

Environmental and Social Management System

**investenergy**

Version: [ ]

Effective Date: [ ]

Company Name | Environmental and Social Management System Manual

# ENVIRONMENTAL AND SOCIAL POLICY

## Notes:

[Insert your environmental and social policy statement here, to be signed by senior management]

Guidance here: [environmental and social policy](#)

## Sample:

[Name of Company] is in the business of XXXXXXX, providing access to cleaner energy solutions for our clients and their communities. Our business is anchored towards [describe business strategy and contribution to overall climate goals]. To do this successfully and sustainably, we are committed to the following principles in our operations:

- Designing, developing, operating, and maintaining microgrid systems in a safe, reliable, and environmentally and socially responsible manner;
- Complying with the relevant national regulations in our project jurisdictions;
- Aligning with the requirements of the International Finance Corporation (IFC) Performance Standards, World Bank Group General Environmental Health and Safety (EHS) Guidelines, UN Guiding Principles on Business and Human Rights, as they apply to the nature and risks of our business operations;
- Partnering with clients whose businesses do not belong to our exclusion list.
- Communicating environmental and social expectations to all staff (including contractors), clients, investors and other external stakeholders;
- Continually improving the overall environmental, social and health and safety performance of our projects through enhanced risk management;
- Continually building capacity of our staff on environmental, social, and health and safety topics that are relevant to our business.

# 1 INTRODUCTION

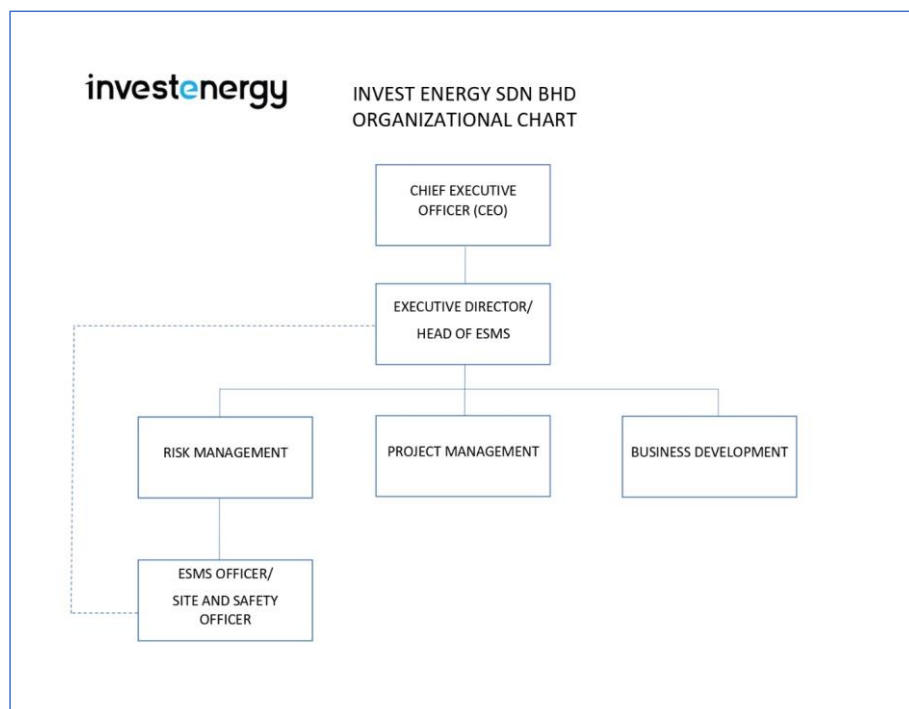
Invest Energy is committed to implementing effective environmental and social (E&S) practices in all our business activities consistent with our Environmental and Social Policy in accordance with the applicable requirements listed in 1.1. Roles and responsibilities for ensuring the implementation and continuous improvement of this ESMS manual are detailed in 1.2.

## 1.1 APPLICABLE REQUIREMENTS

Invest Energy will ensure that our projects are aligned with the following standards:

- Applicable local, national and international environmental and social legislation
- International Finance Corporation (IFC) Performance Standards (2012 version)
- AIIB Environmental and Social Policy (2016, updated 2019)
- UN Guiding Principles on Business and Human Rights
- ILO Declaration on Fundamental Principles and Rights at Work
- ILO Basic Terms and Conditions of Employment
- World Bank Group (WBG) General Environmental, Health and Safety (“EHS”) Guidelines

## 1.2 ROLES AND RESPONSIBILITIES



The company organisational structure is shown in **Figure X** below:

The following positions are responsible for implementing this ESMS at varying levels:

**Chief Executive Officer** – The CEO retains overall accountability for the ESHS risk management of the Company. The CEO will take responsibility for oversight of E&S on a management level, including the Company's environmental and social strategy and policies, the integration thereof within the company, including appointing or hiring qualified staff to manage the ESMS implementation and reporting. The CEO will approve any revisions made to this ESMS Manual.

**Executive Director / Head of ESMS** – The Executive Director will lead the implementation of the ESMS at the company level. The ESMS Officer will work with the BD Manager in the early identification of potential environmental, social and health and safety (ESHS) risks and impacts from the project inception stage, and will supervise project-based staff (i.e. project engineers or health and safety officers) in the effective management of ESHS issues during construction and operation. The ESMS Officer will also be responsible for ESHS data collection and management, and periodic reporting to the Company's investors.

**Business Development Manager** – The Business Development Manager is responsible for sourcing projects and working with the ESMS Officer in the early identification of potential ESHS risks and impacts that need to be incorporated in detailed design and permitting requirements.

**Project Health and Safety Officer** – The Project Health and Safety Officer is responsible for the daily implementation of this ESMS at the project level, including ensuring that project-specific management plans and work instructions related to environmental, social, and health and safety are properly implemented, and that all relevant permit obligations are being complied with. The Project Health and Safety Officer is responsible for the implementation and recording of the Company's external grievance mechanism, collecting ESHS data at the project level, and reporting to the Company ESMS Officer.

### 1.3 TRAINING

The Company will conduct an annual review of the training needs of the team and develop a training plan to fill training needs, whether through internal (online, on-the-job training) or external means. The ESMS Officer will develop the training plan and keep training records for each year.

## 2 PROJECT DEVELOPMENT CYCLE

STAGE 1: CLIENT IDENTIFICATION	STAGE 2: PRE-PROJECT ACCEPTANCE	STAGE 3: DEVELOPMENT/CONSTRUCTION STAGE	STAGE 4: OPERATION AND MAINTENANCE STAGE
<ol style="list-style-type: none"> <li>1. Ascertain whether the client falls within the exclusion list of Invest Energy</li> <li>2. Ascertain any adverse reports/ findings, allegation news of the company on public domain</li> <li>3. Review of the client sustainability charter / commitment.</li> </ol>	<ol style="list-style-type: none"> <li>1. RFI for Project Screening Checklist</li> <li>2. Review if Screening Findings are acceptable and meets Invest Energy requirements</li> <li>3. If not acceptable, review and discussion with client towards improvement plan</li> </ol>	<ol style="list-style-type: none"> <li>1. Project specific ESHS risks plan to be identified and implemented.</li> <li>2. Aligning client and vendors to the company ESMS Policy and site specific ESHS plan</li> <li>3. Monthly review on the adequacy of the ESHS plan</li> </ol>	<ol style="list-style-type: none"> <li>1. Site specific ESMS risk plans for operation</li> <li>2. Monthly review with site safety officer</li> <li>3.</li> </ol>

Commented [J1]: To include outputs/deliverables

### 2.1 OVERVIEW

Integrating environmental, social and health and safety considerations in our business activities are closely interlinked with our project development cycle. In each stage, we seek to enhance our ESHS risk management through incorporating ESHS considerations throughout the different stages of development as shown in Figure XX below:

### 2.1.1 CLIENT IDENTIFICATION

As soon as the Company has identified a prospective client, a due diligence review will be initiated by the ESMS Officer, and a project screening checklist form will be completed, a sample of which is presented in **Annex XX**. The gaps and risks identified as part of the initial due diligence review will be summarised in the project screening checklist form, and will inform the detailed design process, or onward discussion and negotiation with the client. Before moving to development stage, a project-specific construction environmental and social management plan (CESMP) will be developed to aid in managing project-specific ESHS risks which have been identified and summarised in the project screening checklist form. A permit register will also be developed for the project, which will include relevant environmental and health and safety related permits required specific to each project. For projects with multiple sites, site specific permits will be detailed when required.

### 2.1.2 PRE-PROJECT ACCEPTANCE

Once the project reaches the development stage, the ESMS Officer will coordinate with the Project Health and Safety Officer in the implementation and progress reporting of the CESMP, including disclosure and implementation of the grievance mechanism procedure. The ESMS Officer will also track compliance with the permit register, in coordination with the Project Health and Safety Officer.

### 2.1.3 PROJECT DEVELOPMENT STAGE

Project-specific operational risks and impacts during operation phase will be managed in accordance with the operation phase environmental and social management plan (OESMP), to be developed by the ESMS Officer and the technical team. The ESMS Officer is responsible for clearly communicating client responsibilities in the OESMP.

### 2.1.4 OPERATIONS AND MAINTENANCE

Project-specific operational risks and impacts during operation phase will be managed in accordance with the operation phase environmental and social management plan (OESMP), to be developed by the ESMS Officer and the technical team. The ESMS Officer is responsible for clearly communicating client responsibilities in the OESMP.

## 2.2 IDENTIFICATION OF RISKS AND IMPACTS

Table XX lists the environmental, social and health and safety risks that are typically associated with Invest Energy's nature of business activities and geographical footprint.

The risk magnitude and likelihood of each potential risk will be assessed on a per project basis.

Table XX. Potential ESHS risks and impacts associated with Invest Energy's business.

Development phase		
Environmental	Social	Health and safety
▪ Xx ▪ Xx ▪ xx	▪ xx ▪ xx ▪ xx	▪ xx ▪ xx ▪ xx
Construction phase		
▪ Xx ▪ Xx ▪ xx	▪ Xx ▪ Xx ▪ xx	▪ xx ▪ xx ▪ xx
Operation phase		
▪ Xx ▪ Xx	▪ xx ▪ xx	▪ xx ▪ xx

## 2.3 MANAGEMENT PLANS

Invest Energy has developed the following management plans which are to be implemented across all our projects, which can be found in Annex XX:

- Supply Chain and Contractor Management Plan
- Waste (Hazardous and Non-Hazardous) Management Plan
- Security Management Plan
- Health and Safety Management Plan

Other specific management plans will be developed on a per project basis, depending on the outcomes and recommendations in the project-specific due diligence exercise.

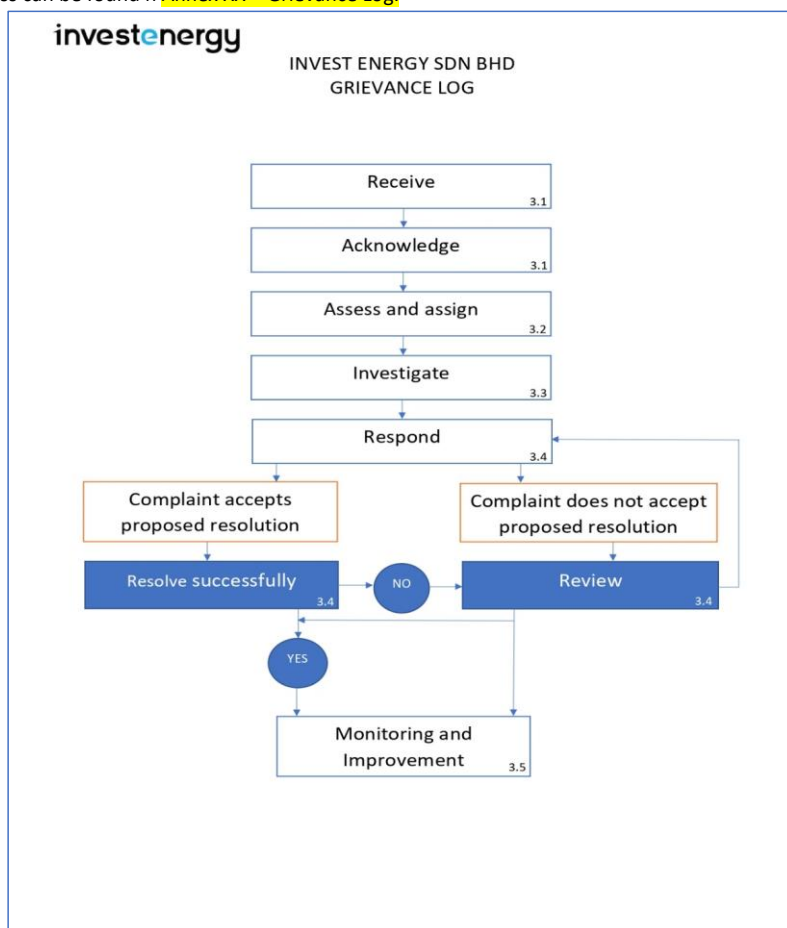
**Commented [PC2]:** These should be developed as a minimum

### 3 EXTERNAL COMMUNICATION AND GRIEVANCE MECHANISM

Invest Energy will develop, maintain and disclose an external communication and grievance mechanism procedure to receive and address feedback or complaints received from external stakeholders, anonymous or not, in relation to Invest Energy, its employees and sub-contractors, or projects. The external communication and grievance mechanism procedure will be available via the following channels:

- Website - [www.investenergygroup.com/contact](http://www.investenergygroup.com/contact)
- Email – XXX
- Tel -

The overall process flowchart is presented in Figure XX. A sample grievance log documenting this process can be found in Annex XX – Grievance Log.



**Commented [PC3]:** You can create something similar, depending on your preference:

<https://www.darzin.com/blog/grievance-procedure/>

<https://www.woodside.com.au/sustainability/part-of-the-community/community-concerns>

<https://www.amfori.org/sites/default/files/amfori%20External%20Grievance%20Mechanism%20policy-.pdf>



### 3.1 RECEIVING AND ACKNOWLEDGING FEEDBACK

Describe here how you would receive and acknowledge feedback, who is responsible for receiving and acknowledging feedback across the different channels.

### 3.2 SCREENING AND EVALUATING FEEDBACK

Describe here how you would record the feedback, process for screening and evaluating whether the feedback is valid or not, and resources involved. This is also the stage where you assess whether the feedback is something you can resolve internally via further investigation, or if there is a need to refer the issue to another channel (e.g. local police for further investigation in case there's report of insider job/theft, personal threats, or similar).

### 3.3 INVESTIGATION

For valid feedback, describe the process for further investigation and resources involved. Might entail conducting further interview with the feedback originator (if not anonymous) to understand context and root cause of the issue.

### 3.4 RESOLUTION AND CLOSURE

Describe how you would resolve and close an issue, including time expectations. Also include provision for an appeal within a certain timeframe, after which you would consider an issue fully closed.

### 3.5 MONITORING AND IMPROVEMENT

Describe monitoring process, including management improvement measures to ensure they do not recur.

## 4 EMERGENCY PREPAREDNESS AND RESPONSE

**Invest Energy** has undertaken a screening of emergency risks that are relevant to the Company's business operations and have developed emergency response procedures accordingly.

Invest Energy will ensure that all employees and contractors working on site are aware of the following procedures:

#### 4.1 FIRE RESPONSE PROCEDURE

## 4.2 INCIDENT/INJURY PROCEDURE

**Commented [PC4]:** You can refer and adapt/tweak the example in the IFC ESMS Toolkit here:  
[https://www.ifc.org/wps/wcm/connect/6147cbba-efe8-4879-ba77-c7af63bde7c/ESMS\\_Toolkit\\_General.pdf?MOD=AJPERES&VID=nzhmvxc](https://www.ifc.org/wps/wcm/connect/6147cbba-efe8-4879-ba77-c7af63bde7c/ESMS_Toolkit_General.pdf?MOD=AJPERES&VID=nzhmvxc)  
pg 38/72

## 5 PERFORMANCE REPORTING

### 5.1 INVESTOR REPORTS

Describe reporting requirements here including frequency and manner of disclosure.

**Commented [PC5]:** SUSI reporting requirements:

Monthly – during construction, for each asset

Quarterly  
Annual

### 5.2 REGULATORY REPORTING

Describe if there's any regulatory reporting required of the Company, or if there's any regulatory reporting inputs required from you by your clients.