

Environmental and Social Action Plan (ESAP)
Orange Sierra Leone Ltd.
Dated May 17, 2018

Action #	Description	Anticipated Completion Date
Performance Standard 1: Assessment and Management of Environmental and Social Risks and Impacts		
1.	E&S Resources and Capacity: Ensure that adequate resources are allocated to the project to manage E&S risks and impacts and have ultimate responsibility of implementing the ESMS. Capacity building will include a training plan to be agreed with MIGA.	Within 90 days of Effective Date of the Contract of Guarantee
2.	Develop and update the group's ESMP and the EHS operating procedures at the company level to ensure that: a) E&S risks and impacts of tower construction, rehabilitation and operations are assessed and mitigated to comply with MIGA's Performance Standards, before undertaking any such operation, b) company's procedure on site survey, acquisition and maintenance reports as well as contractor/sub-contractor monitoring reporting, including the template for internal E&S reports, include (i) E&S risk assessment for site selection according to the group's ESMP, and (ii) relevant E&S compliance assessment criteria in line with MIGA's Performance Standard requirements. The procedure will also define key performance indicators applicable to type of operations such as, but not limited to, visual and noise impacts, community health and safety, cultural and environmental values, fire incidents, occupational incidents and near misses, waste management, environmental spillages, and management of community grievances.	Within 90 days of the Effective Date of the Contract of Guarantee
3.	Identification of Risks and Impacts to be incorporated as part of the corporate quality	Within 90 days of the Effective Date of the

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	health, safety and environment (QHSE) management system, Orange SL Ltd. will formalize and implement: i) supply chain management audit procedures; and ii) cultural heritage management and chance finds procedures.	Contract of Guarantee
4.	Stakeholder Engagement. As part of the corporate QHSE management system, draft and implement a Stakeholder Engagement Plan, outlining mapping, engagement and disclosure activities, establish grievance management system. In addition to monitoring and evaluation for each of the three milestone-level phases: site acquisition; construction; and operations and maintenance.	Within 90 days of the Effective Date of the Contract of Guarantee
5.	Orange SL Ltd. will develop an emergency preparedness and response plan , by identifying where such emergencies may pose a risk to communities and implementing regular drills to test the efficacy of the program.	Within 90 days of the Effective Date of the Contract of Guarantee
6	Design and implement an external grievance mechanism and procedure tailored to company operations, which will channel, process and resolve all inputs received from communities and stakeholders through a consolidated system.	Within 90 days of the Effective Date of the Contract of Guarantee

Performance Standard 2: Labor and Working Conditions		
7.	The company will incorporate into the group's HR policy 's key components (such as entitlement to a contract specifying terms and conditions of work, code of conduct, social security, non-discrimination and equal opportunities, anti-harassment, grievance management, freedom of association, child labor and forced labor prohibition) into its contracts with contractors and franchises and ensure compliance through training and auditing.	Within 90 days of the Effective Date of the Contract of Guarantee
8.	Incorporate in HR policy and procedures , statements on recognition and respect of employees' rights to join a lawful organization of their own choosing and commitment to comply with the laws pertaining to freedom of association and collective bargaining across all its locations, whether there is a representation system or not. These statements will be adopted in Orange's HR Procedures.	Within 180 days of the Effective Date of the Contract of Guarantee
9.	Incorporate in termination procedure a statement on handling collective dismissals due to economic, technical or organizational conditions and include a commitment to prepare a retrenchment plan, when necessary, in line with PS2 requirements.	Within 180 days of the Effective Date of the Contract of Guarantee
10.	Update the Grievance and Disciplinary Procedures to include a formalized grievance mechanism procedure which will be implemented and communicated widely, covering all types of employment (full-time, part-time, short-term, contractor, franchise). It will provide alternatives for employees to raise concerns other than to the immediate supervisors and will allow grievances to be submitted anonymously. Develop and implement appropriate measures to enhance awareness and use of the mechanism.	Within 90 days of the Effective Date of the Contract of Guarantee
11.	Orange SL Ltd. will develop a risk register applicable to the company and to its contractors, to include all Occupational Health and Safety (OHS) risks associated with the company's	Within 90 days of the Effective Date of the

	operations and sites, including physical, chemical, and electromagnetic radiation (EMF) hazards, and specific threats to women. For each risk identified, the company will develop and implement suitable mitigation, the training required for such mitigation to be effective together with formal records of such training. Orange SL Ltd. will maintain up-to-date OHS indicators of performance.	Contract of Guarantee
12.	Strengthen the oversight of contractor and sub-contractor training requirements in line with the group's ESMP, through inclusion, in the contract clauses, of a requirement for a training plan tailored to the needs of the operation; and define and adopt adequate indicators to monitor performance and completion of trainings by the contractor, including sub-contractor staff. The training plan will specifically cover the following: a) ESMP site selection and assessment criteria under ESAP 1. b) OHS Standard Operating Procedures/SOPs of the company (incident reporting, work at heights, fire and electrical safety, first aid, PPE etc.)	Within 120 days of the Effective Date of the Contract of Guarantee
Performance Standard 3: Resource Efficiency and Pollution Prevention		
13.	Develop a comprehensive non-hazardous waste and hazardous material procedure including but not limited to: inventory, labelling, handling and storage, disposal and storage of PCB and ODS containing equipment, phase-out plan, material safety data sheets, site emergency intervention measures (spill kits etc.), auditing, and include terms in contractor agreements that cover pollution prevention and abatement.	Within 90 days of the Effective Date of the Contract of Guarantee
14.	Develop and ensure that a noise monitoring plan is in place carried out for the purposes of establishing the existing ambient noise levels in the area of the proposed or existing tower and verify operational phase noise levels.	Within 90 days of the Effective Date of the Contract of Guarantee
Performance Standard 4: Community Health Safety and Security		
15.	Develop and ensure that a third-party review of the security risk assessment and	Within 90 days of the

management plans are consistent with the requirements of PS4. The risk assessment and management plan will ensure that safeguarding of personnel and property is carried out in accordance with relevant human rights principles and in a manner, that avoids or minimizes risks to the affected communities.

Effective Date of the
Contract of Guarantee