

Environmental, Social, Health and Safety Policy

Seli Hydropower Ltd

REF:	ES / POL / 1 / v1.0
POLICY OWNER:	Environmental and Social Manager, SHPL
VERSION:	1.0
DATE OF ISSUE:	31 st March 2020

The purpose of Seli Hydropower Ltd (SHPL) is to improve the livelihoods of Sierra Leoneans and stimulate economic growth by providing affordable, reliable electricity in Sierra Leone. SHPL's mission is to deliver a long-term sustainable hydropower facility, benefitting the economy, local communities and the natural environment.

SHPL will conduct its business in a manner that is environmentally-sustainable and socially-responsible, that protects the health and safety of its employees and communities, and that is ethical, throughout the development and operation of the Seli Hydropower Project and any other activities.

SHPL will actively manage its impacts and risks in relation to the environment, neighbouring communities, employee health and safety, and contractors and sub-contractors, and will engage ethically and transparently with all of its stakeholders.

SHPL will meet or exceed legal requirements and good international industry practice in hydropower development and operation. We will:

- a) Comply with all applicable national and international laws, regulations, and accepted local rules and standards, governing the environment and occupational health and safety;
- b) Meet or exceed IFC's Environmental and Social Performance Standards (2012);
- c) Follow good international industry practice in hydropower, as set out in industry guidelines such as the Hydropower Sustainability Assessment Protocol and associated guidelines; and
- d) Support and respect the protection of internationally proclaimed human rights.

1. The Environment

SHPL will effectively and responsibly avoid, minimise, mitigate, and compensate for environmental impacts, through the implementation of an environmental and social management system. This will encompass:

- a) The promotion of a culture of environmental stewardship by employees, contractors, and neighbouring communities, and of responsible construction and site rehabilitation;
- b) A biodiversity action plan to achieve a net gain in priority biodiversity features affected by the Seli Hydropower Project;
- c) The provision of minimum environmental flows, maintenance of acceptable quality of all affected surface waters including the Yiben reservoir, and implementation of measures for responsible reservoir management;
- d) The sustainable and efficient use of resources and the minimisation of greenhouse gas emissions;
- e) Responsible waste management, with the prioritisation of reduced waste generation, and of re-use and recycling;
- f) Inspections, audits and monitoring of impacts and adaptive management in response to unanticipated effects; and
- g) A positive contribution to the environmental conditions in the local area.

2. Our Employees

SHPL will safeguard the health and safety of employees, promote their education and training including on environmental matters, and promote equal opportunity in recruitment and employment.

SHPL will respond to employee grievances quickly and appropriately. SHPL does not tolerate any forms of forced, compulsory labour, or the employment of child labour.

Health and Safety

Nothing is more important to us than maintaining the highest standards of health and safety for our employees, contractors, stakeholders and the communities in which we operate. No activity is important enough to be conducted with uncontrolled hazards to life, health, and safety.

SHPL will effectively identify, avoid, and minimise all business-related and workplace health and safety hazards, through the implementation of a health and safety management system. This will encompass:

- a) Ongoing identification of business-related and workplace hazards, health and safety risk assessments, and the adoption of health and safety procedures;
- b) Action to eliminate or decrease hazards and provide procedures, practices and personal protective equipment (PPE) as necessary, to provide a safe working environment at all times;
- c) Healthy working conditions and adequate welfare facilities for all personnel;
- d) Ensuring that employees have the skills, resources and equipment to adopt health and safety measures, and motivating employees to take responsibility for their personal safety and the safety of others;
- e) Ensuring that no-one is required to work on a job that he or she may have reason to believe is not safe or environmentally-responsible;
- f) Health and safety goals and objectives for continuous improvement, and reporting performance against them, including zero fatalities, zero serious injuries, Lost-Days-Incident Incident Frequency Rate (i.e. Lost Time Incident Frequency, LTIF) of less than 1, and Total Recordable Incident Frequency Rate (TRIFR) of less than 2.75.¹

Training and Opportunities

SHPL does not tolerate discrimination in relation to employment and occupation. SHPL will promote employee development equally, irrespective of employee gender, ethnicity, sexuality or disability. SHPL delivers this principle by:

- a) Promotion of equal opportunity, especially of women;
- b) Creating employment and hiring employees from local communities in the area in which SHPL operates;
- c) Proactively extending training and employment opportunities to people in local communities, and training and contracting opportunities to local businesses;
- d) Working actively to ensure that demobilised employees can find future employment;
- e) Promoting environmental and social responsibility as an integral part of each employee's responsibilities; and
- f) Providing personnel with ongoing training and development, including in relation to health and safety working practices.

3. Communities

SHPL respects human rights and is committed to identifying, preventing and mitigating adverse human rights impacts resulting from or caused by the company's business activities.

SHPL is committed to corporate social responsibility and places great emphasis on improving people's lives and developing a constructive and prosperous relationship with the communities in which it operates.

Protecting Communities

SHPL will protect neighbouring communities from the impacts of our activities and the development and operation of the Seli Hydropower Project, and compensate fairly for unavoidable or residual impacts. This will encompass:

- a) The fair acquisition of land with compensation that will at least restore livelihoods;
- b) Responsible construction, traffic, and security management;
- c) Ensuring that all of our employee's interactions with the local people are conducted in a respectful manner;
- d) Planning the location and build of construction areas with communities, so that some infrastructure can be usefully retained for the community following construction;
- e) Emergency preparedness and response for accidental and emergency situations to prevent and mitigate any harm to people and the environment, and safe operations that protect communities from hazards in proximity to the project sites, and especially on water;
- f) Preventing exposure to water-borne, sexually-transmitted or other communicable diseases that could result from the project;
- g) Additional support to vulnerable people;
- h) Identifying and managing the differing impacts on women and men, and youth and the elderly; and
- i) Responding to community grievances promptly and satisfactorily.

¹ US Bureau of Labour Statistics report a lost-days-incident frequency rate of 0.9 and TRIFR of 2.6 for the heavy construction and civil engineering industry in 2018.

Community Development

SHPL is committed to making a positive contribution to community development in the area in which it operates. Neighbouring communities will be given priority in accessing the project's benefits including employment and improved local infrastructure. This will encompass:

- a) Employment on the project and skills training;
- b) Consulting with communities to ensure that community projects are targeted on real needs and build on the capabilities of local people;
- c) Planning and delivering community projects in conjunction with local organisations with proven expertise;
- d) Implementing community development projects to be sustainable without continued support from SHPL in the long term; and
- e) Linking with other initiatives in order to leverage additional investment in community development.

4. Our Contractors and Sub-contractors

SHPL's contractors and their sub-contractors are required to adopt similar environmental and social, health and safety practices as SHPL. Our contractors are responsible for:

- a) Plans and procedures for the management of their environmental and social impacts;
- b) Commitments to their employees regarding their working conditions and health and safety;
- c) Ensuring their employees treat all local people in a respectful manner; and
- d) Responding to and resolving grievances from their employees and community members directly.

SHPL will promote the development of Sierra Leonean and local capacity among contractors, through:

- a) Where they can provide the necessary capability or quality, contracting local and Sierra Leonean companies and suppliers in preference to international companies; and
- b) Providing technical training to and sharing expertise with local companies and suppliers and their employees.

5. Engagement and Disclosure

SHPL engages meaningfully with stakeholders and discloses significant project reports and information. SHPL will continuously improve the ways in which it communicates with employees, communities, contractors and suppliers, and other stakeholders. This encompasses:

- a) Providing key information on the Seli Hydropower Project and affected people's entitlements through means that are accessible at all levels, from neighbouring households to the international level;
- b) Regular meetings with stakeholders, conducting all discussions with good faith, in a two-way manner;
- c) Providing mechanisms for stakeholders to raise issues and grievances, and for feedback to be provided in a thorough and timely manner;
- d) Documenting and reporting publicly on annual environmental, social and health and safety objectives and performance; and
- e) Publicly disclosing this ESHS policy, and ensuring the policy is communicated directly to all stakeholders, including employees, contractors and local communities.

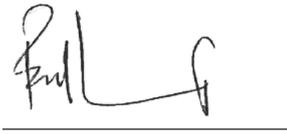
6. Ethics

SHPL is committed to ethical and lawful business conduct. SHPL has zero tolerance for corruption in all its forms, including extortion and bribery in all aspects of its operations. SHPL does not condone the offering, provision, solicitation or receiving of any unwarranted reward that is, or could be perceived to be, an inducement for acting improperly in relation to its business. Guided by SHPL's Code of Business Ethics, the company conducts all of its business dealings with honesty, integrity, fairness, and respect. SHPL requires its commitment to ethical business conduct to be adopted by its project partners.

7. Implementation of this Policy

SHPL has established an organisational structure with appropriate resources to ensure that this policy will be followed and further developed as the Seli Hydropower Project progresses. SHPL will review this policy periodically.

This policy statement is communicated throughout SHPL and made accessible to all personnel including directors, executives, management, supervisors, and staff, whether directly employed, contracted or otherwise representing the company. SHPL's Board holds individuals accountable for upholding this policy and requires all employees and contractors to adhere to these environmental and social, and health and safety objectives. Failure to comply with these requirements will result in disciplinary action or termination of contracts.

Signed: 

Position: General Manager and Director

Date: 31st March 2020