It may be categorised as an accident due to the extent of harmful impact to the surrounding environment or significant disruption to work that it has caused.

Incident –

Means any "unexpected sudden occurrence"/unplanned event that has recognisable potential for causing, but did not result in, an accident but did cause moderate injury to an individual or moderate damage to property, plant or equipment. There is also the possibility of causing a harmful impact to the surrounding environment or significant disruption to work, including major emissions, fires or explosions leading to serious danger to the public or potentially serious pollution of or detriment to the environment (immediate or delayed).

Hazard –

A substance, process, situation or condition with the potential to affect the environment (e.g. storage of oil on site, non-compliance with emission limits, historical activities involving toxic chemicals).

4 Responsibilities

ESMS Representative

The ESMS representative shall work with the contractor to define the monitoring requirements and evaluation of compliance, and have the overall responsibility for ensuring that the requirements of this procedure are implemented.

Contractor

The contractor shall ensure that the requirements as set out in this document are properly executed and that the necessary records and compliance can be proven. The contractor will inform BAC in the event of non-compliance or measurements outside of the set parameters.

5 Procedure

5.1 Emergency Planning

The objective of the HSE management system is the implementation of suitable controls related to proactively identifying hazards, risks and the available controls that aim to reduce the effect of that hazard or risk to “as low as reasonably practical”.

In the event of an unplanned event occurring, effective contingency plans must be in place to deal with the situation to protect the employees and public from the effects of the emergency situation, remove injured persons from the scene and to enable safe operations to resume as soon as is practical.

The probable events must be determined through the hazard identification and risk assessment process once established; then the emergency plan is drafted to include:

- Possible effects to safety, health and the environment;
- Resources available to combat emergency situation, both internal and external;
- Contractor management representative to coordinate plans;
- Train and appoint emergency response members;
- Integrate with customers, local community and neighbours' emergency plans;
- Document the plan and circulate to all;
- Perform regular exercises to evaluate effectiveness of the emergency plans; and
- Perform annual reviews and update plans as required.

5.2 Emergency Response

Periodic testing of the emergency response arrangements will be undertaken. These will be based on potential incidents which may happen on the specific site. Thereafter, the adequacy of the response will be analysed and lessons learned identified, so that improvements can be implemented.

Due to the nature of the operations, full practice drills may not be possible. Thus, the Emergency Co-ordinator will be required to schedule a planned walk-out. During this exercise, all personnel will be walked along their evacuation route to the assembly point.

Emergency drills shall be conducted twice a year. The drill shall enable the review and evaluation of the efficiency of the response system and if necessary, the review of the Emergency Preparedness and Response Procedure.

The emergency drill will be conducted to accomplish the following objectives:

- As a training mechanism to familiarise personnel of their duties and responsibilities in terms of environmental incidents;
- To evaluate the preparedness of each party involved in the procedure, including regulatory agencies and support services, if applicable;
- To test the initial communication sequence and reporting procedures;
- To verify that contact numbers are correct;
- To examine the interaction between the individuals and groups named in this procedure and to address identifiable shortfalls in the established lines of communication; and
- To improve the procedure itself and its efficiency.

5.3 Safety Incident

Safety Assessment

- The Supervisor in charge of the activities carried out in the area where the incident has occurred, must immediately be informed about the incident.
- Once informed about the incident, the Supervisor shall:
 - Determine whether any personnel are injured;
 - Assess the situation to determine whether it is safe to proceed with control or response operations.
- If any personnel are found to be injured, the Supervisor shall:
 - Immediately notify the Emergency Response Team;
 - Determine if the access to the site is safe for the emergency medical team and other response personnel.

First Responder

- Personnel at the incident site shall immediately inform their Supervisor/Safety Officer/ Emergency Coordinator in case of occurrence of an incident.
- Remain calm and take action to reduce the effects of the potential emergency.
- If the person discovers a fire and has been trained to use a fire extinguisher, they may attempt to extinguish the fire. This should not be attempted alone. Notify a colleague to assist.
- Where electrical equipment is involved, switch off power supply if this can be done safely.
- If there is an injury or medical emergency then inform the First Aider.
- If the injury is of a serious nature, the casualty must not be moved except where there is a possibility of further injury and this should only be done by the First Aider.
- Do not remove any objects involved in the incident.
- Take note of the time and circumstances of any accident or incident.
- After reporting the incident and if the situation requires, then move out of the building to the assembly point.
- Do not congregate at the scene of the emergency unless directly involved in the emergency.
- No information may be given out to the press, next of kin or any other person other than through the designated appointed person.

Emergency Co-ordinator

After notification of a possible emergency, the Emergency Co-ordinator will:

- Evacuate premises if deemed necessary.
- Co-ordinate evacuation activities – collect and collate assembly point attendance registers, communicate with the Emergency Response Team on the status of missing persons.
- Should the emergency involve a hostage or captive situation or where weapons are involved, an immediate evacuation must be ordered of the area. No person may negotiate or attempt to attack the perpetrator.
- Notify the required external emergency response teams.

- If injuries are reported, direct the First Aiders to the locations where needed.
- Ensure that all records of all casualties may not be released to any source until their next of kin have been notified.
- Liaise with appointed Management Representative to provide details of the nature of the emergency and casualties.
- The Emergency Co-ordinator is not responsible for releasing any information to the public or media but may merely confirm an incident has occurred and that a statement will be issued by an appointed representative.
- When an emergency has stabilised, the Emergency Co-ordinator may, on the advice of the Emergency Response Team, declare the all clear.
- If employees are allowed back into the building or site, the Emergency Co-ordinator will co-ordinate this with the Emergency Response Team.
- Should a full evacuation away from the building or site be required, then the Emergency Co-ordinator will co-ordinate this with the Emergency Response Team.
- Where the emergency results in permanent damage to the buildings or site, the Emergency Co-ordinator will, along with the relevant Manager, notify employees of further action to be taken.
- The Emergency Co-ordinator is responsible to ensure the Emergency Plan is reviewed from time to time to ensure actions remain current.

First Aider

- The First Aider may be notified of an incident by:
 - The injured person or a colleague;
 - The Emergency Co-ordinator or a Senior Manager.
- On notification of an emergency, the First Aider will respond by:
 - If the injured person comes to the First Aider, then an assessment of the injury should be made;
 - Minor injuries must be treated and a record kept;
 - Serious injuries must be treated as best as possible and external assistance must be called for; and
 - Remain with the injured until help arrives.
- In the event of serious injuries where external emergency care is required, the First Aider may be required to provide first response assistance until the paramedics arrive.
- The First Aider proceeds to the scene of the incident with their first aid kit;
- An assessment of the situation is made to ensure the First Aider is not endangered before attempting to render first aid assistance;
- Where possible, the First Aider remains with the injured and then hands over the injured to the emergency response team;
- If casualty evacuation is required, the First Aider will assist in establishing and recording as many facts about the incident as possible; and
- In the event of a fatal accident, care must be taken not to disturb any objects involved before the arrival of an inspector – such action may only be taken to prevent further accidents or to rescue persons from danger.

5.4 Environmental incidents

Spill Response

All employees should be made aware of the procedure in case of a spill. Any spill should be reported to the supervisor who must report to it to the Contractor HSE Manager. The Contractor HSE Manager must report the incident to the ESMS representative should the spill be significant or require reporting to the relevant authorities.

Procedure

- Identify nature and size of spill e.g. oil 20L. Consult Material Safety Data Sheet (MSDS) for safety precautions.
- Protect exposed storm -water drains, prevent entry of substance to storm-water drains.

- For a small spill (less than a litre), locate spill kit and contain spill according to the training from the spill kit suppliers.
- For large spill (unable to deal with on-site), contact external spill control contractors.
- Determine appropriate method for disposal of material based on information provided in MSDS.
- Determine if any contamination has occurred i.e. entry to storm-water, soil contamination etc.
- If contamination has occurred, consult with authorities on need for on-going monitoring and or rehabilitation requirements.
- Determine medium and long term effects.
- If no contamination has occurred, determine if spill falls under definition of an "incident" and if so, report to relevant authorities.
- Record in Incidents Register
 - Nature of incident;
 - Cause of incident;
 - Contamination if any;
 - Measures taken to control spill and handle contamination;
 - If spill falls under definition of an incident; and
 - Mitigation measures taken to prevent re-occurrence.
- Record in Non-compliance Register or Incident Register (if defined as incident).
- The HSE Manager shall review all spill reports.
- Adjustments will be made, if necessary, to the operational and emergency procedures to prevent future occurrences.

Fire

All fires should immediately be reported to the supervisor who will report it to the Contractor HSE Manager.

Procedure

- Identify source and nature of fire. In case of small fire extinguish with material appropriate to the nature of the fire. Consult MSDS.
- Immediately contact the HSE officer. In case of a large fire, contact Fire Department.
- Determine whether any contamination has occurred.
- If contamination has occurred, consult with authorities to determine appropriate rehabilitation and monitoring
- Record in Incident Register:
 - Nature of incident;
 - Cause of incident;
 - Clean up measures; and
 - Mitigation measures taken.
- Record in Non-compliance Register and record as an incident if applicable.
- The HSE Manager shall review all fire reports.
- Adjustments will be made, if necessary, to the operational and emergency procedures.

6 Records

None

NEW BUGESERA INTERNATIONAL AIRPORT

INCIDENT INVESTIGATION AND REPORTING PROCEDURE

BAC-ESM-PRO-011

REV AA

DOCUMENT CONTROL SHEET

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1 Purpose

The purpose of this document is to guide and clarify the process for the reporting of environmental incidents which may occur on the NBIA Project.

2 Scope

This procedure applies to the construction phase of the NBIA Project and will be amended for the operational phase nearing completion of the construction contract.

3 Definitions, Acronyms and Abbreviations

ESMS	-	Environmental and Social Management System
BAC	-	Bugesera Airport Company
NBIA	-	New Bugesera International Airport
HSSE	-	Health, Safety, Social and Environmental

Environmental Incident –

An environmental incident is an occurrence or set of circumstances, as a consequence of which pollution (air, water, noise or land) or an adverse environmental impact has occurred, is occurring or is likely to occur.

Adverse environmental impacts includes contamination, harm to flora and/or fauna, damage to heritage items and/or adverse community impacts.

4 Responsibilities

BAC Management -

Shall review major and significant incidents at the management review meetings and ensure that corrective actions have been taken to prevent recurrence.

Shall alert the legal department if it is believed there may be any directives and/or fines from the relevant environmental authorities.

ESMS Representative -

Shall ensure that this procedure is communicated to all.

Shall on behalf of BAC and the contractor engage with the relevant environmental authorities in the event of a major incident.

Shall partake in the incident investigation process of major or significant incidents.

Review incident reports to identify trends and ensure that the corrective and preventative measures are incorporated in the relevant procedures and/or plans.

Distribute lessons learnt from the incident investigation to all.

Contractor

Shall familiarise him/herself with the requirements of this procedure.

Shall ensure that resources are in place to administer and report incidents in a timely manner and within the requirements of this document.

Put together a multi-disciplinary team to investigate the root cause of an incident.

Shall ensure that the corrective and preventative measures are properly executed in order to prevent the incident from recurring.

Shall communicate the lessons learned through toolbox talks.

All Employees

Shall ensure that all incidents are reported immediately to their supervisor who in turn will report it to the ESMS representative/contractor HSE manager.

5 Procedure

The main contractor and their sub-contractors are responsible for developing their own Incident Investigation and Reporting Procedure in line with this procedure.

5.1 Incident Classification

Environmental incidents will be classified according to the following levels/definitions. The classification should be used as a guideline. The HSE Manager/ESMS representative should use his/her discretion to assess the potential impact of the incident and classify it accordingly.

Severity	Explanation of Environmental Impact
Minor	Pollution or emissions serious enough to cause harm to the environment, but without any long term impact. Is contained to the immediate area of operations. Can be easily cleaned up and managed on site. One-time violation of procedural requirements, or a single complaint. Negligible financial consequences. No long term impact on operations.
Significant	Limited pollution or emissions, but with influence on neighbouring properties or downstream users, long term damage to the environment. Requires assistance from external specialist for remediation. Repeated exceedance of limits or repeated complaints or non-conformances. Breach of environmental approvals and/or licence conditions. Has a financial implication, may impact on operations (loss of operations for more than a day). Requires remediation but no long term/specialist monitoring. Within the boundaries of the Project property.
Major	Severe environmental damage requiring extensive clean-up through the assistance of an external specialist. Requires long term monitoring. Continual exceedance of limits and/or widespread nuisance and/or long-term environmental damage. Violation of legislative or regulative requirements. Significant financial impacts and loss of operations. Impact extends to outside of the property boundary.

5.2 Incident Reporting Requirements

Major/Significant Incidents

In the event of a major/significant incident the following will apply:

- The person who caused or notice the incident must immediately notify his/her supervisor or the contractors HSE Manager of the incident.
- The contractor HSE Manager will instruct the supervisor of the methods to follow to deal with the incident.
- The HSE Manager need to complete an Incident Notification Report (**BAC-ESM-PRF-011-01**) under development and issue it to the ESMS representative within 24 hours of the incident occurring.
- If the incident is required to be notified to an external authority, such is in the event of a breach of a license or permit condition, the BAC ESMS representative will notify and communicate with the relevant authority. The ESMS representative will in this case set up and lead the incident investigation process.
- If the incident is not reportable to any authorities, the contractor will arrange for an investigation to be conducted to determine the root cause. The incident investigation will be recorded on the Incident Investigation Report (**BAC-ESM-PRF-011-02**) under development.
- The full incident investigation report, with supporting documents and evidences of corrective and preventative measures taken, will be sent to the BAC ESMS representative within 5 working days of the incident occurring.
- The contractor will keep record of all major/significant incidents on an Incident Register (**BAC-ESM-PRF-011-03**) under development.

- The register needs to be made available to the ESMS representative and/or the Lender representative on request.

Minor Incidents

In the event of a minor incident, the following will apply:

- The person who caused or noticed the incident must immediately notify his/her supervisor or the contractors HSE Manager of the incident.
- The contractor HSE Manager will instruct the supervisor of the methods to follow to deal with the incident.
- The HSE Manager needs to complete an Incident Notification Report (**BAC-ESM-PRF-011-01**) under development and issue it to the ESMS representative within 24 hours of the incident occurring.
- The incident will be captured in the incident register.
- If required, a corrective action request will be send to the contractor, which needs to be responded to within 24 hours of the incident occurring.
- The contractor will submit proof of the corrective actions taken to the ESMS representative for record purposes.

5.3 Failure to Report Incidents

In the event that a BAC employee/Lender representative discovers that an incident has occurred which has not been reported by the contractor, the following will apply:

- The person who discovers/or is made aware of an incident which was not reported, will immediately notify the contractor and the BAC ESMS representative.
- The BAC ESMS representative will initiate a formal investigation to determine the cause of the incident and the reasoning for failure to report.
- Based on the outcome of the incident investigation, the BAC ESMS representative will advise the BAC management of the appropriate actions to take against the guilty party. Actions may include fines/penalties or recovery of any monies spent to rectify the damage caused by the incident.

6 Records

BAC-ESM-PRF-011-01	Incident Notification Report
BAC-ESM-PRF-011-02	Incident Investigation Report
BAC-ESM-PRF-011-03	Incident Register

NEW BUGESERA INTERNATIONAL AIRPORT

AUDIT PROCEDURE

BAC-ESM-PRO-012

REV AA

DOCUMENT CONTROL SHEET

Rev No.	Date	Reason of Issue	Drafted by:	Reviewed by	Approved by:

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1 Purpose

The purpose of this procedure is to describe the methods to use for ensuring internal audits are planned, scheduled, correctly executed and recorded to ensure the effectiveness of the BAC ESMS.

2 Scope

This procedure applies to all BAC employees who are responsible for planning, scheduling and the conducting of internal audits.

3 Definitions, Acronyms and Abbreviations

ESMS	–	Environmental and Social Management System
BAC	–	Bugesera Airport Company
NBIA	-	New Bugesera International Airport

Audit –

Systematic, independent and documented process for obtaining audit evidence and evaluating it objectively to determine the extent to which audit criteria are fulfilled.

Audit Criteria –

Set of policies, procedures or requirements used as a reference.

Audit Evidence –

Records, statements of fact or other information which are relevant to the audit criteria and verifiable.

Audit Findings –

Results of the evaluation of the collected audit evidence against audit criteria.

4 Responsibilities

The ESMS representative will draw-up and keep an audit plan/schedule indicating which department/contractor will be audited to ensure compliance with the ESMS requirements. The ESMS representative will be responsible to notify the relevant departmental head/contractor's representative of the intended audit.

5 Procedure

The audit will incorporate all elements of the ESMS, contractual requirements, scope of suppliers/service providers and compliance obligations applicable to the NBIA Project.

The ESMS representative and/or the relevant departmental head shall establish an audit schedule, indicating all departments, sections, contractors, suppliers/service providers etc. that will be audited. The internal audit schedule (**BAC-ESM-PRF-012-01**) will be reviewed on a six monthly basis

The objective of the audit will be to determine the extent towards which the above-said complies with BAC's policies, set objectives, environmental and social management system requirements and applicable compliance obligations.

The ESMS representative or departmental head will select a suitable independent and qualified auditor to undertake the audit. If possible a manager/individual with suitable auditing experience, from a different department, may be selected to oversee the auditing process.

Auditors selected will be adequately experienced in the required ISO standards and effective auditing techniques, the

contract specifications and the ESMS requirements and will not audit their own work.

The auditor develops an audit programme based upon the defined audit criteria, scope, methods and objectives.

A formal audit notification (**BAC-ESM-PRF-012-02**) and the intended audit programme will then be sent to the relevant department heads/contractor representative/service provider/supplier etc. at least a week before leading up to the intended audit date.

As minimum requirement, the following internal audit frequencies shall be applicable:

Departmental audits	-	Bi-annually
Contractors	-	Quarterly/frequency depending of risk of activities
Suppliers/service providers	-	Annually/prior to adding to vendor list depending on type of service
Compliance obligations	-	Bi-annually/after amendment to legal obligations

5.1 Audit Procedure

Audits will be conducted using the prepared Audit Checklist as a guide to determine the conformance with specific requirements and the effectiveness of the ESMS. Where possible, objective evidence will be sought and details recorded on the checklist.

Where objective evidence has been recorded or a deviation from documented requirements, such deviation will be recorded in either one of the following categories:

- **Conformance/Satisfactory:** Verified and found to be in order.
- **Observation:** Isolated incident which may result in a system breakdown if not addressed. If the same is recorded on a follow-up audit, a Non-Conformance (NCR) will be raised automatically as to ensure corrective action.
- **Minor NCR:** More than one minor deficiency detected in the implementation of procedures or work instructions, or a breakdown in the implementation of procedures or work instructions.
- **Major NCR:** Several or severe deficiencies, serious Management System breach/failure/breakdown detected in the implementation/execution/adherence to policies, procedures, processes, operating procedures or work instructions.

When a major non-conformance is identified, the auditor presents the nature of the non-conformity and the evidence to the auditee and relevant departmental head for verification.

The non-conformance will then be recorded as stipulated in the non-conformance, corrective and preventative action procedure.

5.2 Audit Findings

All audit observations and findings will be documented in the audit check sheet which will be distributed to the relevant persons to close-out findings.

5.3 Correction/Corrective/Preventive Action

The Auditee must record all audit findings on the Audit Action Plan Sheet (**BAC-ESM-PRF-012-03**) that is under development, what the root cause for the finding is and what correction/corrective/preventive measures have been taken or are still to be taken, to rectify/address the finding.

A realistic target date for rectification/close-out of findings must be set along with an assigned responsible person, to ensure timely action is taken.

Correction/corrective/preventive action taken will be entered on the Audit Action Plan sheet by the responsible person/Auditee, who in turn will ensure that close-out of findings have been implemented and are signed-off by the relevant person assigned to close-out the findings.

5.4 Follow Up

On completion of the audit response/s, a follow-up visit will be scheduled to verify that the correction/corrective/preventive action is taken satisfactory implementation conducted and that it was effective. This verification could also take place during the next inspection/audit visit.

The Auditor, in collaboration with the Auditee, will verify that the Audit Action Plan findings have been addressed and closed-out.

Failure to ensure close-out of any previous audit finding(s) raised will result in the raising/issuing of relevant repeat findings.

5.5 Performance Review

Close-out of internal and external audit findings will be monitored monthly through the summarised status report to be submitted to the ESMS representative and relevant departmental head.

They will monitor and review findings and close-out performance and submit his/her review as part of the regular progress/compliance report to BAC top management.

5.6 Audits Conducted by External Parties

The external auditor will prepare a forecast audit schedule on a 6 month basis, indicating the areas to be audited, and frequency of the audits and the elements of the NBIA Project to be audited. The schedule will be presented to BAC ESMS representative who will communicate it to the contractors.

An audit date shall be confirmed between the external auditor and the respective contracts manager of the section of the Project which will be audited. This will be done at least 7 working days prior to the intended audit date.

Planning for the formal independent audit process is undertaken by the appointed external auditor. All management on site are responsible for familiarizing themselves with the scheduled audit activities affecting their areas of responsibility and what will be expected of them during the audit.

The external auditor will undertake the audit by observations, questioning and interviewing relevant persons and examining the documentation.

All observations and non-conformances discovered are to be recorded by the external auditor, and will be recorded by the BAC/contractor in the Audit Action Plan Sheet (**BAC-ESM-PRF-012-03**) under development and in accordance with the non-conformance procedure, where applicable. A closing meeting will be scheduled with key personnel during which the external auditor needs to provide feedback on his/her findings and to clarify any uncertainties or non-conformances observed.

6 Records

- BAC-ESM-PRF-012-01 Internal Audit Schedule
- BAC-ESM-PRF-012-02 Audit Notification
- BAC-ESM-PRF-012-03 Audit Action Plan

NEW BUGESERA INTERNATIONAL AIRPORT

RECORDING AND REPORTING OF NON-CONFORMANCES

PROCEDURE

BAC-ESM-PRO-013

REV AA

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1 Purpose

The purpose of this document is for identifying and documenting actual and potential non-conformances associated with the ESMS requirements and other compliance obligations in order for the necessary correction, corrective and preventive action to be put in place once the requirement has been identified.

2 Scope

This procedure applies to the construction phase of the NBIA Project and will be amended for the operational phase nearing completion of the construction contract.

3 Definitions, Acronyms and Abbreviations

ESMS	-	Environmental and Social Management System
BAC	-	Bugesera Airport Company
NBIA	-	New Bugesera International Airport
HSSE	-	Health, Safety, Social and Environmental
NCR	-	Non-conformity Report
CAR	-	Corrective Action Report
PAR	-	Preventative Action Report

Environmental Non-conformance –

An environmental non-conformance may arise as a result of deviations from any requirements as set out in the BAC ESMS, environmental permissions/authorizations, license/permit conditions and/or environmental incidents. Non-conformance Reports can be raised as part of routine inspections or formal audits.

Corrective Action –

Action to eliminate the cause of a detected non-conformity or other undesirable situation.

Preventive Action –

Action to eliminate the cause of a potential non-conformity or other undesirable situation.

4 Procedure

4.1 Identification of a Non-Conformance

Any employee, on identifying a non-conformance, will be expected to initiate immediate action by informing the relevant supervisor.

Non-conformities can be identified through:

- Internal and external communications;
- Emergency Preparedness and Response;
- Monitoring and measurement activities;
- Regulatory compliance requirements;
- Audits (both internally and external/third party);
- Routine inspections; and
- Outcome of incident investigations.

4.2 Raising of an Non-conformance

Environmental non-conformances may arise as a result of deviations from the C-ESMPs, ESMS and environmental approvals, licence and permit conditions.

The following actions will apply in the identification of environmental non-conformances:

- The person who identified the non-conformance will discuss the non-conformance with the relevant responsible person prior to issuing the NCR.
- A NCR will be issued if the responsible person cannot present any proof of appropriate actions taken to rectify the non-conformance
- The NCR will be raised in the non-conformance report (**BAC-ESM-PRF-013-01**), which is under development, and issued to the responsible person.
- Appropriate actions should be taken by the responsible person to re-establish compliance as soon as possible.

4.3 Corrective Action Requests/Preventative Action Requests

A corrective action request (CAR) (**BAC-ESM-PRF-013-02**) relates to a situation/circumstance that is a non-conformance or incident requiring a corrective action to eliminate the cause of the detected non-conformance.

A preventative action request (PAR) (**BAC-ESM-PRF-013-03**) relates to a situation that is a potential non-conformance and that requires a preventative action to eliminate the cause of the potential non-conformance.

The preparation and recording of the CARs/PARs, in relation to the issued Non-conformance Report will be the responsibility of the responsible person to whom the NCR was issued. The corrective action/preventative action report is to be documented, together with an agreed timeframe for implementation on the Non-conformance Report. The initiator of the non-conformance will review the effectiveness of the corrective action/preventative actions undertaken.

If the non-conformance persists after the implementation of corrective action, alternative solutions are to be examined until the closure of the non-conformance can be successfully achieved. On the successful closure of the non-conformance, the Non-conformance Report will be signed off by the initiator.

All records with regards to the effective close-out of the non-conformance need to be kept for record purposes.

5 Records

BAC-ESM-PRF-013-01	Non-conformance Report
BAC-ESM-PRF-013-02	Corrective Action Report
BAC-ESM-PRF-013-03	Preventative Action Report