



ASIAN DEVELOPMENT BANK

Environmental and Social Management Framework (ESMF)

Annex 6

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ACRONYMS

ADB	-	Asian Development Bank
DFI	-	Development Financial Institutions
E&S	-	Environmental and Social
ESAP	-	Environmental and Social Action Plan
ESF	-	Environmental and Social Framework
ESS	-	Environmental and Social Safeguards
ESP	-	GCF's Environmental and Social Policy
ESIA	-	Environmental, Social Impact Assessment
ESMP	-	Environmental and Social Management Plan
ESMF	-	Environmental and Social Management Framework
FPIC	-	Free, Prior and Informed Consent
GAP	-	Gender Action Plan
GCF	-	Green Climate Fund
GHG	-	Greenhouse Gases
IGFF	-	India Green Finance Facility
NDC	-	Nationally Determined Contribution
PIU	-	Project Implementation Unit
PMU	-	Project Management Unit
SEAH	-	Sexual Exploitation, Sexual Abuse and Sexual Harassment
SPS	-	ADB's Safeguard Policy Statement

A. INTRODUCTION

1. **India Green Finance Facility.** The objective of the India Green Finance Facility (IGFF or 'Facility') is to accelerate India's clean energy transition and strengthen climate resilience in the country's economy. This will be accomplished by supporting the transformation of the financial sector through integration of environmental considerations into financial decision-making, which will in turn enable the country to achieve its emission targets. The requirements in the country for transformation in delivering Nationally Determined Contribution (NDC) under the Paris Agreement are massive and require major shifts in financial market structures for concessional financing. It also requires diving beyond the mainstream and standard areas and products. This transformation will be achieved by providing access to concessional resources from the Green Climate Fund (GCF) alongside the Asian Development Bank (ADB)'s own resources, with the aim to crowd India's domestic Development Financial Institutions (DFIs) into the renewable energy market, including for new technologies, such as energy storage and low carbon-transportation, therefore supporting the acceleration of green financial flows. The proposed facility will be implemented over two phases and is intended to:

- I. accelerate financing and increase the deployment of emerging clean energy technologies by addressing barriers associated with high capital costs and perceived risks. By leveraging concessional financing, IGFF seeks to catalyze private sector investments and scale up transformative solutions such as round-the-clock (RTC) renewable energy, green hydrogen, and compressed biogas (CBG), expanding India's clean energy portfolio;
- II. increase green lending by strengthening the institutional capacity of DFIs. By embedding climate-aligned frameworks into their operations, DFIs can better assess, finance, and monitor clean energy projects; and,
- III. embed gender considerations into the lending operations of DFIs to bridge gender gaps in clean energy financing and employment. By enhancing sex-disaggregated data systems and supporting women-led initiatives, IGFF will foster a more inclusive energy transition that recognizes and amplifies women's roles in the sector.

2. With this financial intervention, supported by a dedicated technical assistance package, the Facility will enable the acceleration of the green transition of the financial sector in India through the DFIs, ensuring its alignment with Paris Agreement goals, within applicable climate-related financial disclosure frameworks.

3. As part of the project, extensive technical assistance is provided to participating domestic FIs to deliver corporate and operational upskilling of renewable energy sector lending capacity, identification, management, and reduction of transition and physical climate risk, and climate related reporting and strategic planning. This is a key component, integral to achieving mitigation and adaptation impacts, to support the green and sustainable transition of India's DFIs, ensuring their alignment with Paris Agreement goals, climate-related financial disclosure frameworks and other sustainability targets.

4. This will be reinforced by providing support for the adoption of sustainable and/or green banking practices. By providing this integrated package of technical assistance and low-cost financing, the facility will move India forward in the country's energy transition efforts, reducing carbon intensity and decoupling economic growth from Greenhouse gas (GHG) emissions. A list of proposed sectors and activities is presented in **Appendix 1**, while **Appendix 2** details a list of ADB prohibited investments.

5. The Facility has been categorised as **Intermediation-2** to reflect that the facility will act as an intermediary to the operation of the investments, all of which will have a maximum categorisation of Category B. The rationale for the categorisation is based on the expected risks of the facility and the sub-projects, and is the maximum allowed under the accreditation of the DFIs involved.

B. ROLES AND RESPONSIBILITIES

6. **Project Management Unit and Project Implementation Unit.** On the management side there will be a Program Management Unit and a Project Implementation Unit, defined as follow:

- Program Management Unit (PMU) – this is at the ADB at program (facility) level. This will make all the high-level decisions including allocation of funds for new loan to a DFI.
- Project Implementation Unit (PIU) – these will be established at DFI level and funded by the TA grants also consisting of international and national consultants, to manage DFI-specific operations.

7. The PIU, staffed and overseen by ADB, will provide assistance, conduct screenings and checks of sample projects' categorisations, and revise the relevant environment and social (E&S) safeguards. The PIU will oversee and implement all relevant elements of the ESMF and ADB will ensure that it is fully empowered to do so. The actions of the PIU will be governed by this ESMF and its Policies.

8. Extensive technical assistance will be provided by ADB to participating domestic DFIs on a needs basis to ensure that projects are aligned with the GCF relevant E&S safeguards and suite of policies and the E&S requirements during IGFF Investment Cycle. To foster knowledge-sharing and capacity-building, the facility-level team will organize regular knowledge exchange sessions, facilitating best practice sharing and continuous improvement.

9. By providing this integrated package of technical assistance and low-cost financing, the facility will move India forward in the country's energy transition efforts, reducing carbon intensity and decoupling economic growth from Greenhouse gas (GHG) emissions.

10. **Development Financial Institutions.** The IGFF will have the following DFIs operating in connection with it:

- National Bank for Agriculture and Rural Development (NABARD)
- Rural Electrification Corporation (REC)
- India Infrastructure Finance Company Limited (IIFCL)

11. DFIs will be responsible for pipeline development, initial E&S screening, full proposal assessments, project categorisation, in collaboration with the PIU.

12. The DFIs will allocate responsibilities and appropriate resources to make sure there is effective implementation of the ESMF and IGFF Policies at project level. They will nominate one responsible person and adequate staff resources to oversee the E&S appraisal and monitoring processes and to initiate and develop environmentally and socially beneficial projects.

13. DFIs are also responsible for reporting on E&S and Gender benchmarks to IGFF throughout project implementation. Alongside this, they will be responsible for direct and regular engagement with the project proponents throughout the project lifecycle and feeding information up to IGFF.

14. The DFI should be formally responsible for the preparation of projects and programs' assessments and monitoring.

15. Should a new DFI join the IGFF, a due diligence assessment will be conducted by the PIU in line with section D.1 of this framework, and the new DFI will be subject to all other relevant procedures contained in this framework. Due diligence considerations for DFI are included in Appendix 14.

C. ENVIRONMENTAL AND SOCIAL STANDARDS, GUIDELINES AND POLICIES

16. IGFF's overall approach to its policies and Environmental and Social Management Framework (ESMF) is guided by the ***Green Climate Fund Revised Environmental and Social Policy and all other GCF relevant E&S policies*** and commitments that have been recognized as established good international practices by GCF, development finance institutions, and the private sector. Recognized good international practices include, but are not limited to:

- the ***IFC Policy and Performance Standards on Social and Environmental Sustainability 2012 and its updated Guidance Notes***.
- Relevant ***World Bank Group Environmental, Health and Safety (EHS) Guidelines***, as applicable.
- the ***United Nations Guiding Principles on Business and Human Rights (UNGPs)*** based on the 'Protect, Respect and Remedy' framework of the United Nations.
- International ***Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work***.
- ***UN Convention on the Elimination of All Forms of Discrimination Against Women***.
- the ***Indigenous Peoples Policy (IPP)***, as applicable.

17. IGFF also follows ADB's ***Safeguard Policy Statement (SPS), 2009*** and its other related Environment and Social (E&S) guidelines such as:

- **Strategy 2030:** ADB's long-term strategy to respond effectively to the changing needs of Asia and the Pacific, focusing on achieving a prosperous, inclusive, resilient, and sustainable region. It prioritises environmental sustainability, climate change, and making cities more liveable.
- **Gender Equality Policy:** Aims to integrate gender equality and women's empowerment into ADB operations to enhance the effectiveness of its projects and promote inclusivity.
- **Access to Information Policy:** Ensures transparency and accountability by allowing greater access to ADB documents and information regarding its operations and activities.
- **Anti-Corruption Policy:** ADB has a strict policy against corruption and implements measures to prevent and address corruption in its projects and activities.

- **Asbestos Guidelines:** provides guidance on the duties of employers and contractors in minimizing risks from asbestos; training requirements; and the identification, containment, safe removal and management of asbestos waste.
- **Public Communications Policy:** Guides how ADB communicates with its stakeholders, aiming to promote transparency and accountability.
- **Energy Policy:** Provides the framework for ADB's support to its developing member countries in the energy sector, focusing on achieving access to clean and sustainable energy.
- **Climate Change Policy:** ADB integrates climate change considerations into its operations and aims to support its member countries in mitigation and adaptation efforts.
- **Social Protection Strategy:** Aims to strengthen social protection measures in member countries to reduce poverty and vulnerability.

18. ADB in 2025 developed the new **Environmental and Social Framework (ESF)**, which will come into effect from 1 January 2026. New projects approved by ADB after 1 January 2026, except for projects for which the Project Concept Notes are approved under the SPS, will be governed by ESF. All IGFF projects will be governed exactly similar to these arrangements.

19. A summary of the main principles and commitments of the IGFF is reported in the IGFF E&S policy presented in **Appendix 3**.

20. The DFI's E&S, Gender and other relevant standards are also considered as part of the E&S framework in which IGFF is based upon (*full list of relevant policies and standards is available in **Appendix 4**, while a non exhaustive list of applicable E&S country legislation and international treaties are presented in **Appendix 5***).

21. The IGFF will adhere to any applicable national legislation and regulations. Applicable specific standards are limited, and the facility will apply whichever is the highest standard between GCF, ADB and national policies. This is designed to align with best international practice. Wherever relevant, inconsistencies between national standards and GCF or ADB policies are to be highlighted during the Project screening phase, outlining how the highest standard has been met. Key applicable Indian national standards include:

Environmental Protection:

- Environmental Protection Act 1986
- Environmental Protection (Third) Amendment Rules, 2002, along with subsequent amendments
- Air (Prevention and Control of Pollution) Act, 1981 as amended 1987; and Air (Prevention and Control of Pollution) Rules, 1982
- Noise Pollution (Regulation and control Rules), 2000
- Water (Prevention and Control of Pollution) Act 1974 (section 25) (herein after referred to as Water Act 1974)
- Notified Guidelines to regulate and control Ground water Extraction in India dated 12 December 2018, with effect from 01 June 2019
- Hazardous and Other Wastes (Management and Transboundary) Rules, 2016
- Ozone Depleting Substances (Regulation and Control) Rules, 2000
- Regulation of Polychlorinated Biphenyls (PCB) Order, 2016

- Forest (Conservation) Act 1980
- Wildlife Protection Act 1972
- Guidelines for declaration of eco-sensitive zones around National parks and Wildlife Sanctuaries, 2011
- Coastal Regulation Zone (CRZ) Notification, 2019

Land Acquisition & Resettlement:

- Right to Fair Compensation and Transparency in Land Acquisition Resettlement and Rehabilitation Act 2013 (RFCT LARR Act 2013)
- Guidelines / policies / rules / statutes for acquisition of land on consent basis by various State Governments (Kerala, Chhattisgarh, West Bengal, Uttar Pradesh, Telangana, Punjab, Rajasthan, Goa, Odisha, Bihar, Maharashtra, Himachal Pradesh, Karnataka, and Madhya Pradesh)
- Land Revenue Codes of different State Governments and Union Territories

Labour and Working Conditions:

- Factory Act 1948 and State Factory Rules (Director of Industrial Safety and Health requirement)
- The Central Electricity Authority (Measures relating to Safety & Electric Supply) Regulations, 2010 and amendments
- Child and Adolescence Labour (Regulation and Abolition) Act 1986, as amended in 2017
- Bonded Labour (Abolition) Act 1976
- Contract labour (Regulation and Abolition), 1970
- The Building and Other Construction Workers (Regulation of Employment and Conditions of Service) Act 1996
- Equal Remuneration Act 1976
- Maternity Benefits Act 2017
- Minimum Wages Act 1948
- Payment of Wages Act 1936
- Workmen's Compensation Act 1923
- Sexual Harassment at Workplace (Prohibition, Prevention and Redressal) Act 2013
- The Payment of Bonus Act 1965 and rules 1975 and subsequent amendment
- The Inter-State Migrant Workmen (Regulation of Employment and Conditions of Service) Act 1979
- The Payment of Gratuity Act 1972
- The Employees' Provident Funds and Miscellaneous Provisions Act 1952
- The Employees' State Insurance Act 1948
- The Industrial Disputes Act 1947
- The Employees' Provident Fund & Miscellaneous Provisions (Amendment) Act 1996
- State specific Shops and Establishment Rules

Social Safeguards on engagement and inclusion, cultural heritage and others

- Panchayats (Extension to Scheduled Areas) Act 1996
- Forest Rights Act 2006;
- Scheduled Castes and Scheduled Tribes (Prevention of Atrocities Act) 1989
- Ancient Monuments and Archaeological Sites and Remains Act, 1958 as amended up to 2010

D. ENVIRONMENTAL AND SOCIAL SAFEGUARDS DURING IGFF INVESTMENT CYCLE

I. Overview of IGFF investment cycle

22. IGFF will finance climate-related projects or interventions through DFIs, and the investment cycle will follow a specific process that will entail five different phases:

- a. Generation of potential pipeline at DFIs level;
- b. Screening of project concepts at PIU (sample check) /DFIs level;
- c. Assessment of Full Proposals at PIU (sample check) /DFIs level;
- d. Final approval for financing of the Full Proposals at both PIU and PMU level; and
- e. Supervision and monitoring of financed projects under implementation at both DFIs, PIU/PMU and GCF level.

23. Some projects will be directly financed by DFIs. This is mainly the case for RTC and Green Hydrogen projects. However for CBG, DRE, and emobility, there will be project proponents defined as PFIs.

24. E&S evaluation of the proposed projects is embedded in each of these phases, starting with a first screening and ending with E&S Key Performance Indicator (KPIs) monitoring during project implementation. In the implementation of this ESMF and ADB's SPS (or ESF from 2026), ADB will work with all selected DFIs to ensure that all potential IGFF projects will:

- be screened and categorised against environmental and social impacts and risks in line with ADB's SPS (or ESF from 2026), and GCF requirements, and agreed actions, if any, are identified to fulfil gaps.
- be reviewed and evaluated against national policies, laws, regulations and standards on environment, health, safety; involuntary resettlement and land acquisition; indigenous peoples and physical cultural resources; and meaningful public consultation;
- address gender and development issues, including through meaningful consultation where relevant (including women and tailored to the needs of disadvantaged and vulnerable groups);
- establish a grievance redress mechanism (GRM) to receive and facilitate resolution of the affected people's concerns and grievances regarding the project's environmental and social safeguards performance;
- include in contracts with civil works contractors, subcontractors and other providers of goods and services provisions to employ local labour wherever possible, and to ensure compliance with ADB's social safeguards requirements and international core labour standards, as defined in ADB's Core Labor Standards Handbook;

- have a full ESMP/ESMF ready before approval and disbursement to the project (for category B projects or equivalent category under ADB's ESF).

25. ADB will conduct a safeguards capacity due diligence on the DFIs involved in the IGFF, to assess their capacity and commitment to conduct E&S project evaluations in line with ADB's safeguard policy principles and implement this ESMF.

26. ADB's safeguard due diligence and review emphasizes environmental and social impact assessments and the planning process, in addition to safeguard documentation. Due diligence and review involve desk reviews of the DFI's E&S and gender related documentation in line with ADB's SPS (or ESF from 2026). Where gaps are identified during the due diligence process either in terms of capacity or documentation, ADB will provide technical assistance to bring the DFI's up to the level required by ADB's SPS (or ESF from 2026).

27. E&S requirements during IGFF Investment Cycle (*Figure 1*) shows the E&S requirements associated with each investment phase described with more detail in the following sections.

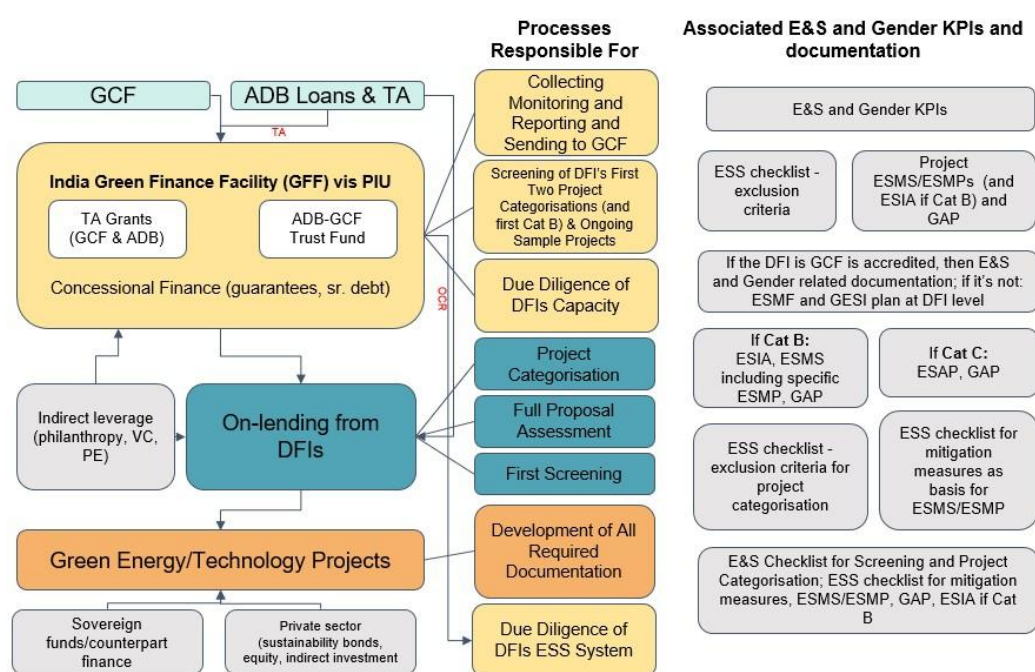


Figure 1: E&S Requirement during IGFF Investment Cycle

a. Screening Phase and Project E&S Categorisation

28. All proposed projects will need to be categorised following their E&S assessment, including Safeguarding Against Sexual Exploitation and Abuse and Harassment (SEAH) risks and impacts, and potential risk profile, following the GCF guidelines.

29. The accreditation status of ADB, allows implementing projects assessed up to Category A/I-1, however no sub-project assessed as Category A will be considered for this facility. This is in line with the accreditation of the implementing DFIs, which have a maximum accreditation status of Category B/I-2 (see B.10). The proper classification of projects will be done implementing all steps indicated in section D, under the capacity building and oversight of ADB as summarised in B.6-9.

30. The IGFF requires that the DFI and PIU as sample check assigns the appropriate E&S risk categories which could be either Category C or B under the GCF E&S classification system, which can be considered equivalent to ADB's classification system also. In order to achieve the requirement, an E&S exclusion criteria checklist will be compiled by the DFI/PIU, as well as a second E&S checklist with the identification of the main E&S risks and the associated mitigation measures, which then will be further expanded in the project Environmental and Social Management System or Plan (ESMS and ESMP). Please refer to **Appendix 7** for the suggested ESS screening template and **Appendix 9** for one specific on Supply Chain Labour risk.

31. Concerning E&S requirements, the analysis is conducted in two steps:

- i. First screening of Project Concepts including the Environmental and Social aspects, *and **ADB's Prohibited Investment Activities List**, (Appendix 2)* resulting in Project Categorisation; and
- ii. Full Proposal Assessment.

32. The screening of proposed project activities will make sure they would not fall under Category A, are not listed in ADB's Prohibited Investment List (**Appendix 2**) and ensuring that mitigation measures which will form the basis of an ESMS/ESMF are in place. A pre screening of the proposed IGFF sectors and activities is presented in **Appendix 8**. This ESS screening is only indicative and it will need to be re-assess by each DFI and PIU when more project details will be available.

33. DFIs E&S teams in collaboration with the PIU, in consultation with the project proponent, will screen and categorise the project based on the significance of the potential impacts and risks. GCF and ADB categorisations can be considered equivalent.

b. Initial Approval System

34. Based on the initial screening projects can receive one of three decisions, leading to the following outcomes:

- **A full approval for continuation** will offer the project proponent/DFI the opportunity to continue the investment cycle and enter the Full Proposal.
- **A request for clarification and more documentation** will require the project proponent/DFI to produce more documentation or more details in order to assess them against eligibility criteria, and be approved for continuation.
- **A screening out** will mean the project concept has been declined or it is considered to have a E&S risks superior to Category B. High-level feedback including E&S, if any, will be offered to the DFI.

c. Assessment of Full Proposal

35. When presenting the full proposal, the project proponent/DFI will need to develop the following E&S requirements.

- **For Category C projects:**
 - A high level ***Environmental and Social Policy*** appropriate to the size and nature of the risks of the activities of the Proposed Project. The ***Environment and Social Policy*** should have a declaration of a company's commitment to sustainable development and management of E&S issues, including Gender and SEAH, that is shared internally and publicly disclosed.
 - Develop an Environmental and Social Action Plan (ESAP) to mitigate any residual impacts identified during the screening exercise the environmental and social action plan template of the GCF is suggested as a template (please refer to ***Appendix 6***).
 - *Gender Assessment and Gender Action Plan (GAP):* a detailed quantitative and qualitative assessment of gender and inclusion concerns relevant to the project sector should be developed and the selection of Gender appropriate KPIs in the GAP. (for more details on methodology, please refer to ***Annex 8 of the Funding Proposal, IGFF Gender Assessment and Gender Action Plan***).
- **For Category B projects:**
 - Develop an Environmental, Social and Health Impact Assessment (ESIA) in line with IFC or equivalent international good practice standards to mitigate any impacts identified during the screening exercise (a ESIA template is provided in ***Appendix 6*** and a chance find procedure is available in ***Appendix 10***) - for existing facilities this will incorporate an environmental and social audit (template in Appendix 14);
 - Develop and maintain an Environmental and Social Management System (ESMS) appropriate to the size and nature of the risks of the activities of the Proposed Project. Key areas of an ESMS include (but are not limited to) human resource management, emergency preparedness and response, environmental management, biodiversity conservation, occupational health and safety management, gender and inclusion, community impacts and relations, and a GRM. The ESMS will identify individuals responsible for its implementation and the way the policy is communicated internally. Operational Procedures must be developed where needed in line with sector best practices such as the IFC PSs (2012), the World Bank ESH sector Guidelines and following ADB's SPS recommendations.
 - Develop one or more specific Environmental and Social Management Plans (ESMPs) to mitigate any residual impacts identified during the screening exercise following the indications contained in the ESIA – for existing facilities a corrective action plan will be developed to address any gaps identified by the environmental and social audit.

- Project's ESMS should include an ***Environmental and Social Policy*** which will have a declaration of a company's commitment to sustainable development and management of E&S issues that is shared internally and publicly disclosed.
- *Gender Assessment and Gender Action Plan (GAP)*: a detailed quantitative and qualitative assessment of gender and inclusion concerns relevant to the project sector should be developed and the selection of Gender-appropriate KPIs in the GAP. *(for more details on methodology, please refer to Annex 8 of the Funding Proposal, IGFF Gender Assessment and Gender Action Plan).*

36. Once a project has been approved for financing, preparation and negotiation of documents will include not only legal documentation, but also preparing and finalising the GAP, as well as any other ESS and impact documentation required.

d. Final Sign-off

37. Following the full assessment approval and project categorisation at DFI level, the proposed project will then be assessed by the PIU of the IGFF, which will check and confirm relevant E&S documentation (ESAP or ESMS & ESMP, ESIA (if Category B), and GAP), conduct a screening of sample projects, as well as overall alignment with IGFF strategic objectives.

38. If approved, the project will progress to implementation, and the IGFF will be responsible for providing regular monitoring and reporting to the GCF.

39. If rejected, the project will be excluded, and high-level feedback will be provided to the project proponents/DFI.

e. Monitoring and Reporting

40. All project proponents are monitored and evaluated periodically by the DFI which will collate and report them to the PIU, which will be responsible for transmittal to the GCF. The main goal is to monitor and report functions related to the project's advancements in E&S performance, to check compliance with the agreed timeline and budget, and, in case of eventual and potential risks, to mitigate them.

41. The extent of the monitoring, including scope and periodicity, will be based on the type and level of risks identified, including E&S risks. This will be conducted in line with applicable ESS standards and this ESMF, and the approved projects will provide IGFF annually with a self-assessment of their compliance with the applicable E&S safeguards requirements which will be then checked at PMU level.

42. At the project level, the PIU, which is consisted of international and national consultants, will manage DFI-specific operations while coordinating with the PMU both in data generation and reporting of progress. To foster knowledge-sharing and capacity-building, the facility-level team will organize regular knowledge exchange sessions, facilitating best practice sharing and continuous improvement.

43. Reports about activities, results, and challenges of the Projects' operations in line with its vision and mission will be produced regularly and in a transparent manner.

44. The results of the annual self-assessments, mid-term reviews, and any ad hoc reviews will include annual performance reports, interim evaluations, and final evaluation reports. If needed, IGFF may require to the DFI more frequent or ad hoc monitoring and reporting or audits on specific E&S issues.

45. The IGFF shall ensure that each DFI requires to the project's responsible who is accountable for monitoring and reporting E&S performances, to undertake all necessary measures to ensure participatory monitoring through the involvement of communities, local stakeholders, and civil society organisations in all the stages of the life cycle of activities. This participatory monitoring approach will also encourage the national designated authorities or focal points to outline which people and other stakeholders might be affected by the activities of the projects.

II. Information Disclosure, Consultation and Participation

46. The PIU shall ensure relevant information (whether positive or negative) about social and environmental safeguard issues on all approved projects is made publicly available in a timely manner, in an accessible place, and in a form and language(s) understandable to affected people and to other stakeholders, including the general public, so they can provide meaningful inputs into project design and implementation.

47. The DFI's shall coordinate with project proponents to make available in the DFI's website the following safeguard documents under pages specific to each project:

- draft environmental assessment and review framework; draft resettlement frameworks and/or plans, and draft Indigenous Peoples planning frameworks and/or plans before project appraisal;
- final or updated environmental impact assessments and/or initial environmental examinations, resettlement plans, and Indigenous Peoples plans upon receipt;
- corrective action plans prepared during project implementation; and
- environmental, involuntary resettlement, and Indigenous Peoples monitoring reports submitted by borrowers/clients during project implementation upon receipt.

48. Links to these reports will also be available on the GCF website, as per GCF Information Disclosure Policy and GCF Environmental and Social Policy.

49. Project proponents/DFIs are also required to conduct meaningful consultation with various stakeholders since the project design and continuously throughout the project cycle. The stakeholder consultation process shall be done by providing disclosure of relevant and adequate information that is understandable and readily accessible to affected people and is undertaken in an atmosphere free of intimidation or coercion. The consultation shall also be done in a gender inclusive and responsive way, and tailored to the needs of disadvantaged and vulnerable groups and enable incorporation of all relevant views of affected people and other stakeholders into decision making, such as project design, mitigation measures, the sharing of development benefits and opportunities, and implementation issues.

50. Project proponents shall engage with communities, groups, or people affected by the proposed projects, and with civil society through information disclosure, consultation, and

informed participation in a manner commensurate with the E&S risks and impacts on affected communities.

51. The consultation process will employ a range of formal and informal consultative methods such as in-depth interviews, public meetings, focus group discussions etc. Examples of key informants to be consulted, during the preparation and implementation, include the following stakeholders: (i) Heads and members of households likely to be affected; (ii) Affected households belonging to the vulnerable groups; (iii) Host communities; (iv) Indigenous Groups; (v) Women in the affected as well as host communities; (vi) Local CSOs and NGOs, if present; (vii) Relevant government agencies and departments; others as relevant.

III. Grievance Redress Mechanism

52. The Grievance Mechanism ensures that stakeholders, particularly affected individuals and communities, can raise concerns, seek solutions, access information, and provide feedback on project compliance with E&S policies. It must be proportional to project risks and impacts, ensuring a transparent, accessible, and culturally appropriate process.

53. IGFF's system, aligned with ADB's Accountability Mechanism Policy (2012) and GCF's stakeholder engagement guidance, facilitates grievance reception, response, and monitoring. The Project Management Unit (PMU) reviews grievances for sensitivity and confidentiality before forwarding them to the Grievance Redress Officer (GRO) at the Project Implementation Unit (PIU) and Implementing Agency (IA) levels. The PMU acknowledges, tracks, and processes grievances according to best practices, escalates unresolved cases to higher levels (including ADB), consolidates grievances in a central database, and raises public awareness through media campaigns.

54. Each project must establish a grievance mechanism per the ESMF, GCF, ADB's SPS, the ADB ESF (from 2026) and best practices. DFIs oversee compliance and report to IGFF. The mechanism must be legitimate, accessible, gender-sensitive, free of cost, confidential, fair, transparent, predictable, timely, and learning-oriented, ensuring affected parties can seek resolution without financial barriers.

55. IGFF and DFIs must remedy adverse impacts they have contributed to, ensuring grievance resolution is documented and confirmed by stakeholder satisfaction. Non-admissible complaints should be referred to relevant authorities. The mechanism should not hinder access to independent legal remedies but rather complement them. DFIs must monitor stakeholder engagement and grievance mechanisms, focusing on workforce, community, and Indigenous Peoples' concerns, excluding resettlement.

56. A whistle-blower program must be developed to report fraud, wrongdoing, or integrity violations, aligning with GCF's zero-tolerance policy on corruption.

57. ADB's Accountability Mechanism contact details and how to voice concerns are available at <https://www.adb.org/who-we-are/accountability-mechanism>

58. GCF's Independent Redress Mechanism contact details and resources are available at <https://irm.greenclimate.fund/>

59. Grievance mechanisms are also available through the GCF's Independent Redress Mechanism. Additionally, it will be possible to access the GCF's Indigenous Specialist as per the GCF's [Indigenous Peoples Policy](#).

60. For guidance on considering SEAH instances in the Grievance Redress Mechanism, please refer to **Appendix 11**.

IV. Accountability Mechanism

61. Project-affected people can also submit complaints directly to ADB's Accountability Mechanism. The Accountability Mechanism provides an independent forum and process whereby people adversely affected by ADB-financed projects can voice, and seek a resolution of their problems, as well as report alleged violations of ADB's operational policies and procedures. The Accountability Mechanism comprises two separate, but related, phases, namely: (i) a consultation phase, led by ADB's special project facilitator who reports directly to the ADB President, to assist project-affected people in finding solutions to their problems; and (ii) a compliance review phase, led by a three-member panel that reports to the Board of Directors. The Compliance Review Panel investigates alleged violations of ADB's operational policies and procedures, as defined by the Board of Directors, including safeguard policies, that have resulted or are likely to result in direct adverse and material harm to project affected people and recommends how to ensure project compliance with those policies and procedures.

V. Stakeholder Engagement

62. Based on the principles of transparency, accountability, inclusiveness, non-discrimination, and "do no harm", a successful stakeholder engagement by the approved sub-projects should follow the steps outlined below:

63. Step 1: Develop a strategy

Define why stakeholder engagement is important for the success of the project implementers, the project itself and the impacted communities. Strategy should take into consideration specific provisions for Indigenous Peoples and gender sensitive engagement. All approved projects will be required, in a manner appropriate to the sector and proposed intervention, to engage with relevant stakeholders affected by the activities, including women, Indigenous Peoples and other vulnerable groups, and to apply a gender lens during all stages of the project cycle, including design, formulation, implementation and monitoring and evaluation.

6.4 Step 2: Stakeholders and issues analysis

According to specific criteria related to the project, consider any interest group, such as national and sub-national entities, governments, civil society, women, minorities, and Indigenous Peoples. Analyse their position and interests, expectations, relative influence, emotional stake, financial or political position and their potential contributions. Depending on the interests of the groups, define a prioritised engagement list, considering which stakeholder will be mostly affected and impacted.

At this step it will also be important to reach out to the groups identified and "pre-consult" them, in order to share information about the project and collect feedback about the most appropriate way to communicate and refine the stakeholders' list and engagement strategy.

65. Step 3: Engage with stakeholders

Depending on the prioritised engagement list of Step 2, engagement with stakeholders differs based on the extent of the project impact.

High priority stakeholders, who are the most likely to be impacted by the activity, should be regularly involved in dialogues and negotiation processes and partnerships. Communication

with stakeholders who have a high degree of interest but are not directly impacted should be considered via feedback, as survey or focus group, or via newsletter, social media updates or invitations to specific meetings. Those who are less interested or impacted should as well receive information and updates about the project. When engaging with stakeholders it is important to offer multiple opportunities for consultation, to keep records of meetings and of any agreement and timelines for accomplishing tasks.

66. Step 4: Monitor and follow-up

A key to understanding the gradual and correct evolution of the engagement activities is a monitoring process, which is also useful to respond to unexpected events. Monitoring consists of regular intervals aimed at identifying any changes in the project that may introduce new E&S risks, and to mitigate and correct possible issues. The monitoring process considers the number and diversity of stakeholders, feedback on the effectiveness of the plan, completion of agreements and commitment, and extent of involvement of women, Indigenous Peoples, vulnerable or minority groups and other under-represented stakeholders.

By the stakeholder engagement plan is required to describe the disclosure of information, key consultation among stakeholders in a manner that is gender-sensitive and considers any risks and impact of approved sub-project activities. Once stakeholders and their level of engagement have been mapped, a stakeholder engagement plan should be outlined according to the following elements:

- 1. Introduction:** brief description of the initiative and potential E&S risks.
- 2. Regulations and requirements:** summary of any legal, regulatory or company requirements referring to stakeholder engagement.
- 3. Summary of disclosed information:** if the entitled project has disclosed any information or consultation regarding previous stakeholder engagement activity, it should summarise the nature of the information, and add details about its form and how it was disseminated; the location and dates of any meetings undertaken; participants that have been consulted; issues discussed and follow-up activities.
- 4. Stakeholder list:** list of the stakeholders who will be consulted and informed, depending on the level of impact produced by the project.
- 5. Program:** description of the purposes and goals of the program; what information will be disclosed and by which term; description of the women and minorities engagement.
- 6. Timetable:** production of a timetable of outlined dates and location of the different engagement activities.
- 7. Resources and Responsibilities:** for every entitled project, identify what staff and resources will be dedicated to the implementation of the stakeholder engagement plan and/or if a qualified Stakeholders Liaison Officer(s) is hired.
- 8. Grievance Mechanism:** description of the process by which individuals and communities affected by the project can present grievances to the company, specifying how and by whom they will be resolved.
- 9. Monitoring and Reporting:** description of the monitoring process, which considers the number and diversity of stakeholders, feedback on the effectiveness of the plan, completion of agreements and commitment, and extent of involvement of the time and process schedule of the monitoring of the engagement plan.
- 10. Management Functions:** to provide a detailed overview of how the stakeholder engagement will be integrated into the project's ESMS, as well as the staff dedicated to managing and deploying the engagement plan, the tools that will be used to document, track

and manage the process and how the interaction between entitled programs will ensure good relations with local stakeholders.

APPENDIX 1 - IGFF Proposed Sectors and Activities

Table 1 presents an indicative list of sectors and activities eligible for mitigation financing from IGFF, to be further developed in line with benchmarks like the MDB's Paris Alignment Framework, as well as CBI and EU Taxonomies.

Table 1. Indicative list of sectors and activities

Powering India's Energy Transition: Renewable energy technologies	<ul style="list-style-type: none"> • Round-the-clock RE • Green hydrogen/ammonia production
Modernizing Energy Access for Cleaner Living:	<ul style="list-style-type: none"> • E-mobility (2 and 3 wheelers) and related charging infrastructure • Compressed biogas CBG (establish a robust business market for compressed biogas across India by utilizing municipal solid waste and agricultural residue). The project will support at least 131 CBG plants. At least 30 CBG plants are expected to be supported by the guarantee mechanism, and an additional 101 CBG projects are supported by the proposed credit line. The project also promotes gender-inclusive workforce development and aims to enhance waste management systems through digital trading platforms for feedstock supply chains.
Resilient and Reliable Energy Systems for Rural and Urban Communities	<p>Decentralized renewable energy applications to power livelihood applications</p> <ul style="list-style-type: none"> • Solar-powered cold storage • Off-grid solar powered water pumps • Off-grid solar powered flour mills • Off-grid solar powered dairy farms

APPENDIX 2 - ADB Prohibited Investments Activities List

The following do not qualify for ADB financing through the IGFF:

- (i) production or activities involving harmful or exploitative forms of forced labor¹ or child labor;
- (ii) production of or trade in any product or activity deemed illegal under host country laws or regulations or international instruments or subject to international phaseouts or bans, such as (a) pharmaceuticals, pesticides and herbicides, and persistent organic pollutants, (b) ozone-depleting substances (c) polychlorinated biphenyls and other hazardous chemicals, (d) wildlife or wildlife products regulated under the Convention on International Trade in Endangered Species of Wild Fauna and Flora, and (e) transboundary trade in waste or waste products;
- (iii) production of or trade in weapons and munitions, including paramilitary materials;
- (iv) production of or trade in alcoholic beverages, excluding beer and wine;
- (v) production of or trade in tobacco;
- (vi) gambling, casinos, and equivalent enterprises;
- (vii) production of or trade in radioactive materials, including investment in nuclear reactors;
- (viii) production of, or trade in, or use of asbestos fibers;
- (ix) commercial logging operations or the purchase of logging equipment for use in primary tropical moist forests or old-growth forests;
- (x) marine, inland and coastal fishing practices, such as large-scale pelagic drift net fishing and fine mesh net fishing, harmful to vulnerable and protected species in large numbers and damaging to marine or freshwater biodiversity and habitats;
- (xi) new coal-fired power generation and coal-fired heating plants;
- (xii) coal mining, processing, storage or transportation;
- (xiii) upstream or midstream oil projects; and
- (xiv) natural gas exploration or drilling.

APPENDIX 3 - Environmental and Social Policy for IGFF

This policy outlines the E&S principles and commitments that serve as guidelines for IGFF. IGFF is designed to enable investments in projects with specific development and climate priorities (please refer APPENDIX 1 - IGFF Proposed Sectors and Activities).

Principles

IGFF's approach to this policy is underpinned by the following principles, which must be adhered to by both IGFF and Development Finance Institutions (DFIs):

1. Compliance with Legislation and International Standards

IGFF and DFIs must comply with all host country laws, regulations, and permits, including those laws that implement host country obligations under international agreements. In cases where host country laws are less stringent than internationally recognized standards, IGFF will encourage alignment with best practices and good international industry practices (GIIP) in line with ADB's ESS1 (Assessment and Management of E&S Risks and Impacts).

2. Technical Assistance and Capacity Building

IGFF will, based on available resources, support DFIs in developing their governance and management systems. This includes:

- Providing guidance and technical assistance to strengthen E&S risk management capacity.
- Collaborating with third parties to enhance compliance with international E&S benchmarks.
- Encouraging the adoption of higher E&S standards beyond those typically applied in the host country, where feasible.

This is consistent with ADB's approach to strengthening borrower E&S systems.

3. Risk-Based Approach to E&S Implementation

E&S requirements will be implemented proportionate to risk levels rather than through a one-size-fits-all approach. This means:

- High-risk projects will undergo more stringent E&S assessments and closer monitoring.
- Lower-risk projects will follow streamlined E&S procedures, ensuring efficiency while maintaining environmental integrity.

This aligns with ADB's approach to risk classification and proportionality in E&S management.

4. Application of the Mitigation Hierarchy

Projects must adhere to the mitigation hierarchy to:

- Avoid adverse E&S impacts where possible.

- Minimize impacts that cannot be avoided.
- Restore affected environments and livelihoods.
- Offset residual negative impacts only as a last resort.

This principle is in line with ADB's ESS1 and ESS6 (Biodiversity Conservation and Sustainable Natural Resource Management).

5. Commitment to No Net Loss of Biodiversity

Projects must prevent any deterioration in environmental quality and aim for no net loss of biodiversity and ecosystems. In critical habitats, net positive gains must be demonstrated.

6. Good Corporate Governance, Integrity, and Ethical Conduct

IGFF requires honesty, integrity, fairness, and diligence in all business dealings. Financed projects must demonstrate adherence to principles of good corporate governance, including:

- Anti-corruption measures.
- Prevention of financial mismanagement.
- Commitment to responsible business conduct and ethical supply chains.

This aligns with ADB's anti-corruption and integrity standards.

7. Transparency, Accountability, and Disclosure of Information

IGFF will operate in a transparent and accountable manner, ensuring that stakeholders and the public have access to relevant project-related E&S information.

- Projects must disclose E&S risks, impacts, and management plans in a timely and accessible format.
- Stakeholders, including affected communities, must have access to meaningful consultation processes.

This is aligned with ADB's ESS10 (Stakeholder Engagement and Information Disclosure).

8. Engagement with Vulnerable Groups

Approved projects must identify and engage with vulnerable and marginalized groups, including:

- Women, Indigenous Peoples, and persons with disabilities.
- Communities that may be disproportionately affected by project activities.

Projects should align with ADB's ESS7 (Indigenous People) and GCF's IP Policy, including ensuring free, prior, and informed consent (FPIC) for Indigenous Peoples. New projects approved by the IGFF after 1 January 2026, except for projects for which the Project Concept Notes are approved under the SPS, will be governed by the ESF, and in all cases will adhere to the GCF's Revised Environmental and Social policy.

9. Zero Tolerance for Sexual Exploitation, Abuse, and Harassment (SEAH)

IGFF upholds a zero-tolerance policy on Sexual Exploitation, Sexual Abuse, and Sexual Harassment (SEAH), ensuring:

- Robust prevention measures are integrated into project planning and implementation.
- A survivor-centred and gender-responsive approach is adopted for response mechanisms.
- Clear grievance and accountability frameworks are in place to handle SEAH-related complaints.

This aligns with ADB's commitments to social safeguards and workplace safety under ESS2 (Labor and Working Conditions).

10. Continuous Learning and Adaptive Management

IGFF is committed to:

- Tracking global best practices in E&S management.
- Learning from ADB and other DFIs to refine its approach.
- Building knowledge-sharing platforms to improve sector-wide E&S standards.

11. Strengthening Environmental and Social Performance of DFIs

DFIs must:

- Develop robust E&S management systems (ESMS).
- Conduct E&S due diligence and risk screening for all investments.
- Ensure ongoing monitoring and reporting on E&S performance.

APPENDIX 4 - List of Relevant E&S Standards

GCF

- Revised environmental and social policy (2021). Available at: <https://www.greenclimate.fund/document/revised-environmental-and-social-policy>
- Sustainability Guidance Note: Designing and ensuring meaningful stakeholder engagement on GCF-financed projects (2022). Available at: <https://www.greenclimate.fund/document/sustainability-guidance-note-designing-and-ensuring-meaningful-stakeholder-engagement-gcf>

Indigenous Peoples Policy (2018). Available at:

<https://www.greenclimate.fund/document/indigenous-peoples-policy> **ADB**

- Access to Information Policy (2018). Available at: <https://www.adb.org/documents/access-information-policy>
- Accountability Mechanism (2012). Available at: <https://www.adb.org/sites/default/files/institutional-document/31483/om-l1.pdf>
- Anticorruption Policy: Harmonised Definitions of Corrupt and Fraudulent Practices (2006). Available at: <https://www.adb.org/sites/default/files/institutional-document/174820/r179-06.pdf>
- Climate Change Action Plan 2023-2030 (2023). Available at: <https://www.adb.org/documents/climate-change-action-plan-2023-2030>
- Energy Policy (2023). Available at: <https://www.adb.org/sites/default/files/institutional-document/737086/energy-policy-2021.pdf>
- Good Practice Guidance for the Management and Control of Asbestos: Protecting Workplaces and Communities from Asbestos Exposure Risks (2022) Available at: <https://www.adb.org/publications/good-practice-management-control-asbestos>
- Policy on Gender and Development (2003). Available at: <https://www.adb.org/documents/policy-gender-and-development>
- Safeguard Policy Statement (2009). Available at: <https://www.adb.org/documents/safeguard-policy-statement>
- Social Protection Framework: Policies and Strategies (2003). Available at: <https://www.adb.org/documents/social-protection-strategy>
- Strategy 2030 (2018). Available at: <https://www.adb.org/documents/strategy-2030-prosperous-inclusive-resilient-sustainable-asia-pacific>

IIFCL

- Corporate Social Responsibility (CSR) Policy of IIFCL (2021). Available at: <https://iifcl.in/images/FileUploaded/CSRPolicyofIIFCL2021pdf01122022191405.pdf>
- Environmental and Social Safeguards Framework (ESSF) (2022). Available at: <https://www.iifcl.in/images/FileUploaded/ESSFupdatedinMay2022EnglishVersionpdf30112022104858.pdf>

NABARD

- Environment and Social Policy of Nabard (nd). Available at: <https://www.nabard.org/auth/writereaddata/File/Environment%20and%20Social%20Policy%20of%20NABARD.pdf>

REC

- Environment, Social and Governance Policy Framework (nd). Available at: <https://recindia.nic.in/uploads/files/ESG-Report-Dt22-02-23.pdf>
- Equal Opportunities Policy (2019).
- Policy on Diversity and Skills of the Board, Criteria for Appointing Senior Management Personnel and Remuneration to Directors, KMPs and Other Employees (nd). Available at: <https://recindia.nic.in/uploads/files/Amended---Policy-on-Board-Diversity--Other-matters-dt-150722.pdf>

APPENDIX 5 - A non exhaustive list of applicable country specific E&S legislation and international agreements

A non exhaustive list of applicable country specific E&S legislation and international agreements is presented below.

- **Environmental (Protection) Act, 1986:** is a comprehensive law enacted in response to the Bhopal Gas Tragedy to protect and improve the environment in India. It grants the central government broad powers to regulate industries, set environmental standards, and control hazardous substances. The Act defines "environment" broadly and empowers authorities to take preventive and corrective actions against pollution. It also includes strict penalties for violations, promotes environmental impact assessments (EIA), and encourages public participation in environmental protection. As an umbrella legislation, it complements other laws like the Water and Air Acts, making it a crucial tool for environmental governance in India.
- **Environmental Impact Assessment (EIA) Notification, 2006:** is a regulation issued under the Environmental (Protection) Act, 1986, to assess and manage the environmental impact of industrial and infrastructural projects in India. It mandates that certain projects undergo an EIA process before obtaining environmental clearance. The regulation classifies projects into Category A (national level, requiring clearance from the Ministry of Environment, Forest and Climate Change - MoEFCC) and Category B (state level, cleared by the State Environmental Impact Assessment Authority - SEIAA) based on their potential environmental impact. The EIA process involves four key stages: Screening, Scoping, Public Consultation, and Appraisal. Public consultation is a critical component, allowing local communities to express concerns about potential environmental damage. The notification also specifies exemptions and conditions for projects that do not require a full assessment. It plays a crucial role in balancing development with environmental sustainability by ensuring that projects incorporate environmental safeguards before approval.
- **National Green Tribunal (NGT) Act, 2010:** This Act established the NGT, a specialised judicial body equipped to handle environmental disputes and enforcement of legal rights related to the environment.
- **Air (Prevention and Control of Pollution) Act, 1981:** This Act aims to prevent, control, and reduce air pollution by establishing standards and regulating emissions.
- **Water (Prevention and Control of Pollution) Act, 1974:** This legislation focuses on the prevention and control of water pollution, maintaining or restoring the wholesomeness of water.
- **Forest (Conservation) Act, 1980:** This Act provides for the conservation of forests and regulates deforestation by requiring prior approval from the central government for the use of forest land for non-forest purposes.

- [**Biodiversity Act, 2002**](#): This Act aims to conserve biological diversity, promote its sustainable use, and ensure fair and equitable sharing of benefits arising from the utilisation of biological resources.
- [**THE PROTECTION OF HUMAN RIGHTS ACT, 1993 ACT NO. 10 OF 1994 \[8th January, 1994.\]**](#): this act defines human rights as the rights related to life, liberty, equality, and dignity, as guaranteed by the Constitution or embodied in international covenants enforceable by Indian courts.
- [**The Code on Wages, 2019**](#): regulates wage payments and sets minimum wage standards.
- [**The Occupational Safety, Health, and Working Conditions Code, 2020**](#): the Occupational Safety, Health, and Working Conditions Code, 2020 emphasizes the health, safety, and welfare of workers employed in various sectors like industry, trade, business, manufacturing, factory, motor transport undertaking, building and other construction work, newspaper establishments, audio-video production, plantation, mine and dock-work, and service sectors.
- [**The Code on Social Security, 2020**](#): an Act to amend and consolidate the laws relating to social security with the goal to extend social security to all employees and workers either in the organised or unorganised or any other sectors and for matters connected therewith or incidental thereto.

International Environmental Agreements

- [**Convention on Biological Diversity \(CBD\)**](#): Aims to conserve biological diversity, promote its sustainable use, and ensure fair sharing of benefits from genetic resources.
- [**United Nations Framework Convention on Climate Change \(UNFCCC\)**](#): Addresses global climate change by stabilising greenhouse gas concentrations in the atmosphere.
- [**Convention on International Trade in Endangered Species of Wild Fauna and Flora \(CITES\)**](#): Regulates international trade in specimens of wild animals and plants to ensure such trade does not threaten their survival.

APPENDIX 6 - Suggested Templates for DFIs: Environmental and Social Impact Assessment (ESIA) and Environmental and Social Action Plan (ESAP)

Environmental and Social Impact Assessment (ESIA) Outline

Each project will be required to conduct an ESIA in line with the relevant legislation. While the scope and level of detail of the ESIA should be commensurate with the potential impacts of the foreseen operations, a comprehensive ESIA report should include the following items, in compliance with IFC PS1:

- a) **Executive summary.** Concisely discusses significant findings and recommended actions.
- b) **Policy, Human Rights, legal and administrative framework.** Presents the policy, legal and administrative framework within which the assessment is carried out.
- c) **Project description.** Describes the proposed project and its geographic, ecological, social and temporal context, including any associated facilities and third-party activities. It also indicates need for additional considerations due to land requirements and in meeting the needs of Indigenous Peoples. A map of the project site and the projected area of influence is included.
- d) **Baseline data.** Assesses the dimensions of the study area and describes relevant physical, biological and socioeconomic conditions based on up-to-date information, including any changes anticipated before the project commences. It also takes into account current and proposed development activities within the project area that may not be directly connected to the project.
- e) **E&S impacts.** Identifies, predicts and assesses the likely positive and negative impacts of environmental and social risks, human rights, SEAH, gender and Indigenous Peoples' factors, in qualitative and quantitative terms as may be feasible. Identifies indirect, cumulative and transboundary impacts, as well as impacts due to associated facilities and third-party activities. Identifies mitigation measures and any residual negative impacts that cannot be mitigated. Explores opportunities for environmental enhancement and improvement of the welfare and livelihoods of affected people. Identifies and estimates the extent and quality of available data, key data gaps and uncertainties associated with predictions, and specifies topics that may require further studies and attention.
- f) **SEAH assessment.** To improve environmental and social outcomes and to generate inclusive benefits to the communities, assess any risks or potential SEAH related impacts on women, men, girls and boys as early as possible.
- g) **Analysis of alternatives.** Systematically compares feasible alternatives to the proposed activities, site, technology, design and operation – including the "do nothing" situation – in terms of their potential E&S impacts; the feasibility of mitigating these impacts; their suitability under local conditions; and their institutional, training and monitoring requirements.
- h) **Environmental and social management plan (ESMP).** Covers mitigation measures, monitoring and institutional strengthening. It also includes description of the stakeholder engagement plan, grievance redress mechanism and disclosure of safeguards documents and relevant updates and further due diligence that may need to be undertaken.

- i) **Conclusion and recommendation.** Describes the conclusions drawn from the assessment and provides recommendations (e.g., additional specialized studies that need to be undertaken).
- j) **Relevant appendices**, which could include for example:
 - a. List of report preparers, individuals and organizations.
 - b. References and written materials, both published and unpublished, used in study preparation.
 - c. Record of stakeholder consultations, interagency consultation meetings, including consultations for obtaining the informed views of the affected people and local non-governmental organizations (NGOs). The record specifies any means other than consultations (e.g., surveys) that were used to obtain the views of affected groups and local NGOs.
 - d. Photo documentation, modelling outputs and assumptions, computations, tables presenting the relevant data referred to or summarized in the main text.

List of associated reports (e.g., audit reports, strategic environmental assessment study, cumulative impact assessment study, resettlement plan or Indigenous Peoples development plan, etc.).

Environmental and Social Action Plan template from the GCF SAP Annex 12

Summary of risks	Mitigation measures	Risk significance	Responsible party/person	Schedule	Expected results	Cost/Budget
<i>This contains the description of risks and can be derived from the responses to the screening questions in Part B2.</i>	<i>Options to avoid, reduce, mitigate risks and impacts. This may also indicate additional due diligence and specific management plans</i>	<i>This contains a description of the overall level of risk*</i>	<i>Individual person, unit, or entity tasked to carry out the mitigation measures</i>	<i>Timing of implementation of measures including any additional due diligence and management plans and may depend on the stage of implementation</i>	<i>Expected outputs of the measures</i>	<i>Estimated cost of carrying out the measures</i>

**Risk significance. The probability of occurrence is the likelihood for a risk to occur and can be characterized in terms of the degree to which it will happen (for example, the UNDP screening procedure uses “expected, highly likely, moderately likely, not likely, and slight”). The impact or magnitude of risks is the description of how severe the impacts would be if it were to occur (for example, “critical, severe, moderate, minor, and negligible”). A significance value of the risk (for example low, medium, high) can be obtained by combining the probability and impact values. The risk significance indicates the relationship between probability and severity or magnitude of impacts. The entities or organizations that will be implementing the proposed activities are best positioned to define the probability of occurrence and severity or magnitude of impacts.*

There is no single technique to determine the significance of risks nor will it apply in all situations. The entities and organizations that will be implementing the activities will need to determine which technique will work best for each situation. Determining risk significance would require an understanding of activities and locations, the urgency of situations, and objective judgment.

APPENDIX 7 - ESS Screening Checklist Template

Part A: Risk Factors related to the menu of eligible activities

General information on the potential Project		
Company Name		
First year of activities		
Location of projects areas (with geographical coordinates)		
Risk Factors	YES	NO
Will the activities involve associated facilities and require further due diligence of such associated facilities?	<input type="checkbox"/>	<input type="checkbox"/>
<i>Please provide a justification of your answer:</i>		
Will the activities involve trans-boundary impacts including those that would require further due diligence and notification to affected states?	<input type="checkbox"/>	<input type="checkbox"/>
<i>Please provide a justification of your answer:</i>		
Will the activities potentially expose local communities and workers to a higher risk of SEAH?	<input type="checkbox"/>	<input type="checkbox"/>
<i>Please provide a justification of your answer:</i>		
Will the activities adversely affect working conditions and health and safety of workers or potentially employ vulnerable categories of workers including women and children?	<input type="checkbox"/>	<input type="checkbox"/>
<i>Please provide a justification of your answer:</i>		
Will the activities potentially generate hazardous waste and pollutants that would require further studies on management, minimization and control and compliance to the country and applicable international environmental quality standards?	<input type="checkbox"/>	<input type="checkbox"/>
<i>Please provide a justification of your answer:</i>		

Will the activities involve the construction, maintenance, and rehabilitation of critical infrastructure (like dams, water impoundments, coastal and riverbank infrastructure) that would require further technical assessment and safety studies?	<input type="checkbox"/>	<input type="checkbox"/>
<i>Please provide a justification of your answer:</i>		
Will the proposed activities potentially involve resettlement and dispossession, land acquisition, and economic displacement of persons and communities?	<input type="checkbox"/>	<input type="checkbox"/>
<i>Please provide a justification of your answer:</i>		
Will the activities be located in or in the vicinity of protected areas and areas of ecological significance including critical habitats, key biodiversity areas and internationally recognized conservation sites?	<input type="checkbox"/>	<input type="checkbox"/>
<i>Please provide a justification of your answer:</i>		
Will the activities affect Indigenous Peoples that would require further due diligence, free, prior and informed consent (FPIC) and documentation of development plans?	<input type="checkbox"/>	<input type="checkbox"/>
<i>Please provide a justification of your answer:</i>		
Will the activities be located in areas that are considered to have archaeological (prehistoric), paleontological, historical, cultural, artistic, and religious values or contains features considered as critical cultural heritage?	<input type="checkbox"/>	<input type="checkbox"/>
<i>Please provide a justification of your answer:</i>		

Part B: Specific environmental and social risks and impacts

Assessment and Management of Environmental and Social Risks and Impacts	YES	NO	TBD
Has the E&S risk category of the project been provided at project concept stage including SEAH consideration?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Has the rationale for the categorization of the project been provided in the relevant sections of the concept note?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Are there any additional environmental, health and safety requirements under the national laws and regulations and relevant international treaties and agreements?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Please provide a justification of your answer:</i>			
Are the identification of risks and impacts based on recent or up-to-date information?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Please provide a justification of your answer:</i>			
Labour and Working Conditions	YES	NO	TBD
Will the activities potentially have impacts on the working conditions, particularly the terms of employment, worker's organization, non-discrimination, equal opportunity, child labour, and forced labour of direct, contracted and third-party workers?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Please provide a justification of your answer:</i>			
Will the activities pose occupational health and safety risks to workers including supply chain workers?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Please provide a justification of your answer:</i>			
Aspect	Observation/Comment	Reference	

Number of workers and origin: local or non-local			
% of the workforce that is direct and contracted			
Awareness / information available regarding contractor's labour practices			
Is there any evidence or reasonable doubt of child labour or forced labour?			
Do workers live in the working place?			
Are forest operations mostly manual or mechanized? Do workers have adequate training and equipment?			
Did any serious accident happen in the last 5 years? Is there evidence of serious accident records			
Do working conditions comply with the ILO Fundamental Conventions?			
Resource Efficiency and Pollution Prevention	YES	NO	TBD
Will the activities generate (1) emissions to air; (2) discharges to water; (3) activity-related greenhouse gas (GHG) emissions, (4) noise and vibration; and (5) wastes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Please provide a justification of your answer:</i>			
Will the activities utilize significant amounts of natural resources including water and energy?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Please provide a justification of your answer:</i>			
Will there be a need to develop detailed measures to reduce pollution and promote sustainable use of resources?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Please provide a justification of your answer:</i>			

Community Health, Safety, and Security	YES	NO	TBD
Will the activities potentially generate risks and impacts to the health and safety of the affected communities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Please provide a justification of your answer:</i>			
Will there be a need for an emergency preparedness and response plan that also outlines how the affected communities will be assisted in times of emergency?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Please provide a justification of your answer:</i>			
Will there be risks posed by the security arrangements and potential conflicts at the project site to the workers and affected community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Please provide a justification of your answer:</i>			
Aspect	Observation/Comment	Reference	
Local and indigenous communities / stakeholders: How far away and how many? Are these identified by the company?			
Main livelihoods of local and indigenous communities			
Are communities dependent on the resources and land managed by the company?			
Status of community customary rights over resources			
Company-community relationships			
Does the company implement a Stakeholder Engagement Plan?			
[Does the company employ participatory, fair and transparent decision-making processes? Is there evidence of FPIC from			

Indigenous Peoples? How is this recorded / documented?			
Are there any resettlements or (unresolvable) conflicts with communities, particularly in the last 5 years?			
Do operations create noise, dust, vibration, shadow, etc. to an extent that could affect local communities?			
Do project activities significantly increase transport and heavy vehicles in the area? Could this affect local infrastructure? Schools, hospitals, relocation of bridges, etc.			
Are there cultural sites on the project area or surroundings? Are these considered in the HCV process? Cultural sites could be cemeteries, places of worship, holy sites or trees, etc.			
Are social impacts of company operations monitored over time? Do communities have an opportunity to discuss E&S performance with the company?			
Are grievance mechanisms operational and policy / processes developed to handle grievances?			
Are security guards employed? Are they trained in the Voluntary Principles on Security and Human Rights?			
Land Acquisition and Involuntary Resettlement	YES	NO	TBD
Will the activities likely involve land acquisition and/or physical or economic displacement?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Please provide a justification of your answer:</i>			

Aspect	Observation/Comment		Reference
Land use strategy foreseen by the company: Purchase / lease land from communities / large private owners Land concentrated in one property / distributed among more properties			
Share of the target production area already secured			
Tenure status of the area currently controlled by the company			
Are there any easements on the land? By whom?			
Information on conflicts over land tenure in current and target areas			
Company follows UN FAO VGGT if applicable?			
Biodiversity Conservation and Sustainable Management of Living Natural Resources	YES	NO	TBD
Will the activities potentially introduce invasive alien species of flora and fauna?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Please provide a justification of your answer:</i>			
Will the activities have potential impacts on or be dependent on ecosystem services including production of living natural resources (e.g. agriculture, livestock, fisheries, forestry)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Please provide a justification of your answer:</i>			
Aspect	Observation/Comment		Reference

Is there a land use planning process? Is there a target conservation area? Does it cover at least 5% of the area?		
Natural biophysical conditions and baseline		
Conditions / studies conducted incl. status prior to activities		
Forest conversion after 1994?		
Degradation of peatlands?		
Land with conservation / protected areas status (IUCN PA categories) in the vicinity (distance)?		
HCVA assessment completed? If no: Likelihood and size of HCVs in the management units or the vicinity		
Information on flora and fauna, particularly endangered species		
Other conditions that pose significant environmental risk (natural or other conditions)		
Is the screening of natural and critical habitat conducted per IFC-GN6 for the site area involved		
Does the project area qualify as natural and /or critical habitat		
Are the project activities anticipated to have significant adverse impacts on the critical and natural habitat. If yes, then the project site/ location/ activity to be dropped from financing		
Are the project activities anticipated to have less than significant adverse impacts on the critical and natural habitat. If yes, are provisions made to meet the requirements of critical and natural habitat as per ADB, SPS, 2009 and achieve 'no net loss' / "net gain"		
<i>Please provide details</i>		

Indigenous Peoples	YES	NO	TBD
Will the activities potentially have any indirect impacts on Indigenous Peoples, ethnic minorities, or vulnerable and marginalized groups?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Please provide a justification of your answer:</i>			
Cultural Heritage	Yes	NO	TBD
Will the activities restrict access to the cultural heritage sites and properties?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Please provide a justification of your answer:</i>			
Will there be a need to prepare a chance-find procedure in case of the discovery of cultural heritage assets?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Please provide a justification of your answer:</i>			
Stakeholder engagement and grievance	Yes	NO	TBD
Will the activities include a continuing stakeholder engagement process and a grievance redress mechanism and integrated into the management/implementation plans?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Please provide a justification of your answer:</i>			

APPENDIX 8 – ESS Pre Screening of IGFF Proposed Activities

Renewable energy technologies (round-the-clock RE and Green hydrogen/ammonia production)

Part A: Risk Factors related to the menu of eligible activities

This is a ESS pre -screening, it does not substitute the ESS screening DFI will have to do once more details are available.

- **TBD:** there are not enough information at the moment, to be re assessed during project evaluation;
- **NO:** if triggered, the project will likely be Cat A so excluded;
- **YES:** Likely Cat B.

Risk Factors	YES	NO	TBD
Will the activities involve associated facilities and require further due diligence of such associated facilities?	<input type="checkbox"/>	<input type="checkbox"/>	X
<i>Please provide a justification of your answer:</i>			
Will the activities involve trans-boundary impacts including those that would require further due diligence and notification to affected states?	<input type="checkbox"/>	X	
<i>Please provide a justification of your answer:</i>			
Will the activities potentially expose local communities and workers to a higher risk of SEAH?	<input type="checkbox"/>	<input type="checkbox"/>	X
<i>Please provide a justification of your answer:</i>			
Will the activities adversely affect working conditions and health and safety of workers or potentially employ vulnerable categories of workers including women and children?	<input type="checkbox"/>	<input type="checkbox"/>	X
<i>Please provide a justification of your answer:</i>			
As hydrogen is a highly inflammable gas, occupational health and safety of workers would need proper management measure s (eg handling of hazardous chemicals and high-pressure equipment, use of PPE; logistic and transport of high pressure equipment)			
Will the activities potentially generate hazardous waste and pollutants that would require further studies on management, minimization and control and compliance to the country and applicable international environmental quality standards?	<input type="checkbox"/>	<input type="checkbox"/>	X
<i>Please provide a justification of your answer:</i>			
Area water scarcity would need assessment to avoid water shortages, management procedure of handling chemicals like catalyst and wastewater management			

Will the activities involve the construction, maintenance, and rehabilitation of critical infrastructure (like dams, water impoundments, coastal and riverbank infrastructure) that would require further technical assessment and safety studies?	<input type="checkbox"/>	X	
<i>Please provide a justification of your answer:</i>			
Will the proposed activities potentially involve resettlement and dispossession, land acquisition, and economic displacement of persons and communities?	<input type="checkbox"/>	X	
<i>Please provide a justification of your answer:</i>			
Will the activities be located in or in the vicinity of protected areas and areas of ecological significance including critical habitats, key biodiversity areas and internationally recognized conservation sites? BMP will be required to manage any impacts on biodiversity predicted	<input type="checkbox"/>	<input type="checkbox"/>	X
<i>Please provide a justification of your answer:</i>			
Will the activities affect Indigenous Peoples that would require further due diligence, free, prior and informed consent (FPIC) and documentation of development plans?	<input type="checkbox"/>	X	
<i>Please provide a justification of your answer:</i>			
Will the activities be located in areas that are considered to have archaeological (prehistoric), paleontological, historical, cultural, artistic, and religious values or contains features considered as critical cultural heritage?	<input type="checkbox"/>	<input type="checkbox"/>	X
<i>Please provide a justification of your answer:</i>			

Summary of risks	Mitigation measures	Risk significance
<i>This contains the description of risks and can be derived from the responses to the screening questions in Part B2.</i>	<i>Options to avoid, reduce, mitigate risks and impacts. This may also indicate additional due diligence and specific management plans</i>	<i>This contains a description of the overall level of risk*</i>
<p>Water Consumption and Contamination -Ammonia production typically involves the use of catalysts and other chemicals that can potentially contaminate water sources.</p> <p>Large amounts of water are needed to produce hydrogen (approximately 9L per 1 kg of hydrogen). This has the potential to make water (a critical requirement in production) scarce – especially to local communities and particularly where it is already limited – exacerbating water shortages, causing conflicts with food production and threatening lives and livelihoods.</p> <p>.</p> <p>Discoloration of receiving waters, due to high concentration of ferric substances, also with high- suspended solids and turbidity.</p>	<p>The sustainability of the freshwater demand shall be assessed.</p> <p>Measures for resource efficiency.</p> <p>Communication campaigns and raising awareness on sustainable water management (especially for productive end users).</p> <p>Effects of wastewater discharge on ecosystems and ecosystem services shall be assessed. Existing EHS guidelines on discharge limits need to be integrated with provisions specifically related to hydrogen projects.</p> <p>Availability of resources to manage waste and hazardous waste shall be assessed for each project. Existing EHS guidelines need to be integrated with provisions specifically related to hydrogen projects.</p>	Medium
<p>Land Use/Land Cover Change and Land Rights - Large amounts of land required for associated wind or solar energy generation, This could lead to the conversion of natural habitats or agricultural land, which could have negative impacts on biodiversity, ecosystem services and food security.</p> <p>Such changes can lead to deforestation, land degradation and habitat fragmentation, invasive alien species, over-exploitation, hydrological changes, nutrient loading, and pollution.</p> <p>This may involve loss of natural buffer areas such as wetlands, mangroves, and upland forests that mitigate the effects of natural hazards such as flooding, landslides, and fire; these may result in increased vulnerability and community safety-related and health-related risks and impacts.</p> <p>Production plants and associated infrastructure (e.g. transport pipelines, transmission lines, port facilities, access roads) will also involve land use</p>	<p>Proper identification of risk (and design of mitigation measures, when necessary), in the pre-construction phase. Land use, land use fragmentation, and water demand shall be assessed also in terms of potential impacts to the livelihood resources of local communities.</p> <p>Potential impacts originated by land use and land use fragmentation on ecosystems and communities shall be assessed.</p> <p>Installations on the ground must take into account the protection of existing agricultural and forestry areas.</p> <p>Prioritize “degraded sites” (brownfield sites) Avoid areas subject to natural hazards.</p>	Medium

Summary of risks	Mitigation measures	Risk significance
<p>change with similar impacts. This will also result in increased human access to less developed areas.</p> <p>The presence of hydrogen related infrastructure may also cause visual and aesthetic impacts.</p> <p>There are risks that acquisition of land for plants and associated infrastructure will undermine, restrict or limit local community rights to access particular areas of cultural or livelihood importance; lead to ownership conflicts – particularly as regards agricultural lands.</p>		
<p>Waste - General waste, sludge and wastewater from (fresh) water purification for electrolysis requires careful management to avoid pollution of water courses and groundwater. The quantity of sludge will depend on the level of contaminants originally present in the raw water, and on the purity of water required by the specific electrolysis process adopted.</p> <p>Electric and electronic waste and hazardous substances as a result of the decommissioning of electrolyzers and plants.</p> <p>Risk of abandonment of the facilities at the end of their lives (probably 20- 30 years).</p>	<p>Effects of wastewater discharge on ecosystems and ecosystem services shall be assessed. Existing EHS guidelines on discharge limits need to be integrated with provisions specifically related to GH projects.</p> <p>Availability of resources to manage waste and hazardous waste shall be assessed for each project. Existing EHS guidelines need to be integrated with provisions specifically related to GH projects.</p>	Medium
<p>Pollution - emission from trucks during the construction phase</p>	<p>Safety shall be considered in the pre-construction phase, and buffer zones shall be established between projects and urban/commercial areas. Companies shall establish safety management systems and apply state- of-the-art methods for safety assessment.</p>	Low
<p>Occupational Health and Safety - risk of accidents on site and on roads.</p> <p>Hydrogen is highly flammable. If not handled properly, it can pose a significant risk to workers' safety during production, transportation, and storage (explosions and fires).</p> <p>Production process involves the operation of complex and potentially dangerous high-pressure equipment (containers and pipelines) and the handling of hazardous chemicals, which can lead to accidents and injuries.</p>	<p>Workers shall wear protective gear and be trained in safe practices.</p> <p>Assessment of workplace hazards. Consult and involve workers in the workplace risk assessment as well as in the choice of prevention measures.</p> <p>Internal training on type of risks and suppression measures (safe working procedures).</p>	Medium

Summary of risks	Mitigation measures	Risk significance
Workers may also be exposed to intense electromagnetic fields within the electrolyser building, to toxins (including methanol and ammonia) in conversion and storage units, and to cold surfaces in cryogenic storage units.	Supply appropriate Personal Protective Equipment (PPE) and train on its use and ensure that is properly maintained. Maintain a fully stocked and accessible first aid kit.	
<p>Labour Risks and Influx of Workers - Risk of poor/unacceptable working conditions (including lack of training or protective equipment) at production sites and associated infrastructure.</p> <p>Catalyzers involves the use of rare earth elements such as iridium, which can present labour risks in the primary supply chain if not sourced responsibly – including the risk of forced and child labour</p> <p>An influx of workers, both unskilled and skilled, is likely, particularly during the construction phase</p>	<p>No child or forced labor can be employed by companies</p> <p>Develop and implement a proper grievance redress mechanism.</p> <p>RE companies to have HR policies that articulate clear and fair terms of employment and provide for no discrimination and equal opportunity.</p> <p>Proper training and record on the system or working procedure.</p> <p>Fair employment practices can lead to better business and better workers.</p> <p>Employing women.</p>	Medium
Cultural Heritage - There is a risk that cultural, religious and archaeological sites may be disturbed or destroyed as a result of developing hydrogen production sites or associated infrastructure, or access to such sites may be restricted or denied.	Proper identification of risk (and design of mitigation measures, when necessary), in the pre-construction phase.	Low
<p>Gender Issues and Indigenous Communities - gender inequalities may arise during the construction and operation of plants and infrastructure.</p> <p>Women may be discriminated against or subject to sexual harassment/abuse in the workplace.</p> <p>Land fragmentation may affect women disproportionately.</p> <p>A large influx of male workers may lead to an increase of gender-based violence.</p> <p>The may be a disproportionate impact of lack of access to safe water.</p> <p>Women risk being excluded and/or underrepresented.</p>	<p>Women employment with energy businesses is part of fair labour practices.</p> <p>Gender-sensitive stakeholder engagement.</p> <p>Promote active participation of women entrepreneurs, women's organizations, civil society and non-governmental organizations working on gender and energy issues.</p> <p>Increase information and awareness of women's that will allow them to enter into renewable energy market.</p> <p>Ensure that women entrepreneurs in the energy sector will have equal access to finance.</p>	Medium

Summary of risks	Mitigation measures	Risk significance
Indigenous peoples may be particularly and disproportionately affected by many of the above socio-economic issues. However, opportunities may arise for development of indigenous owned companies producing green hydrogen and ammonia.	<p>Capacity building and internal training on GBV prevention; GBV to be reported and dealt with as per the law.</p> <p>Taking action for women to be seen and engaged as valuable partners along the entire value chain: design, marketing, sales, and after-sale services.</p> <p>Promote education approaches to reinforce social inclusion.</p> <p>Stakeholder engagement measures to identify and take into consideration possible social tensions and conflicts within communities.</p> <p>Land use, land use fragmentation, and water demand shall be assessed also in terms of potential impacts to gender equality and indigenous people.</p>	

Part B: Specific environmental and social risks and impacts will be assessed by the DFI/PIU

Modernizing Energy Access for Cleaner Living (e-mobility and related charging infrastructure, compressed biogas)

Part A: Risk Factors related to the menu of eligible activities

This is a ESS pre -screening, it does not substitute the ESS screening DFI will have to do once more details are available.

- **TBD:** there are not enough information at the moment, to be re assessed during project evaluation;
- **NO:** if triggered, the project will likely be Cat A so excluded;
- **YES:** Likely Cat B.

Risk Factors	YES	NO	TBD
Will the activities involve associated facilities and require further due diligence of such associated facilities?	<input type="checkbox"/>	<input type="checkbox"/>	X
<i>Please provide a justification of your answer:</i>			
Will the activities involve trans-boundary impacts including those that would require further due diligence and notification to affected states?	<input type="checkbox"/>	X	
<i>Please provide a justification of your answer:</i>			
Will the activities potentially expose local communities and workers to a higher risk of SEAH?	<input type="checkbox"/>	<input type="checkbox"/>	X
<i>Please provide a justification of your answer:</i>			
Will the activities adversely affect working conditions and health and safety of workers or potentially employ vulnerable categories of workers including women and children?	<input type="checkbox"/>	<input type="checkbox"/>	X
<i>Please provide a justification of your answer:</i>			
For biogas: eg assessment and implementation of standard precautionary measures – good work practices, gas sensors, safety walk-throughs, PPE, adequate ventilation, low pressure storage noise prevention measures.			
Will the activities potentially generate hazardous waste and pollutants that would require further studies on management, minimization and control and compliance to the country and applicable international environmental quality standards?	<input type="checkbox"/>	<input type="checkbox"/>	X
<i>Please provide a justification of your answer:</i>			
Odour control measures and waste management procedure should be in place			

Will the activities involve the construction, maintenance, and rehabilitation of critical infrastructure (like dams, water impoundments, coastal and riverbank infrastructure) that would require further technical assessment and safety studies?	<input type="checkbox"/>	X	
<i>Please provide a justification of your answer:</i>			
Will the proposed activities potentially involve resettlement and dispossession, land acquisition, and economic displacement of persons and communities?	<input type="checkbox"/>	X	
<i>Please provide a justification of your answer:</i>			
Will the activities be located in or in the vicinity of protected areas and areas of ecological significance including critical habitats, key biodiversity areas and internationally recognized conservation sites? BMP will be required to manage any impacts on biodiversity predicted	<input type="checkbox"/>	<input type="checkbox"/>	X
<i>Please provide a justification of your answer:</i>			
Will the activities affect Indigenous Peoples that would require further due diligence, free, prior and informed consent (FPIC) and documentation of development plans?	<input type="checkbox"/>	X	
<i>Please provide a justification of your answer:</i>			
Will the activities be located in areas that are considered to have archaeological (prehistoric), paleontological, historical, cultural, artistic, and religious values or contains features considered as critical cultural heritage?	<input type="checkbox"/>	<input type="checkbox"/>	X
<i>Please provide a justification of your answer:</i>			

The below is not an exhaustive list of considerations or potential management strategies – each sub-project will be reviewed on a case-by-case basis to ensure E&S risks are considered holistically.

Summary of risks	Mitigation measures	Risk significance
Hazardous Wastes – lack of adequate disposal mechanism, inadequacy in organised collection of e-waste ending up in landfill.	<ul style="list-style-type: none"> Regulations and best practices in the nascent e-waste management sector are rapidly evolving. It is recognised that the e-waste management approach adopted by the facility and sub-projects will be subject to these evolving regulations and best practices. 	Medium
Supply Chain - The main raw materials for batteries i.e., cobalt, lithium, copper and nickel, have known issues in some parts of the supply chain with human and workers' rights' violations and unacceptable environmental consequences: child labour, ecological destruction and water shortage.	<ul style="list-style-type: none"> Undertake supply chain due diligence for select suppliers of the proposed entity. Exclude suppliers with negative reports. Actively engage in stakeholders consultations regarding regulatory developments in this sector to support greater transparency and controls. 	Medium
Indirect Emissions and Air Quality - Indirect emissions can be generated by charging of EVs through the grid rather than from renewable sources	<ul style="list-style-type: none"> The facility will use best efforts to investigate and pursue commercially feasible opportunities to reduce the indirect emissions associated with its operations. This may include installation of onsite renewables (e.g., rooftop solar), dispatchable storage, procurement of renewable electricity. The facility will incorporate into its policies and stakeholder management programme the support of and participation in government programmes that support grid decarbonisation. 	Low
Social Impacts - There may be indirect social impacts related to the shift to electric vehicles, however, these are not expected as a direct consequence of the sub-projects, which could have socially beneficial impacts related to generation of opportunities for employment, improved air quality and access to new transport options	<ul style="list-style-type: none"> Consider, as part of the planning phase of each sub-project, the social impact caused, including job creation for new / reskilled workers, improved amenity and aesthetics due to reduced noise and pollution, enhanced low-cost mobility and connectivity for communities and improved quality of life and security for customers. Review any likelihood of significant retrenchment as a result of the transaction (unlikely). Support or be involved in workshops and training for the e-mobility sector organised by financing counterparties. 	Low

Part B: Specific environmental and social risks and impacts will be assessed by the DFI/PIU.

Resilient and Reliable Energy Systems for Rural and Urban Communities (solar-powered cold storage, off-grid solar powered water pumps, off-grid solar powered flour mills, off-grid solar powered dairy farms)

Part A: Risk Factors related to the menu of eligible activities

This is an ESS pre-screening, it does not substitute the ESS screening DFI will have to do once more details are available.

- **TBD:** there are not enough information at the moment, to be re assessed during project evaluation;
- **NO:** if triggered, the project will likely be Cat A so excluded;
- **YES:** Likely Cat B.

Risk Factors	YES	NO	TBD
Will the activities involve associated facilities and require further due diligence of such associated facilities?	<input type="checkbox"/>	<input type="checkbox"/>	X
<i>Please provide a justification of your answer:</i>			
Will the activities involve trans-boundary impacts including those that would require further due diligence and notification to affected states?	<input type="checkbox"/>	X	
<i>Please provide a justification of your answer:</i>			
Will the activities potentially expose local communities and workers to a higher risk of SEAH?	<input type="checkbox"/>	<input type="checkbox"/>	X
<i>Please provide a justification of your answer:</i>			
Will the activities adversely affect working conditions and health and safety of workers or potentially employ vulnerable categories of workers including women and children?	<input type="checkbox"/>	<input type="checkbox"/>	X
<i>Please provide a justification of your answer:</i>			
Will the activities potentially generate hazardous waste and pollutants that would require further studies on management, minimization and control and compliance to the country and applicable international environmental quality standards?	<input type="checkbox"/>	<input type="checkbox"/>	X
<i>Please provide a justification of your answer:</i>			
Disposal of solar batteries and equipment will need to be managed as well as procurement of them.			
Will the activities involve the construction, maintenance, and rehabilitation of critical infrastructure (like dams, water impoundments, coastal and riverbank infrastructure) that	<input type="checkbox"/>	X	

would require further technical assessment and safety studies?			
<i>Please provide a justification of your answer:</i>			
Will the proposed activities potentially involve resettlement and dispossession, land acquisition, and economic displacement of persons and communities?	<input type="checkbox"/>	X	
<i>Please provide a justification of your answer:</i>			
Will the activities be located in or in the vicinity of protected areas and areas of ecological significance including critical habitats, key biodiversity areas and internationally recognized conservation sites? BMP will be required to manage any impacts on biodiversity predicted	<input type="checkbox"/>	<input type="checkbox"/>	X
<i>Please provide a justification of your answer:</i>			
Will the activities affect Indigenous Peoples that would require further due diligence, free, prior and informed consent (FPIC) and documentation of development plans?	<input type="checkbox"/>	X	
<i>Please provide a justification of your answer:</i>			
Will the activities be located in areas that are considered to have archaeological (prehistoric), paleontological, historical, cultural, artistic, and religious values or contains features considered as critical cultural heritage?	<input type="checkbox"/>	<input type="checkbox"/>	X
<i>Please provide a justification of your answer:</i>			

Summary of risks	Mitigation measures	Risk significance
<i>This contains the description of risks and can be derived from the responses to the screening questions in Part B2.</i>	<i>Options to avoid, reduce, mitigate risks and impacts. This may also indicate additional due diligence and specific management plans</i>	<i>This contains a description of the overall level of risk*</i>
Chemical Pollution & Electronic Waste Production - Electronic waste (e-waste) production occurring at the end of life cycle for off-grid products and materials. E-waste contains hazardous materials which can potentially contaminate soil and freshwater if not properly disposed.	<ul style="list-style-type: none"> • Encourage incorporating the cost of the responsible management of waste into the business budgeting and financial prospectations. Responsibly choose a waste management partner • Encourage common (regional or country) frameworks for recycling of batteries and need to be promoted • Engagement with industry, regulators, and NGOs to explore practical regional and country waste management solutions • Proper management waste systems and channel • Establishment of a reparation network and replacement parts channel • Communication and educational campaigns for end users and communities • Internal training on waste management processes • Promote reuse, recycling or energy recovery plastic treatment • Reuse, recycling or energy recovery in an equipped unit for polystyrene treatment • Promote recycling • Implementation of voluntary management systems such as ISO 14001 	Medium
Water Consumption - when off-grid solar technology is used for irrigation purposes, the system can lead to the overexploitation of groundwater resulting from free pumping.	<ul style="list-style-type: none"> • Measures for resource efficiency 	Medium

Summary of risks	Mitigation measures	Risk significance
	<ul style="list-style-type: none"> • Communication campaigns and raising awareness on sustainable water management (especially for productive end users) 	
Occupational Health & Safety - potential injuries and/or accidents can occur throughout the entire off-grid solar life cycle.	<ul style="list-style-type: none"> • Solar equipment needs to be installed safely • Workers shall wear protective gear and be trained in safe practices • Assessment of workplace hazards. Consult and involve workers in the workplace risk assessment as well as in the choice of prevention measures • Internal training on type of risks and suppression measures (safe working procedures) • Supply appropriate Personal Protective Equipment (PPE) and train on its use and ensure that is properly maintained • Maintain a fully stocked and accessible first aid kit 	Low
Land-Related Risks - off-grid systems are typically installed on buildings but installation may incorporate a small portion of land. Risks include voluntary donation of land.	<ul style="list-style-type: none"> • Photovoltaic installations on the ground must take into account the protection of existing agricultural and forestry areas • Prioritize “degraded sites” (brownfield sites) Avoid areas subject to natural hazards 	Low
Gender and Vulnerable Group Risks - gender-related risks include exclusion of female-headed households, gender-based violence and harassment, and the potential of women being disproportionately affected by a lack of reliable access to energy.	<ul style="list-style-type: none"> • Women employment with solar businesses is part of fair labour practices • Gender-sensitive stakeholder engagement • Promote active participation of women entrepreneurs, women's organizations, civil society and non-governmental organizations working on gender and energy issues 	Medium

Summary of risks	Mitigation measures	Risk significance
	<ul style="list-style-type: none"> • Increase information and awareness of women's that will allow them to enter into renewable energy market • Ensure that women entrepreneurs in the energy sector will have equal access to finance • Capacity building and internal training on GBV prevention; GBV to be reported and dealt with as per the law • Taking action for women to be seen and engaged as valuable partners along the entire value chain: design, marketing, sales, and after-sale services • Promote education approaches to reinforce social inclusion • Stakeholder engagement measures to identify and take into consideration possible social tensions and conflicts within communities 	
End Users' Health and Safety - end user risks include electric shocks, overcurrent, and decouplings. These risks are associated with the intallation of electrical equipment.	<ul style="list-style-type: none"> • Ensure safe installation • Promote consumer education about proper and safe practices for use of equipment • Proper isolation of equipment • Proper signalization of the solar power system • E-waste generation and management raising awareness 	Low
Labour Issues - risks associated with labour issues include the potential for child or forced labour, improper gievnance redress for workers, and unfair terms of employment	<ul style="list-style-type: none"> • No child or forced labor can be employed by companies • Develop and implement a proper grievance redress mechanism 	Medium

Summary of risks	Mitigation measures	Risk significance
	<ul style="list-style-type: none"> • Solar companies to have HR policies that articulate clear and fair terms of employment and provide for no discrimination and equal opportunity • Proper training and record on the system or working procedure • Fair employment practices can lead to better business and better workers • Employing women 	
Supply Chain - risks include lack of awareness raising on E&S risks, such as child labour, in the supply chains of solar equipment	<ul style="list-style-type: none"> • Awareness of CFIs, solar companies of supply chain E&S risks 	Medium

Part B: Specific environmental and social risks and impacts will be assessed by the DFI/PIU.

APPENDIX 9 – Supply Chain Human Rights

ADB's Procurement Policy and Procurement Regulations for ADB Borrowers (2017, both as amended from time to time) require borrowers, their executing and/or implementing agencies, as well as bidders, suppliers, and contractors under ADB-financed contracts to observe the highest standard of ethics during the procurement and execution of their contracts. ADB has the obligation to ensure that the proceeds of its financing are used in accordance with ADB's procurement policy and with due attention to considerations of economy, efficiency, and transparency.

The ADB's Procurement Policy and Procurement Regulations for ADB Borrowers may be accessed through the following ADB websites:

<https://www.adb.org/documents/adb-procurement-policy>

<https://www.adb.org/documents/procurement-regulations-adb-borrowers>

Additionally, the IGFF seeks to align with United Nations Guiding Principle (UNGP) of respecting and protecting human rights (including in the supply chain), including through both:

- a) Avoiding causing or contributing to adverse human rights impacts through their own activities, and address such impacts when they occur;
- b) Seeking to prevent or mitigate adverse human rights impacts that are directly linked to their operations, products or services by their business relationships, even if they have not contributed to those impacts.

The UN Guiding Principles can be accessed through the following link:

https://www.ohchr.org/sites/default/files/documents/publications/guidingprinciplesbusinesshr_en.pdf

Human rights, including labour conditions in the supply chain, are also captured within the ESS Screening Checklist found within **Appendix 7 and 8**.

Labour risks and supply chain high-level checklist

UNDP Standard 7: Labour and Working Conditions - Annex 1: Labour Management Procedures Template: [https://ses-](https://ses-toolkit.info.undp.org/sites/g/files/zskgke446/files/SES%20Document%20Library/Learning%20Materials/UNDP_S7_Labour%20Guidance%20Note_June2021.pdf)

[toolkit.info.undp.org/sites/g/files/zskgke446/files/SES%20Document%20Library/Learning%20Materials/UNDP_S7_Labour%20Guidance%20Note_June2021.pdf](https://ses-toolkit.info.undp.org/sites/g/files/zskgke446/files/SES%20Document%20Library/Learning%20Materials/UNDP_S7_Labour%20Guidance%20Note_June2021.pdf)

APPENDIX 10 – Cultural Heritage procedure

Cultural heritage is defined as resources with which people identify as a reflection and expression of their constantly evolving values, beliefs, knowledge, and traditions. Cultural heritage encompasses tangible and intangible heritage, which may be recognised and valued at a local, regional, national or global level, as follows:

- Tangible cultural heritage, which includes movable or immovable objects, sites, structures, groups of structures, and natural features and landscapes that have archaeological, paleontological, historical, architectural, religious, aesthetic, or other cultural significance. Tangible cultural heritage may be located in urban or rural settings, and may be above or below land or under the water; and
- Intangible cultural heritage, which includes practices, representations, expressions, knowledge, skills—as well as the instruments, objects, artifacts and cultural spaces associated therewith— that communities and groups recognise as part of their cultural heritage, as transmitted from generation to generation and constantly recreated by them in response to their environment, their interaction with nature and their history.

A Chance Find Procedure outlines the procedures that the DFI will follow should potential cultural heritage discoveries occur during the small-scale construction and/or renovation activities associated with the project.

Tangible cultural heritage is the focus of a Chance Find Procedure and in particular, chance finds which are when archaeological, historical, cultural and/or remain material is unexpectedly encountered during project construction or operation.

General requirements

IGFF require projects to have established a provisional Chance Find Procedure, in compliance with IFC PS 8 Cultural Heritage, upon submission of a full proposal.

The scope and scale of the Chance Find Procedure will be proportionate to the nature, scale and type of potential risks and impacts to cultural heritage that may arise from the Projects' small-scale construction and/or renovation activities. In addition, the Chance Find Procedure will be commensurate with the type and scale of the planned construction/ renovation activities. As such, construction/ renovation activities deemed at screening to have a negligible potential negative impact on cultural heritage (Category C) or with a small/ negligible footprint will not require a Chance Find Procedure. This will need to be justified in the Project Proposal.

This Appendix does not aim to be prescriptive but rather serves as a guide for a Chance Find Procedure. Requirements can be changed and adapted to project type and context as needed and in line with the IFC PSs compliant ESIA study of the Approved Project. The guidance provided below is focused on what to include in the Chance Find Procedure and is not intended as 'how to' guidance.

If there is a legally established procedure for accidental discoveries (e.g., of archaeological objects or remains) in the host country, that procedure must be followed. However, if no such procedure exists, then this Chance Find Procedure can be used.

A Chance Find Procedure should:

- Be proportionate to the nature, scale and type of potential risks and impacts to cultural heritage as well as the type and scale of the construction/ renovation activities.

- Be developed in alignment with international good practice, including the World Bank Environmental and Social Standards (notably ESS8²⁰), and also complies with Host Country requirements as well as IGFF policies and procedures.
- Set out how chance finds associated with the project will be managed. The procedure should include a requirement to notify relevant authorities of found objects or sites by cultural heritage experts; to fence off the area of finds or sites to avoid further disturbance; to conduct an assessment of found objects or sites by cultural heritage experts; to identify and implement actions consistent with the requirements of WB ESS8 and national law; and to train project personnel and project workers on chance find procedures²¹.
- Aim to:
 - Protect physical cultural resources from the adverse impacts of physical investment activities and support their preservation.
 - Promote the equitable sharing of benefits from the use of Physical Cultural Resources; and
 - Raise awareness of all construction workers and management on site regarding the potential for accidental discovery of cultural heritage resources.

In order for the Chance Find Procedure to be effective, all personnel on the proposed development site understand the Chance Find Procedure and the importance of adhering to it if cultural heritage resources are encountered. In addition, training or induction on cultural heritage resources that might potentially be found on site should be provided by the DFI.

Procedures for accidental discovery of cultural resources (chance finds)

The procedure that should be followed if cultural resources are discovered when undertaking small-scale construction activities, civil works and/or renovation activities are briefly described below.

Prior to project implementation, the DFI is responsible for siting and designing project activities to avoid significant adverse impacts to cultural heritage. The environmental and social risks and impacts identification process at the screening stage should help determine whether the proposed location of a project is in areas where cultural heritage is expected to be found, either during construction or operations.

The DFI will develop provisions for managing chance finds through a chance find procedure which will be applied if cultural heritage is subsequently discovered.

DFI and any contractors will make sure not to disturb any chance find further until an assessment by competent professionals is made. Where necessary, this will include qualified experts, including the relevant government authorities and civil society organisations, as well as traditional knowledge holders and other people from the area who should be consulted on whether disclosure of information is desirable, since there are situations in which disclosure may compromise the safety or integrity of the cultural heritage in question and/or endanger the sources of information.

The Chance Finds Procedure should cover the actions to be taken from the discovering of a heritage site or item to its investigation and assessment by a professional archaeologist or other appropriately qualified person to its rescue or salvage.

If cultural resources (e.g., archaeological sites, historical sites, remains, objects, graveyards or individual graves) are discovered when undertaking small-scale construction activities, civil works and/or renovation activities, a procedure similar to the below should be executed:

- a. Halt the construction activities around the chance find to avoid any (or further) damage;
- b. Report the discovery to the designated supervisor immediately;
- c. Delineate and fence the discovered site or area and provide a 25-meter buffer zone around all sides of the find;
- d. Secure the site to prevent any damage or loss of removable objects. In cases of removable antiquities or sensitive remains, a night guard will be arranged until the responsible local authorities or the District/ Provincial Department of Culture, or the local Institute of Archaeology, if available, can take over;
- e. Forbid any removal of the objects by the workers or other parties;
- f. Note the type of archaeological materials you think you have encountered, their location (GPS) and if possible, the depth below the surface the find occurred;
- g. Photograph the exposed materials, preferably with a scale (e.g., a file binder, coin, rules etc.);
- h. Notify the responsible local authorities and the relevant Institute of Archaeology immediately (within 24 hours or less);
- i. Responsible local authorities would oversee protecting and preserving the site before deciding on subsequent appropriate procedures. This would require a preliminary evaluation of the findings to be performed by the local Institute of Archaeology. The significance and importance of the findings should be assessed according to the various criteria relevant to cultural heritage; these include the aesthetic, historic, scientific or research, social, and economic values;
- j. Decisions on how to handle the finding shall be taken by the responsible authorities. This could include changes in the physical investment layout (such as when finding an irremovable remain of cultural or archaeological importance) conservation, preservation, restoration, and/or salvage;
- k. Implementation for the authority decision concerning the management of the finding shall be communicated in writing by relevant local authorities;
- l. The mitigation measures could include the change of proposed Project design/ layout, protection, conservation, restoration, and/or preservation of the sites and/or objects;
- m. Construction work at the site could resume only after permission is given from the responsible local authorities concerning safeguard of the heritage; and
- n. The physical investment proponent is responsible for cooperating with the relevant local authorities to monitor all construction activities and ensure that the adequate preservation actions are taken and hence the heritage sites protected.

In addition, the DFI are obliged to declare the chance find discovery at the earliest possible date to IGFF.

APPENDIX 11 – SEAH-specific Guidance for Grievance Redress Mechanism

This facility has a separate Grievance Redress Mechanism (see **Section D. III**), however, following the ADB Good Practice Note on Addressing Sexual Exploitation, Abuse, and Harassment in ADB-Financed Projects with Civil Works (2023)¹, it is acknowledged that due to the nature of SEAH concerns, it is necessary to provide SEAH-specific guidance for implementation. This appendix provides guidance on how DFIs can set up and implement a reporting mechanism considerate to SEAH requirements. For further information, and for templates for risk assessments, refer to the above document.

Core Standards for Sexual Exploitation, Abuse, and Harassment-Reporting Mechanisms in Project Grievance Redress Mechanisms

The following core standards are to be applied to the project's grievance redress mechanism and the handling of reports of sexual exploitation, abuse, and harassment (SEAH).

Confidentiality. It is important to maintain confidentiality at all stages of the process when dealing with SEAH concerns. Confidentiality is critical to satisfactory outcomes and the protection of privacy and safety of all concerned. Information relating to the concern and subsequent case handling of that concern should be shared on a need-to-know basis only and should be kept secure at all times. Breach of confidentiality for anything other than proper case management, handling, legal obligation, or whistleblowing purposes where an individual feels that the case has not been handled appropriately, is unacceptable.

Disclosure will be permitted when (i) specific permission is given by the complainant; (ii) it is required by law; (iii) it is needed to obtain specialist help for the complainant or survivor or advice on the evidence (with the permission of the complainant or where the complainant is a child, and it is in their best interest); or (iv) granted by a whistleblower regarding case handling².

If breach of confidentiality is reported, it should be treated as a disciplinary matter (following appropriate investigation and/or disciplinary guidance). Breach of confidentiality may be accidental or intentional. Accidental disclosure occurs when key details about the complaint are inadvertently revealed, generally in casual conversation or when documents fall into the wrong hands. To minimize the risks of accidental disclosure, there should be clear guidelines on who is to be informed about cases and when. Intentional disclosure is more difficult to prevent. To mitigate against intentional disclosure, project proponents need to ensure that information is limited to the "need-to-know" group, and they must remain alert to any conflict of interest and take disciplinary action against anyone who knowingly broadcasts confidential information about the case.

Responsiveness. Each complaint is responded to immediately, within a maximum of 24 hours. At a minimum, information should be provided to the survivor regarding available services, and safety should be provided to anyone connected to the incident who has requested it.

Nonretaliation. It is the right of all stakeholders to complain. Any attempt at retaliation against a complainant is considered gross misconduct and IGFF will support the DFIs in taking immediate action against such behavior, including disciplinary action where appropriate.

¹ <https://www.adb.org/sites/default/files/institutional-document/879161/good-practice-seah-adb-financed-projects.pdf>

² Only one of these conditions needs to be in place

Objectivity. Every complaint is addressed in an impartial, equitable, and objective manner.

Safety and welfare. The safety of the complainant, alleged survivor, witnesses, person or subject of complaint, and staff member is paramount. A risk assessment must be carried out for each complaint, and safety and welfare precautions must be considered before proceeding to deal with a complaint.

Survivor-centered approach. A survivor-centered approach seeks to empower the survivor by prioritizing their rights, needs, and wishes. It means ensuring that survivors have access to appropriate, accessible, and good quality services, including health care, mental health and psychological support, and legal and security support. Where a survivor reports SEAH, the immediate priorities of the agency receiving the complaint should be to provide the survivor with information regarding available services and the pros and cons of accessing those services, and to offer to facilitate access to them (with a particular emphasis on health care for sexual assault survivors). A risk assessment should be conducted with the survivor and the subject of concern as soon as possible following the report of the incident. However, where a survivor indicates during initial disclosure that they or anyone else is at risk, their safety should be assured by working with and referring to local protection actors and a safety plan should be put in place as a matter of urgency.

Survivors' decisions should be at the center of all actions. If the survivor is an adult, that person should decide whether they will seek referral to response services, and whether police are to be notified.

Responders must understand their legal obligations, the legal limits of confidentiality, and their professional codes of practice, particularly when reporting SEAH cases to the police. The World Health Organization does not recommend mandatory reporting of gender-based violence to the police, but if a country's legislation requires mandatory reporting, the responder should inform the executing and/or implementing agencies and the potential survivor of this obligation and of any other limits to confidentiality.

Further, to make an informed decision, each individual should be provided with information on the quality of the services available, based on risk–benefit assessments of seeking support from service providers. Some of the benefits of accessing health care are to receive a compassionate response from a trained health care provider; to prevent HIV infection (within 72 hours of the incident taking place), pregnancy (within 120 hours), and/or sexually transmitted infections; to treat cuts and bruises; and to receive ongoing mental health and psychological support. No monetary compensation should be given directly to the survivor. All support services, including transportation, housing, and support requirements such as obtaining official documentation or collecting forensic evidence, can be paid only through the service provider.

Following disclosure, survivors should not be forced to attend any service. Women and men can choose whether to seek services through referrals. Survivors who are girls, boys, or adults-at-risk should participate in the referral decision (and this should be weighted in accordance with their age and their cognitive capacity), and a referral should be in the best interest of the child or adult-at-risk.

Table 1. Guide to setting up a reporting mechanism:

Actions	Details
Engage and consult	<p>With</p> <ul style="list-style-type: none"> the government, local officials, and community leaders to gain buy-in and support, and to understand the context; women, girls, and other at-risk groups within the community, working with a wide range of community groups and actors to ensure a diversity of perspectives is sought; employees and staff members, particularly women and other at-risk staff; and civil society organizations and women's groups. <p>The process of creating the reporting mechanism should involve collaboration with all key actors. At-risk populations and communities affected by the project are always best placed to support the design of feedback and grievance mechanisms. The consultation process should consider power imbalances and seek to ensure that the most at-risk groups have equal access to reporting mechanisms. Engagement with communities should be done carefully. Where specific groups may not be able to talk freely in mixed groups, separate sessions may be more appropriate. It is important not to seek out survivors of SEAH as this may cause harm or distress.</p>
Design the reporting mechanism	<ul style="list-style-type: none"> Decide whether the DFI or sub-project proponents themselves will deliver reporting and response to SEAH or whether this will be wholly or partially outsourced to a third party. This should be based on assessment against minimum good practice standards, feedback from the engagement and consultations, and the project risk assessment. Ensure that reporting mechanisms are accessible to at-risk groups. Reporting mechanisms within the workplace and within the community should consider accessibility for different groups. This should be explored at length during the engagement and consultation period, and should continue to be monitored throughout the life of the project. Reporting entry points should be accessible and consider issues such as access for people with disabilities, women's access to and control of technology, and literacy levels. At least one option for anonymous reporting should be put in place. Ensure that reporting mechanisms are child friendly. At least one reporting mechanism should be easily accessible to children. Ensure multiple reporting entry points. Several reporting channels should be available to community members and staff. Decide whether the mechanism can receive reports from suppliers and contractors as well as company workers and project-affected communities. Community members

Actions	Details
	<p>are unlikely to know the difference between one company and another delivering work on a project.</p> <ul style="list-style-type: none"> • Therefore, it is advisable to develop the company's reporting mechanism to receive concerns that involve workers as well as suppliers and contractors. • If there are many companies and/or official development assistance agencies working in the same location, it may be most appropriate to use a shared reporting mechanism with clear processes and procedures. Coordination is highly encouraged wherever possible.
Communicate	<p>Promote key messages to the community and staff, including</p> <ul style="list-style-type: none"> • what SEAH is, and that staff and community members have a right to live free from it; • the company's code of conduct; • the types of concerns and issues that can be reported through the reporting mechanism; • when, where, and how community members can access the reporting mechanism; • what happens following the receipt of a report; • the rights of complainants and survivors (e.g., to privacy, confidentiality, and protection from reprisal); and • the survivor support services available in the project area. <p>Communication about the reporting mechanism and SEAH in general should always be carefully considered. The words and/or images used to describe the mechanism and behaviors in the code of conduct should be tested with target groups in the community for suitability and to understand whether the language used would increase or undermine trust in the reporting mechanism. For example, including images depicting violence may be triggering for survivors or may lead to the project being associated with SEAH, potentially causing an adverse reaction in the community toward women who work with the project proponent.</p> <p>The methods for communicating with the community and with staff members should also be designed in consultation with target groups. A range of methods should be used including posters, radio, short messaging services, and community meetings. It is vital to ensure that jargon is not used, language and literacy are accounted for, and those most at risk are reached by creating and regularly disseminating information using multiple methods and communication channels.</p>

As a minimum, project proponents should have the following in place:

Table 2. Minimum Good Practice Standards

Area	Minimum Good Practice Standard
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A. SEAH policy	1. Have a policy or a combination of relevant policies that address SEAH in the workplace and in the community.
B. Code of Conduct	2. Have a clear employee code of conduct that prohibits all forms of SEAH and requires regular training requirements for all personnel.
C. Reporting, handling of complaints, and whistleblowing (standards 4–9 may be outsourced to an appropriate specialized partner)	<p>3. Have, or be willing to develop, a comprehensive and confidential SEAH reporting mechanism for escalating and managing concerns and complaints. This should include the option of anonymous reporting and whistleblowing. They must be accessible to workers and community members who come into contact with project proponents' staff and workers.</p> <p>4. Be able to work with communities and constituencies to analyze the most appropriate and accessible means to report concerns and complaints. Multiple methods to do so must be put in place.</p> <p>5. Be able to promote the code of conduct and reporting mechanisms to the staff and the community or communities in the project area.</p> <p>6. Have a clear internal handling framework (standard operating procedure) to respond appropriately to all concerns and support the survivor in a survivor-centered way.</p> <p>7. Have identified and risk-assessed services available within the project context to ensure safe referrals of survivors can take place.</p> <p>8. Have in-house trained investigators or have identified an appropriate external investigation resource.</p> <p>9. Have a whistleblowing policy that includes SEAH.</p>
D. Risk management	<p>10. Have a comprehensive and effective risk management framework in place that includes reference to SEAH and the creation of a central register of SEAH reports.</p> <p>11. Have requirements for maintaining and updating the central register of SEAH concerns, including information confidentiality requirements.</p>
E. Leadership and accountability	<p>12. Communicate regularly regarding their zero tolerance to inaction on SEAH utilizing internal and external communication routes.</p> <p>13. Have clear guidelines for monitoring and overseeing implementation of the policy or policies.</p> <p>14. Have the capacity to be able to report allegations within 24 hours to the DFI and IGFF.</p>

APPENDIX 12 – Land Acquisition and Resettlement Action Plan (LARP)

Should the sub-project operations require a specific LARP, an outline of the contents that a comprehensive LARP should include, based on the IFC Performance Standards Guidance Notes, is provided in the following:

1. **Description of the project:** General description of the project and identification of the project area.
2. **Potential impacts:** Identification of
 - the project component or activities that give rise to resettlement;
 - the zone of impact of such component or activities;

- the alternatives considered to avoid or minimize resettlement; and
 - the mechanisms established to minimise resettlement, to the extent possible, during project implementation.
3. **Objectives and studies undertaken:** The main objectives of the resettlement program and a summary of studies undertaken in support of resettlement planning/implementation, e.g. census surveys, socio-economic studies, meetings, site selection studies, etc.
 4. **Regulatory framework:** Relevant laws of the host country, other policies and procedures, performance standards.
 5. **Institutional framework:** Political structure, NGOs.
 6. **Stakeholder engagement:** Summary of public consultation and disclosure associated with resettlement planning, including engagement with affected households, local and/or national authorities, relevant CBOs and NGOs and other identified stakeholders, including host communities. This should include, at a minimum, a list of key stakeholders identified, the process followed (meetings, focus groups, etc.), issues raised, responses provided, significant grievances (if any) and a plan for ongoing engagement throughout the resettlement implementation process.
 7. **Socioeconomic characteristics:** The findings of socioeconomic studies to be conducted in the early stages of project preparation and with the involvement of potentially displaced people, including results of household and census surveys, information on vulnerable groups, gender dynamics, information on livelihoods and standards of living, land tenure and transfer systems, use of natural resources, patterns of social interaction, social services and public infrastructure.
 8. **Eligibility:** Definition of displaced persons and criteria for determining their eligibility for compensation and other resettlement assistance, including relevant cut-off dates.
 9. **Valuation of and compensation for losses:** The methodology used in valuing losses to determine their replacement cost; and a description of the proposed types and levels of compensation under local law and such supplementary measures as are necessary to achieve replacement cost for lost assets.
 10. **Magnitude of displacement:** Summary of the numbers of persons, households, structures, public buildings, businesses, croplands, churches, etc. to be affected.
 11. **Entitlement framework:** Showing all categories of affected persons and what options they were/are being offered, preferably summarized in tabular form.
 12. **Livelihood restoration measures:** The various measures to be used to improve or restore the livelihoods of displaced people.
 13. **Resettlement sites:** Including site selection, site preparation, and relocation, alternative relocation sites considered and explanation of those selected, impacts on host communities.
 14. **Housing, infrastructure, and social services:** Plans to provide (or to finance resettlers' provision of) housing, infrastructure (e.g., water supply, feeder roads), and social services (e.g., schools, health services); plans to ensure comparable services to host populations; any necessary site development, engineering and architectural designs for these facilities.
 15. **Grievance procedures:** Affordable and accessible procedures for third-party settlement of disputes arising from resettlement; such grievance mechanisms should take into account the availability of judicial recourse and community and traditional dispute settlement mechanisms.
 16. **Organizational responsibilities:** The organizational framework for implementing resettlement, including identification of agencies responsible for delivery of resettlement measures and provision of services; arrangements to ensure appropriate coordination between agencies and jurisdictions involved in implementation; and any measures (including technical assistance) needed to strengthen the implementing agencies' capacity to design and carry out resettlement activities; provisions for the

transfer to local authorities or resettlers themselves of responsibility for managing facilities and services provided under the project and for transferring other such responsibilities from the resettlement implementing agencies, when appropriate.

17. **Implementation schedule:** An implementation schedule covering all resettlement activities from preparation through implementation, including target dates for the achievement of expected benefits to resettlers and hosts, and implementation of the various forms of assistance. The schedule should indicate how the resettlement activities are linked to the implementation of the overall project.
18. **Costs and budget:** Tables showing itemized cost estimates for all resettlement activities, including allowances for inflation, population growth, and other contingencies; timetables for expenditures; sources of funds; and arrangements for timely flow of funds, and funding for resettlement, if any, in areas outside the jurisdiction of the implementing agencies.
19. **Monitoring, evaluation and reporting:** Arrangements for monitoring of resettlement activities by the implementing agency, supplemented by independent monitors to ensure complete and objective information; performance monitoring indicators to measure inputs, outputs, and outcomes for resettlement activities; involvement of the displaced persons in the monitoring process; evaluation of the impact of resettlement for a reasonable period after all resettlement and related development activities have been completed; using the results of resettlement monitoring to guide subsequent implementation.

APPENDIX 13 – ESMS Monitoring and Reporting Template

Provided below is a standard ESMS monitoring & reporting template for the application of properly preparing monitoring reports pertaining to the E&S performance standards. Template 1 provides a format for monitoring the effectiveness of the mitigation measures and Template 2 provides a format for creating plans in order to monitor the effectiveness of an ESMP.

Note: The progress of implementing mitigation measures should be color-coded in column C:
Green = On Schedule/ Ahead of Schedule/ Completed, Orange = Slightly Delayed, Red = Delayed

ON SCHEDULE / AHEAD OF SCHEDULE/ COMPLETED	SLIGHTLY DELAYED	MAYOR DELAYS/ ISSUES
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Disclosure				
Template 1: ESMP Monitoring				
Period covered by the report:				
ESMS Standards	Describe the progress of implementing the required tools (Indigenous Peoples Plan, Process Framework etc.):			
Social & Environmental Impacts	Mitigation measures	Color coding	Describe status of completion , suggest solutions where problems are encountered	Early judgement: Does this measure seem effective?
<i>New ESMS risks that have emerged</i>				
<i>Other ESMS provisions</i>	Describe status of completion and evidence			Outstanding action and timing
Disclosure				
Grievance Mechanism				
Gender Mainstreaming				
Stakeholder Engagement				
TO BE COMPLETED BY IMPLEMENTING AGENCY			Date/Name of reviewer:	
ESMP monitoring - main findings:			Status ESMP	
			<input type="checkbox"/> on schedule	
			<input type="checkbox"/> slightly delayed	
			<input type="checkbox"/> major delays/issues	

Template 2: Plan for Monitoring Effectiveness of ESMP <small>TO BE COMPLETED BY EXECUTING AGENCY</small>					
Mitigation measures	Indicators <i>proving effectiveness of avoidance or reducing impacts</i> ³	Baseline	Monitoring methodology	Target (mid-term)	Target (end of project)
A	B	C	D	E	F
<i>New ESMS risks that have emerged</i>					

³ Identify one indicator for each mitigation measure. Use the same numbering as for mitigation measures as in Table 1 and use corresponding number for indicators; e.g., measure 1 (M1) would be monitored by indicator 1 (Ind1).

APPENDIX 14 – Environmental and Social Audit for Existing Facilities

For proposed projects involving facilities and/or business activities that already exist or are under construction prior to proposal submission, the DFIs with guidance from the PIU will undertake an environment and social compliance audit (ESA), including on-site assessment, to identify past or present concerns related to impacts on the environment, involuntary resettlement, and indigenous people and determine whether actions were in accordance with ADB's safeguard principles. Existing facilities, at a minimum, must comply with national laws and regulations having all environmental clearances and permits secured. Where noncompliance is identified, a time-bounded corrective action plan agreed on by DFI E&S team, PIU, and borrower/clients will be prepared as part of the full proposal. The plan will define necessary remedial actions, the budget for such actions, and the time frame for resolution of noncompliance. The audit report will be made available to the public in accordance with the information disclosure requirements, consultation and participation defined in Section II. If a project involves an upgrade or expansion of an existing facilities that has potential impacts on the environment, involuntary resettlement, and/or indigenous people, the project will undergo the screening phase and project E&S categorisation to determine the E&S requirements.

An ESA includes the following items:

- *Executive Summary:* A concise discussion of all environmental and social safeguards areas of concern, recommended corrective actions and schedule for compliance.
- *Scope of the Audit:* A description of what the audit focused upon (e.g., where the audit was conducted), what was audited (e.g., geographical scope, processes, organization, operations, etc.), when the period of performance began and ended (e.g., slice in time or all operations since establishment)
- *Regulatory Setting:* Tabular summary of host country, local and any other applicable environmental and social laws, regulations, guidelines, and policies including environmental and social policies and procedures at the existing facility level, plus the institutional arrangements as they may directly pertain to the scope of the audit.
- *Audit and Site Investigation Procedure:* Brief overview of the approach used to conduct the audit. A discussion of the records review, site reconnaissance, and interview activities; a description of the site sampling plan and chemical testing plan, field investigations, environmental sampling and chemical analyses and methods, if applicable.
- *Findings and Areas of Concern:* Detailed discussion of all environmental and social safeguards areas of concern. The areas of concern should be discussed

in terms of both existing facilities and operations and contamination or damages due to past activities, including the affected media and its quality and recommendations for further investigation and remediation, if applicable. The report may wish to consider prioritizing findings into categories: immediate action; mid-term action; and long-term action.

- *Corrective Action Plan, Costs and Schedule:* For each area of concern, the audit report may include specifics on the appropriate corrective actions to mitigate them and why they are necessary. If so, the report should indicate priorities for action, provide estimates of the cost of implementing the corrective actions and a schedule for their implementation if this has been agreed to between the auditor and auditee. Schedules should be recommended within the context of any planned capital expenditure for the facility.

- *Annexes:* These should include references, copies of interview forms, any details regarding the audit protocol not already included, and data obtained during the audit but not included directly above.

APPENDIX 15 – Financial Intermediary Environmental and Social Due Diligence Questionnaire

To assist ADB in FI due diligence, please accomplish the following detailed requests for information and questions:

Information Request		Company's response including links to online sources or accompanying documents as requested
1	Portfolio Information	
1.1	Describe the company's existing and future portfolio, in relation to the proposed use of ADB's proceeds, including product lines, profile of business supported, amount of exposure, average loan sizes and loan tenure. Please complete Table 1 in Annex 1 below. Describe how the ADB investment will likely change the portfolio in terms of increase in volume (amount of loans/investments) and number (number of loans/investments) of each business line.	
1.2	What is the geographic distribution of the FI's target portfolio.	
1.3	What is the extent of the FI's portfolio that is vulnerable to natural or socio-economic calamities? Are there specific areas/provinces that are considered vulnerable to natural or socio-economic calamities or conflicts? Please describe any actions/steps taken by the company to reduce the vulnerability of its borrowers, if any.	
2	Use of ADB Proceeds	
2.1	Will ADB proceeds be used for any loans that may be considered as having significant impacts for environment, involuntary resettlement or Indigenous Peoples?	
2.2	Will ADB proceeds be used to acquire land or properties?	
2.3	Will ADB proceeds be used in Indigenous Peoples/SC/ST/ethnic minority areas?	
3	Environmental and Social Management System (ESMS)	
3.1	Please describe how the ESMS (or equivalent system) operates, and how this will be applied to the target loan portfolio.	
3.2	Please provide a list and description of relevant environmental and social laws, regulations and standards associated with the FI's financing programs.	

Information Request		Company's response including links to online sources or accompanying documents as requested
	Does the company have a system to track updates in laws to ensure its compliance is up-to-date?	
3.3	Has the company been certified by an external auditor for compliance with ISO 9001 (Quality Management System), ISO 14000 (Environmental Management System)? If not, does the company have plans to have a certified ESMS? If yes, please provide copy of ISO accreditation indicating the date it was certified.	
3.4	<p>Does the company have the following policies, standard operating procedures (SOPS) related to EHS and social safeguards, and can you share these documents if available?</p> <ul style="list-style-type: none"> • Land Acquisition/ Land Leasing Arrangement Procedures (for the company and for borrowers) • Indigenous Peoples Policy • Human Resource Policy • Human Rights Policy • Information Disclosure Procedure • Stakeholder Engagement Plan/Consultation and Participation Procedures • Supply Chain Policy • Contractor Management Policy • Procurement Policy 	
4	Screening, Categorization, and Review	
4.1	<p>Please describe the company's loan application process, particularly for the target portfolio.</p> <p>What is the screening and due diligence process for new and repeat borrowers? Does the company use any loan exclusion list?</p> <p>Please indicate the person(s) responsible for assessing and validating the environment and social (E&S) documents attached to the loan application forms.</p> <p>Please share a sample filled-up (accomplished) application form.</p> <p>Please provide a sample report/output from previous loan applications, if available.</p> <p>Please provide examples of E&S covenants included in loan agreements if any.</p>	

Information Request		Company's response including links to online sources or accompanying documents as requested
4.2	Does the FI have a procedure to screen and categorize (according to risk level) potential environmental and social (i.e. involuntary resettlement and indigenous peoples/ vulnerable ethnic minorities) impacts of borrowers' intended activities? If yes, please describe procedure, including responsible officer/ staff. At what stage of the loan processing are E&S screening and categorization being undertaken?	
4.3	Has the company developed an E&S screening checklist as part of the preliminary stage of E&S risk assessment in the loan application procedure? Please present a sample of an accomplished / completed E&S screening checklist, if available. Please indicate impact assessments used to qualify E&S risk and categorization. Are there standard scopes for such assessments? If yes, please provide examples, if available.	
4.4	Was/were there potential loan(s) where the FI deemed it necessary to undertake environmental and social due diligence during the loan application process? If yes, please provide information on: <ul style="list-style-type: none"> • the nature of the loan • the level of environmental/social due diligence undertaken, and the type of documentation prepared • who conducted the environmental/social due diligence; • the outcome of the environmental/social due diligence and the loan application. • E&S documentation that is publicized as a result. 	
4.5	In the evaluation of loan application, does the FI review compliance of borrowers to local and/or national permitting requirements, and environmental and social related laws? If yes, how?	
4.6	Please discuss how the FI determines if borrowers will use the loan to acquire land parcel/s or properties. Does the company have policies in relation to land acquisition? If yes, please provide these.	
4.7	Please describe how screening and due diligence recommendations are incorporated into sub-loan decision making (i.e. application and approval processes) in the overall context of the FI procedures.	

Information Request		Company's response including links to online sources or accompanying documents as requested
4.8	Have there been instances where transactions/loan applications were rejected due to environmental and/or social concerns? Please describe.	
4.9	Does the loan covenant/agreement between the FI and its borrowers include provisions on compliance to national laws, particularly on environment, involuntary resettlement, Indigenous Peoples, and labor? Please provide a copy of the loan agreement template for different loan products.	
5	Organizational Capacity	
5.1	<p>Please provide an organogram depicting the FI's organizational structure at HQ and branch levels.</p> <p>Please indicate staff members with E&S responsibilities and confirm if there are specific staff handling the target loan portfolio.</p> <p>Specify responsibilities of each staff and indicate reporting relationships. Please also indicate the qualification of these staff members and if they managed E&S issues on a full-time basis or share with other responsibilities.</p> <p>Please confirm if there is a specific team/unit or specific position in the FI which manages environmental and social issues that may arise from the loans.</p> <p>If none, what is the alternative arrangement in place?</p>	
5.2	<p>Does the FI engage consultants (individuals and/or firms) to do the following tasks: (i) environment and social due diligence (ESDD), and (ii) environmental and social risk management. If yes, please provide instances or lending activities where the company engaged consultants to conduct ESDD. Please provide TOR(s) and an organogram to illustrate workflow between TORs.</p> <p>If no, how does the FI conduct the due diligence and who in the organization conducts due diligence related activities?</p>	
5.3	Who oversees implementing and monitoring ESMS compliance? Please provide organogram to illustrate workflow.	
5.4	Does the FI have a training program for its workers relating to EHS, HR, gender, labor, and other social related training? Do these extend to business partners or service providers (if any)? Kindly provide a training record.	

Information Request		Company's response including links to online sources or accompanying documents as requested
5.5	Please confirm if the FI promotes employment of staff from local communities where the FI operates.	
6	Monitoring and Reporting	
6.1	<p>How does the FI monitor compliance of its (pre and post loan approval stage) borrowers/clients with the local and national laws and regulations, including labor laws and core labor standards? If any, please provide sample monitoring reports from previous loan transactions.</p> <p>Does the FI monitor or audit borrower's E&S performance or risks after the due diligence process? Please describe the process and any differences for types of projects or transaction risks.</p> <p>Please share example monitoring and/or audit report. Please provide an example Corrective Action Plan for a project, if available.</p>	
6.2	Does the FI undertake visits to loan applicants or loan recipients for due diligence/monitoring purposes? Are there particular types of loans that require this?	
6.3	Please describe the FI's internal reporting process of portfolio performance, including E&S aspects to senior management. Please describe how the issues are being resolved by management and by the staff. Please provide a sample copy of any available report. Indicate who prepares the report, who receives the report, what is being reported, and how often the reporting is being made.	
6.4	Please enumerate the usual topics/issues discussed during management meetings to develop the capacities and skills of borrowers.	
6.5	<p>Please describe the FI's ongoing E&S compliance with Lenders' safeguards requirements and share sample monitoring reports if possible.</p> <p>What are current environmental, health, safety and social monitoring and reporting system and reporting requirements to investors or lenders?</p>	
7	Stakeholder Engagement and Grievance Redress	

Information Request		Company's response including links to online sources or accompanying documents as requested																										
7.1	<p>Is there a grievance management mechanism and a written procedure to handle external and clients' concerns, e.g., hotlines, digital help desk? Please describe the procedure, including responsible staff/officers, to receive and facilitate resolution of grievances from external stakeholders.</p> <p>Are grievances reported and discussed with the management? And are these recorded and tracked up until it is resolved?</p> <p>Who is responsible for handling external grievances?</p>																											
7.2	<p>Please provide a summary of external grievances received in the past year:</p> <table border="1"> <thead> <tr> <th>Type/nature of external grievance</th> <th>No. of resolved grievance within timeline</th> <th>No. of outstanding grievances</th> </tr> </thead> <tbody> <tr><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td></tr> </tbody> </table>	Type/nature of external grievance	No. of resolved grievance within timeline	No. of outstanding grievances																								
Type/nature of external grievance	No. of resolved grievance within timeline	No. of outstanding grievances																										
7.3	How does the FI manage external relationships with clients, public, government, civil society organizations, etc.? Does the company have a stakeholder engagement plan? Please provide relevant documentation.																											
7.4	What performance/E&S/CSR information does the FI disclose to the public? Does it produce a performance/E&S/CSR report? Please share.																											
7.5	Please provide an overview of the Corporate Social Responsibility (CSR) activities, priority areas, budget etc.																											
7.6	<p>What stakeholder engagement activities, disclosures, consultations and CSR activities were conducted in the past year?</p> <table border="1"> <thead> <tr> <th>Activity</th> <th>Date</th> <th>Location</th> <th>Type of participants or beneficiaries</th> <th>No. of participants or beneficiaries</th> </tr> </thead> <tbody> <tr><td> </td><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td><td> </td></tr> <tr><td> </td><td> </td><td> </td><td> </td><td> </td></tr> </tbody> </table>	Activity	Date	Location	Type of participants or beneficiaries	No. of participants or beneficiaries																						
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8	Track Record in E&S Management																											

Information Request		Company's response including links to online sources or accompanying documents as requested
8.1	<p>Have there been instances of any environmental and social issues associated with the implementation of activities financed by loans from the FI? Have any of its borrowers been subjected to environmental liabilities of any kind? To its knowledge, has any of its borrowers been the subject of environmental criticism / accidents / fatalities / litigation / complaints / regulatory fines and notices? If so, please describe.</p> <p>Have there been any notable media records from borrowers in the past 5 years? Please summarize.</p>	
8.2	Has the FI received any commendation or awards concerning environmental and social matters?	
9	Prohibited Investment	
9.1	In the past, has the company financed activities included in ADB's PIAL? If any, please provide details on the activities and amount of financing as well as the steps being taken to reduce exposure to such activities.	
9.2	Does the company have an exception list annexed to its procedures for environmental and social assessment in lending. Is the company amenable to adopting ADB's PIAL and to further enhancing the ESMS to specifically include clear guidance for categorizing and assessing subloans?	
10	Human Resources, Labor and Working Conditions	
10.1	<p>Please provide the FI's HR/ labor-related policies and procedures. If any, please share company policies(i) against discrimination in relation to recruitment and hiring, compensation, working conditions and terms of employment for its workers, including prevention of sexual exploitation, abuse, and harassment (SEAH); (ii) elimination of child labor; (iii) elimination of forced labor; and (iv) respect of employees' freedom of association and the recognition of the right to collective bargaining?</p> <p>What HR policies are applicable to contractors or third-party workers?</p>	
10.2	Please provide sex-disaggregated (number of male-female) employment data of the company's by position classification, status of employment, headquarters, and branch offices.	

Information Request							Company's response including links to online sources or accompanying documents as requested
	Level / Position	Total Number of Employees	No. of permanent employees by sex		No. of temporary / contractual employees by sex		
			Female	Male	Male	Female	
10.3	Please enumerate the benefits provided to employees (permanent and temporary / contractual) and indicate whether these are statutory, or company initiated. If any, please also indicate benefits specifically provided to women employees.						
10.4	If any, please provide information on existing workers' union and collective bargaining agreements.						
10.5	What is the employee turn-over rate in 2024 and were there instances of retrenchment?						
10.6	Does the FI have contractor and supplier management policies and procedures to ensure contractors'/ suppliers' compliance with national labor laws and internationally recognized core labor standards? If yes, please share copy/ provide information. Please also indicate if legal agreements with contractors /suppliers include labor provisions.						
10.7	<p>Is there a grievance management mechanism and a written procedure and/or a whistle blower policy to handle employee concerns? Please describe the process and provide the procedure if available. Please also indicate if employees engaged through third-party (e.g contractors, labor agency) have access to the GRM.</p> <p>Who is responsible for receiving and handling grievances?</p> <p>Does the FI have a system to record and track grievances and their resolution?</p> <p>Are grievances reported and discussed with the management?</p>						
10.8	Please provide a summary of employee grievances received in the past year						
	Type/nature of external grievance	No. of resolved grievance within timeline	No. of outstanding grievances				

Information Request				Company's response including links to online sources or accompanying documents as requested

Annex 1. Loan Portfolio (Please add rows, as necessary)

Loan types (e.g. per sector or per type of business,)	Description/ Purpose (Please specify use of proceeds or business activities, as applicable)	Range of Loan amount (in USD)	Maximum Allowable Loan Amount (in USD)	Average loan/ transaction amount (in USD) and average tenor	Outstanding Exposure (Total amount in USD and % of exposure)			No. of loans with significant environmental impacts	No. of loans with significant social impacts
					Tenor (months)	Amount (USD)	% of Total		
i.e. Solar, Wind etc.									

APPENDIX 16 Outline Biodiversity Management Plan

At the concept stage, projects that are anticipated to pose significant impacts and risk on biodiversity and natural resources that will either: i) impair their high biodiversity value or ability to function, or ii) anticipated to lead to a reduction in the population of any recognized endangered or critically endangered species; or iii) a loss in area of the habitat concerned such that the persistence of a viable and representative host ecosystem be compromised will be screened out. All other projects found eligible will conduct critical habitat assessment and biodiversity management planning in accordance with the IFC GN 6 and ADB's ESS6 on Biodiversity Conservation and Sustainable Natural Resource Management. The biodiversity management plan (BMP) will have the following components:

(1) Description of biodiversity context: Identifies national and/or regional biodiversity context; location of projects site/s; relevant physiography; general description of relevant ecosystems, habitats, flora, fauna; priority biodiversity features and components of elevated significance.

(2) Objectives and targets biodiversity actions and mitigation: Identifies measures and actions to enhance and conserve biodiversity and/or in accordance with the mitigation hierarchy avoid, minimize, mitigate, potentially significant adverse social and environmental impacts to acceptable levels with reference to national laws and IFC PS6. Describes – with technical details – each biodiversity-related action/mitigation measure, including the type of issue/impact to which it relates and the conditions under which it is required (e.g., continuously and during pre-construction, construction or operation, or in the event of contingencies), together with designs, implementation descriptions and operating procedures, as appropriate; takes into account, and is consistent with, other relevant mitigation plans (e.g. indigenous peoples, economic displacement).

(3) Implementation action plan (schedule and cost estimates): Outlines an implementation schedule for measures that must be carried out as part of the project, showing phasing and coordination with overall project implementation plans including pre-construction, construction and operation; and the capital and recurrent cost estimates and sources of funds for implementing the BMP. Describes institutional arrangements, identifying which party is responsible for carrying out the actions/mitigation and monitoring measures.

(4) Stakeholder Engagement: Outlines plan to engage in meaningful, effective and informed consultations with relevant stakeholders, including locally affected groups. Includes information on means used to inform and involve affected people and description of effective processes for receiving and addressing stakeholder concerns and grievances regarding the project's social and environmental performance.

(5) Monitoring and reporting: Identifies monitoring objectives and specifies the type of monitoring, with linkages to the biodiversity actions and mitigation measures. Describes parameters to be measured, methods to be used, sampling locations, frequency of measurements, detection limits (where appropriate), and definition of thresholds that will signal the need for corrective actions. Establishes reporting schedule and format.