

Appendices to Annex 6

Environmental & Social Management System

GCF Board | Final Version JUNE 2023

2023

BLUE GREEN BANK
A GREEN CLIMATE FUND INITIATIVE



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Appendix 1: BGB E&S Exclusion List

BGB adopts the following Exclusion List, whereby it does not finance the following projects:

Exclusion	Description
<p>Transactions that are categorised by BGB as being Category A projects.</p>	<p>Category A projects may have significant adverse environmental and/or social impacts that are irreversible, sensitive, diverse, or unprecedented in the absence of adequate mitigation measures. Category A subprojects are considered high risk. The following examples of E&S risks and impacts (per IFC Performance Standards) would lead the subproject to be categorized as Category A (and hence excluded from financing):</p> <ul style="list-style-type: none"> • PS2: subprojects that would involve poor working conditions (high overtime, lack of retrenchment plans management, absence of working contracts, etc.) • PS3: Processing and disposal installations for the incineration, chemical treatment or landfill of hazardous waste, Waste disposal installations for the incineration or chemical treatment of non-hazardous waste with a capacity exceeding 100 tonnes per day. • PS4: Works for the transfer of water resources between river basins where this transfer aims at preventing possible shortages of water and where the amount of water transferred exceeds 100 million cubic metres/year • PS5: subprojects that would involve the involuntary resettlement of a significant number of people (i.e., >200 people) or would involve the involuntary resettlement of informal settlers. • PS6: subprojects that would be developed in critical habitats, such as wetlands or forests with high biodiversity value. • PS7: subprojects that would affect land upon which Indigenous People reside (or seasonally migrate over) or who retain ties to the land through traditional ownership or customary usage. • PS8: subprojects that would have a perceptible impact on areas of cultural or archaeological significance.
<p>Projects that impact certain socio-cultural groups and projects involving significant alteration, damage or removal of way critical cultural heritage</p>	<p>There are certain socio-cultural groups present in or use the project area who may be considered as “tribes” (hill tribes, schedules tribes, tribal peoples), “minorities” (ethnic or national minorities), or “Indigenous communities”. Those groups may be:</p> <ul style="list-style-type: none"> - Either significantly adversely impacted by a project that would fall under Category A; and/or - Not consulted under Free, Prior and Informed Consent principle; and/or - Withholding their consent under Free, Prior and Informed Consent principle. - Cultural heritage consists of internationally and nationally recognised historical, social and/or cultural heritage.
<p>Activities or materials deemed illegal under Barbados laws or regulations or international conventions and agreements, or subject to</p>	<p>Activities or materials deemed illegal can include (but not limited to):</p> <ul style="list-style-type: none"> - Trade in wildlife or wildlife products regulated under the Convention on International Trade in Endangered Species or Wild Fauna and Flora (“CITES”);

Exclusion	Description
international phase-outs or bans.	<ul style="list-style-type: none"> - Unsustainable fishing methods (e.g., blast fishing and drift net fishing in the marine environment using nets in excess of 2.5Km in length); - Production, use of or trade in pharmaceuticals, pesticides/herbicides, chemicals, ozone depleting substances and other hazardous substances subject to international phase-outs or bans.
Production or activities involving harmful or exploitative forms of forced labour or child labour.	<p>Forced labour means all work or service, not voluntarily performed, that is extracted from an individual under threat of force or penalty as defined by ILO conventions.</p> <p>Persons may only be employed if they are at least 14 years old, as defined in the ILO Fundamental Human Rights Conventions (Minimum Age Convention C138, Art. 2), unless local legislation specifies compulsory school attendance or the minimum age for working. In such cases the higher age shall apply.</p>
Destruction of critical habitat, any forest project under which no sustainable development and managing plan is carried out, and/or of High Conservation Value areas.	<p>Destruction means the (1) elimination or severe diminution of the integrity of an area caused by a major, long-term change in land or water use or (2) modification of a habitat in such a way that the area's ability to maintain its role is lost.</p> <p>High Conservation Value (HCV) areas are defined as natural habitats where these values are considered to be of outstanding significance or critical importance (see http://www.hcvnetwork.org)</p>
Transactions that are with Borrowers where the primary business activities are in prohibited sectors.	<p>The following are prohibited sectors:</p> <ul style="list-style-type: none"> - Gambling; - Media communications of an adult or political nature; - Military production or sales; - Alcoholic beverages; - Tobacco and related products; - Production or trade in radioactive materials. This does not apply to the purchase of medical equipment, quality control (measurement) equipment or any other equipment where the radioactive source is understood to be trivial and/or adequately shielded; - Production or trade in unbonded asbestos fibres. This does not apply to purchase and use of bonded asbestos cement sheeting where the asbestos content is less than 20%; - Cross-border trade in waste and waste products, unless compliant with the Basel Convention and the underlying regulations; - Any activity involving live animals for scientific and experimental purposes, including the breeding of these animals; - Production, trade or use of ozone depletion potential (ODP) refrigerants.

Exclusion	Description
<p>Transactions involving separate funding from the Green Climate Fund.</p>	<p>BGB will avoid providing financing involving separate funding from the Green Climate Fund without its consent to do so. This is to avoid the potential for double counting of climate impact.</p>
<p>Bioenergy (including biofuels) transactions with the following characteristics.</p>	<p>The following are prohibited characteristics for bioenergy transactions:</p> <p>First generation biofuels that are produced from edible energy crops regardless of the Global Hunger Index and food security assessment of the host countries.</p> <p>Biofuels grown in areas converted after 2015 from land with previously high carbon stock, such as wetlands or forests.</p> <p>Biofuels produced from raw materials obtained from land with high biodiversity, such as primary forests or highly biodiverse grasslands.</p>
<p>Hydrogen transactions with the following characteristics.</p>	<p>Any hydrogen other than produced from water electrolysis powered by 100% renewable energy.</p>
<p>Transportation transactions with the following prohibited characteristics.</p>	<p>The following are prohibited characteristics for transportation transactions:</p> <p>Deployment of any type of fossil fuel-based vehicles and vessels including hybrids.</p> <p>Deployment of CNG buses, the fuel supply of which cannot be 100% secured by locally sourced renewables during the lifetime of the buses.</p> <p>Any form of financial support to promote ownership of private vehicles including electric vehicles.</p> <p>Any road construction</p>

Appendix 2: BGB Eligibility List

Minimum Screening Criteria (yes to all to proceed)	
A.	Geography: The project or programme located in Barbados
B.	Financial: The amount requested has a positive financial return
C.	Governance: the project does not fall into the prohibited or exclusionary investment list <i>*list will be provided in the operational arrangements document to be developed</i>
D.	Climate: The project or programme is addressing a material (current or future) climate risk and impact in its country(ies) of operation either by addressing SDG 3, climate action by strengthening resilience and adaptive capacity to climate-related hazards and natural disasters and/or reducing GHG emissions
E.	Mitigation (if applicable): The project or programme's activities contribute to the reduction of GHG emissions in line with the Bank's target geographies and respective NDC targets <i>and/or</i> Adaptation (if applicable): The project or programme's activities will provide direct and/or indirect benefits to communities by increasing their ability to adapt to, or absorb, climate change stresses, shocks and variability and/or by helping reduce exposure to them
F.	Environmental: The project or programme is a Category B or C
G.	Funding sources: The project has determined that traditional funding sources are insufficient to fund the project to scale
H.	SDG: the project/programme is aligned or meets the SDG targets

Additional questions include:

Environmental & Social and Gender responsiveness: does the proposed initiative align with the bank's environmental and social safeguard policies and management systems and the gender action plan? (Under section 3 of the tool)	
3.1.1.	The activities comply with all environmental and planning laws, regulations and permits in all material respects
3.1.2.	The activities will not cause significant negative environmental impact
3.1.3.	There is no potential for the release into the environment of hazardous materials (e.g., persistent organic pollutants, ozone depleting substances, mercury and/or other heavy metals, etc.) resulting from their production, transportation, handling, storage and/or use for the project activities.
3.1.4.	The proposed project would not result in involuntary resettlement of populations

3.1.5.	The project will not cause an increase in public health risks to contagious diseases or transmission (e.g., HIV/AIDS, Malaria, etc.) for project workers or communities in the project area, as a result of a change in living and working conditions
3.1.6.	The project or programme location subject to currently approved land use plans (e.g., roads, settlements), will not negatively affect the environmental and social sustainability of the project
3.1.7.	There is a grievance mechanism that has been developed and agreed with concerned communities that has been disseminated to the concerned right holders

Appendix 3: Outline of typical ESMS for FI and NFI

BGB requires FI and NFI intermediaries to develop an E&S Management System to manage E&S risks throughout the project lifecycle. This should ensure that the subprojects are developed in compliance with the standards outlined in BGB's E&S Policy. This Appendix provides an outline of the typical components of an ESMS for FIs and NFIs, based on the requirements of IFC Performance Standard 1¹ and the IFC Performance Standards Interpretation Note on Financial Intermediaries².

Financial Institution ESMS

The ESMS of an FI should typically comprise the elements shown in Figure 1 below. The ESMS should be tailored towards the size and complexity of the FI, the nature of the financial services it offers and the transactions and investments it makes and the level of E&S risk the FI is exposed to through these services and transactions and/or investments. The elements of Figure 1 are briefly explained below.

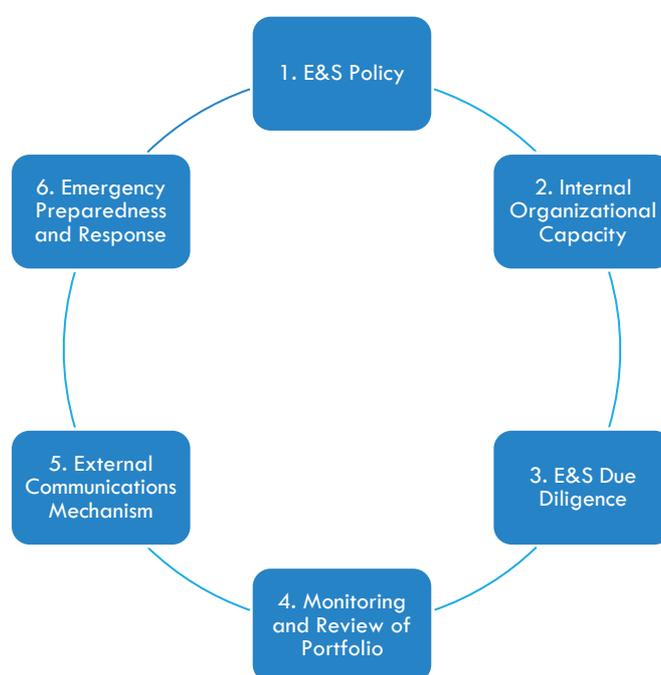


Figure 1: Outline of an FI ESMS

1. E&S Policy

FIs are required to develop an overarching E&S Policy that defines the institution's E&S objectives and principles as well as the E&S requirements and standards that the FI will apply in its lending or investment activities. The E&S Policy should also

¹ https://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/sustainability-at-ifc/policies-standards/performance-standards/ps1

² https://www.ifc.org/wps/wcm/connect/topics_ext_content/ifc_external_corporate_site/sustainability-at-ifc/publications/publications_policy_interpretationnote-f#:~:text=The%20Interpretation%20Note%20on%20Financial,the%20activities%20and%20operations%20of

refer to an E&S Exclusion List, should include a commitment to comply with applicable E&S laws and regulations of the countries where the FI operates or provides financing / invests as well as a commitment to develop and maintain the necessary internal capacity to implement the ESMS. The E&S Policy should be endorsed by the institution's senior management, to signal the institution's commitment to E&S.

2. Internal Organizational Capacity

FIs are required to designate E&S responsibilities to qualified E&S staff. This includes that sufficient human and financial resources should be available for the implementation of the ESMS. The required internal E&S capacity depends on the FI's exposure to E&S risks through its portfolio. Ultimate responsibility for the ESMS lies with the FI's senior management, while certain operational E&S tasks might be outsourced, e.g., because they require specific expertise that the FI does not possess. FIs should ensure that staff with E&S responsibilities are and remain knowledgeable and compete for managing E&S risks and implementing the ESMS. As such, the FI should ensure that sufficient training opportunities are offered.

3. E&S Due Diligence

FIs are required to assess the E&S risks of individual transactions / investments through an E&S Due Diligence (ESDD) process. How the ESDD is conducted depends on the E&S Risk Categorization of the transaction / investment. The E&S risks of higher-risk transactions / investments are usually assessed through: (1) a document review, (2) an assessment of E&S risks against the applicable E&S standards (including applicable E&S laws and regulations), (3) a site visit to the target project or company, including meetings with stakeholders, and (4) a review of the borrower's / investee's E&S track record on E&S issues (including any non-compliances). The FI will engage external specialists for Higher-Risk transactions / investments or for any transaction for which internal E&S capacity is insufficient. As part of the ESDD process, an E&S Action Plan (ESAP) needs to be developed which lists the gaps against the applicable E&S standards as well as proposed mitigating measures. The ESAP should always be included in the legal documentation of a transaction / investment, which further includes E&S clause (including a commitment to implement the ESAP).

4. Monitoring and Review of Portfolio

FIs are required to monitor each individual borrower's / investee's E&S performance. The monitoring process should be guided by the level of E&S risk of the transaction / investment, i.e., those with higher risk levels require more frequent and in-depth monitoring. The E&S performance includes the borrower's / investee's compliance with the ESAP, its exposure to any new E&S risks, any changes to the borrower's / investee's ESMS, and major incidents that happened during the reporting period. If the FI provides lending or invests in another FI, the monitoring needs to include a review of the FI's portfolio (e.g., sector exposure, E&S Risk Category breakdown).

5. External Communication Mechanism

FIs are required to develop and maintain an external communication procedure, including a grievance mechanism through which external stakeholder can submit complaints with the FI. The FI is also required to develop a grievance management procedure, including receiving, registering, screening, assessing, responding to and tracking the status of grievances. In addition to the grievance mechanism, the FI is also required to develop external communication mechanisms through which external stakeholders can express their views, opinions, concerns, etc.

6. Emergency Preparedness and Response

FIs are required to develop and maintain Emergency Preparedness and Response (ERP) plans to ensure the health and safety of its employees and visitors. These plans should identify roles and responsibilities for communicating different types of emergencies to the authorities and should include training and practice requirements.

Non-Financial Institution ESMS

The ESMS of an NFI should typically comprise the elements shown in Figure 1 below. The ESMS should be tailored towards the size, complexity, and operational activities of the NFI. The elements of Figure 1 are briefly explained below.

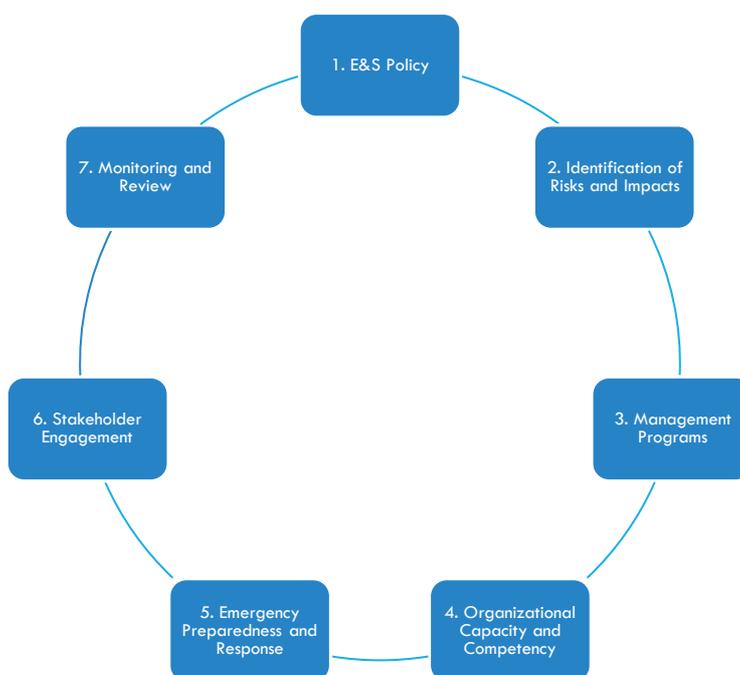


Figure 2: Outline of an NFI ESMS

1. E&S Policy

The NFI is required to develop an overarching E&S Policy that defines the E&S objectives and principles that will guide the NFI’s E&S performance. The Policy should include a commitment to complying with applicable E&S laws and regulations and should state any other E&S standards and requirements that are implemented. As such, the Policy provides a framework for assessing and managing the environmental and social risks relevant to NFI’s operations. The Policy should identify the relevant person with the NFI organization who is responsible for the implementation of the Policy.

2. Identification of Risks and Impacts

The NFI will develop a process for identifying the E&S risks of the project, the scope and required level of effort of which are guided by the type, scale, and location of the project. The process may require a full-scale Environmental and Social Impact Assessment (ESIA) or more limited or focused assessments. The E&S risks of existing assets could be identified through E&S compliance audits. The E&S risk and impact identification process should cover all relevant environmental and social risks in the project’s area of influence, including those under IFC Performance Standard 2-8. Types of impacts that should be assessed include direct impacts from the project (planned and unplanned), indirect impacts, impacts caused by Associated Facilities (i.e., facilities that are not funded as part of the project but would not have been constructed without the project), and cumulative impacts.

3. Management Programs

The NFI is required to develop programs to mitigate the identified adverse environmental and social impacts. These plans will follow the mitigation hierarchy, i.e., adverse impacts should first be avoided and only if that is not feasibly possible, they should be mitigated. Management programs may include operational procedures, practices, plans, guidance documents, etc. depending on the nature and scale of the project.

4. Organizational Capacity and Competency

The NFI is required to develop and maintain an organization structure that clearly identifies E&S roles and responsibilities. Staff with E&S responsibilities should be knowledgeable and competent to manage E&S risks and implement the ESMS. External expertise might need to be engaged for identifying the E&S risks of potentially Higher-risk projects.

5. Emergency Preparedness and Response

The NFI is required to develop and maintain an Emergency Preparedness and Response (ERP) system that is relevant to the potential accidents and emergencies that could be associated with the project. The preparation of an ERP system requires the identification of potential accidents and emergencies, the persons or communities that might be impacted, response procedures, roles and responsibilities, communication protocols, etc. The NFI is required to cooperate with local authorities and potentially Affected Communities as applicable.

6. Stakeholder Engagement

The NFI is required to conduct stakeholder engagement throughout the project lifecycle. Stakeholder engagement is critical for the successful identification and management of E&S risks. It comprises stakeholder analysis and planning, disclosure and dissemination of information, consultation and participation, grievance mechanism and ongoing reporting to Affected Communities.

7. Monitoring and Review

The NFI is required to monitor the effectiveness of the measures it has implemented to mitigate E&S risks and to monitor the exposure to any new E&S risks throughout the project lifecycle. The extent of E&S monitoring should be commensurate with the level of E&S risk associated with the project.

3	Does the intermediary have a recorded ongoing and/or historical pollution event associated with its site(s)?	Y/N/NA	Comments
4	Is the intermediary aware of any significant complaints or grievances, or adverse media campaigns from external stakeholders, including NGO's, interest groups or local communities surrounding the project/company, clients and other stakeholders?	Y/N/NA	Comments
5	Is the intermediary involved current and / or historical and / or planned land acquisition that leads to: i) Involuntary Resettlement; and / or ii) Economic and occupational displacement.	Y/N/NA	Comments
6	Has the intermediary been subject to any class actions, prosecutions, or lawsuits where claim is for >25% annual turnover?	Y/N/NA	Comments
7	Have there been any emergency incidents in the past year that resulted in threat to life (fire, bomb threat, explosion, active shooter, chemical/biological/radiological (CBR) emergencies etc.)?	Y/N/NA	Comments
8	Is the intermediary planning property expansions / new sites on undeveloped land?	Y/N/NA	Comments
9	Has the FI intermediary, through its lending or investment activities, been involved in serious environmental or social incidents?	Y/N/NA	Comments
SOCIAL ISSUES			
Substantial job losses	Are substantial job losses or economic displacement expected to arise from the subproject or restructuring of the investment? Or have they occurred already as a result of the subproject?		
Project and Associated facilities, area	Will the subproject's construction or operations result (or have already resulted) in resettlement or		

of influence and: Resettlement	economic displacement of people, involuntary or otherwise? If so, was there/will there be a Resettlement Action Plan (RAP)/ Livelihood Restoration Plan (LRP)? Was compensation given? Has this been monitored? Are there any outstanding claims/liabilities?		
Stakeholder concerns	Are subproject's stakeholders (including NGOs) currently expressing any concerns about the project or any of the proposed investors/contractors? Are such concerns likely?		
Operation of labour	Is there a risk that the subproject would not be constructed/ operated in line with fundamental ILO conventions/PS2 requirements? E.g., child or forced labour, discrimination, refusal to allow freedom of association and collective bargaining.		
Indigenous peoples	Will/has the subproject affected Indigenous peoples? Has there been Free, Prior and Informed Consent (FPIC)? Is there Broad Community Support for the project?		
Cultural Heritage	Is the subproject in a location that affects or likely to significantly affect cultural heritage?		

Appendix 5: Initial Investment Committee Decision Meeting Paper

INTERMEDIARY DETAILS	
Type of Intermediary (FI or NFI)	
Name of Intermediary	
Name of subproject(s)	
Sector	
Sub-sector	

MATERIAL E&S RISK SUMMARY	
Inherent E&S Sector Risks Identified	<ul style="list-style-type: none"> • • •
Transaction specific E&S Risks	<ul style="list-style-type: none"> • • •
Issues Identified	

APPLICABLE IFC PERFORMANCE STANDARDS			
PS 1: ESMS	YES / NO	PS 5: Land Acquisition	YES / NO
PS 2: Labour	YES / NO	PS 6: Biodiversity	YES / NO
PS 3: Resource Efficiency	YES / NO	PS 7: Indigenous People	YES / NO
PS 4: Community	YES / NO	PS 8: Cultural Heritage	YES / NO
Comments			

OTHER E&S STANDARDS	
Include any other E&S Standards that apply	
Include any other E&S Standards that apply	
Comments	

INITIAL E&S RISK CATEGORIZATION	
IFC Risk Category NFI Intermediary: Category B or C / FI Intermediary: Category FI-2 or FI-3)	(Category B/FI-2 or/ FI-3)
IFC Risk Description	
Comments	

E&S DUE DILIGENCE PLAN	
E&S Due Diligence Requirements	
Timelines	
Cost Implication	

E&S SPECIALIST RECOMMENDATION	
<input type="radio"/> Proceed with Transaction <input type="radio"/> Do not proceed with the Transaction	
Date	
Signature	

Appendix 6a: E&S Due Diligence Checklist FI Intermediaries

FI INTERMEDIARY DETAILS			
Name of the FI intermediary			
FI Intermediary description	<i>e.g., mandate, investment strategy, geographical and sectoral focus and type of FI (commercial bank, microfinance institution, etc.)</i>		
List of locations of the FI Intermediary			
Total employees	<i>include a breakdown by gender and type of contract (i.e., permanent or contract)</i>		
FI Intermediary point of contact	<i>Name, title and contact details</i>		
	Name and title	Date	Signature
Completed by			
Approved by			

CONTROVERSIES		
Has the FI Intermediary or any of its borrowers faced controversies (i.e., any material E&S events such as a labour strike, bribery and corruption allegations, gender-based violence/sexual harassment, data breach etc.) over the last 3 years? If yes, select below.		
Fines, penalties, or increased permit charges related to environmental or social issues	<input type="radio"/> Yes	<input type="radio"/> No
Complaints from regulatory agencies, interest groups, or local communities	<input type="radio"/> Yes	<input type="radio"/> No
Fatalities or serious injury	<input type="radio"/> Yes	<input type="radio"/> No
Major environmental accidents (e.g., spills, accidental pollution, fires, ...)	<input type="radio"/> Yes	<input type="radio"/> No
Strikes (with or without violence) or other labour disputes	<input type="radio"/> Yes	<input type="radio"/> No
Legal action related to environmental or social issues	<input type="radio"/> Yes	<input type="radio"/> No
Negative attention on the part of the media or non-governmental organizations	<input type="radio"/> Yes	<input type="radio"/> No

Other? Please specify.	
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If the response to any of the foregoing questions is yes, provide details of such controversy and the measures taken by the Financial Institution to address any instances of non-compliance.

FI INTERMEDIARY PORTFOLIO

Fill in the top 5 sectors of exposure

N°	Industry Sector	% of exposure/total portfolio	High E&S risk sector?
1			
2			
3			
4			
5			

E&S COMMITMENT, POLICY AND MANAGEMENT SYSTEMS

	Question	Answer	Source
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E&S Policy

1	Does the FI Intermediary have a policy that describes its approach to identifying and managing environmental and social (“E&S”) factors within the transaction and portfolio management process? If so, please request a copy and confirm that it is readily available to employees and stakeholders. If not, please confirm whether the FI Intermediary would consider adopting an E&S Policy.		
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2	Does the E&S Policy clearly articulate the E&S standards to be applied to (potential) borrowers? What are the applicable E&S standards?		
3	What is the current implementation status of the E&S Policy?		
4	Is the FI Intermediary a signatory to any ESG related standards or codes? If not, would the organization consider becoming a signatory of any of such standards or codes (e.g., UN Principles for Responsible Investment)?		
<i>Exclusion List</i>			
5	Does the FI Intermediary apply an E&S Exclusion List (i.e., specific harmful activities that will not be financed)? Is the Exclusion List aligned with BGB's Exclusion List?		
<i>E&S Risk Categorization</i>			
6	How does the FI Intermediary categorize E&S risks of investments? Is this aligned with IFC E&S Risk Categories (i.e., Category A, B and C for direct investments and FI-1, FI-2 and FI-3 for indirect investments)?		
<i>E&S Due Diligence</i>			
7	Please provide a brief overview of the E&S Due Diligence (ESDD) process undertaken by the FI Intermediary for new transaction reviews and appraisals.		
8	Who at the FI Intermediary is responsible for carrying out the ESDD (e.g., E&S Officer/Team; Investment Officer(s); depends on the investment/category/risk, etc.)?		
9	Does the ESDD process involve site visits to the client's operating sites / project sites? Are site visits conducted during due diligence of all investments? For which investments are no site visits conducted?		
10	Does the FI Intermediary have formal procedures to guide internal ESDD processes (i.e., internal E&S questionnaires / checklists, E&S action plan templates, E&S summaries for decision making, etc.)?		

11	What happens in instances where the ESDD identifies breaches / non-compliances with the E&S standards set by the FI Intermediary?		
<i>Deal Approval and Structuring</i>			
12	Which functions/decision bodies approve transactions at the FI Intermediary? How is E&S integrated into decision making?		
13	If there are formal transaction decision-making bodies in place, do they have relevant E&S expertise skills / capacity and are these bodies provided with sufficient E&S information to make informed decisions on key E&S risks and impacts?		
14	Is an E&S Action Plan (ESAP) attached to the investment documentation if any gaps have been identified during ESDD? Are any E&S clauses included in the investment documentation, e.g., on reporting requirements of the portfolio company?		
15	Does the FI Intermediary develop and include E&S clauses in the transaction's legal documentation to ensure that borrowers comply with the FI Intermediary's E&S requirements throughout the tenure of the loan?		
<i>E&S Monitoring</i>			
16	Are borrowers/subprojects required to routinely report on any E&S information?		
17	What E&S Monitoring activities does the FI Intermediary undertake to understand new and existing E&S risk exposures post approval (e.g., site visits, client engagements, monitoring templates, etc.)?		
18	Is the frequency of E&S Monitoring informed by the E&S Risk Category that was assigned to the company? If yes, please provide details.		
19	What evidence is there that E&S monitoring of the FI Intermediary's borrowers shapes and informs the organization's transaction practices and decision-making processes (i.e., lessons learnt, etc.)?		
<i>E&S Capacity and Competency</i>			

20	How are responsibilities for implementing the E&S Management System and for identifying and mitigating E&S risks and impacts designated within the FI Intermediary's organization? Please especially highlight whether the FI intermediary has an E&S Manager with years of experience and whether this is a Full Time Employee.		
21	Has a specific budget been allocated to the implementation of the E&S policy and ESMS?		
22	Does the FI Intermediary have appropriate training procedures in place for employees on the institution's E&S management system? Please explain.		
<i>Stakeholder Engagement</i>			
23	What are the FI Intermediary's requirements for borrowers on stakeholder engagement? Are these aligned with BGB's requirements for stakeholder engagement at sub-project level?		
24	How does the FI Intermediary ensure that borrowers engage stakeholders in conformance with its own and BGB's requirements?		
<i>Grievance Mechanism</i>			
25	Does the FI Intermediary have an external grievance mechanism in place? Does this mechanism protect the confidentiality of the grievant and does it ensure the impartial assessment of the complaint?		
26	Has the FI Intermediary received any significant grievance in the past 3 years? Have these been resolved? If not, what are the main reasons for the unresolved grievances?		
27	Does the FI Intermediary require borrowers to develop a grievance mechanism? What are the requirements for this mechanism?		

E&S MANAGEMENT (INTERNAL ORGANIZATION)

	Question	Answer	Source
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28	Does the FI Intermediary have a formalized HR Management System / Manual / Handbook that is aligned with national labour standards and working conditions?		
29	Does your FI Intermediary have an active commitment for promotion of safe and healthy working conditions, and to protect and promote the health of workers (i.e., Occupational Health and Safety Policy, procedures, committees, etc.)?		
30	Do staff have the right of association and collective bargaining?		
31	Does the FI have an Emergency & Response Plan in place for all foreseeable emergencies and disasters (e.g., strikes, fire, power outages, riots, etc.)?		
32	Does the FI have a formalized mechanism to manage internal grievances including grievances collection, analysis, internal communication, and timely response?		

Appendix 6b: E&S Due Diligence Checklist NFI Intermediaries

NFI INTERMEDIARY DETAILS			
Name of the NFI intermediary			
FI Intermediary description	<i>e.g., geographical and sectoral focus of operations – type of NFI Intermediary (holding company, platform, EPC contractor, etc.)</i>		
List of locations of the NFI Intermediary			
Total employees	<i>include a breakdown by gender and type of contract (i.e., permanent or contract)</i>		
NFI Intermediary point of contact	<i>Name, title and contact details</i>		
	Name and title	Date	Signature
Completed by			
Approved by			

CONTROVERSIES		
Has the NFI Intermediary or any of its subprojects faced controversies (i.e., any material E&S events such as a labour strike, bribery and corruption allegations, gender-based violence/sexual harassment, data breach etc.) over the last 3 years? If yes, select below.		
Fines, penalties, or increased permit charges related to environmental or social issues	<input type="radio"/> Yes	<input type="radio"/> No
Complaints from regulatory agencies, interest groups, or local communities	<input type="radio"/> Yes	<input type="radio"/> No
Fatalities or serious injury	<input type="radio"/> Yes	<input type="radio"/> No
Major environmental accidents (e.g., spills, accidental pollution, fires, ...)	<input type="radio"/> Yes	<input type="radio"/> No
Strikes (with or without violence) or other labour disputes	<input type="radio"/> Yes	<input type="radio"/> No
Legal action related to environmental or social issues	<input type="radio"/> Yes	<input type="radio"/> No

Negative attention on the part of the media or non-governmental organizations	O Yes	O No
Other? Please specify.		
If the response to any of the foregoing questions is yes, provide details of such controversy and the measures taken by the Financial Institution to address any instances of non-compliance.		

E&S COMMITMENT, POLICY AND MANAGEMENT SYSTEMS			
	Question	Answer	Source
<i>E&S Management System (IFC Performance Standard 1)</i>			
1	Does the NFI Intermediary's E&S Policy focus on the key E&S risks and opportunities associated with the subprojects it finances (including labour and employment practices, supply chains or other third parties)?		
2	Does the policy clearly articulate the E&S standards that NFI Intermediary and the subprojects it finances / develops will seek to adhere to? What are the applicable E&S standards? Are these standards relevant to your company?		
3	How have E&S issues of subprojects been identified (i.e., ESIA, E&S audit, E&S risk assessments, etc.)? Is there evidence that the NFI Intermediary has implemented mitigation measures / recommendations?		
4	Does the NFI Intermediary have a functional E&S management system (ESMS) in place? To what extent is there a document(s) or evidence of systematic processes that		

	would ensure the effective implementation of the ESMS? ³		
5	Does the NFI Intermediary's staff with responsibilities for implementing the ESMS have appropriate skills, capacity, and authority to ensure it is implemented? Please explain.		
6	Does the NFI Intermediary have appropriate training procedures in place for employees on the company's E&S Management System?		
7	Is there an emergency preparedness and response plan/system in place, which is an integrated part of the NFI Intermediary's ESMS? Does it accurately reflect the facility and surroundings? Is the plan / system properly documented?		
8	Does the NFI Intermediary have a Stakeholder Engagement Plan and Grievance Mechanism? Are these in line with BGB's requirements? How does the NFI Intermediary ensure that the Stakeholder Engagement and Grievance Mechanism requirements are adequately implemented at subproject level?		
<i>Labour and Working Conditions (IFC Performance Standard 2)</i>			
9	Does the NFI Intermediary have an HR policy/manual? If "Yes", is it easy to understand and easily accessible to all employees? What are the requirements for subprojects that the NFI Intermediary finances / develops?		
10	Are the terms and conditions of employment clearly defined? Are there specific requirements for minimum age, minimum wage, forced labour and discrimination applicable to the NFI Intermediary and to subprojects?		
11	Has the NFI Intermediary or any of its subprojects ever faced any issues related to labour and working conditions? (e.g.,		

³ Please provide a copy of your ESMS.

	excessive working hours, wages below national minimum wage, child labour).		
12	What form of worker representation is there at the NFI Intermediary? Are workers free to join a union? How does the NFI Intermediary ensure that subprojects' workers can form or join workers' organizations?		
13	Does the NFI Intermediary have an occupational health and safety (OHS) plan in place which meets the requirements of its operating jurisdiction, and does it require its subprojects to develop such a plan? Please provide evidence.		
14	Has the NFI Intermediary or any of its subprojects experienced or recorded accidents, occupational illnesses or any other complaints / litigation cases relating to Occupational Health & Safety in the last 3 years?		
<i>Pollution Prevention and Resource Use Efficiency (IFC Performance Standard 3)</i>			
16	Have the NFI Intermediary's subprojects adversely impacted the air, water, soil, local communities, fauna and/or flora or they expected to do so? What measures does the NFI Intermediary required at sub-project level to avoid and / or mitigate pollution?		
17	Does the NFI Intermediary check whether subprojects have the environmental permits required for developing the subproject? Have any non-compliances been identified in the past?		
18	Are the subprojects of the NFI Intermediary expected to use any hazardous chemicals, (agrochemicals, pharmaceuticals, CFCs etc.) and wastes that are deemed illegal under applicable local or national regulations?		
19	Has the NFI Intermediary or any of its subprojects experienced environmental accidents and/or environmental litigation in the last 3 years?		
20	What waste and effluent streams do the NFI Intermediary or any of its subprojects generate and what evidence is there that these are actively managed and reduced as much as possible?		

21	[For housing development projects], how housing units are going to treat grey water and sewages (or are connected to a centralized municipal sewerage system)?		
Community Health and Safety (IFC Performance Standard 4)			
22	Does the NFI Intermediary's subprojects create new or significant risks to and/or impacts on local communities, e.g., through air emissions, wastewater discharges, transportation, explosion risks, armed security staff, etc.? Please explain.		
23	If the NFI Intermediary's subprojects create risks for local communities, what are the requirements for engaging with affected parties at subproject level? Is there a subproject level grievance mechanism?		
24	For its security personnel, has the company established a code of conduct or ensured that security personnel underwent an ethical behaviour training?		
Land Acquisition and Resettlement (IFC Performance Standard 5)			
25	Has the NFI Intermediary or any of its subprojects acquired land through expropriation in the past, or might it in the future? If so, how and when was or will the land (be) acquired? What compensation was provided to affected persons and was a Resettlement Action Plan (RAP) developed? How was compensation calculated?		
26	If resettlement is expected for subprojects that BGB will finance, how many people will be physically or economically displaced? Are there any vulnerable groups which require particularly attention? How does the NFI Intermediary ensure compliance with BGB's Land Acquisition and Resettlement Action Framework?		
Biodiversity Conservation and Natural Resource Use (IFC Performance Standard 6)			
27	Have the NFI Intermediary's subprojects or are they expected to adversely impact biodiversity (e.g., through conversion of habitats to other land uses, introduction of non-native species, extensive water abstraction)? What mitigating measures does the NFI Intermediary require to be implemented at subproject level? Is there a Biodiversity Management Plan (BMP)?		

28	Could NFI Intermediary's subprojects adversely impact endangered or critically endangered species?		
29	Has the NFI Intermediary or any of its subprojects been targeted by NGO programs or campaigns in relation to biodiversity?		
Indigenous People (IFC Performance Standard 7)			
30	Could NFI Intermediary's or its subprojects' operations directly or indirectly affect Indigenous Peoples? If so, how? How many Indigenous People would be affected? Has the NFI identified measures to avoid or minimize impacts on Indigenous People?		
Cultural Heritage (IFC Performance Standard 8)			
31	Could the NFI Intermediary's or its subprojects' operations directly or indirectly affect cultural heritage? If so, how has this risk been identified? Has the NFI Intermediary and/or its subprojects obtained the necessary permits / approvals for its operations?		

Appendix 7: External E&S Due Diligence Terms of Reference

E&S DUE DILIGENCE TERMS OF REFERENCE (TOR) TEMPLATE

Blue Green Bank ('BGB') is designed to become a significant institution for practical and strategic financing of climate change adaptation and mitigation policies and measures, supporting the Governments of Barbados to achieve national resilience and emissions reduction targets. As a partnership which brings together public (Government of Barbados), private and multilateral institutions at the level of equity, the BGB can present a holistic view of the market and the potential for green financing by ensuring that new projects align with Barbados' NDC targets. Because the BGB's goal is national climate adaptation and mitigation, it will seek not to replace other financial institutions but to act as a partner and support system for them in this underdeveloped market segment. To this end, the bank will be wholesale in operation, providing support in the form of funds, guarantees or other mechanisms to existing lenders, whether banks, credit unions, insurance companies etc. to facilitate the funding of blue/green programs contemplated by government policy. The BGB will also serve as a conduit between local financial institutions and the Government of Barbados, allowing the BGB to identify market opportunities and provide feedback and data to inform policy decisions more effectively.

We would like to invite *[Insert Service Provider Name]* to submit a proposal to provide BGB services to perform an Environmental and Social Due Diligence ("ESDD") assessment of a proposed investment to *[Insert name of NFI or FI Intermediary]* (hereafter referred to "prospective transaction"). The E&S Consultant must have experience working with *[insert risk categorization (e.g., Category B / FI-2)]* investments (in terms of the IFC E&S Risk Categorisation Guidelines), in Barbados, and experience conducting ESDD's within the *[insert prospective transaction sector / sub-sector type]* sector/sub-sector.

In this regard, this Terms of Reference (ToR) outlines the project details and assessment requirements to ensure that the appointed E&S Specialist executes the ESDD assessment in accordance with the BGB E&S Policy and international best practice.

1. Description of Project

[Insert brief description of NFI or FI Intermediary and the anticipated subprojects including type of business, geographic, sector, scale of operations, size of workforce, etc]

2. Applicable E&S Standards

The prospective transaction should be assessed against the following reference framework:

- Applicable National E&S Laws and Regulations
- Applicable IFC Performance Standards
- *[insert additional standards as required]*

3. Reporting and Deliverables

The E&S Consultant should clearly present the findings of the ESDD as a written report fully reflecting the scope of work, summary of the E&S risks, opportunities and impacts, compliance gaps with the reference framework identified and corresponding correction actions, presented in ESAP - using the example reporting format provided in Annex 1.

Note, a key outcome of the ESDD should be an overview of key E&S risks and impacts identified and associated mitigation measures as well as key E&S opportunities to inform BGB decision making (supplemented by the ESAP) as outlined in the below table:

Aspect	Risk Identification	Risk Rating	Proposed Mitigation Measure	Costing & Timing
E&S Management Systems				
Environment				
Health & Safety				
Social				
Summary of E&S Opportunities				

4. Proposal Structure

The proposal for this ESDD should contain the following [*include additional sections as appropriate*]:

- a. Company Profile
- b. Project Team Profile and Qualification:
 - Details of the main point of contact for this proposal.
 - Details of the proposed consultants and any sub-contractors involved in the ESDD, including names, CV's and a brief description of their role within the project team;
 - A list of relevant experience and qualifications of the consultants involved covering technical capabilities, specific previous project experience similar to this project, specific in-country experience and knowledge, specific language skills, etc.
- c. Scope of Work

- Detailed description of the proposed ESDD methodology in order to accomplish the required tasks, including any proposed site visits/reconnaissance, documents to be reviewed, interviews, etc.
- If the E&S Specialist feels that additional tasks or components within a required task are suggested or warranted, these should be stated and delineated as “Optional Tasks”.

d. Costing

- An indication of total costs to perform ESDD [*in preferred currency i.e., US Dollars*].
- A breakdown of the estimated costs by task must also be presented (i.e., tabular format) and should include Direct Labour Costs (number of hours or days per staff and their associated unit costs) and Indirect Labour Costs (i.e., travel, per diem, sub-contractors, etc.).

e. Schedule

- A proposed schedule of work

f. Conflict of Interest Statement

- As part of the proposal, please confirm there are no conflict of interests and that you are in a position to provide an adequate, accurate and objective review of the prospective transaction.

The proposal should be submitted in English by close of business [*insert date*] to [*insert relevant BGB contact person and email address*]. Please do treat this project as confidential.

Appendix 8: E&S Due Diligence Report Template

1. Executive Summary

Provide an overview of key E&S risks and mitigation measures and opportunities in the below table:

Aspect	Risk Identification	Risk Rating	Proposed Mitigation Measure	Costing & Timing
E&S Management Systems				
Environment				
Health & Safety				
Social				
Summary of E&S Opportunities				

2. Prospective Transaction Description

Provides relevant information regarding the prospective transaction (e.g., industry, sector of activity, site location(s), relevant environmental and social setting(s) information, surrounding land use(s), history, prospective transaction facilities and infrastructure, permitting status, etc.).

3. Identified Applicable Performance Standards and Legal Requirements

Provides a description of the applicable reference framework that was used and against which the prospective transaction was assessed.

4. Environmental and Social Risk Categorisation Rationale

Provide an assessment of the prospective transaction Risk Categorisation (in terms of the IFC E&S Risk Categorisation Guidelines) providing rationale for the final categorisation given.

5. Prospective Transaction Environmental and Social Management System

A description of the prospective transaction's E&S Management System in place (to manage E&S risks and opportunities for both internal operations and asset level operations where applicable).

6. E&S Due Diligence Assessment Findings

A description of the key E&S risks, impacts and opportunities identified against applicable E&S requirements (i.e., the reference framework)

7. E&S Opportunities Findings

A description of the key observations made in relation to the assessment of potential E&S value add opportunities.

8. Recommended E&S Action Plan (ESAP)

For E&S performance gaps, recommend corrective actions with corresponding schedules, indicate priorities, and advise as to how to incorporate these into the Transaction Agreement, as either Conditions Precedent or Management Actions. Include the ESAP template that has been shared as part of the ESDD Terms of Reference. The ESAP should be produced in *[insert language requirement i.e., English and in French]*

Appendix 9: Final Investment Committee Decision Meeting Paper

INVESTMENT DETAILS	
Type of Intermediary (NFI or FI)	
Intermediary Name	
Name of subproject(s)	
Sector	
Sub-sector	

E&S DOCUMENTATION			
Attached Documentation	Medium E&S Risk: Cat. B or FI-2	Low E&S Risk: Cat. C or FI-3	Comments
<input type="checkbox"/> Completed E&S Screening Checklist	Required	Required	
<input type="checkbox"/> Transaction Due Diligence Report	Required	Not Required	
<input type="checkbox"/> E&S Action Plan (ESAP)	Required	Required if Necessary	

E&S DUE DILIGENCE SUMMARY	
Applicable E&S Standards	<i>Outline the applicable IFC Performance Standards, local and national legislations, ILO Fundamental Conventions etc., used to assess the client/project against during the E&S DD.</i>
E&S Risk Categorization	<i>Denote the E&S risk categorization (Category B or C / FI-2 or FI-3) assigned to the client/project, including a high-level summary of the rationale and justification for the chosen category. Important to note whether the categorization may have been amended since the screening stage.</i>
E&S Due Diligence Assessors	<i>Indicate who performed the E&S DD for the transaction (i.e., internally by deal team and / or E&S officer or name of external service provider appointed, etc.)</i>

E&S Due Diligence Methodology	<p>Provide a high-level description of the E&S DD methodology undertaken. For example:</p> <ul style="list-style-type: none"> E&S desktop review (i.e., types of information sources e.g., environmental, and social impact assessments (ESIA), E&S permits, client/project E&S policies and management procedures, public domain information, etc.); Interviews conducted with client/project (list of client personnel interviewed, job titles, roles and responsibilities, E&S experience, etc.)
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KEY E&S RISKS IDENTIFIED		
Main E&S Risks Identified	Does the borrower have adequate E&S control measures in place to sufficiently manage the risks identified?	
Describe key E&S risks, impacts and opportunities according to the topics covered by the applicable IFC Performance Standards and other applicable standards.		
	<input type="checkbox"/> Yes	<input type="checkbox"/> No, refer to ESAP
	<input type="checkbox"/> Yes	<input type="checkbox"/> No, refer to ESAP
	<input type="checkbox"/> Yes	<input type="checkbox"/> No, refer to ESAP
	<input type="checkbox"/> Yes	<input type="checkbox"/> No, refer to ESAP
	<input type="checkbox"/> Yes	<input type="checkbox"/> No, refer to ESAP

ESMS REQUIREMENTS FOR NFI INTERMEDIARIES		
ESMS Components	Alignment with BGB Requirements	Comments
E&S Policy	Fully / Partially / Non-aligned	
Identification of E&S Risk	Fully / Partially / Non-aligned	
Organizational Capacity and Competence	Fully / Partially / Non-aligned	
Management Programs	Fully / Partially / Non-aligned	
Emergency Planning	Fully / Partially / Non-aligned	

Monitoring and Review	Fully / Partially / Non-aligned	
Stakeholder Engagement	Fully / Partially / Non-aligned	
External Communication & Reporting	Fully / Partially / Non-aligned	

ESMS REQUIREMENTS FOR FI INTERMEDIARIES

ESMS Components	Alignment with BGB Requirements	Comments
E&S Policy	Fully / Partially / Non-aligned	
Exclusion List	Fully / Partially / Non-aligned	
E&S Risk Categorization	Fully / Partially / Non-aligned	
E&S Appraisal	Fully / Partially / Non-aligned	
Major Incident Reporting	Fully / Partially / Non-aligned	
E&S Monitoring	Fully / Partially / Non-aligned	
E&S Roles and Responsibilities	Fully / Partially / Non-aligned	
Grievance Mechanism Redress	Fully / Partially / Non-aligned	

E&S SAFEGUARD INSTRUMENTS AT SUBPROJECT LEVEL

Category B Transactions

Necessary:		
ESIA and Audit reports	<i>In place / Outstanding</i>	If outstanding, include ESAP reference number

E&S Management Plans / Management Systems	<i>In place / Outstanding</i>	If outstanding, include ESAP reference number
<i>Where applicable:</i>		
Stakeholder Engagement Plan	<i>In place / Outstanding</i>	If outstanding, include ESAP reference number
Land Acquisition and Resettlement Plan	<i>In place / Outstanding</i>	If outstanding, include ESAP reference number
Grievance Mechanism	<i>In place / Outstanding</i>	If outstanding, include ESAP reference number
Indigenous People Plan	<i>In place / Outstanding</i>	If outstanding, include ESAP reference number
Category C Transactions		
<i>Necessary:</i>		
Relevant E&S permits / licenses, as required by law	<i>In place / Outstanding</i>	If outstanding, include ESAP reference number

RECOMMENDATION INVESTMENT COMMITTEE

Proceed with Transaction

Do **not** proceed with the Transaction

Date

Signature

Appendix 10: E&S Disclosure Report Form for Subprojects

Accredited entity (AE)	
Programme	
FP number and programme title	
Sector (public/private)	
Location (target country and, if any, specific areas)	
ESS category	
Board decision and date	Decision B.XX/XX, para. (X), on Date Month Year]
Subproject	
Subproject title	
E&S category	
Location (target country and, if any, specific areas)	
Environmental and Social Impact Assessment (ESIA) (if applicable)	
Date of disclosure on AE's website	
Language(s) understandable to affected peoples	
Link to disclosure	
Other link(s)	
Remarks on compliance with GCF policies	In accordance with the Green Climate Fund's Information Disclosure Policy (the "Policy"), the AE plans to disclose information relating to a Category B Sub-Project(s) being considered for investment. This disclosure is intended to satisfy the requirement set out in paragraph 17 of the GCF Policy and paragraph 65 of the GCF Revised Environmental and Social Policy to disclose an ESIA and ESMP (if not included as part of the ESIA), at least 120/30 days in advance of the Accredited Entity's investment decision.
Environmental and Social Management Plan (ESMP) (if applicable)	

Date of disclosure on AE's website	
Language(s) understandable to affected peoples	
Link to disclosure	
Other link(s)	
Remarks on compliance with GCF policies	
Environmental and Social Management System (ESMS) (if applicable)	
Date of disclosure on AE's website	
Language(s) understandable to affected peoples	
Link to disclosure	
Other link(s)	
Remarks on compliance with GCF policies	
Any other relevant E&S reports and/or disclosures (if applicable), e.g. Indigenous Peoples Plan (IPP), Indigenous Peoples Planning Framework (IPPF), Resettlement Action Plan (RAP), Resettlement Policy Framework (RPF)	
Description of report/disclosure	
Date of disclosure on AE's website	
Language(s) understandable to affected peoples	
Link to disclosure	
Other link(s)	
Remarks on compliance with GCF policies	

Disclosure in location(s) convenient to affected peoples	
Date(s)	
Place(s)	
Provision on disclosure at the subproject level	[Insert relevant Clause in the Funded Activity Agreement (FAA)]
Date and place of Accredited Entity meeting	

Appendix 11: E&S Clauses Guidance Note

E&S DEFINITIONS

- **“E&S”** Non-financial factors relating to Environmental & Social
- **“Environmental & Social (E&S) Action Plan”** means the plan or plans agreed upon between BGB and the Investee, defining, but not limited to, corrective actions, responsibilities, associated costs, deliverables, and timeframes for the measures required to remedy any known non-compliances of the business activities with the E&S requirements and for any other measure agreed upon, as amended from time to time.
- **“E&S Officer”** means the suitably trained person(s) of the Investee, responsible for the practical and day-to-day development, implementation, and operation of the ESMS.
- **“E&S Manager”** means the senior representative of the Investee having management responsibility, among other things, for ensuring proper operation and maintenance of the ESMS.
- **“E&S Requirements”** includes policies, principles and standards established by the BGB E&S Policy and associated ESMS.
- **“E&S Performance Report”** means the annual E&S monitoring report providing information as set out by BGB.
- **“E&S Recommendations”** mean the recommendations on the E&S due diligence report relating to an anticipated investment provided by BGB in accordance with set E&S requirements.
- **“EHS Guidelines”** mean the general and relevant sector specific EHS Guidelines of the World Bank Group, which may be amended from time to time.
- **“ESMS”** means the Environmental and Social Management System of the Investee that includes the relevant policies, organizational structure, planning activities, responsibilities, practices, procedures and resources for developing, implementing, achieving, reviewing and maintaining compliance with the set E&S requirements, dedicated to the systematic and structured improvement of E&S performance, specifically targeted to identify and manage E&S risks and opportunities in the investment appraisal and management processes for:
 - ensuring compliance with the Exclusion Lists.
 - assessing and categorizing (as low, medium or high) the environmental, social, labour, occupational health and safety risks associated with each investee.
 - verifying that each investee complies with the E&S requirements.
 - contractually agreeing with each investee that it will comply with the E&S requirements.
 - agreeing upon an E&S Action Plan between the Financial Intermediary and its respective investee that do not comply with the E&S requirements, and

- monitoring, evaluating and reporting on a regular basis and at least annually on the compliance of each investee with the E&S requirements and, if applicable, its E&S Action Plan or any other actions found to be necessary to reach compliance, including any Remediation Measures
- **“Exclusion List”** is BGB’s list of Prohibited Activities
- **“IFC Performance Standards”** means the International Finance Corporation (IFC) 2012 Performance Standards on Social and Environmental Sustainability (including the technical reference documents known as World Bank Group Environmental, Health, and Safety (EHS) Guidelines) which can be sourced from the below websites:
 - IFC Performance Standards; and
 - World Bank Group EHS Guidelines
- **“Investee”** means all businesses in which the BGB’s capital is invested.
- **“Incident”** means any incident, accident, or circumstance that could reasonably be expected to have, any material adverse effect or a material adverse impact on the investee operations; and / or involves or causes, or is reasonably likely to involve or cause, any material breach of the E&S requirements.
- **“Remediation Measures”** mean with respect to any existing investment in an investee, such measures as are necessary or appropriate to remedy the applicable breach, including an appropriate timeframe for implementation of such measures.

E&S CLAUSES FOR INVESTMENTS LEGAL AGREEMENTS

Contained within are suggested and tailorable E&S clauses and provisions for inclusion into legal agreements and documentation between Blue Green Bank (‘BGB) and an Investee. Determining the most appropriate E&S clauses and provisions depends on the nature and type of investment in question. BGB shall negotiate and agree upon the E&S terms included in the legal agreement with the Investee to achieve a clear understanding and record of BGB’s expectations.

E&S CLAUSES AND PROVISIONS

Operation and Implementation of the Investee’s E&S Management System

[Depending on the set-up and focus of the Investee, the suggested clauses and provisions need to be adapted by BGB to match the specific requirements]

1. The Investee shall at all times carry out its business and operations in compliance with all applicable national environmental, occupational health & safety and social laws and regulations.
2. The Investee shall adhere to the IFC Performance Standards.

3. The Investee agrees to not engage in (nor authorise or any other person acting on its behalf to engage in) or finance any activities listed on the BGB Exclusion List [*insert reference to list as an annex to the legal agreements*].
4. The Investee shall establish, implement, and maintain, in conformance with IFC Performance Standard 1, an Environmental and Social Management System (ESMS) commensurate with the operating asset or project and the associated risks / its investment activities and the risks associated with the portfolio. The Investee shall ensure that the ESMS will assess and manage the E&S performance of the operating asset or project / of its investment portfolio in compliance with BGB's E&S requirements. In particular,
 - a. The Investee shall appoint and maintain [*insert requirements for E&S resources e.g., a dedicated E&S Manager / E&S Officer responsible for day-to-day implementation; and designate senior management for overall responsibilities of E&S*]. The Investee shall notify BGB if the persons set forth are replaced or the responsible team has been enlarged or reduced, indicating the name and functions of the responsible persons and their relevant expertise.
 - b. The Investee shall designate the responsibility of E&S matters to an appropriate individual(s) within the organisation. This individual shall be BGB's primary contact person on E&S matters arising at the Investee.
 - c. The Investee shall advise and consult with BGB regarding any proposed change in the objectives or operations of the operating asset or project / portfolio of (projected) investments, including any material E&S risk posed by the proposed change; and if requested by BGB, amend the ESMS to assess and manage such additional risks in compliance with BGB's E&S requirements and these provisions, in a manner reasonably acceptable to BGB.
 - d. The Investee shall contractually bind the operating asset or project to comply with the E&S requirements of BGB as set out in this legal agreement.
5. The Investee shall develop and implement a grievance mechanism satisfactory to BGB, which is accessible to the general public and in particular persons affected by the Investee's operating or investment activities, including the financed investees and their workforce.
6. The Investee shall, on a best-efforts basis, encourage the operating asset or project / its investees to implement policies and commit to continuous improvements on E&S matters.

Investments

7. The Investee will not finance any of the activities listed on its Exclusion List and the BGB Exclusion List (**for financial intermediaries**).
8. The Investee will monitor the E&S performance and compliance with E&S requirements, including E&S Action Plans, in a frequency adequate to the risk classification assigned to the investee and as needed with regard to reported incidents.
9. In case an operating asset or project / investee anticipates collective dismissals of more than 10% of the workforce and/or more than a total of 50 Employees, the Investee will develop a Job Protection Plan to mitigate the adverse impacts of retrenchment in line with national law, the IFC Performance Standard 2

(“Labour and Working Conditions”) and good industry practice and based on the principles of non-discrimination and consultation to be reflected in the final retrenchment plan.

Monitoring and Reporting

10. The Investee will:

- a. within [*insert timeframe here e.g., ninety (90) days after the end of each financial year*], deliver copies of the E&S Performance Report to the BGB. The Investee shall provide complete and accurate information.
- b. within [*insert timeframe here e.g. three (5) days*] after becoming aware of the occurrence, notify BGB of any environmental, social, labour or health and safety incident, accident or circumstance with respect to any existing or proposed investee that (a) has, or could reasonably be expected to have, a material adverse effect or impact on BGB, the Investee, the operating asset or project / investee, the environment, communities or the workforce, or (b) involves or causes, or is reasonably likely to involve or cause, any material breach of set E&S requirements, specifying the nature of the incident, accident, or circumstance and the impact or effect arising or likely to arise therefrom, and the measures being taken, or plans to be taken, to address them and prevent any future similar event; and keep BGB informed of the ongoing implementation of those measures; and
- c. within [*insert timeframe here e.g., ten (10) days*] of a request from BGB, provide such information as is reasonably requested by that party to confirm that the Investee is in compliance with set E&S requirements.

11. The Investee permits representatives of BGB the right to visit, upon reasonable notice and at BGB’s cost, any of the premises of operations, to have access to the Investee’s management, and to have access to its records and books of account, in each case, to a) monitor compliance with the E&S requirements; b) assess the legal or reputational risk posed to BGB or its investors by any incident, accident or circumstance; and / or c) assess progress against the E&S Action Plan.

12. If BGB reasonably determines that the Investee is in material breach of the E&S requirements, it will require the Investee to undertake, within a specified timeframe, Remediation Measures which shall be approved by BGB. If the Remediation Measures are not so approved or if they are approved but the Investee fails to implement such Remediation Measures within the agreed timeframes, BGB will use all reasonable efforts to (a) assert and enforce any right of BGB to require the Investee to comply with such undertakings, including but not limited to, any available action for specific performance or similar remedy, and/or (b) absent timely or reasonable remedy, dispose of BGB’s financing to the Investee on commercially reasonable terms.

Appendix 12: Annual and Quarterly Monitoring Reports Templates

INTRODUCTION

Blue Green Bank (hereafter referred to as “BGB”) requests [Insert Investee] to complete this quarterly / annual questionnaire, as applicable, in order to determine whether its transactions are meeting applicable E&S requirements agreed during transaction negotiation and outlined in the current agreement and its annexes (and notably in the E&S Action Plan). The term “environment and social” includes environmental and health & safety issues, human resource management, labour rights and labour conditions, biodiversity aspects and social / cultural risks and opportunities.

The questionnaire results will be used to help understand which E&S issues are most important to your business and to BGB, which in turn will inform how we look to engage on these types of topics going forward. The information will also be used to showcase the good work being done across the portfolio. The survey will also look to understand your company’s / financial institution’s current E&S priorities, and what aspirations you have for your company / financial institution from an E&S perspective going forward.

Your response to this survey will not be used in any way to discredit, penalize, or undermine your business, and is designed strictly for the purpose of supporting E&S performance within BGB’s portfolio.

Please complete and return the questionnaire by *[insert date]* to *[insert appropriate BGB representatives’ details]*.

Thank you for your co-operation.

Blue Green Bank

NOTE TO BGB:

This template consists of a mandatory section (1-7) and a supplementary section (8-9). The supplementary sections can be removed if deemed unnecessary (e.g., if the information is only required on an annual basis and this template is used for quarterly reporting). Please tailor the template to the specific use (i.e., for financial and non-financial intermediaries).

1. REPORT INFORMATION	
Reporting period	<i>(month/year – month/year)</i>
Name of FI or NFI Intermediary	
Physical address	
Report completed by	<i>(Name and title)</i>
Contact telephone number	
Contact e-mail address	

2. INTERMEDIARY DETAILS

Key E&S Person	<i>(Name, title and contact details)</i>
Executive / Board member responsible for E&S	<i>(Name, title and contact details)</i>
Short description of the Intermediary's business	<i>(Insert location & description of the business including types of products and services, target beneficiaries, sectorial and geographical focus, etc.)</i>

3. STATUS OF NEW⁴ SUBPROJECTS

Number of new subprojects							
	<i>Name Operating Asset / Project or Investee Company</i>	<i>Purpose</i>	<i>Sector</i>	<i>E&S Category Assigned</i>	<i>Type of E&S Appraisal</i>	<i>E&S non-compliances</i>	<i>ESAP developed (Yes/ No)</i>
1							
2							
3							
4							
5							
6							
7							
8							
9							
10							

4. STATUS OF EXISTING SUBPROJECTS

Number of existing investments per E&S Risk Categorization	
Number of existing subprojects (Cat. B)	

⁴ New refers to subprojects which are assessed for providing finance in the reporting period.

Number of existing subprojects (Cat. C)	
Monitoring and Reporting	
Did the subprojects conduct monitoring activities during the quarter?	(Yes / No)
If 'Yes', please describe:	
Risk Exposure	
Were any new or on-going E&S issues identified in the last reporting period?	<i>E&S issues could include significant complaints, grievances or notices raised by internal or external stakeholders, outstanding legal or worker compensation claims, pollution events or incidents that require clean up etc.</i>
Incidents	
Number of significant Incidents occurred	
Number of non-compliances with national E&S laws and regulations	
Number of significant grievances received	
5. STATUS OF E&S ACTION PLAN (IF RELEVANT)	
<i>Please attach the latest version of the ESAP as an attachment to this report</i>	
Provide update on the ESAP	
What are the key priorities from an E&S management perspective that are to be addressed during the next reporting period?	
Provide information on any exemptions or plans to address outstanding / overdue items)	
6. E&S KPIs	
<i>(This section should include information on E&S KPIs aggregated for all subprojects that have been financed with BGB's loan)</i>	

	Reference Standard	Unit of Measurement	Value
E.g., water consumption			
E.g., Total waste (hazardous and non-hazardous waste) from production activities			
Insert additional KPIs			
Insert additional KPIs			
Insert additional KPIs			

7. E&S PERFORMANCE

Describe progress of selected interventions	
Please state any difficulties and/or constraints related to the implementation or planned implementation of any E&S aspects identified above?	
Describe key E&S plans / priorities for the upcoming reporting period	
Please report any other information that BGB should be aware of?	

8. STATUS OF E&S RISK MANAGEMENT (NFI INTERMEDIARIES)

E&S MANAGEMENT SYSTEM

Describe the current approach to the management of environmental and social issues?	
Has your company developed, upgraded, or implemented an ESMS during the reporting period? If 'Yes', please describe the changes made in the reporting period.	
How is compliance with national environmental and social laws and regulations managed?	
Please state any difficulties and/or constraints related to the implementation or planned implementation of any E&S aspects identified above?	
Have company operations been inspected or audited by an external regulator / agency in the reporting period? If so, please provide the date	

and reasons for the inspection or audit? Please also elaborate on any findings of the inspection and any actions outstanding which require attention?	
Did the company regularly engage with internal or external stakeholders or customers on environmental or social type issues during the reporting period? Please elaborate on specific topics engaged on and the channel for engagement (online surveys, interviews, workshops, etc.).	
Were any changes made during the reporting period to the grievance mechanism in place to receive complaints or feedback from both internal and external stakeholders, including employees, contractors, customers, suppliers, etc.? If 'Yes', please describe the changes.	
E&S Resources and Training	
During the reporting period, have specific roles and responsibilities changed or been assigned to manage E&S aspects? If 'Yes', please describe the changes.	
Has the environmental or social capital expenditure budget been revised from the previous reporting period? If so, what has changed to necessitate the increase or decrease in budget?	
Has your institution provided E&S training to staff in the reporting period? If 'Yes', please describe.	
9. STATUS OF E&S RISK MANAGEMENT (FI INTERMEDIARIES)	
E&S MANAGEMENT SYSTEM	
Has your institution developed, upgraded, or implemented an ESMS during the reporting period? If 'Yes', please describe the changes made in the reporting period.	
Does your institution perform E&S due diligences / risk appraisals for relevant transactions to assess the identified risks and impacts?	
Does your institution categorize its transactions based on exposure to E&S risks and impacts?	
When identifying, assessing, mitigating, and managing the E&S risks associated with transactions, what standards does your institution apply?	
Does your institution contractually bind clients to comply with the applicable standards?	
Does your institution monitor the E&S performance of your clients/financed transactions? [Examples include site visit by	

your institution's staff, inspection by environmental/health authorities, Copies of updated or renewed permits, Reports from the client, etc.]	
Please state any difficulties and/or constraints related to the implementation or planned implementation of any E&S aspects?	
E&S Resources and Training	
During the reporting period, have specific roles and responsibilities changed or been assigned to manage E&S aspects? If 'Yes', please describe the changes.	
Has the environmental or social capital expenditure budget been revised from the previous reporting period? If so, what has changed to necessitate the increase or decrease in budget?	
Has your institution provided E&S training to staff in the reporting period? If 'Yes', please describe.	

SIGN-OFF			
Form filled out by		Phone number	
		E-mail address	
Signature		Date	

Appendix 13: Major Incident Reporting Form for subprojects

The Major Incident Reporting Form Template is a template that should help the Investee with monitoring the occurrence of incidents at Clients. Incidents can vary in scale and severity as well as their nature, e.g., environmental incidents, worker incidents, incidents with local communities, etc. It provides information to the Investee about exposure to E&S risk and about the effectiveness of the E&S Management System that the Client has implemented.

SUBPROJECT DETAILS	
Subproject Name	
Location	
Sector	
Sub-sector	
Form completed by	
Date completed	
Contact details	

DETAILED DESCRIPTION OF THE INCIDENT	
Type of Event	<i>(e.g., fires / explosions, strikes, work-related injuries / fatalities, security breaches, significant pollution discharges, community unrest or public relations incidents, etc.)</i>
Date	
Time	
Incident Location	
Description of the Incident	<i>(Detailed and precise description of the location, circumstances, equipment, and number of individuals (personnel, contractors, visitors, general public) involved)</i>
Date Investee notified of the Incident	
Date BGB notified of the Incident	

NATURE OF THE CONSEQUENCES	
Were any individuals injured?	YES / NO / NA
If "Yes", please provide further details (e.g., how many individuals, nature of the injuries, etc.)	
Were any damages experienced as a result of this event (e.g., environmental or damage to equipment / property, etc.)?	YES / NO / NA
If "Yes", please provide further details.	
Was the event reported to key internal company senior / executive management?	YES / NO / NA
If "Yes", please provide further details.	
Has the regulator, local authority government or emergency services been involved in or informed of this event?	YES / NO
If "Yes", provide further details.	
What causes were identified as leading to the incident (if known)?	
What actions have been undertaken to remedy the situation?	
Provide an indication of the financial costs incurred by the operating asset / project or investee company as a result of the event (e.g., fines / penalties / costs due to ceased operations / medical costs / compensation claims, etc.)?	
What is the likelihood of this event occurring again (i.e., residual risk)?	

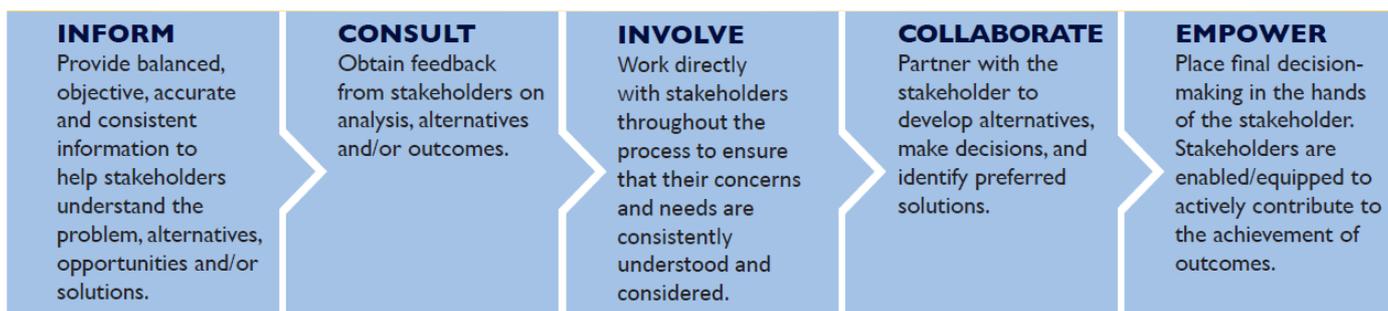
SIGN-OFF

Form filled out by		Phone number	
		E-mail address	
Signature		Date	

Appendix 14: Stakeholder Engagement Plan Template for subprojects

PROCESS TO CONDUCT THE CONSULTATION

Stakeholder consultation is required throughout the project's cycle. The below diagram⁵ showcases the engagement process during which meaningful consultation with affected communities, relevant national authorities and civil society should occur:



Effective stakeholder engagement depends on the full and systematic identification of stakeholders and their expectations, objectives, and priorities in relation to the Project and their influence on it. It is also appropriate to understand how each stakeholder might be affected, or perceived to be affected, by the Project in order to tailor the information provided to stakeholders and understand their views and expectations of the Project. It can be useful to group stakeholders on the basis of their common interests and characteristics to help structure stakeholder engagement activities, e.g., communities of a certain group or locality, traditional / local / national authorities, law enforcement forces, among other potential groups.

As part of the stakeholder identification process it is important to include individuals or groups of individuals who may have difficulty participating in the engagement process and/or who may be impacted by the Project in a particular way because of their vulnerability. The stakeholder engagement process helps to identify additional stakeholders as the project evolves.

The nature and frequency of the Project's engagement with stakeholders will be determined by a range of factors, including the potential impact of the Project on the stakeholder, the influence of the stakeholder on the Project, and the stakeholder's ability and preference to access information and participate in consultations.

Consultations will be undertaken procedurally, in line of national and international requirements, and will consider the following elements:

⁵ Source: USAID, Guide to community engagement for power projects in Kenya, 2018

Information provided:

- The project owner will provide project information to the stakeholders in their local language. This information will include any possible gender, E&S, Indigenous Peoples impacts that they must be aware of before the project is undertaken.
- Contact details of the project owner as well as a method for further contact should any issues or questions arise during or from the meeting.

Modes of consultation:

- The Investee must designate staff responsible for stakeholder engagement. Management from multiple business units, e.g., community relations, health & safety, HR, executives, etc., need to take an active part at various levels in communities' engagement.
- The Investee must structure community engagement through a plan, resulting in structured and regular engagements with identified stakeholders.
- Engagements can consist of meetings, consultations, workshops (where the infrastructure is available, virtual meetings will also be arranged as a last resort subject to the agreement of the community). The project will encourage effective participation of men and women in the stakeholder consultations (this also includes the appropriateness of the place and time of the consultation(s)). The Investees must deploy specific means to engage vulnerable populations.
- Whenever needed the Investee should establish specific engagement platforms such as dedicated focus groups.
- Particular attention should be paid to the fact that projects should consider stakeholder feedback and modify the project design, implementation, and closure, whenever reasonable and possible.
- All projects will establish a formal input, feedback, and grievance mechanism to provide stakeholders with the opportunity to submit any feedback or grievances throughout the life of the project.

Notes created during the process:

- All engagement must be traced, whether with a simple mention that the engagement took place or with detailed minutes (see "Reporting on progress" Section).
- Engagement shall be a push / pull process, during which the Investee communicates information about the project, and will receive information and feedback from the stakeholders.
- The project owner will apply a gender lens to consultation, e.g., is there a need to hold specific focus groups, to incentivise women to take a more active part in consultations, etc., and ensure the relevance of the feedback received.
- The project will review the comments submitted by stakeholders and report back to them on how these comments have been taken into account. Changes may go up to changes to the project design, where appropriate. The project promoter will trace justifications when the observations have not been incorporated or addressed and will communicate back to the relevant stakeholders on those reasons.
- In the specific case of Barbados, international experts and specialized NGOs agrees that there the risk to negatively impacts Indigenous Peoples' rights, as defined in the IFC Performance Standard 7, is non-existent. Therefore, the present Stakeholder Engagement Plan template does not include provisions to set up a consultation process requiring the obtention and maintenance over time of Free, Prior and Informed Consent (FPIC), which would apply to engagement with Indigenous Peoples.

Reporting on progress:

The project owner will store the information collated and provide key details to the Accredited Entities during the investment process. A simple database or ledger must be in place to manage and monitor engagement. Information that should be concealed in the database or ledger regarding conducted and planned engagement must at least consist of:

- A unique ID number;
- A date of engagement;
- A place of engagement;
- The nature of the engagement (e.g., public meeting, public consultation, semi-public meeting);
- Participants' identity and numbers;
- Objectives and discussions points;
- If the engagement conducted to the establishment of detailed written minutes.

Appendix 15: Grievance Redress Mechanism (for BGB, Intermediary, and subproject levels)

As per the 3rd Pillar of the United Nations' Guiding Principles on Business and Human Rights (UNGPs) and as per the Universal Declaration of Human Rights, Companies have the obligation to remedy the adversely impacts related to a company's business activities. One of the components to the access to remedy is a functioning non-judicial Grievance Redress Mechanism (GRM).

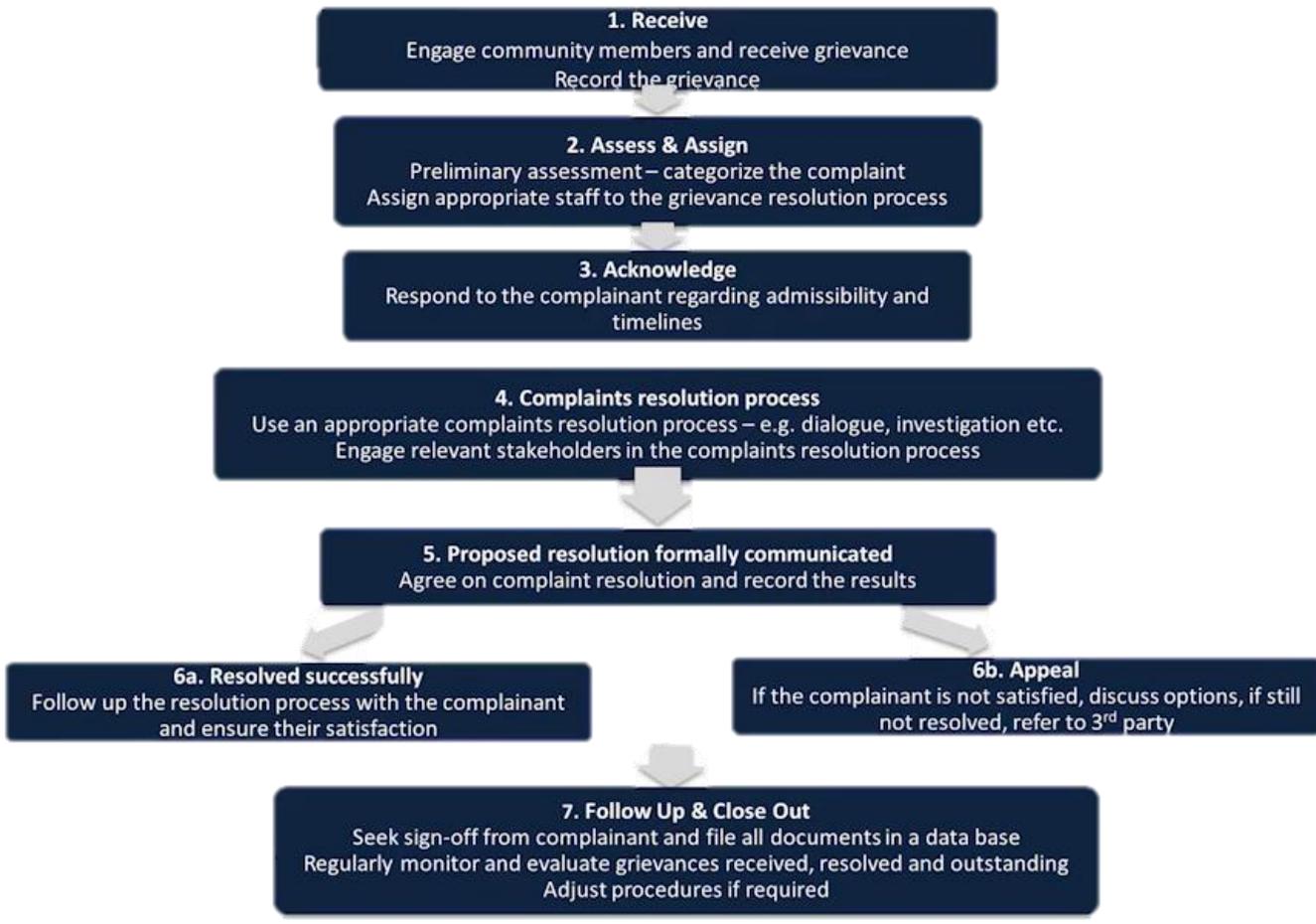
A GRM is a systematized, structured, and resourced process to receive, assess, analyse, and provide resolution to complaints and/or grievances raised by complainants. GRMs can typically be administered at Project-level (Investee's level) and/or at Lender-level (BRB's level), alone or in collaboration with other stakeholders, such as other companies, civil society organizations, among others.

GRMs ought to be culturally appropriate and readily accessible, at no cost to the complainants, and without retribution to the individuals, groups, or communities that raised issues or concerns. GRM will also take into account the "effectiveness criteria" outlined in the UNGPs in order to maximize effectiveness:

- Legitimate: enabling trust from the stakeholder groups for whose use they are intended, and being accountable for the fair conduct of grievance processes;
- Accessible: being known to all stakeholder groups for whose use they are intended, and providing adequate assistance for those who may face particular barriers to access;
- Predictable: providing a clear and known procedure with an indicative time frame for each stage, and clarity on the types of process and outcome available and means of monitoring implementation;
- Equitable: seeking to ensure that aggrieved parties have reasonable access to sources of information, advice and expertise necessary to engage in a grievance process on fair, informed and respectful terms;
- Transparent: keeping parties to a grievance informed about its progress, and providing sufficient information about the mechanism's performance to build confidence in its effectiveness and meet any public interest at stake;
- Rights-compatible: ensuring that outcomes and remedies accord with internationally recognized human rights;
- A source of continuous learning: drawing on relevant measures to identify lessons for improving the mechanism and preventing future grievances and harms;
- Based on engagement and dialogue (Project level GRM especially): consulting the stakeholder groups for whose use they are intended on their design and performance and focusing on dialogue as the means to address and resolve grievances.

Intermediary-Level Grievance Redress Mechanism

An Intermediary -level GRM shall follow a succession of steps, until a specific grievance is provided response or remedy to, assessed out of scope, or redirected to other non-judicial or judicial mechanisms. Below is a diagram⁶ outlining schematically what are the most important steps of an Intermediary-level GRM:



In terms of roles and responsibilities, the Intermediary-level GRM should define clear roles and responsibilities, resource appropriately each role and ensure responsibilities are being adequately understood by the relevant workers. A sample of typical roles to resource a GRM, along with associated responsibilities, are outlined below:

Roles	Responsibilities
Grievance Officer	<ul style="list-style-type: none"> • Informs the public about the Grievance Redress Mechanism (GRM). • Ensures that all individuals with responsibilities under the GRM are made aware of the existence of the process and receive adequate training. • Receives and reports complaints.

⁶ Source: Danish Institute for Business and Human Rights, Grievance mechanism flowchart

	<ul style="list-style-type: none"> • Serves as principal point of contact and liaison with complainants. • Ensures communication with the complainant and follows specified procedures and timelines. • Maintains a log of complaints received. • Resolves complaints that do not need a substantive expert. • Supports the substantive expert, if necessary. • Serves as a liaison between company and third parties, as required. • Monitors resolution of complaints. • Prepares monitoring reports. • Provides feedback on the effectiveness of the grievance mechanism to management.
Complaint owner	<ul style="list-style-type: none"> • Responsible for investigating and resolving complaints. • The complaint owner may be either: <ul style="list-style-type: none"> • The Grievance Officer, if the complaint can be resolved with limited additional information expertise or resources; or • A substantive expert, such as a manager from the area of operations implicated by the complaint, if the complaint cannot be easily or quickly resolved by the Grievance Officer.
Appeals Committee	<ul style="list-style-type: none"> • May be composed of company officials that have not been involved with the complaint to date (i.e., site manager, specific officers). • May also include or be exclusively composed of other trusted people from outside the company, if an independent view is necessary (i.e., such as NGOs, community leaders, etc.). • Intervenes when the proposed resolution is not accepted by the complainant and identifies additional actions to address the complaint. • Approves the close-out of complaints when an agreement cannot be reached with the complainant.
Contractors	<ul style="list-style-type: none"> • Understand the basics of the GRM, having received information about and training in the grievance resolution process from the company. • Assist the complaint owner to manage and resolve complaints in a timely manner when the contractor may be involved.
Project/Operation manager	<ul style="list-style-type: none"> • Approves and is accountable for implementation of the GRM.

- | | |
|--|---|
| | <ul style="list-style-type: none"> • Provides support for implementation of the grievance resolution process and enforcement of specific agreements. |
|--|---|

In terms of GRM accessibility, it is important to offer a mix of confidential, anonymous, semi-public, and public ways to access resolution and remedy. Some examples of access points include:

- Complaint hotline (confidential or anonymous);
- Web page (confidential or anonymous);
- E-mail address (confidential or semi-public);
- Text messaging (confidential or semi-public);
- Complaint box in a public area (anonymous, confidential, or semi-public);
- Community leaders (confidential, semi-public, or public);
- NGOs (anonymous, confidential, semi-public, or public); and
- Community Liaison Officers (confidential, semi-public, or public).

Companies should avoid, when possible, access means to Intermediary-level GRM that are guarded by company security, located on company property where community members are forbidden, or in buildings that are often locked or too far from the community. At least, the Intermediary shall ensure that a diversity of access points is offered.

An Intermediary-level GRM will include but not be limited to the following elements:

- Intermediaries will require an established and operational, accessible, and inclusive survivor centered, SEAH relevant and gender responsive Grievance Redress Mechanism (GRM) that:
 - Includes stakeholder guidance to identify existing and potential local SEAH to enable effective redress of the matter.
 - Enables consultations with women leaders and those working with adolescent girls and boys and other at-risk groups should be prioritized to enable understanding of SEA/SH risks and trends in the community.
 - Monitors SEAH and GBV indicators to track possible risks or challenges (see Appendix 17 on SEAH).
 - Offers various methods to lodge complaints, including online, phone, email, letters or in-person options.
 - Provides confidentiality/anonymity to a complainant or a representative if requested by the complainant.

- Addresses concerns promptly and effectively at no-cost and without retribution.
- Handles grievances in a culturally appropriate, discreet, objective, transparent, sensitive and responsive manner.
- Deploy measures to protect complainants from retaliation, including a risk assessment for the complainant after having lodged a grievance;
- Ensure vulnerable people have access to the mechanism and can submit their grievances;
- Authorize the submission by a vouched representative or civil society organization;
- Keep complainants' identities confidential, especially in instances where the complainants fear retaliation;
- Provide interpretation/translation to overcome language barriers/limitations;
- Publicly and repeatedly advertise procedures, identifying the means for submitting grievances, setting out the length of time users can expect to wait for acknowledgement, response, and resolution of their grievances, descriptions of the transparency of the procedures, and the governing and decision-making structures;
- Disseminate information about other available grievance mechanisms, including the BGB Grievance Redress Mechanism and the accredited and implementing entities' grievance mechanisms.

BGB and Intermediaries shall specify to Sub-Project that similar GRMs must be designed, rolled out and resourced at sub-Projects-Level, along the same guidelines than at Intermediary-Level. Specific communication around BGB's and Intermediaries' GRMs (to be tailored depending on in-country features, e.g., flyers, radio, on-site signs, in-person meeting, etc.) is also a requirement.

A simple database must be in place to manage and monitor grievances. Log all grievances, even recurrent ones or grievances that will eventually be dismissed as unreasonable or out of scope. Regardless of the actual establishment of such a database, typically documentation on grievances keeps track of:

- the name and contact details of the complainant.
- if appropriate the date and nature of the complaint
- the name of the technical staff charged with addressing the complaint
- if appropriate any follow up actions taken the proposed resolution of the complaint
- if appropriate, a level of saliency/priority attached to the complaint
- how and when relevant Project decisions were communicated to the complainant
- whether longer-term management actions have been taken to avoid the recurrence of similar grievances in the future, if applicable.

The project owner will acknowledge the complaint in writing in a timely manner and report back to the AE on next steps. Complaint investigations may vary depending on the nature of the complaint, but every effort should be made to ensure that complaints are dealt with promptly. Most investigations should not last longer than 90 days, to be defined in the relevant management system, i.e., grievance management procedure. The content of the registered complaint and the management thereof must respect the confidentiality of the aggrieved party to the extent possible, and there should be no retaliation against aggrieved parties or complainants.

In some cases, it may be appropriate for the project owner to continue to involve the aggrieved party during the investigation of the complaint. This could take place by inviting the aggrieved party to a meeting, a conference call, or in writing. Any ongoing engagement with the aggrieved party must be noted in the register of complaints.

BRB's Grievance Redress Mechanism

Any grievance is best dealt with as close to the impact as possible, and so grievance mechanisms at the level of the Intermediary and sub-Project may often be the most appropriate route for rights-holders seeking remedy. However, this assumes that such GRM exists and is effective, which might not be always the case. Additionally, a financial institution cannot fulfil its own responsibility to provide for or cooperate in – remediation of adverse impacts it has contributed to by leaving remediation to its clients. A hands-off approach that leaves remediation entirely to the Intermediaries has clear risks for the Lender as well as for rights-holders. The principle that grievances are best dealt with close to the impact does not take away from the Lender's responsibility to establish or participate in Intermediary-level GRM itself. Communities may wish to raise a complaint regarding a project or company to Lenders financing it for several reasons:

- The Intermediary may be simply unwilling to remediate the impact or may not be trusted by the community;
- Rights-holders may feel they have a greater chance of securing remedy with the Lender's involvement;
- Rights-holders may perceive that the bank has breached its own policies. Grievance mechanisms should be equipped to coordinate as appropriate to the case at hand.

Rights-holders or affected communities may have considerable difficulty obtaining remedy from the Borrower. This is particularly in the instance where the Intermediary is operating in an environment with weak governance, corruption and poor rule of law. It is also difficult where human rights defenders and complainants are at risk of retaliation. The Intermediary may not feel the need to remediate when the actions it has taken are not prosecuted in the country of operation but are considered human rights abuses under international human rights and business standards.

BRB's GRM functions along the same principles and process than the Intermediary-level GRM, in terms of typical process flowchart, effectiveness criteria and staffing (see above). All the same, the BRB must dedicate resources at BRB's level for grievance collection, analysis and remedy.

The BRB-level GRM's mandate is to:

- Facilitate the resolution of Complaints from individuals and communities who may be affected by Projects, through settling issues raised about the environmental and/or social impacts of sub-Projects through a neutral, collaborative, problem-solving approach and contributes to improved outcomes at sub-Project's level

- Enhance the E&S outcomes of sub-Projects, through advisory provision to Intermediaries with the purpose of improving systemic performance on environmental and social sustainability and reducing the risk of harm
- Foster public accountability of both BRB and Intermediary.

Due to the BRB's potential remoteness from sub-Projects, specific communication and outreach effort must be deployed at the BRB's level. BRB will disseminate information about the GRM BRB operates through international and local civil society organizations, BRB offices, partner independent accountability mechanisms, the business community, academia, and other organizations. BRB shall specify to Intermediaries that specific communication around a BRB's GRM (to be tailored depending on in-country features, e.g., flyers, radio, on-site signs, in-person meeting, etc.) is a requirement. The complaints and grievances must be lodged either in-person or remotely, with the list of potential remote access points below:

- Complaint hotline (confidential or anonymous);
- Web page (confidential or anonymous);
- E-mail address (confidential or semi-public);
- Text messaging (confidential or semi-public);

A fair and transparent process must be outlined, similar to the Intermediary -level GRM. If a complaint or grievance is eligible to settlement, the BRB should provide remedy, either directly, or through the use of leverage on the Intermediaries / sub-Projects to provide remedy on behalf of the Lender, on a case-by-case basis, with the effective remedy provision as the main objective. In both case, adequate monitoring of remedy provision should be rolled out.

Appendix 16: Chance Finds Procedure

Project Activities

- Pre-construction phase through site preparation;
- Construction phase;
- Throughout the project's life with movement from workers and vehicles on-site; and
- Site decommissioning.

Risks

Heritage objects or artefacts, including physical structures, archaeology, palaeontology, meteors, ritual sites, and public monuments found on-site are inappropriately managed or destroyed.

The risk to impact the abovementioned finds related to cultural heritage is the highest at pre-construction and construction phases, when site clearance, levelling and drilling activities are conducted. The risk to impact a find decreases during operations and rises again at decommissioning. Training and monitoring activities should therefore be reinforced during pre-construction, construction and decommissioning phases.

Mitigation Measures

Initial Identification and/or Exposure

1. Although no cultural heritage sites were identified on-site, it is recommended that the Project take cognisance of the possibility that archaeological sites may be found during site work.
2. All workers / contractors must be trained on this procedure for dealing with chance finds of heritage objects/ sites e.g., stone tools, artefacts or bone and fossil remains. The training must at least intervene during the worker's induction training, and regular reminder should be organized.
3. All staff / contractors must maintain, at all times, a high level of awareness of the possibility of discovering heritage sites.
4. The person, or group (identifier), who identified or exposed the site must cease all activity in the immediate vicinity of the site.
5. The identifier must document the find immediately through taking pictures.
6. The identifier must immediately inform his / her / their supervisor of the discovery.
7. The supervisor must inform the Project Health, Safety and Environmental (HSE) Manager⁷.
8. The supervisor and the HSE manager must ensure that the site is secured, and access controlled to avoid and prevent impacts to the object or structure discovered.
9. The HSE Manager must then inform the Construction Manager who will notify the Project Manager.

⁷ Designations may change.

Heritage and Archaeological Resources

1. The Project Manager must appoint a qualified specialist (archaeologist and / or heritage specialist with appropriate qualifications) to consider the heritage resource, either communicating via telephone or email, or through a direct site inspection.
2. The specialist must propose appropriate measures to construction management for approval in order to safeguard the artefact.
3. Should the specialist conclude that the find is a heritage resource protected in terms of national legislation and international protocols, the Project Manager / HSE Manager must notify the relevant National heritage authority of the country in which the Project is located.
4. It may be required that a heritage impact assessment take place, which may include rescue excavations. The scale of excavations must be determined by the heritage specialist and the National heritage authority.
5. Activities may only be re-started when positive feedback from local authorities has been received and authorization has been granted.

Burial Grounds and Graves

1. In the event that human remains were accidentally exposed, the Project Manager must immediately be notified of the discovery in order to take the required further steps.
2. The local government agency as well as the local police must be notified on behalf of the Project; and ensure the deployment of a suitably qualified specialist (either medical professional, coroner or heritage specialist) to inspect the exposed burial and determine, in consultation with the local police and community leadership: (1) the temporal context of the remains, i.e. forensic, authentic burial grave, or archaeological.; and (2) any additional graves may exist in the vicinity.
3. Should the specialist conclude that the find is a heritage resource protected in terms of national legislation, they must notify the national heritage authority on behalf of the Project.
4. The heritage authority may require that an identification of interested parties, consultation and/ or grave relocation take place.
5. Consultation must take place in terms of national legislation.
6. Grave relocation must take place in terms of national legislative requirements.
7. Activities may only be re-started when positive feedback from local authorities has been received and authorization has been granted.

Monitoring and Reporting

Monitoring

- Conventional standards of excavation; and
- Documentation and staff training on the chance finds procedure described above.

Reporting

- All heritage and archaeological finds must be recorded and spatially presented to track the location of such finds, thereby indicating the likelihood of similar resources appearing in a given geographical area;
- Training/ Induction Register;
- Community Grievance Register;
- Heritage Impact Assessment (if applicable);
- Permit/ Licence from local authority (if applicable); and
- Consultation Attendance Register (if applicable).

Appendix 17: Land Acquisition and Resettlement Action Framework

Guidance notes on Land Acquisition and Resettlement Action Plan:

A Land Acquisition and Resettlement Framework (“**LARF**”) defines the process for screening, assessing, compensating, and managing potential risks and impacts resulting from land acquisition and forced resettlement, related to the operations of BGB. A LARF provides the necessary background to ensure that any operation that might involve land acquisition and/or resettlement and loss of livelihoods of Project-Affected Persons (PAPs) will comply with the national laws and BGB’s ESMS requirements. For each operation that would entail activities likely to generate displacement and resettlement impacts, a stand-alone or updated Resettlement Action Plan (RAP) will be prepared, based on principles outlined in the present LARF. In the case of economic displacement only, a Livelihood Restoration Plan (LRP) will be prepared to ensure the risks and impacts on the PAPs’ livelihoods are managed in adequation with national requirements and international best practices. The LARF describes the design criteria for the displacement and resettlement of affected persons in the course of implementation of the project, the legal context, the process for the execution of related management plans (RAP, LRP, Stakeholder Engagement Plan), and finally the required institutional/corporate organization to manage such process.

The OECD Common Approaches on the Environment Officially Supported Export Credit define Project categories depending on the Project’s impacts. Categories are described below:

- Category A: a project is classified as Category A if it has the potential to have significant adverse environmental impacts. These impacts may affect an area broader than the sites or facilities subject to physical works. Category A, in principle, includes projects in sensitive sectors or located in or near sensitive areas. Category A also includes projects involving the involuntary resettlement of a “significant number” of affected people. The Common Approaches does not define a threshold for what is a significant resettlement.
- Category B: a project is classified as Category B if its potential environmental impacts are less adverse than those of Category A projects. Typically, these impacts are site-specific, few if any of them are irreversible, and mitigation measures are more readily available.
- Category C: a project is classified as Category C if it is likely to have minimal or no adverse environmental impacts

Scope of LARF:

This framework recognizes Land Acquisition and Resettlement as a multi-purpose and an inter-sectoral issue. It applies to all types, modes, and processes of acquisition of land rights – regardless of the application of compulsory land acquisition – and to any situation in which impacts of physical (shelter) and/or economic (livelihoods) displacement on people.

For context, **forced resettlement** is the planned process of acquisition of inhabited and/or used land and the provision of compensation for impacts of displacement generated by the acquisition or restrictions on land use. Resettlement occurs when people are physically displaced from homes, shelters and/or economically displaced from farmland, forests, businesses or other productive assets from which they derive their livelihoods or when

they lose (access to) employment, territories or natural resources upon which they depend for survival, as a result of land acquisition that is not the result of a voluntary, market-based, transaction between a buyer and a seller.

Forced resettlement thus implies the provision of appropriate cash and/or in-kind compensation for all losses incurred and is not to be confused with the provision of physical relocation. Resettlement is considered involuntary either when it occurs without the informed consent of the affected persons, or in cases where they do not have the power to refuse resettlement whether or not they approve. **Rehabilitation**, on the other hand, implies the restoration, and preferably improvement, of the living standards and conditions of people affected by resettlement.

Therefore, this framework applies to **permanent or temporary physical and economic displacement** resulting from the following types of land acquisition or restrictions on land use undertaken or imposed in connection with project implementation:

- Land rights or land use rights acquired or restricted through expropriation or other compulsory procedures in accordance with national laws;
- Land rights or land use rights acquired or restricted through negotiated settlements with property owners or those with legal rights to the land, if failure to reach settlement would have resulted in expropriation or other compulsory procedures;
- Restrictions on land use and access to natural resources that cause a community or groups within a community to lose access partially or totally to resource usage where they have traditional or customary tenure or recognizable usage rights. This may include situations where legally designated protected areas, forests, biodiversity areas or buffer zones are established in connection with the project;
- Displacement of people without formal, traditional, or recognizable usage rights, who are occupying or utilizing land prior to a project specific cut-off date;
- Displacement of people as a result of project impacts that render their land unusable or inaccessible;
- Restriction on access to land or use of other resources including communal property and natural resources such as marine and aquatic resources, timber and non-timber forest products, fresh water, medicinal plants, hunting and gathering grounds and grazing and cropping areas;
- Land rights or claims to land, or resources relinquished by individuals or communities without full payment of compensation;
- Land acquisition or land use restrictions occurring prior to the project, but which were undertaken or initiated in anticipation of, or in preparation for, the project.

As the subprojects that BGB will invest in are not yet known, the list above is not considered exhaustive and will be expanded on as and when subprojects are recorded.

Although "acquisition" is the dedicated term, IFC PS5 applies to projects that make use of land without necessarily acquiring the land, such as State-driven land requisition for the construction of a road. In the context of State-driven land acquisition process, such as eminent domain land acquisition, it is likely that the Government of

Barbados and the responsible Ministries will abide by national requirements only to proceed with the acquisition of the necessary land,

Land Acquisition in Barbados is guided by the Land Acquisition Act of 1949. The Act governs the acquisition of land by the Minister for public purposes. In summary, the Act provides guidance on the following with respect to compulsory land acquisition:

- The right for the Chief surveyor to survey the land, including any digging, boundary demarcation, and clearance that is required to do so, and associated compensation.
- The right for the Chief surveyor to undertake work on the land prior to acquisition.
- The right for the Chief surveyor to compulsorily acquire the land.
- Provision for compensation for compulsorily acquired land, and the method for determination of compensation amounts.
- Right of chief surveyor or land claimant to appeal the compensation decision.
- If persons refuse to give up land, this warrants for a police/parish authority to possess the land.

Additional supporting legislation includes the Environmental Impact Assessment Regulations (2021) and the Town and Country Planning Act (1985).

Barbados legislation with respect to Land Acquisition and Resettlement is limited as compared to international standards and a number of gaps need to be considered, particularly with respect to the consideration of involuntary resettlement and displacement, informal land users, and the compensation of non-land assets. Those gaps are detailed in the Table below. In order that a sub-project aligns with international standards, especially with IFC PS5, the sub-project ought to verify whether the resettlement and compensation standards deployed by government authorities are aligned with IFC PS5 through a gap analysis. In that context, expropriation is not necessarily illegal, but can be misaligned with international standards. In face of misalignment, it is the responsibility of the sub-project to design and roll out complementary action plans, in most cases a Supplementary Resettlement Action Plan (SRAP) and a Supplementary Livelihood Restoration Plan (SLRP), to prevent or mitigate potential negative impacts on expropriated land users.

Issue	IFC Requirements	Barbados Law	Recommended Gap Filling Measures
Consultation	A Stakeholder Engagement Plan will be developed scaled to the project risks and impacts and development stage and tailored to the characteristics and interests of Affected Communities.	No reference/provisions made in national law for involuntary resettlement and/or displacement resulting from land acquisition.	Consultation requirements in Barbados Law will be supplemented with the IFC PS 5 consultation requirements.

	<p>The Project will undertake and document a process of consultation in a manner that provides the affected communities with an understanding of the risks, impacts and opportunities presented by resettlement, and which enables them to express their views and the Project to consider and respond to them.</p> <p>The consultation process will be undertaken in a manner that is inclusive and culturally appropriate. The Project will tailor its consultation process to the language preferences of the affected communities, their decision-making process, and the needs of disadvantaged or vulnerable groups.</p> <p>Consultation should capture men’s and women’s views and concerns. All households and communities will be informed early in the planning process about their options and rights regarding displacement and compensation.</p>	<p>Therefore, no reference is made to stakeholder engagement with Affected Communities.</p> <p>No reference is made in national law to Stakeholder Engagement Plans or culturally sensitive consultation.</p>	
Disclosure	<p>Affected Communities to be engaged through the process of stakeholder engagement described in Performance Standard 1. Decision-making processes related to resettlement and livelihood restoration should include options and alternatives, where applicable. Disclosure of relevant information and participation of Affected Communities and persons will continue during the planning, implementation, monitoring, and evaluation of compensation payments, livelihood restoration activities, and resettlement to achieve outcomes that are</p>	<p>Barbados EIA Regulations (2021) make reference to giving notice of the application for EIA for a project to the public in general, and particularly persons whose interests are likely to be affected, directly or indirectly, by a proposed development. This includes owners or occupiers of every parcel of land adjacent to the premises, and affix a conspicuous notice containing the same particulars to some object</p>	<p>Disclosure of information to be aligned to IFC PS 5, including cut-off date establishment, assessment of alternatives, and planning with respect to resettlement and livelihood restoration.</p>

	<p>consistent with the objectives of this Performance Standard.</p>	<p>on the land where the proposed development is to take place.</p> <p>The Land Acquisition Act makes reference to the requirement of the Chief Surveyor to serve a notice in person or by post to those entitled to compensation in respect of compulsory land acquisition.</p> <p>No reference/provisions made in national law for involuntary resettlement and/or displacement resulting from land acquisition.</p> <p>No reference to consideration of alternatives is made.</p>	
<p>Vulnerable Groups</p>	<p>Vulnerable groups will be identified from the start of Project development and offered tailored assistance throughout the resettlement process.</p>	<p>Where any person who has interest in the land/compensation is payable is subject to any disability or incapacity, the Judge may appoint a guardian ad Zitem to protect the interests of that person.</p>	<p>Vulnerable groups to be identified and paid special consideration throughout the land acquisition and compensation process in line with IFC PS 5.</p>

		No other provisions made for vulnerable groups.	
Grievance Mechanism	Establish a grievance mechanism consistent with Performance Standard 1 as early as possible in the project development phase, in order for the client to receive and address specific concerns about compensation and relocation raised by displaced persons or members of host communities in a timely fashion, including a recourse mechanism designed to resolve disputes in an impartial manner.	No provisions for a grievance mechanism. Either party may appeal to the Court of Appeal and every such appeal shall be made within the time and in the manner laid down by any enactment or rules of court for the purposes of appeals from the High Court to the Court of Appeal and shall be subject in all respects to the law relating to such appeals.	A IFC PS 5-aligned grievance mechanism is to be established at project and subproject's levels.
Monitoring	The Project will establish procedures to monitor and measure the effectiveness of resettlement and use dynamic mechanisms, such as inspections and audits, where relevant, to verify compliance and progress toward the desired outcomes. The Project will retain qualified and experienced external experts to verify its monitoring information. The Project will document monitoring results, implement corrective and preventive actions, and follow up on these actions to ensure their effectiveness.	No reference/provisions made in national law for involuntary resettlement and/or displacement resulting from land acquisition. Therefore, no provision for resettlement monitoring made.	In the case of resettlement, IFC PS 5-aligned monitoring to be undertaken.

<p>Resettlement Planning and Documentation</p>	<p>In the case of physical displacement, a RAP that covers, at a minimum, the applicable requirements of IFC PS 5, regardless of the number of people affected, will be developed.</p> <p>The RAP will be designed to mitigate the negative impacts of displacement, identify development opportunities, develop a resettlement budget and schedule and establish the entitlements of all categories of affected persons (including host communities).</p>	<p>No reference/provisions made in national law for involuntary resettlement and/or displacement resulting from land acquisition.</p> <p>Therefore, no provision for RAP development made.</p> <p>The Town and Country Planning Act makes reference to displacement of persons residing in any premises, that</p> <p>in so far as there is no other</p> <p>residential accommodation suitable to the reasonable requirements of those persons available on reasonable terms, secure the provision of such accommodation in advance of the displacement.</p>	<p>In the case of physical displacement, an IFC PS 5-aligned RAP to be developed and rolled out by the Barbados authorities.</p> <p>In case of misalignment of State-managed resettlement practices, it is the responsibility of the sub-project or project to supplement the practices to align with IFC PS5, e.g., through a supplementary RAP and/or compensations.</p>
<p>Eligibility</p>	<p>Displaced persons may be classified as persons who: (i) have formal legal rights to the land or assets they occupy or use; (ii) do not have formal legal rights to land or assets, but have a claim to land that is recognised or recognisable under the national laws; or (iii) have no recognisable legal right or claim to</p>	<p>No provisions for compensation for persons who do not have formal legal rights to the land in national law. Only formal landowners are recognised.</p>	<p>The Project will compensate those without recognizable rights to land for affected non-land assets.</p>

	the land or assets they occupy or use.		In case of misalignment of State-managed resettlement practices, it is the responsibility of the sub-project or project to supplement the practices to align with IFC PS5.
Census and Asset Inventory	A census and asset inventory will be carried out in order to collect appropriate data to identify the persons who will be displaced by the project, establish the losses they will experience, determine who will be eligible for compensation and assistance, and prevent ineligible persons, such as opportunistic settlers, from claiming benefits.	Census and asset inventory is not specifically addressed in the legislation; only land valuation is addressed.	Census and asset inventory is to be carried out with respect to displacement and claims to compensation.
Cut Off Dates	A cut-off date for eligibility should be established. Information regarding the cut-off date will be well documented and disseminated throughout the project area. The Project is not required to compensate or assist those who encroach on the project area after the cut-off date for eligibility, provided the cut-off date has been clearly established and made public	Claims for compensation in respect of the compulsory Acquisition of land shall be admitted or entertained if made in writing to the Chief Surveyor within two years after the publication in the local Gazette	Two-year cut-off date required by the Barbados law presents a risk to the project as to having to re-instate the census and asset inventory process once closed.
Compensation and Benefits	Land is compensated at full replacement cost (market value + transaction costs) including depreciation of structures and assets.	Land is compensated based on open market value (amount which land would realise if sold at the time in the open market by a willing seller, being used for the same purpose at the time).	IFC methodology for asset valuation to be applied. In case of misalignment of State-managed resettlement practices,

	<p>Replacement of land and structures:</p> <ul style="list-style-type: none"> ■ Agricultural land: market value of equal productive use or potential located in the vicinity + cost of preparation + transaction costs (registration and transfer taxes); ■ Land in urban areas: market value of equivalent area and use with similar or improved infrastructure and services + transaction costs; <p>Houses and other structures: the cost of purchasing or building a new structure (area and quality similar or better than those of the affected structures) + labour and contractors fees + transaction fees.</p>	<p>Land is deemed to be used for agricultural purposes unless claimant proves otherwise to a judge.</p> <p>The Chief Surveyor shall pay to the claimant the reasonable costs incurred by him in or about the preparation and submission of his claim. No detail provided on what is deemed a reasonable cost.</p> <p>No formalised methodology applied for asset valuation outside of agricultural land. No valuation methodology for specific crops and trees.</p>	<p>it is the responsibility of the sub-project or project to supplement the practices to align with IFC PS5.</p>
<p>Livelihood Restoration and Improvements</p>	<p>IFC PS requires all households either physically or economically resettled to restore their livelihoods.</p> <p>Means of income earning capacity, productivity levels and associated livelihoods and standards of living of affected communities must be improved or at least restored to pre-project levels.</p>	<p>As national law does not make provision for economic or physical resettlement, no provision is made for restoration of livelihoods.</p>	<p>In the case of physical or economic resettlement, an IFC PS 5 compliant Livelihood Restoration Plan to be developed (either as a standalone document, or as part of a RAP if required).</p> <p>In case of misalignment of State-managed resettlement practices, it is the responsibility of</p>

	Transitional support to be provided based on reasonable estimates of the time required to restore income earning capacity, productivity levels and associated livelihoods and standards of living.		the sub-project or project to supplement the practices to align with IFC PS5.
Replacement Housing	In the case of physically displaced persons, the client will offer the choice of replacement property of equal or higher value, security of tenure, equivalent or better characteristics, and advantages of location or cash compensation where appropriate. Compensation in kind should be considered in lieu of cash.	No provision is made for involuntary resettlement in national legislation and therefore no guidelines regarding replacement property are provided.	IFC PS 5 standard to be applied with respect to replacement housing. In case of misalignment of State-managed resettlement practices, it is the responsibility of the sub-project or project to supplement the practices to align with IFC PS5.
Security of Tenure	Security of tenure will be provided to all those displaced by the Project.	There is no provision to offer security of land tenure as part of the compensation allowance provided under Barbados Law.	The Project will support households to obtain occupancy rights, depending on the location of the land, for all new housing and land parcel obtained. In case of misalignment of State-managed resettlement practices, it is the responsibility of the sub-project or project to supplement the practices to align with IFC PS5.

<p>Involuntary resettlement</p>	<p>Early consultation with PAPs is required.</p> <p>Either enhance or at least restore to pre-project levels.</p> <p>In the case of physically displaced persons under paragraph 17 (i) or (ii), the client will offer the choice of replacement property of equal or higher value, security of tenure, equivalent or better characteristics, and advantages of location or cash compensation where appropriate. Compensation in kind should be considered in lieu of cash. Cash compensation levels should be sufficient to replace the lost land and other assets at full replacement cost in local markets.</p> <p>Where physical relocation is necessary, IFC requires that the sponsor provides temporary housing, permanent housing sites, and resources (in cash or in kind) for the construction of permanent housing, inclusive of all fees, taxes, customary tributes, and utility hook-up charges.</p> <p>Relocation/transitional support.</p> <p>M&E on resettlement.</p>	<p>No provisions for physical displacement/involuntary resettlement.</p> <p>Only compensations for land and not for other assets.</p> <p>No M&E on resettlement provisioned.</p> <p>Where the requirements of an order under this section will involve the displacement of persons residing in any premises, the Chief Town Planner shall, in so far as there is no other residential accommodation suitable to the reasonable requirements of those persons available on reasonable terms, secure the provision of such accommodation in advance of the displacement.</p>	<p>In case of misalignment of State-managed resettlement practices, it is the responsibility of the sub-project or project to supplement the practices to align with IFC PS5.</p>
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<p>Compensation for enterprises (lost income)</p>	<p>Compensation for lost earnings should be paid to proprietors and employees for the duration of work stoppages resulting from the relocation of enterprises</p>	<p>regard shall be had to the net amount of any income derived from that land at the material time and, where no income is derived therefrom at that time, to the rent at which the land might, at the material time, reasonably be expected to be let from year to year for the purpose of being put to the same use to which it was being put at that time;</p>	<p>Acknowledgment of the potential impacts of land acquisition / work on land, but no specific provisions are made on compensations.</p> <p>In case of misalignment of State-managed resettlement practices, it is the responsibility of the sub-project or project to supplement the practices to align with IFC PS5.</p>
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Purpose:

BGB aims to facilitate land acquisitions and limit induced negative impacts by ensuring that displaced PAPs are treated in a fair and equitable way and are not left worse off in the process.

Guiding principles:

The guiding principles governing LARF are as follows:

- The Project must consider national and international legal requirements related to land acquisition, conduct a gap analysis and apply the dispositions that are the most protective of the impacted populations' rights;
- All forms of displacement must be avoided to the extent possible;
- When avoidance is not an option, minimize social, economic and environmental impacts on the livelihoods of affected persons, with special attention to the most vulnerable individuals. Displacement is a last resort;
- Assess what vulnerability means in the context of the project;
- All legitimate property rights, including informal, customary and traditional ownership, use and other secondary and tertiary rights recognized and inventoried;

- Land users without a recognised land title or claim to the land must not be compensated for loss of access to land, but must be compensated for the potential impacts on their livelihoods, provided that they have been identified prior to the cut-off date;
- Compensation must be the result of specific transparent engagement and to result in negotiated settlements;
- Ensure transparent, accountable, culturally appropriated and meaningful engagement with affected and host communities and all other relevant stakeholders.

Eligibility classification:

Directly and Indirectly affected persons may be classified depending on the claims they have on impacted lands prior to the cut-off date: (a) Who have formal legal rights to land or assets; (b) Who do not have formal legal rights to land or assets, but have a claim to land or assets that is recognized or recognizable under national and international requirements; or (c) Who cannot provide recognizable legal right but still hold claim to the land or assets they occupy or use.

Project design:

The key implementer of the LARF will be with the Investee. The Investee will demonstrate that land acquisition potentially leading to restrictions on land use are limited to direct project requirements for clearly specified project purposes within a clearly specified period of time. The Investee will consider feasible alternative project designs to avoid or minimize land acquisition or restrictions on land use, especially where this would result in physical or economic displacement, while balancing environmental, social, and financial costs and benefits, and paying particular attention to gender-related impacts and impacts on the poor and vulnerable.

Compensation and benefits:

When land acquisition or restrictions on land use (whether permanent or temporary) cannot be avoided, the Investee will offer affected persons compensation at replacement value or higher. Other assistance may be necessary to help them improve or at least restore their standards of living or livelihoods. Compensation standards for categories of land and fixed assets will be disclosed and applied consistently. Compensation rates may be subject to upward adjustment where negotiation strategies are employed. In all cases, a clear basis for calculation of compensation will be documented, and compensation distributed in accordance with transparent procedures.

The Investee will take possession of acquired land and related assets only after compensation in accordance with this LARF has been made available and, where applicable, displaced people have been resettled and moving allowances have been provided to the displaced persons in addition to compensation. In addition, livelihood restoration and improvement programs will commence in a timely fashion in order to ensure that PAPs are sufficiently prepared to take advantage of alternative livelihood opportunities as the need to do so arises.

Stakeholder engagement:

The Investee will engage affected communities, including host communities, through a structured process of stakeholder engagement. Engagement must happen early in the life of the Project, be regular, structured and traced through a dedicated plan, conducted in a culturally appropriate way, and aim both at providing and gathering information. The consultation process should ensure that women’s perspectives are obtained, and their

interests factored into all aspects of resettlement planning and implementation. Addressing livelihood impacts may require intra-household analysis or census in cases where women's and men's livelihoods are affected differently. Women's and men's preferences in terms of compensation mechanisms, such as replacement land or alternative access to natural resources rather than in cash, should be explored.

Grievance Redress Mechanism:

Investees will establish a Project-level Grievance redress mechanism directed at PAPs for them to seek redress of any grievances that may arise in the course of planning, implementation and decommission of their project. Investees should also communicate around the existence of a Lender-level Grievance Redress Mechanism.

Planning and implementation:

Where displacement is unavoidable, as part of the environmental and social assessment, the Investee will:

- Conduct a census to identify the persons who will be affected by the project;
- Establish an inventory of land and assets to be affected;
- Determine who will be eligible for compensation and assistance and discourage ineligible persons, such as opportunistic settlers, from claiming benefits. The social assessment will also address the claims of communities or groups who, for valid reasons, may not be present in the project area during the time of the census, such as seasonal resource users;
- Establish a cut-off date for eligibility. Information regarding the cut-off date will be well documented and will be disseminated throughout the project area at regular intervals in written and (as appropriate) nonwritten forms and in relevant local languages. This will include posted warnings that persons settling in the project area after the cut-off date may be subject to removal.

To address the issues identified in the environmental and social assessment, the Investee will prepare a plan proportionate to the risks and impacts associated with the project:

- A. For projects causing physical displacement, the plan will set out the additional measures relevant to **relocation of affected persons, such as eligibility criteria for affected persons, set out procedures and standards for compensation, and incorporate arrangements for consultations, monitoring and addressing grievances;**
- B. For projects involving economic displacement with significant impacts on livelihoods or income generation, the plan will set out the **additional measures relating to livelihood improvement or restoration;** and
- C. For projects that may impose changes in land use that restrict access to resources in legally designated parks or protected areas or other common property resources on which local people may depend for livelihood purposes, the plan will establish a **participatory process for determining appropriate restrictions on use and set out the mitigation measures to address adverse impacts on livelihoods that may result from such restrictions.**

The Investee's plan will also establish the roles and responsibilities relating to financing and implementation and include arrangements for contingency financing to meet unanticipated costs, as well as arrangements for timely

and coordinated response to unforeseen circumstances impeding progress toward desired outcomes. **The full costs of resettlement activities necessary to achieve the objectives of the project are included in the total costs of the project.**

The Investee will also establish procedures to monitor and evaluate the implementation of the plan and will take corrective action as necessary during implementation to achieve the objectives of this ESMS. Implementation of the Investee's plan will be considered completed when the adverse impacts of resettlement have been addressed in a manner that is consistent with BGB's LARF, the relevant plans (RAP, LRP), as well as the objectives of this ESMS.

Physical displacement:

In the case of physical displacement, the Investee will develop a plan that covers, at a minimum, the applicable requirements of this ESMS regardless of the number of people affected. The plan will be designed to mitigate the negative impacts of displacement and, as warranted, to identify development opportunities. It will include a resettlement budget and implementation schedule and establish the entitlements of all categories of affected persons (including host communities). Particular attention will be paid to gender aspects and the needs of the poor and the vulnerable. The Investee will document all transactions to acquire land rights, provision of compensation and other assistance associated with relocation activities.

If people living in the project area are required to move to another location, the Investee will: offer displaced persons choices among feasible resettlement options, including cash and in-kind compensations, as well as coverage for the relocation costs; and

- provide relocation assistance suited to the needs of each group of displaced persons.

New resettlement sites will offer living conditions at least equivalent to those previously enjoyed, or consistent with prevailing minimum codes or standards, whichever set of standards is higher. If new resettlement sites are to be prepared, host communities will be consulted regarding planning options, and resettlement plans will ensure continued access, at least at existing levels or standards, for host communities to facilities and services. The displaced persons' preferences with respect to relocating in pre-existing communities and groups will be respected wherever possible. Existing social and cultural institutions of the displaced persons and any host communities will be respected. The Investee will not resort to forced evictions of Project-Affected Persons. "Forced eviction" is defined as the permanent or temporary removal against the will of individuals, families, and/or communities from the homes and/or land which they occupy without the provision of, and access to, appropriate forms of legal and other protection, including all applicable procedures and principles in this LARF. When the Investee is contributing or linked to forced evictions, it will deploy the proportional mitigation and remediation measures, and exert leverage depending on the Investee's relationship to the evictions.

As an alternative to displacement, the Investee may consider negotiating in situ land development arrangements by which those to be affected may elect to accept a partial loss of land or localized relocation in return for improvements that will increase the value of their property after development. Any person not wishing to participate will be allowed to opt instead for full compensation and other assistance as required in this ESMS.

Economic Displacement

In the case of projects' land intake or use affecting livelihoods or income generation, the Investee's management plans (RAP, LRP) will include measures to allow affected persons to improve, or at least restore, their incomes or

livelihoods. The plan will establish the entitlements of affected persons and/or communities, paying particular attention to gender aspects and the needs of vulnerable segments of communities, and will ensure that these are provided in a transparent, consistent, and equitable manner. The relevant management plans will incorporate arrangements to monitor the effectiveness of livelihood measures during implementation, evaluation once implementation is completed and at regular interval after the plan's end. The mitigation of economic displacement will be considered complete when the completion audit concludes that affected persons or communities have received all of the assistance for which they are eligible and have been provided with adequate opportunity to re-establish their livelihoods. The mechanisms for compensation will be designed and outlined by the Investee in their preparatory documentation, in line of the present LARF.

Livelihood Restoration:

By issuing a guarantee for a project, certain operations may affect local communities to resources resulting in losses or disruption of livelihood. The Investee should thus recognise the potential and magnitude of adverse impacts of their projects and develop livelihood restoration options captured in a LRP that can consider the following:

- Livelihood restoration for vulnerable affected peoples should refer to the ecological conditions, livelihoods and socio-cultural characteristics possessed by directly and indirectly affected people;
- Livelihood restoration should be able to support project affected people to gain a similar or even better livelihood, independently. It is important that the land acquisition and resettlement process will not cause dependency to the project nor to the Investees, which has the potential to generate negative impacts with effects persisting longer than the project's life. Livelihood Restoration's effects should be monitored at least until livelihood means are restored;
- Involving representatives of both communities, the project-affected people and host populations, in the consultation process to maximise positive engagement, tailor the Investee's intervention to the impacted communities' needs, avoid the appearance of unintended consequences including violent conflict, and to resolve disputes that are expected to arise during and after the resettlement process.

Resettlement Action plan:

Where applicable, Investees will be required to compile a Resettlement Action Plan (RAP) that details the **procedures** to be followed and the **actions** to be taken in order to resettle and compensate affected people and communities while minimizing the adverse impacts of resettlement. The RAP reflects the commitment made by the Investee to PAPs to meet obligations arising from resettlement. The RAP will be part of a more comprehensive LARP and should cover the following elements:

1. Introduction

- Briefly describe the project.
- Describe project components requiring land acquisition and resettlement; give overall estimates of land acquisition and resettlement.
- Provide explanation of how displacement is necessary to achieve the project objectives, how the project is in the public interest and how displacement is proportional to project outcomes.

2. Legal Framework

- Describe all relevant international, national, local, and community laws and customs that apply to displacement and resettlement activities, with particular attention to laws and customs relating to tenure rights; highlight any potential conflicts.
- Describe how free, prior, informed consent was obtained for resettlement of Indigenous peoples and tribal communities, if applicable. As previously mentioned, this case is unlikely to arise in the context of Barbados.

3. Knowledge of the affected population

- Incorporate descriptive material on the impacted population's economic, social, health, cultural characteristics of (extracted from ESIA, baseline study, among others), including the need of new studies related to resettlement.
- Include a description of what vulnerability means in the context of the Investees' project, e.g., single-headed households, economically dependent individuals or households, outcasts, etc.
- Use baseline information as a control point throughout the resettlement and livelihood restoration.

4. Avoiding resettlement

- Avoid resettlement when reasonably possible, notably through changes in the project's or transport infrastructure's design. It is important that avoiding resettlement is an early concern, at the core of the Project's design.
- When resettlement cannot be avoided, compile the elements that led to this conclusion in a related study of plan (e.g., ESIA, LARP, RAP, etc.).

5. Minimizing Resettlement and impact mitigation

- Describe the justification for the resettlement.
- Describe efforts and measures to minimize displacement and its effects on the impacted population. Among the effect should be considered access to natural resources, to a source of income, to cultural and archaeological sites, and to meaningful community interaction. Set the expected outcomes of these efforts and measures.
- Mitigate negative impacts of displacement and or resettlement to the best of the project's ability.

6. Compensation calculation

- Develop a resettlement budget and schedule.
- Establish the entitlements of all categories of affected persons (including host communities). Entitlements can include, but are not limited to, cash, land, facilitated access to replacement natural resources or source of economic activities, transportation support.
- Entitlement ought to be systematically, collaboratively, and transparently determined along a predictable framework, in line with national and international standards, and cognizant of the resettlement or displacement local context's particularities.

7. Resettlement Sites and Housing

- If the project requires relocation, describe how affected people have been involved in a participatory process to identify sites, assess advantages and disadvantages of each site, and select preferred sites.
- If housing must be replaced, describe how affected people have been involved in developing an acceptable strategy for housing replacement and how alternative housing meets adequate housing criteria.
- Describe the specific process of involving affected populations in identifying potential housing sites, assessing advantages and disadvantages, and selecting sites.

- If the project involves allocation of agricultural land or pasture/rangeland, describe how individual households that will be allocated lands have been involved in identifying potential new sites, and how they have explicitly accepted the selected sites.
- Describe the feasibility studies conducted to determine the suitability of the proposed relocation sites and housing, including where relevant natural resource and environmental and social impact assessments of the sites.
- Describe mechanisms for: (1) procuring, (2) developing and (3) allotting resettlement sites and housing, including the awarding of title or use rights to allotted lands. Indicate to whom titles and use rights will be allocated, including by gender. In some cases, land can be allocated to a community or a group of individuals wider than a single household.
- Indicate whether temporary resettlement will be necessary and how the communities' social capital will be preserved. The Investees will avoid placing population to temporary housing to the best of their abilities. Permanent housing solutions should be the immediate priority, without which resettlement activity should be avoided.

8. Livelihood Restoration

- Co-design with impacted communities, national agencies and potential implementation partners, livelihood restoration projects, at least until the impacted population's livelihoods become sustainable again and to the level they were before resettlement or displacement occurred.
- Communicate to all stakeholders the objectives, timeline and means deployed for livelihood restoration.
- Monitor if compensation entitlements sufficient to enhance, or at least restore, livelihoods and income streams for each category of impact, and overall.
- If not, deploy additional impact mitigation strategies for additional economic rehabilitation measures to remedy to livelihood disruption.

9. Institutional Arrangements

- Describe the institution(s) responsible for delivery of each item/activity in the entitlement policy; implementation of income restoration programs; and coordination of the activities associated with and described in the resettlement action plan.
- State how coordination issues will be addressed where resettlement is spread over a number of jurisdictions or where resettlement will be implemented in stages over a long period of time.
- Identify the agency that will coordinate all implementing agencies, if any.
- Describe the external (non-project) institutions involved in the process of income restoration (land development, land allocation, credit, training) and the mechanisms to ensure adequate performance of these institutions.
- Conduct a gap assessment between national and international standards and assess institutional capacity for and commitment to resettlement. Upon conclusion, apply the disposition that are the most protective of the impacted population's rights.
- Describe mechanisms for ensuring independent monitoring, evaluation, and financial audit of the RAP and for ensuring that corrective measures are carried out in a timely fashion.

10. Implementation Schedule

- List the chronological steps in implementation of the RAP and LRP, including identification of agencies responsible for each activity and with a brief explanation of each activity.

11. Participation and Consultation

- Describe the various stakeholders, linking this description to stakeholder mapping efforts (see Annex 13 on Stakeholder Engagement plan).
- Describe the process of entrenching consultation/participation of affected populations and other relevant stakeholders in the design, rollout and monitoring of resettlement activities, e.g., national agencies, civil society, etc.

12. Grievance Redress

- The Investee will design and rollout a Project-Level Grievance redress mechanism as early as possible during its project's cycle.
- Communicate with particular attention the existence of this mechanism to community members impacted by resettlement and/or displacement. Ensure unrestricted access of those impacted individuals to the mechanism.
- The Investee will report frequently the lodging of resettlement and/or displacement-related grievance, and will provide updates on those grievances' status (See Appendix 14 for details on Project-level Grievance Mechanism).

13. Monitoring and Evaluation

- Describe the internal/performance monitoring and evaluation process. Ensure monitoring program seeks to measure whether displaced enjoy at least a standard of living and access to livelihoods equal to what they enjoyed before displacement.

14. Costs and Budgets

- Provide a clear statement of financial responsibility and authority.
- List the sources of funds for resettlement and describe the flow of funds.

Appendix 18: Potential Sexual Exploitation, Abuse, and Harassment (SEAH) report template

Purpose and definitions:

BCB has zero tolerance for all forms of Sexual Exploitation, Sexual Abuse and Sexual Harassment (SEAH) in its banking-related activities. SEAH violates human dignity and have always been unacceptable behaviour. SEAH is based on unequal relations and power dynamics resulting in a culture of discrimination and privilege. It creates hostile interpersonal relationships and work-related environments, which limit the ability of affected persons to thrive and BGB to achieve its mission. SEAH in any form is not acceptable at BGB.

BGB recognises the imperative to prevent and respond effectively to SEAH and to protect persons, especially persons in vulnerable positions and situations, and survivors of SEAH in all bank-related activities. These protections are essential to strengthen integrity and accountability throughout BGB. BGB will support entities it engages with to develop and implement policies and mechanisms that address Sexual Exploitation, Sexual Abuse and Sexual Harassment.

BGB's definitions of the different components of SEAH are based on internationally agreed understanding of SEAH⁸ in connection with a Bank-related activity, as described below:

- Sexual exploitation: any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes. Includes profiting momentarily, socially, or politically from sexual exploitation of another. Under UN regulations it includes transactional sex, solicitation of transactional sex and exploitative relationship;
- Sexual abuse: the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. It should cover sexual assault (attempted rape, kissing / touching, forcing someone to perform oral sex / touching) as well as rape. Under UN regulations, all sexual activity with someone under the age of 18 is considered to be sexual abuse;
- Sexual harassment: a continuum of unacceptable and unwelcome behaviours and practices of a sexual nature that may include, but are not limited to, sexual suggestions or demands, requests for sexual favours and sexual, verbal or physical conduct or gestures, which are or might reasonably be perceived as offensive or humiliating.

Guiding principles:

Guiding principles underpin the core values and premises of the SEAH Policy and are aligned with the objectives and guiding principles of the Governing Instrument:

⁸ UN Glossary on Sexual Exploitation and Abuse 2nd Edition and UN General Assembly Resolution “Intensification of efforts to prevent and eliminate all forms of violence against women and girls: sexual harassment” (A/RES/73/148)

1. BGB shall not tolerate any form of Sexual Exploitation, Sexual Abuse, or Sexual Harassment.
2. BGB and its clients shall not enter into future engagements with those who condone, encourage, participate in, or engage in SEAH.
3. BGB shall take all appropriate measures to prevent, mitigate, investigate, and remedy SEAH in relation to acts perpetrated by Investees in Bank-related activities, including exerting leverage on Investees. BGB will exert oversight on Investees that a variety of effective, clear, and simple survivor- and victim-centred complaints mechanisms that are available to all community members and workers, with clear requirements and guidance on when and how the mechanisms might be used and ensure appropriate linkages to and support for the provision of survivors' and victims' assistance. Complaints mechanisms should be developed and implemented, adapted to specific local and cultural contexts, and used in co-operation with local leadership, and with authorities where safe and appropriate, and to the maximum extent practicable, be jointly supported.
4. BGB shall take all appropriate measures to protect actual or suspected survivors such as ensuring their anonymity, physical safety and removal from proximity to suspected perpetrators - from retaliation because of a report of actual or suspected SEAH perpetrated by Investees in Bank-related activities. Those prevention, avoidance, mitigation, and remedy measures are detailed in a SEAH action plan that is regularly updated and cross-pollinated with the relevant management system at BGB's level, such as the grievance mechanism related systems or the Human Resources' Management System.

Management of SEAH

BGB recognises the imperative BGB-financed activities to prevent and respond effectively to SEAH in a survivor-centred and gender-responsive way. This includes protecting persons, especially persons in vulnerable positions and situations, and survivors of SEAH in BGB-financed activities. These protections are essential to strengthen integrity and accountability throughout BGB. The management of SEAH is detailed as per the below:

- Embed SEAH in risk and impact assessment process at fund, project and subproject's levels. ESIA and ESMP, as appropriate, include measures to enhance gender equality, and to avoid, prevent, mitigate and remedy SEAH.
- Deploy mitigation measures such as a grievance mechanism, whistle-blower mechanism, provide training to the HR function and line management, make explicit that BGB, projects and subprojects condemn any individual or groups engaging in related practices.
- Provide a safe environment for individuals at risk of or experiencing SEAH to seek for protection and remedy, through their line management, professional environment, availability of mechanisms.
- Embed the monitoring of SEAH in performance-tracking systems at fund, project and subproject's level to update.
- In case incidences of SEAH occur:
 - Make use of the survivor-centred and gender-responsive grievance redress mechanisms at the level closest to the incident (subproject, project, or fund), apply specific procedures for SEAH, including confidential reporting with safe and ethical documenting of such cases, that indicate when and where to report incidents, and what follow-up actions will be undertaken.
 - Provide timely services and redress to survivors, including as appropriate, medical care, psychosocial support, legal support, community driven protection measures, and reintegration.

- Ensure that BGB, project and sub-project's level grievance mechanisms are designed and implemented to receive and provide remedy to SEAH-related complaints, as well as avoiding and preventing future occurrence of SEAH-related harm in the future. This implies that grievance mechanisms are survivor-centred and gender-responsive.
- Through active continuous learning measures, identify patterns and causes of SEAH through different stakeholder groups, including assisting with the identification of barriers to access of to a grievance mechanism and their causes, particularly barriers due to a heightened risk of vulnerability or marginalization.

Report template:

Field	Data
Reporting officer	
Date of incident reporting	DD/MM/YYYY
Date of incident	DD/MM/YYYY Do not wish to disclose this information Risk of identification Unknown for another reason
Gender of survivor / victim	
Age of survivor / victim	
Type of allegation	Sexual exploitation Sexual abuse Sexual harassment Risk of identification
Reporting channel used	To be defined
Profile of person reporting incident	Staff of my organisation Staff of another organisation Survivor/victim Member of victim/survivor's family

	<p>Other member of the community</p> <p>Anonymous</p> <p>Risk of identification</p>
Profile of alleged perpetrator	<p>Staff member - senior management</p> <p>Staff member - middle management</p> <p>Staff member - field staff</p> <p>Volunteer</p> <p>Partner staff</p> <p>Contractor</p> <p>Consultant</p> <p>Donor</p> <p>No alleged perpetrator identified</p>
Gender of alleged perpetrator	
Overall status of the allegation	<p>Substantiated - Subject was separated from hiring entity as a result of SEAH</p> <p>Substantiated – Subject separated from hiring entity before the allegation was found to be substantiated</p> <p>Subject resigned or separated pending investigation</p> <p>Subject resigned or separated pending disciplinary process</p> <p>Unsubstantiated</p> <p>No responsive action possible</p>
<p>Have the Barbados police, or other authorities, been informed of the incident/allegation?</p> <p>If yes, provide details on the police’s response or proposed actions and relevant point of contact</p>	Free text
Assistance/responsive action rendered to survivor/victim	<p>Medical assistance</p> <p>Mental Health & Psychosocial assistance</p>

	<p>Legal assistance</p> <p>Physical protection</p> <p>Economic assistance</p> <p>No survivor/victim identified</p> <p>Survivor/victim did not seek assistance</p> <p>Survivor/victim declined assistance</p> <p>No assistance available</p>
Reason why no responsive action taken	<p>N/A - Responsive action taken</p> <p>Survivor/victim did not give consent</p> <p>Risk for survivor/victim deemed too high</p> <p>Complainant did not cooperate</p> <p>Lack of internal capacity or resources</p> <p>No jurisdiction over allegation</p> <p>No access to the area of the incident</p> <p>Insufficient information to assess allegation</p> <p>Determined not to be SEAH (allegation reclassified)</p>
Remedial actions taken	<p>Training of staff or affiliated personnel</p> <p>Community awareness raising</p> <p>Risk mitigation measures assessed (programmatic)</p> <p>Risk mitigation measured implemented (programmatic)</p> <p>Risk mitigation measures assessed (human resources)</p> <p>Risk mitigation measures implemented (human resources)</p> <p>SEAH action plan designed</p>
Comment	Free text

Appendix 19: E&S Impact Assessment – table of contents

- I. Introduction
 - a. Project's context
 - b. Project justification
 - c. Presentation of Project's implementer
 - d. ESIA objectives
- II. Policy, legal and institutional framework
 - a. National legislative framework
 - b. Government Organisation
 - c. National Government
 - d. Local Government
 - e. National Environmental Administrative framework
 - f. National Environmental Impact assessment process
 - g. National Environmental quality standards
 - h. Ratified multilateral environmental and social agreements applicable to the project
- III. International best practices and standards applicable to the Project
- IV. Corporate applicable policies
- V. Project description
- VI. Project alternatives
- VII. Stakeholder mapping and consultation framework
- VIII. Environmental and social baseline
 - a. Physical environment
 - b. Biological environment
 - c. Socio-economic baseline
- IX. Assessment of Project impacts and risks
- X. Environmental and social mitigation measures
- XI. Environmental and social management plan

Appendix 20: E&S Audit Report – table of contents

- I. Introduction
 - a. Project's context
 - b. Presentation of Project's implementer
 - c. E&S audit objectives
 - d. E&S audit's reference framework
- II. Environmental and social baseline information
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- IV. Stakeholder mapping and consultation framework
- V. Audit findings
- VI. Audit recommendations

Appendices

The following appendices are attached to this ESMS Manual.

- [Appendix 1: E&S Exclusion List](#)
- [Appendix 2: BGB Eligibility List](#)
- [Appendix 3: E&S Screening Checklist](#)
- [Appendix 4: Initial Investment Committee Decision Meeting Paper](#)
- [Appendix 5: E&S Due Diligence Checklist](#)
- [Appendix 6: External E&S Due Diligence Terms of Reference](#)
- [Appendix 7: E&S Action Plan template](#)
- [Appendix 8: Final Investment Committee Decision Meeting Paper](#)
- [Appendix 9: Green Climate Fund subproject disclosure report](#)
- [Appendix 10: E&S Clauses Guidance Note](#)
- [Appendix 11: Annual and quarterly monitoring reports templates](#)
- [Appendix 12: Major Incident Reporting Form for subprojects](#)
- [Appendix 13: Stakeholder Engagement Plan template for subprojects](#)
- [Appendix 14: Grievance mechanism \(BGB, Investee and sub-project level\)](#)
- [Appendix 15: Chance Finds Procedure](#)
- [Appendix 16: Land Acquisition and Resettlement Action Framework](#)
- [Appendix 17: Potential Sexual Exploitation, Sexual Abuse, and Sexual Harassment \(SEAH\) report template](#)
- [Appendix 18: E&S Impact assessment - table of contents](#)
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