



TFCA FINANCING FACILITY

Guidance Note - Construction of Infrastructure and Other Physical Interventions: ESMP and ESCP Preparation



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TERM	DEFINITION
E&S	Environmental and Social
EIA	Environmental Impact Assessment
ESCAP	Environmental and Social Code of Practice
ESHS	Environmental, Social, Health and Safety
ESIA	Environmental and Social Impact Assessment
ESMP	Environmental and Social Management Plan
ESMS	Environmental and Social Management System
ERT	Emergency Response Team
FPIC	Free, Prior and Informed Consent
GRM	Grievance Redress Mechanism
H&S	Health and Safety
ILO	International Labour Organization (ILO)
IP	Indigenous Peoples
KfW	KfW Development Bank
LACP	Land Acquisition and Compensation Plan
PA	Protected Area
PPE	Personal Protective Equipment

TERM	DEFINITION
RAP	Resettlement Action Plan
SOPs	Standard Operating Procedures
ToC	Table of Contents
TFCA	Transfrontier Conservation Area
TFCA FF	Transfrontier Conservation Area Financing Facility
TRA	Thematic Risk Area
UDHR	Universal Declaration of Human Rights
UXO	Unexploded Ordinances
WB	World Bank
WB	World Bank
WBG ESS	World Bank Group Environmental and Social Standard

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1.

Introduction

Construction activities and other physical interventions, such as the removal of alien invasive species, can have potential negative environmental and social (E&S) effects depending on the nature and scale, sensitivity of the site, significance, magnitude, and duration of such potential E&S impacts, complexity of issues raised, appropriateness and effectiveness of mitigation measures. An environmental and social management plan (ESMP) and an environmental and social code of practice (ESCOP), which functions as a simplified ESMP, are safeguard tools to manage and mitigate those E&S risks and potential impacts. The Applicant (the potential Grantee applying for grant-funding) is required to develop the ESMP or the ESCOP for infrastructure construction and other small works with moderate and lower environmental and social risks and impacts, respectively. The requirement to develop the ESMP and/or ESCOP might be stated in the environmental and social commitment plan (ESCP) that is part of the grant agreement between the Applicant and TFCA FF.

NOTE: The ESMP might be sufficient for those activities where the national legislation does not require to develop an Environmental Impact Assessment (EIA) or comparable safeguard document (e.g., Impact Statement). The Applicant is required to comply with national legislation and check the relevant requirements, including the TFCA FF safeguard requirements as per Environmental and Social Management System (ESMS) Manual (see also section 2 below). If an EIA has to be developed, the ESMP guidance provided in this template should be consulted when developing the ESMP (that would be then part of the EIA). The Applicant is encouraged to consult the illustrative table of content for the EIA provided in Annex A.

In the event that the Applicant organization or any of the implementing partners have already produced and/or are presently using similar plans and/or templates, the Applicant should perform a gap analysis between the existing template and/or document and this TFCA FF guidance note, and the templates contained therein. The identified gaps should be closed in accordance with the applicable stricter provision.

Furthermore, this guidance in hand does not cover all potential risks, and only refers to the risks which are expected to be typical for TFCA FF funded activities. However, the Applicant is required to identify and address all risks connected to the project and/or project activities. For example, it is imperative to acknowledge and prioritize potential risks, such as unexploded ordnance (UXO). When there is a presence of UXO or similar hazards, it is essential to engage professional certified organizations with expertise in this field. These organizations should be tasked with conducting thorough assessments to identify and evaluate the associated risks comprehensively. It is important to emphasize that this specific risk assessment and mitigation procedure does not fall within the scope of the guidance in hand. Instead, it necessitates a distinct and focused approach,

recognizing the unique nature and potential severity of UXO-related risks. The Applicant is required to ensure that the management of such risks is handled by experts, promoting the safety and well-being of personnel, local communities and the environment.

1.1 Purpose and Objectives

This document serves as an ESMP and ESCOP template and includes a checklist for site risk assessments (e.g., to be shared with contractors and others who undertake physical works). The templates and checklist cover the typical E&S impacts and associated mitigation measures that need to be considered for activities that fall under the Thematic Risk Area (TRA) 4 “Infrastructure and Other Physical Interventions” as per TFCA FF ESMS Manual and ESMS Questionnaires. The ESMP and/or ESCOP template must be used by the Applicant and the contractor, if applicable, and modified to the project specifics regarding the construction activities, features, and risks.

The goal of the ESMP and ESCOP is to ensure that the environmental requirements, social commitments, and health and safety risks associated with the project are carried over and properly handled over the project's development and operational phases. The ESMP and ESCOP have to make sure that the project operations are carried out in accordance with the applicable standards (see below), as well as the national legislative requirements of the host country, and they must serve as a benchmark for future monitoring and assessment.

2. **Applicable E&S Legislation, Standards and Guidelines**

The TFCA FF ESMS Manual contains a complete list of applicable standards for the development of the ESMP and/or ESCOP. The templates and guidance provided in this document are in line with the applicable standards and guidelines specified in the TFCA FF ESMS Manual. Furthermore, the Applicant and/or the party establishing the plans and/or procedures must always adhere to local and national regulations.

The World Bank (WB) Group Environmental, Health, and Safety Guidelines¹ should also be taken into consideration. These recommendations should be used as a technical reference guide with examples of good worldwide industrial practice from many industries and in various sectors.

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

3. General Provisions

3.1 Overview

In the context of TFCA FF funded activities, construction activities and other physical works are likely to include infrastructure and small works like construction and operation of workshops, training centres or information centres, administrative buildings, ranger accommodation, storage facilities, air strips, small roads and bridges, regular removal of alien invasive species or other regular vegetation clearance, activities in relation to community support, e.g., agricultural activities including very small irrigation schemes, erosion prevention structures such as soil bunds or small terraces, etc., and are assumed to have moderate or low E&S risks. However, even though risk levels may be of lower nature, risks still have to be addressed.

The Applicants are required to develop and implement a Construction Workers Code of Conduct (refer to **Annex H**). The Code of Conduct lays out precise standards for proper business conduct and moral behaviour. Each employee working on activities involving small construction and other physical works (including implementing partners, contractors and subcontractors) must be aware of this document and agree to abide by its terms by signature. The Code of Conduct must be made public and accessible to local communities in the relevant locations.

Annex D to this guidance – the Do and Don't Table - provides general best practices to be used during construction of infrastructure and other small works. These recommendations have to be applied regardless the content of the ESMP and ESCOP.

Not listed in this ESMP and ESCOP guidance are the safeguard instruments which are mandatory for all projects as described in the TFCA FF ESMS Manual; these are:

- Stakeholder Engagement Plan (refer to Annex K to the ESMS Manual);
- Grievance Redress Mechanism (refer to Annex L to the ESMS Manual); and
- Immediate Reporting of Serious Accidents and Incidents (refer to Annex M to the ESMS Manual).

3.2 ESMP and/or ESCOP Report Outline

The main part of the ESMP and/or ESCOP have to comprise the mitigation measures with the according means of verification (indicators), responsibilities and the means of monitoring. **Furthermore, the ESMP and ESCOP should include chapters on the following topics:**

- Description of construction activities or other physical interventions;
- Project applicable standards;
- Roles and responsibilities;
- Training requirements;
- Stakeholder engagement; and
- Monitoring and reporting.

If there is a potential that project activities might have an impact on a cultural heritage, the Applicant is required to avoid and if avoidance is not possible to minimize major negative effects during construction operations. The Applicant must assess whether the planned location is in areas where cultural heritage is predicted to be found, either during construction or operations, using the E&S risks and impacts identification procedure (as a part of site risk assessment, or during an ESIA study, if ESIA is required). A Chance Finds Procedure (refer to **Annex C**) should be developed and implemented for the projects with potential negative impact on cultural heritage.

The Applicant and/or contractor (if applicable) shall, as appropriate, amend the ESMP and/or ESCOP (please refer to this guidance/templates in this guidance) to reflect site-specific E&S risks and the approaches to manage those risks (see checklist for site risk assessment **Annex A**).

In case planned infrastructure would require land acquisition, the Applicant must develop and implement a Land Acquisition and Compensation Plan (LACP) (or a similar document, it may have a different name). The Land Acquisition Guidance (refer to **Annex G**) provides a guidance on the information that must be included in such plan. Any land acquisition and compensation plan ought to be developed early on during the project's design and planning phases to ensure that any impacts from land take would have been compensated prior to the actual occurrence of the loss (this would be prior to the commencement of construction). The Applicant will be required by the contractual provisions of the grant agreement to entirely avoid taking private land from its owners without compensation as per national legal requirements and the provisions of the Land Acquisition Guidance including any resulting forced relocation of people.

3.3 Contractors

The Applicant will typically, but not obligatory, engage construction contractor(s) or have the beneficiary communities or project staff (e.g., when undertaking removal of alien invasive species) to undertake the works. The Applicant has to oversee and ensure that an overall E&S risk assessment for the proposed actions is undertaken and an ESMP and/or an ESCOP is prepared that is appropriate to the magnitude and significance of the identified risks and potential impacts. The Applicant is in charge of the ESMP and/or ESCOP preparation as a whole. The contractor will be obliged to support the preparation and ensure the implementation of the ESMP and/or ESCOP and the respective reporting. Any subcontractors the contractor hires and/or any suppliers connected to the operations need to be informed of and have to abide to the mitigation measures, roles, responsibilities and monitoring requirements. The contractor is responsible of ensuring that each employee and subcontractor on the ground is aware of the ESMP and/or ESCOP's content and their individual obligations under it.

The Applicant should include the ESMP and/or the ESCOP in the contract with its construction contractor(s) and ensure the pertinent ESMP and/or ESCOP requirements are carried out when the project is being implemented.

3.4 Moderate and Lower Risk Construction Activities

Moderate to lower risk construction activities and other physical interventions are those whose potential E&S implications are anticipated to be site-specific, transient, reversible, and mitigatable with best practices and standard methods. Typical impacts from such activities would comprise for example construction waste, dust and noise generation, community safety and occupational health and safety issues.

Criteria to be used to define moderate and lower risk construction activity include, but are not limited to:

- No ESIA required neither by applicable national standards nor by the TFCA FF;
- No physical displacement;
- Limited economical displacement (not more than 15 households);
- No project associated facilities²;
- No electric power production and transmission construction activities (except individual / local power facility);
- No need of UXO clearance activities on the site³; and
- No manipulation of asbestos is required, or no asbestos is presumed to be present.

Additional criteria to define lower risk construction activities (compared to moderate risk) include, but are not limited to:

- No use of heavy machinery (except vehicles for transportation of workers and material);
- No demolition works are required, no dismantling of a structure or part of a load-bearing structure is required⁴;
- No earthmoving works are required (except for small trenches as specified below);
- No scaffolding required (work at height limited to the use of ladders);
- No trenches deeper than 120 cm, or in unstable, loose, soft, or wet soil types⁵;
- No work in confined spaces;
- No roofing works or rehabilitation of roof protection required;
- No prolonged use of vibratory power tools required;
- No lifting equipment for material handling, such as cranes, required;
- No work with hazardous substances in significant quantities⁶;
- Not more than fifty workers mobilized⁷ for individual intervention; and
- No on-site material manufacturing, such as production of brick or concrete blocks, manufacturing of windows and doors, and production of gravel and stones, is required.

²Facilities or activities that are directly and significantly related to the project; and carried out, contemporaneously with the project; and necessary for the project to be viable and would not have been constructed, expanded, or conducted if the project did not exist (for example access roads, worker camps, transmission lines, quarries etc.)

³In case there are UXO risks, either aim to identify an alternative site or carry out UXO assessment and clearance with recognized agencies, in line with int. standards (that would no longer be a category B (moderate risk) but a category B+ project requiring a specific UXO management plan

⁴Demolition or dismantling of a load-bearing structure/element is considered "high-risk construction work"

⁵In general, trenches that are deeper than 120 cm require a protective system (sloping, shoring or temporary protective structure), unless excavation is made in stable rock.

⁶Significant quantities: more than what a private person can buy without special authorisation

⁷For 50 workers and above a dedicated environmental safety and hygiene officer is frequently required on construction sites by national legislations

The above-mentioned criteria provide practical guidance to define moderate or lower risk projects and do not cover all hazards or risks which may arise. Thus, these criteria are not exhaustive, and the final definition shall consider additional construction activities and specific circumstances. Especially in cases where monitoring capabilities of the Applicant, or contractors' qualifications, or labourer skills are expected to be low, additional specific risks' assessment should be taken in consideration.

For example, construction which would require scaffolding (small buildings) or roofing works (e.g., ranger housing) would be categorized as of moderate risk (i.e., category B). While these activities may not trigger the need for a full ESIA, they do necessitate the development and implementation of specific, detailed Standard Operating Procedures (SOPs) tailored to the respective project activity. This is especially required for operations like scaffolding, roofing, and trenching. It is important to note that the measures and procedures associated with these specific activities are not encompassed within this guidance. Instead, it is the responsibility of the Applicant to adhere to national requirements and applicable standards that pertain to these operations. This approach ensures that environmental, social, health and safety (ESHS) considerations are addressed in accordance with established guidelines and regulatory frameworks.

4. Environmental and Social Management Plan (ESMP)

The construction activities with moderate E&S risks are required to develop an ESMP. The ESMP Template (Annex E) should not be used “as it is” for a given construction activity but serves as a basis for the Applicant to develop a project- and/or activity specific ESMP, commensurate with the relevant E&S risks and expected impacts of the construction activity (refer to Annex A).

The ESMP is typically divided into the following three phases:

- Preparation phase (conception, planning);
- Implementation/construction phase; and
- Operation phase.

Each phase is further divided into construction activity relevant topics (e.g., occupational health & safety or waste management) in line with relevant standards requirements. Each topic should provide specific measures, along with means of verification, the provision of responsibilities and a short description of appropriate monitoring procedures. **The list below provides a few examples of medium risk construction activities that could be included in ESMP respective section:**

Scaffolding activity

- Topic: Occupational Health & Safety.
- Measures: Ensure all scaffolding components are inspected and assembled correctly by certified personnel. Provide workers with proper training on safe scaffold usage and fall protection techniques.
- Means of Verification: Regular inspections by competent personnel, documentation of worker training sessions, and incident reporting.
- Responsibilities: Site supervisor to oversee scaffold erection, designated safety officer to monitor compliance.
- Monitoring Procedures: Weekly scaffold inspections, monthly safety audits, and incident response drills.

Roofing Activity

- Topic: Waste Management.
- Measures: Implement a waste segregation system for roofing materials. Provide designated containers for different types of waste, such as metal, shingles, and insulation, to facilitate proper disposal.
- Means of Verification: Regular waste audits, tracking waste disposal records, and monitoring of waste disposal contractors.
- Responsibilities: Site manager to oversee waste segregation, waste management personnel to coordinate disposal activities.
- Monitoring Procedures: Monthly waste management audits, quarterly review of waste disposal records, and contractor performance evaluations.

Trenching Activity

- Topic: Groundwater Protection.
- Measures: Prior to trenching, conduct geotechnical assessments to identify potential groundwater sources. Install proper dewatering systems and implement measures to prevent soil erosion and sedimentation.
- Means of Verification: Geotechnical assessment reports, documentation of dewatering system installation, regular site inspections.
- Responsibilities: Geotechnical engineer to assess groundwater risks, construction team to install and maintain dewatering systems.
- Monitoring Procedures: Weekly site inspections to ensure proper dewatering and erosion control, groundwater quality testing as required.

5.

Environmental and Social Management Code of Practice (ESCOP)

An ESCOP applies to construction activities and other physical interventions for which potential E&S impacts are expected to be lower and site-specific, reversible, and mitigatable with standard measures.

Typical activities to be addressed with an ESCOP may comprise for example:

- Waste collection;
- Rehabilitation of classrooms and other public buildings (only ground floor building);
- Rehabilitation of small rural roads, including breaking of rocks (without large machinery);
- Cleaning and replacement of culverts, and drainage clearance along roads, rehabilitation of small irrigation channels;
- Small water sanitation and hygiene infrastructure (e.g., school sanitation, hand dug wells/small wells, improvement of springs);
- Rehabilitation of other small infrastructure;
- Rehabilitation, renovation, or construction of buildings for which no specific impacts are expected;
- Simple soil erosion prevention structures (soil bunds);
- Vegetation clearance without large machinery; and
- Agricultural works (under community development measures).

The ESCOP guidance provided in **Annex F** is conceptualized as a template and a living document that needs to be reviewed and can be complemented by additional measures as appropriate in order to address site-specific conditions of a given construction activity, prior to its application. The template should not be used “as it is” for a given construction activity but serves as a basis for the Applicant to develop a project and/or activity specific ESCOP.

The ESCOP is based on a set of general pre-requisites:

- UXO/hazardous and dangerous materials clearance as relevant completed and approved prior to start of works;
- Works will be carried out with hand tools or handheld small machinery; no large machinery is used (except transport vehicles/lorries);
- Works will **not** include:
 - Working on electricity infrastructure;
 - Working in trenches deeper than 120 cm;

- Working at heights (higher than ground floor) and scaffolding; and
- Working in confined spaces.
- No land acquisition, economic and/or physical displacement will occur from construction activities; land requirements would only be related to temporary land needs for construction activities; land take will be based on mutual agreements with landowners on the willing buyer/willing seller principle (including compensation/rental arrangements and conditions for use and reinstatement);
- Compensation at replacement cost/full repair costs will be paid by the contractor for any damage resulting from construction activities (e.g., damage to land, structures, livestock, crops, and trees) to the respective owner of the affected asset;
- The ESCOP is a living document that will be adapted and amended as appropriate to meet site specific conditions;
- The ESCOP will be part of tender documents and of contracts with contractors/implementing partners;
- The ESCOP implementation will be supervised during construction; and
- The ESCOP will be complemented by obligations from relevant local legislation as appropriate.

6. ESMP and ESCOP Monitoring

The Applicant must ensure that the ESMP and/or ESCOP will be adhered to by the contractor and all subcontractors.

To monitor the related commitments the Applicant must use an ESMP monitoring table (see Table 6-1 below). The template can be amended as needed but should include as a minimum:

- ESMP/ESCOP Commitments;
- Date of Inspection;
- Findings/ Observations (potentially including a colour code red/orange/green); and
- Defined Corrective Actions (if any).

The ESMP implementation shall be monitored on a monthly basis. This means that the responsible person for ESMP implementation at the contractor must do at least one site visit per month to the construction site with the ESMP commitments at hand. After each site visit the status of compliance with the ESMP commitments shall be noted down in the Excel Sheet, including corrective actions if any.

Should any serious environmental, social or Health and Safety incidents be observed or reported by the construction workers or other parties this shall be reported to the Applicant immediately (see also the Facility's Annex M – Serious Incident and Management Procedure), who then must immediately report to TFCA FF.

Table 6-1: Example for an ESMP Monitoring Table

Topic/ Potential Impact	Mitigation, Management and Enhancement Measures	Means of Verification	Responsibility	Monitoring Procedure	Date of Inspection/ Review/ ESMP Monitoring DD/MM/JJ	
Occupational Health and Safety					Findings/ Observations	Corrective Action
...						
...						
Ambient Air					Findings/ Observations	Corrective Action
...						

Colour Code for Findings/Observations
<i>Red Flag. Major Non-compliance with ESMP requirements. Urgent Action needed to protect ecological and human environment and avoid risks to the Project schedule.</i>
<i>Minor Non-compliance. Action needed but no immediate threat for ecological and human environment or Project schedule.</i>
<i>In compliance with ESMP commitment.</i>

ANNEX A - ESIA Table of Content (Example)

Introduction

The table of content (ToC) for the Environmental and Social (E&S) Impact Assessment (ESIA) provided below, could be used by the Applicant or their E&S consultant to develop the ESIA for the project and/or project activity.

Remember that the content and order of the ToC can vary based on the specific project, regulatory requirements, and the preferences of the reviewing authority. The Applicant is required to ensure that project ESIA aligns with local regulations and guidelines and applicable standards as per TFCA FF ESMS Manual.

Table of Content:

1. Non-Technical Summary

- Overview of the Project
- Summary of Key Findings and Recommendations

2. Introduction

- Purpose and Objectives of the ESIA
- Project Description and Location
- Regulatory Framework and Scope of the ESIA

3. Baseline Conditions

- Physical Environment
- Biological Environment
- Social Environment
- Cultural and Heritage Resources

4. Impact Assessment

- Methodology for Impact Assessment
- Assessment of Environmental Impacts
- Assessment of Social Impacts
- Cumulative Impact Assessment

5. Mitigation and Management Measures

- Environmental Mitigation Measures
- Social Mitigation Measures
- Monitoring and Management Plans

6. Resettlement and Compensation (if applicable)

- Resettlement Action Plan (RAP)
- Compensation and Livelihood Restoration Plan

7. Stakeholder Engagement

- Stakeholder Identification and Consultation
- Public Participation and Grievance Mechanisms
- Community Engagement Plans

8. Environmental and Social Management Plan

- Environmental and Social Management Framework
- Institutional Arrangements and Responsibilities
- Capacity Building and Training
- Environmental and Social Management Plan for the project

9. Health and Safety

- Occupational Health and Safety
- Emergency Preparedness and Response

10. Environmental and Social Monitoring

- Monitoring Parameters and Frequency
- Reporting and Data Management

11. Annexes

- Terms of Reference for the ESIA
- Environmental and Social Baseline Studies
- Maps, Diagrams, and Figure
- Relevant Regulations and Permits

ANNEX B - ESMP Site Assessment Tool

Introduction

This Site Assessment Tool is applicable for projects that are not obliged to fulfil an environmental impact assessment in the national legal context and fall under the category of “Moderate Risk Category B Projects”, as defined in the Facility’s ESMS Manual. **This tool consists of two sections:**

- Section A – Project Information; and
- Section B – Site Assessment Checklist.

The intention of the checklist is to assist the Applicant during a site visit in identifying the most significant environmental, social, health and safety (ESHS) risks of the specific site. Of course, each site is unique and some of the mentioned topics will not be relevant at all, while others may be highly acute. As such, the checklist should be used in a prudent and realistic manner by the Applicant E&S Manager (or ESHS officer) responsible. Should any critical ESHS risks be identified during the initial site assessment, the contractor is advised to immediately inform the Applicant (if the contractor involved), thus the Applicant can contact the TFCA ESMS Officer for further support.

Definitions

Project area: defines an area within which the ESHS aspects below and the management measures as defined in the Environmental and Social Management Plan (ESMP) apply. This includes the (construction) site (see below) and surrounding areas that may be impacted temporarily or permanently by construction activities (e.g., nearby communities, habitats, water bodies).

SITE: is the places where the permanent construction works are to be executed and to which equipment and materials are to be delivered. The site is part of the project area.

Site Visit Instructions

The site assessment tool has to be applied based on a site visit, to be performed by the responsible ESHS person at the Applicant organisation. The site visit will be looking for safety-, environmental-, health-, labour and community issues. This will involve both what can be observed directly while walking around the site, but also what is being documented, monitored, and recorded, as available. For documentation, any policies and procedures that are already in place related to the project site and for the planned activities, to determine E&S risks are identified. Such documentation should be reviewed, as well as any permit, authorisation, contract etc. that may exist already and/or may have to be renewed as appropriate. To gather relevant E&S information, the site visit should not be limited to the site itself, but surroundings of the site should also be observed. Engagement with people and communities living on or close to the site and project area may be an important source of information for site assessment.

Instructions for filling in Section A of the Site Assessment Tool

The Section A provides general information on the project for documentation purposes. This can be filled in ahead of the site visit and completed as necessary.

Instructions for filling in Section B of the Site Assessment Tool

The third column in the checklist in Section B provides a reference to the ESMP template. Questions in the checklist can therefore trigger elements of the ESMP template which have to be part of the project ESMP and be implemented accordingly by the contractor. Hence, for any question answered with “YES”, the corresponding item in the ESMP is relevant and the proposed measures have to be taken into account for the project. For any question answered with “NO”, the corresponding item in the ESMP is not relevant and can be deleted. For any question answered with “UNKNOWN”, the Applicant should do as much as possible and reasonable to find the answer. As a matter of prudence, the corresponding section of the ESMP should be maintained until evidence is found that the topic is not relevant.

Use as much as possible the “comments” column to document the information on which the answer is based. After completing this checklist, revert to the generic ESMP template and amend the table to the project specifications as triggered through this checklist.

Section A - Project Information

Project Title:	
Project Site Location:	Village, district, region, country
Project TFCA Areas:	
Project ID Number:	
Name of Applicant Organization:	Organisation receiving funding
Implementation Body:	Contracted construction partner
Project Description: Objective and need for/ purpose of the project: Project Features:	Describe: - Type of Infrastructure to be built for this project and its exact location. - Project activities to be carried out (construction, operation and decommissioning). - Type of machinery used. - Key E&S risks and impacts of the activities expected. - Type of E&S provisions required by national legislation (e.g., ESIA) - Organizational structure and responsibilities If possible and relevant include a location map. Provide quantitative data (volume, length, target population etc.) as available and relevant. Overview of the envisaged schedule, stakeholders involved in the project.

Can you confirm that the project complies with criteria⁸ for "Moderate and Minor Risk projects"?

☐ Yes ☐ No

Permitting obligations associated with this project:

List all permits that need to be granted by the administration of the host country to authorise the project, provide status of the document (incl. if the obligation has been lifted) and information of steps to be taken to receive authorisation to implement the project – if any

Document	Status	Actions
Water discharge permit	Granted	None
Waste management permit	Pending	Needs to be ordered start of operation

Checklist filled in by:	Name, Date and Signature
--------------------------------	--------------------------

⁸Refer to the TFCA FF ESMS documentation, **Guidance Note on Infrastructure and other physical interventions.**

Stakeholder Engagement

The following consultations have been carried out during project design and preparation:

STAKEHOLDERS MET	DATE	TOPICS
<i>Who?</i> Village development committee	<i>When?</i> 10.02.2023	<i>What?</i> Presentation of project design options. Discussions about village contribution
District representatives	15.01.2023	Presentation of the project
Add as many lines as necessary		

The following consultations have been carried out during project construction and preparation:

STAKEHOLDERS MET	DATE	TOPICS
<i>Who?</i> Village development committee	<i>When?</i> Once a month	<i>What?</i> Information of status
Add as many lines as necessary		

The following concerns and suggestions were identified during stakeholder engagement and will be considered by the implementation partner and/or its contractor(s) if any:

STAKEHOLDERS MET	DATE	TOPICS
<i>What?</i>	<i>Who?</i>	<i>How the project will respond to that</i>
The project needs to consider that man force may not be available due to agriculture works	Village representatives	Project schedule will be adapted so that no construction is scheduled between June and August
The project needs to be registered to water protection authority	District representatives	Meeting at authority has been organised and water discharge permit is granted

Add as many lines as necessary

Prior to the start of works, the Applicant and the contractor(s) will at a minimum:

- Introduce themselves to the authorities/community leaders and community,
- Provide information about works' duration and schedule,
- Provide information about required work force,
- Define the recruitment process,
- Make any request to access or use community infrastructure, and
- Raise awareness about the risks associated with the construction activities.

The Applicant will also ensure that:

- A grievance redress mechanism (GRM) is in place,
- Employment will be transparent and non-discriminatory, and
- Recruitment of women shall be promoted.

B – SITE ASSESSMENT CHECKLIST

#	QUESTION	LAW	ESMP REFERENCE ⁹	POSSIBLE RISKS TO CONSIDER/GUIDANCE	COMMENTS
Part 1 – Project area baseline characteristics					
1.1	Is the site located on an inclined area?	☐ Yes ☐ No ☐ Unknown	B.10 – Erosion control measures	Inclined area is a factor that may trigger soil erosion.	Provide here: additional details that support the assessment missing elements documentary evidence possible action/mitigation to be considered etc.
1.2	Is vegetation present in the project area that will need to be cleared/removed for the purpose of the project?	☐ Yes ☐ No ☐ Unknown	B.8 – Vegetation clearing B.11 – Site Rehabilitation	Methods of vegetation clearing can be harmful to the environment, biodiversity and habitat of fauna can be impacted.	
1.3	Is the project area prone to impacts of natural disasters such as storm surges, fire, flooding or earthquakes?	☐ Yes ☐ No ☐ Unknown	C.4 – Emergency prevention	The project needs to consider impacts of natural disasters and adopt measures that would minimize those impacts.	
1.4	Is the project area prone to be impacted by climate change such as sea-level rise, drought, heat?	☐ Yes ☐ No ☐ Unknown	C.4 – Emergency prevention	The project needs to consider impacts by climate change and adopt measures that would minimize those impacts.	
1.5	Is the site located at immediate vicinity (less than 50 m) of residential houses, public building such as medical centre, school / educational infrastructures or other sensitive building that is likely to be impacted through construction activities (noise, dust, odour, traffic) or site access patterns.	☐ Yes ☐ No ☐ Unknown	B.1 – Protection of adjacent areas D.4 – Community interaction	Constructions activities may result in disturbances for communities and sensible human receptors. Thus, disturbances should be reduced at the source. If this is not possible, the works have to undertake so that disturbances are minimized. In any case, interaction with communities is required to find the best solution.	

⁹Refer to the Annex D – ESMP Template

#	QUESTION	LAW	ESMP REFERENCE ⁹	POSSIBLE RISKS TO CONSIDER/GUIDANCE	COMMENTS
1.6	Is the site located in the vicinity (<100 m) of water bodies (e.g., rivers, ponds, lakes) that are reachable by effluent generated by the project (effluents such as non-treated waste waters, chemicals, etc.)?	☐ Yes ☐ No ☐ Unknown	B.3 – Pollution Prevention B.4 – Effluents	Constructions activities may cause pollution of water bodies, resulting in adverse impacts for flora and fauna as well as communities. Construction activities that can cause pollution need to be avoided, minimized and mitigated.	
1.7	Are any groundwater or drinking water resources known to be present within the project area?	☐ Yes ☐ No ☐ Unknown	B.3 – Pollution Prevention B.4 – Effluents D.4 – Community interaction	Competition for water resources between project and communities. Contamination of water by effluents during construction and/or operation.	
1.8	Is the project area fully or partly located within or in immediate vicinity of national or international recognised natural protected area (PA)?	☐ Yes ☐ No ☐ Unknown	B.9 – Areas of ecological value	Depending on the nature of the protection and of the type of project, the construction activities may directly affect the PAs or indirectly lead to pressure on protected resources (for instance, temporarily due to increase influx of workers or permanent due to increased traffic on a long term)	
1.9	Is the site exposed to heat and extreme weather conditions with no structures to provide shade or wind protection?	☐ Yes ☐ No ☐ Unknown	C.9 – Provision of health and safety (H&S) facilities	If the site is exposed to heat and extreme weather conditions, the health of workers may be endangered and protection (shelter) for resting time needs to be provided.	
1.10	Will the project impact or restrict access to cultural or religious sites such as graves, sacred sites, religious sites, historical or archaeological sites?	☐ Yes ☐ No ☐ Unknown	D.4 – Community interaction	Impacting or restricting access to cultural sites may jeopardize acceptance of the project. It is necessary to consider this at the design/planning stage.	

#	QUESTION	LAW	ESMP REFERENCE ⁹	POSSIBLE RISKS TO CONSIDER/GUIDANCE	COMMENTS
1.11	Are there local communities known within the project area that rely on land or resources that will be permanently or temporarily impacted by construction activities (e.g., agricultural land, water bodies, forests etc.)	☐ Yes ☐ No ☐ Unknown	D.4 – Community interaction D.6 – Land take	If the project restricts access to resources, suitable livelihood alternative needs to be provided to the affected.	
1.12	Are there socio-cultural groups present within the project area who may be considered as "tribes" (hill tribes, scheduled tribes, tribal peoples), "minorities" (ethnic or national minorities), or "indigenous communities"?	☐ Yes ☐ No ☐ Unknown	D.4 – Community interaction	Indigenous communities (and other groups considered as "tribes" and "minorities") can have specific vulnerabilities. The project needs to consider the specific needs to ensure these groups are not worse off due to project activities.	
1.13	Do access roads cross community settlements?	☐ Yes ☐ No ☐ Unknown	D.4 – Community interaction D.7 – Traffic management	Restrictions on access of land can have impacts on the acceptance of the project as well as cause safety risks due to increased traffic.	
1.14	Is the ownership status and current usage of land to be acquired known?	☐ Yes ☐ No ☐ Unknown	D.4 – Community interaction D.6 – Land take	See above	
1.15	Will there be loss of shelter and residential land (permanent or temporary) due to land acquisition?	☐ Yes ☐ No ☐ Unknown	D.4 – Community interaction D.6 – Land take	See above	
1.16	Will there be loss of income sources (e.g., assets such as crops, trees) and means of livelihoods (permanent or temporary) due to land acquisition?	☐ Yes ☐ No ☐ Unknown	D.4 – Community interaction D.6 – Land take	See above	
1.17	Are transport routes or facilities used by the local communities impacted through construction activities?	☐ Yes ☐ No ☐ Unknown	D.7 – Traffic management	Project needs to ensure that community exposure to project-related traffic and road safety risks is avoided and minimized.	

GUIDANCE NOTE TRA CONSTRUCTION OF INFRASTRUCTURE AND OTHER PHYSICAL INTERVENTIONS
Environmental and Social Management System

#	QUESTION	LAW	ESMP REFERENCE ⁹	POSSIBLE RISKS TO CONSIDER/GUIDANCE	COMMENTS
1.18	Is the site frequently traversed or used by people from the nearby communities?	☐ Yes ☐ No ☐ Unknown	D.5 – Damage to people and property		
1.19	Is the site considered to be safe of UXO?	☐ Yes ☐ No ☐ Unknown	C.5 – UXO clearance	Project needs to ensure that community and labour exposure to risks related to UXO is avoided and minimized.	If "NO", these risks are not covered by the guidance and have to be addressed with specific additional sub plans and in depth risk assessments, by professional bodies.
1.20	Has UXO clearance been carried out for the site?	☐ Yes ☐ No ☐ Unknown	C.5 – UXO clearance	Project needs to ensure that community and labour exposure to risks related to UXO is avoided and minimized.	In case there are UXO risks, the Applicant is required either aim to identify an alternative site or carry out UXO assessment and clearance with recognized agencies, in line with int. standards (that would no longer be a category B but a B+ project requiring a specific UXO management plan)
1.21	Is the site considered to be safe of hazardous materials?	☐ Yes ☐ No ☐ Unknown	C.6 –Hazardous materials clearance	Project needs to ensure that community and labour exposure to risks related to hazardous materials is avoided and minimized.	If "NO", these risks are not covered by the guidance and have to be addressed with specific additional sub plans and in depth risk assessments, by professional bodies
1.22	Is the social/gender context prone to gender-based violence on inequity?	☐ Yes ☐ No ☐ Unknown	A.4 – Code of Conduct D.5 Damage to people and property	Consider risks of sexual harassment and aggression of female workers and/or community women and provide adequate protection solutions (facilities, work organisation, grievance mechanism). Ensure that no gender-based discrimination occurs within the project.	

#	QUESTION	LAW	ESMP REFERENCE ⁹	POSSIBLE RISKS TO CONSIDER/GUIDANCE	COMMENTS
Part 2 – Project Features					
2.1	Are water abstractions planned from surface or groundwater bodies within the project area?	☐ Yes ☐ No ☐ Unknown	D.4 – Community interaction	Provide safeguards (e.g., water management plan, water resource monitoring, water distribution plan, allocation agreement, water conservation and education etc.) to prevent competition for water resources between project and communities.	
2.2	Will natural resources (e.g., timber; water, sand, quarries) within the project area be used for construction activities in a significant quantity?	☐ Yes ☐ No ☐ Unknown	D.4 – Community interaction	Provide safeguards (e.g., water management plan, water resource monitoring, water distribution plan, allocation agreement, water conservation and education etc.) to prevent competition for water resources between project and communities.	
2.3	Are access roads unpaved (i.e., dirt roads) and/or will there be temporary dirt roads built for construction activities?	☐ Yes ☐ No ☐ Unknown	B.5 – Emissions and dust D.7 – Traffic management	Paved road construction may constitute a risk for emissions and disturbances for populations.	
2.4	Are any of the following activities planned within the project area? • Earthworks; • Excavations/topsoil removal; • Borrow areas; • Stockpiles; and • Storage facilities (e.g., tanks, silos).	☐ Yes ☐ No ☐ Unknown	B.2 – Borrow areas, stockpiles B.4 – Effluents B.10 – Erosion and sediment transport D.8 – Fossils/ Archaeological Chance Finds		
2.5	Will construction activities result in production of waste that need special treatment or disposal measures?	☐ Yes ☐ No ☐ Unknown	B.7 – Waste Management	Contamination of environment through inadequate disposal and/or public health risks, e.g., through reuse of packaging.	

GUIDANCE NOTE TRA CONSTRUCTION OF INFRASTRUCTURE AND OTHER PHYSICAL INTERVENTIONS
Environmental and Social Management System

#	QUESTION	LAW	ESMP REFERENCE ⁹	POSSIBLE RISKS TO CONSIDER/GUIDANCE	COMMENTS
2.6	Will construction involve use storage (e.g., tanks, refuelling stations), transport and handling of substances with potential harm to human health or the environment (i.e., hazardous materials, contaminants, fuels, oils)?	☐ Yes ☐ No ☐ Unknown	B.7 – Waste Management	Contamination of environment and safety risk of human health through inadequate handling of substances.	
2.7	Will construction activities result in the production of wastewater streams?	☐ Yes ☐ No ☐ Unknown	B.4 - Effluents	Contamination of environment through inadequate disposal.	
2.8	Are there potentially unsafe elements present at the site or planned to be constructed, such as pits, ponds, ditches, trenches, holes, scaffolds, etc.	☐ Yes ☐ No ☐ Unknown	A.4 – Code of Conduct C.1 – Health and Safety Plan C.2. – Accidents reporting C.3 - Personal protective equipment	Safety risk (slips, fall) for the public and other non-workers accessing the site, such as children.	
2.9	Are the construction works located within an area that is frequented by public?	☐ Yes ☐ No ☐ Unknown	C.1 – Health and Safety Plan D4. – Community interaction D5. - Damage to people and property	Risks of accidents through intrusion of the public on the construction site. Ensure that site areas are provided with appropriate security, access restriction, signage and lighting.	
2.10	Will the project engage security personnel to be present at the site during construction activities?	☐ Yes ☐ No ☐ Unknown		Risk of abuse of security personnel toward public and communities if the security personnel are not appropriately trained	This would not fall under this guidance and require specific provisions which are not part of this document
2.11	Is the workforce staying overnight in the communities?	☐ Yes ☐ No ☐ Unknown			

#	QUESTION	LAW	ESMP REFERENCE ⁹	POSSIBLE RISKS TO CONSIDER/GUIDANCE	COMMENTS
2.12	Does the project need land acquisition? If there is land acquisition, which will apply? ☐ Loss of shelter and residential land (permanent or temporary) ☐ Loss of income sources (e.g., assets such as crops, trees) and means of livelihoods (permanent or temporary) ☐ Loss of access to natural resources ☐ Loss of access to communal facilities and services ☐ None of the above	☐ Yes ☐ No ☐ Unknown	D.4 – Community interaction D.6. – Land acquisition and land take	Project-related land acquisition or restrictions on land use may cause significant adverse impacts due to loss of livelihoods, this can significantly reflect on the project acceptance of communities.	Please refer to Annex G
2.13	Does the project foresee voluntary land donation?	☐ Yes ☐ No ☐ Unknown	D.4 – Community interaction D.6 – Land take	The project must ensure that land donation is voluntary and free of constraints	Please refer to Annex G
Part 3 – Working Conditions					
3.1	Does the project ensure that all persons working for the project; including persons directly employed or contracted; work according to International Labour Organization (ILO) or national standards working hours rules (whatever the most stringent)?	☐ Yes ☐ No ☐ Unknown	D.1 – Labour standards	Regular working hours as per ILO are limited to 8 hours a day / 48 hours per week. Overtime is possible but work hours should not exceed 60h/week and needs to be compensated.	
3.2	Does the project ensure that all persons working for the project; including persons directly employed or contracted as well as community labour are working on free basis and not under any form of coercion?	☐ Yes ☐ No ☐ Unknown	D.1 – Labour standards	Minimum age for work is at 15 years (13 for light work) and the minimum age for hazardous work at 18. The project should not prevent the young workers to attend to education/School. An age monitoring system (identification document check) should be considered	

#	QUESTION	LAW	ESMP REFERENCE ⁹	POSSIBLE RISKS TO CONSIDER/GUIDANCE	COMMENTS
3.3	Does the project ensure that all persons working for the project; including persons directly employed or contracted as well as community labour are working on free basis and not under any form of coercion?	☐ Yes ☐ No ☐ Unknown	D.1 – Labour standards	The employer can't retain salary, benefits, property or documents to force personal to work. Workers should have the right to leave workplace after completing their workdays.	
3.4	Does the project intend to employ community labour?	☐ Yes ☐ No ☐ Unknown	A.4 – Code of Conduct D.1 – Labour standards D.2 – Local recruitment D.3 – Transport D.4 – Community interaction D.5 – Damage to people and property	Community work is only to be performed on voluntary basis, with free and informed consent of the workers, who must have the possibility to freely revoke the consent at any time. Working time need to consider occupation of community, particularly agricultural work or other seasonal activities related to livelihood.	
3.5	Will temporary worker accommodation be erected on site?	☐ Yes ☐ No ☐ Unknown	C.7 – First aid C.9 – Hygiene, accommodation and food D.5 – Damage to people and property	Worker's accommodation needs to be managed through adequate policies to ensure the health, safety and well-being of workers, including the consideration of social and cultural needs.	
3.6	Are more than 20 workers external to the project host community expected due to the demand for construction workforce? Or Are more than 50 workers to be mobilized on the project at once?	☐ Yes ☐ No ☐ Unknown	A.4 – Code of Conduct C.40 – Hygiene, accommodation and food D.1 – Labour standards D.2 – Local recruitment	Community and workers' health, safety and wellbeing need to be protected by the project.	

#	QUESTION	LAW	ESMP REFERENCE ⁹	POSSIBLE RISKS TO CONSIDER/GUIDANCE	COMMENTS
3.7	Does the project include works in height (above 1m such as construction of roofs, pylons, trees cutting, use of scaffoldings, etc.?)	☐ Yes ☐ No ☐ Unknown	A.4 – Code of Conduct A.5 – ESHS Training C.2 – Accident reporting C.4 – Emergency prevention C.7 – First aid	Risks linked with work at heights needs to be minimized through appropriated PPE (harnesses)	This would not fall under this guidance and require specific provisions which are not part of this document (e.g., the scaffolding requirements/specifications).
3.8	Does the project include excavation works (trenches, pit digging or similar) below 120cm deep?	☐ Yes ☐ No ☐ Unknown	A.5 – ESHS Training C.2 – Accident reporting C.4 – Emergency prevention C.7 – First aid	To prevent risk of soil collapsing and burying workers, no worker should be authorized to work alone.	This would not fall under this guidance and require specific provisions which are not part of this document
3.9	Will heavy machinery (e.g., excavators, cranes, trucks, jackhammers) be used for construction activities?	☐ Yes ☐ No ☐ Unknown	A.5 – ESHS Training B.3 – Pollution prevention B.6 – Noise and Vibrations C.2 – Accident reporting C.3 – PPE C.7 – First aid C.4 – Emergency prevention	To prevent risk of accidents no worker should be authorized to work alone, and adequate training needs to be provided.	
3.10	Will the work include activities in confined spaces such as pits, septic tanks etc.?	☐ Yes ☐ No ☐ Unknown	A.5 – ESHS Training C.2 – Accident reporting C.4 – Emergency prevention C.7 – First aid	To prevent risk of accidents no worker should be authorized to work alone, and adequate training needs to be provided.	

#	QUESTION	LAW	ESMP REFERENCE ⁹	POSSIBLE RISKS TO CONSIDER/GUIDANCE	COMMENTS
3.11	Will the project activities involve the handling of hazardous materials/contaminants?	☐ Yes ☐ No ☐ Unknown	A.4 – ESHS Training C.2 – Accident reporting C.4 – Emergency prevention C.7 – First aid	To prevent risk of accidents no worker should be authorized to work alone, and adequate training needs to be provided.	

ANNEX C - Chance Finds Procedure

Introduction

The activities associated with construction and operation, particularly ground clearance and excavation, have the potential to disturb, alter, or damage unknown or unrecorded cultural heritage sites, structures and objects. This is known as a 'chance find'. The Applicant must develop the chance finds procedure using this template to mitigate potential impacts to chance finds.

Purpose and Objectives

The purpose of the chance finds procedure is to define the process that governs the management of chance finds. **The objectives are to:**

- Ensure the preservation and appropriate treatment of chance finds while also minimizing disruption to the project schedule; and
- Enable compliance with all relevant national laws, regulations and other applicable international standards listed in the Facility's ESMS Manual (particularly World Bank Group Environmental and Social Standard (WB ESS) 8 and respective guidance note).

Scope

The procedure applies to all activities conducted by the Applicant and its subsidiaries, including its employees, contractors and subcontractors, which have the potential to uncover a cultural heritage site, structure or object. Potentially activities that require to develop and implement the chance finds procedure include but are not limited to construction/ renovation activities deemed at screening to have a negligible potential negative impact on cultural heritage (e.g., renovations to ranger shelters, etc.) or with a small/ negligible footprint. Examples of a cultural heritage site, structure or object that may be unexpectedly found include:

- Archaeological artefacts;
- Human skeletal remains; and
- Remains of historic infrastructure and objects.

Induction and Training

The Applicant and its subsidiaries have to develop relevant content for a project's induction process. This content should also be issued to contractors and sub-contractors to disseminate to their employees prior to commencing project activities.

This should include, at a minimum, a basic understanding of how to identify potential cultural heritage sites, structures and objects, and who to contact if a suspected chance find is found.

Management of Chance Finds

If any member of the workforce discovers a cultural heritage site, structure or object, such as, but not limited to, archaeological artefacts, human skeletal remains and/or historical sites and objects during a project activity, the following steps shall be taken:

- Stop all works in the vicinity of the find. All works within a 5-meter radius should be stopped.
- Immediately notify the nominated person, such as the Applicant's project activity supervisor, who will notify the environmental and social (E&S) Manager, or other relevant person(s).

- Secure the site. The site will be secured to prevent any damage or loss of removable objects. In cases where removable antiquities or sensitive remains, a night guard shall be arranged.
- Record details of the chance find. The project activity supervisor will record the details of the chance find in the chance finds report form (see below) and take photos of the find.
- Notify the relevant parties. The E&S Manager, or other relevant person(s), will notify the relevant authorities and the Applicant's senior management, and will work with them to identify the appropriate individual to conduct an assessment of the chance find. The Applicant will consult¹¹ with affected communities who use, or have used within living memory, the cultural heritage for long-standing cultural purposes. The Applicant will consult with the affected communities to identify cultural heritage of importance, and to incorporate into the Applicant's decision-making process the views of the affected communities on such cultural heritage.
- Undertake a preliminary investigation. A preliminary investigation will be undertaken by the identified individual in conjunction with the E&S Manager, or other relevant person(s). The identified individual will make a rapid assessment of the chance find to determine its importance.
- Develop a management strategy, based on the assessment, in collaboration with the relevant authorities, the senior management and the E&S Manager, or other relevant person(s). **Appropriate strategies may include:**
 - Avoidance: This option minimizes the impact to the chance find through partial or complete project activity redesign or relocation. This is the preferred option from a cultural resource management perspective.
 - Salvage excavation: This recovery option is destructive and can delay project activities. If required, salvage excavation shall be conducted in accordance with the requirements of the relevant authority.
 - Exhume: Exhumation of the human skeletal remains should be done in a manner considered appropriate by the relevant authority. This will involve the predetermination of a site suitable for the reburial or relocation of the remains. Certain ceremonies or procedures may need to be followed before project activities can recommence in the area of the discovery.
 - In-situ management: This option includes the application of site protection measures, such as fencing or barricades, or capping the site area with fill. Appropriate protection measures will be identified and agreed between the health and safety (H&S) manager, or other relevant person(s) and the relevant authorities on a site-specific basis.
 - Surface collection: If a chance find is assessed as having limited salvage excavation potential but contains significant surface archaeological items, the surface finds may be individually mapped and collected in consultation with the relevant authorities.
 - Destruction: If a site is assessed as having limited archaeological significance, it may be destroyed once a complete photographic record has been made and a chance finds report form has been completed.
- Implement the agreed strategy: Once the appropriate strategy is determined based on the chance find's significance, the E&S manager, or other relevant person(s), the activity supervisor and the relevant authorities will work to implement the strategy.
- Resume work: Following implementation of the appropriate strategy and only after permission from the relevant authority is granted, project activities at the site can resume.

Record Keeping

The Applicant's E&S Manager, or other relevant person(s) will be responsible for ensuring a chance finds report form is completed and logged for every chance find. A photo log, copies of communications with decision making authorities, conclusions and recommendations/guidance, and implementation reports, should be kept onsite for the duration of the project and/or project activity.

Chance Finds Report Form

Date of the find:

Location of the find description:

GPS coordinates:

Person who identified the find:

Was work stopped in the immediate vicinity (i.e., 5 meters radius) of the find? ☐ Yes ☐ No

Description of find (fill in applicable information) (use additional pages if required):

Photo Record: ☐ Yes ☐ No

Type of find: _____

Brief description of Find (e.g., size, shape, number of items, colour):

Brief description of site and vegetation (e.g., surface sediment type, ground surface visibility, distance to nearest freshwater source, attach site sketch if necessary):

Relevant Authority

Was a relevant authority contacted? ☐ Yes ☐ No

If yes, please provide the following information of the relevant authority:

Name: _____

Organization: _____

Contact details: _____

Documentation from relevant authority attached (e.g., assessment of find): ☐ Yes ☐ No

Impact Assessment

Is the site destroyed? ☐ Yes ☐ No

Can further impacts to the find be avoided? ☐ Yes ☐ No

Avoidance and mitigation measures discussed:

Impact to Find avoidance and mitigation outcome:

Activity supervisor sign-off

Name: _____

Signature: _____ Date: _____

E&S manager (or another relevant person) sign-off

Name: _____

Signature: _____ Date: _____

ANNEX D - DO AND DON'T TABLE

Topic	DO	DON'T
Land Use	• Prefer already disturbed areas for workers' accommodation, storage, workshop and the worksite. • Ensure that unexploded ordnance (UXO) clearance has been carried out for the project site/work area. • Clearly mark "No-go" areas (cultivated lands or fruit trees, wetlands, grave sites or any sensitive environment or social site/area). • Avoid proximity to schools, health posts and households with vulnerable families. • Clean up the worksite and rehabilitate the site to its original condition. • Rehabilitate all temporary access tracks, haul roads and any other disturbed areas outside of the approved working areas to their original condition.	• Do not enter any worksites and areas without permissions and approvals. • Do not damage any households and associated structures, cultivated lands, fruit trees or any other potential source of income. • Do not undertake any activity and park your vehicles outside of the working area borders.
Noise	• Limit working hours for noisy activities working hours close to schools, hospitals, residents, religious buildings, etc. • Turn off vehicle engines if not required. • Keep the noise level to acceptable limits.	• Do not undertake any noisy activity during night-time.
Dust and Air	• Minimize traffic wherever possible and drive slowly. • Spray the unpaved roads with water if you're working close to schools, hospitals, residential areas, etc. • Revegetate the disturbed areas as soon as activity is completed. • Drive slowly not to generate dust.	• Do not store cement, sand, excavated material without cover sheets or shelters. • Do not clear the vegetation cover if it's not required.
Water	• Refuel the vehicles at least 30 m away water courses. • Fence the construction site adjacent to the sensitive areas such as natural water courses, ponds, drains. • Divert the runoff / water the construction sites or disturbed areas, using ditches.	• Do not use any natural water resources to supply water (e.g., springs, streams, lakes) without approval of relevant authorities, local leaders. • Do not discharge of hazardous substances, chemicals, construction material and wastes into water courses, ponds, drainage systems. • Do not block the water flow.
Waste	• Keep the working site clean and tidy. • Store hazardous waste using secondary containment and restrict access to hazardous waste storage area to prevent harm to construction staff, environment and public. • Perform on site sorting to separate liquid, organic, demolition material, hazardous and recyclables waste streams and identify the disposal pathway for each of them. • Use waste containers without any damages and leakages. • Reuse the excavated soil as much as possible for backfilling, landscaping and for other project areas where excavation material is required. • Collaborate with local authorities to transport and dispose waste in accordance with legal requirements.	• Do not burn any type of waste. • Do not dump waste at any unpermitted area and especially near watercourses. • Do not leave any sharp or dangerous objects (knives, box cutters, scissors, broken glass, etc.) that may attract children's attention living close to the construction site.

Topic	DO	DON'T
Employment and Labor Rights	- Implement a fair and transparent employment process. - Provide workers with clear and understandable information regarding rights via contract documents in local language.	- Do not enter any worksites and areas without permissions and approvals. - Do not damage any households and associated structures, cultivated lands, fruit trees or any other potential source of income. - Do not undertake any activity and park your vehicles outside of the working area borders.
Code of Conduct	Establish a Code of Conduct for worker-community interaction and on-site behaviour. Oblige workers to adhere to code of conduct.	
Grievances	Establish and maintain a grievance redress mechanism (GRM) accessible for workers.	
Community Safety	- Establish and maintain grievance mechanism for local communities adjacent to construction sites. - Secure worksites (temporary bridges, traffic controls, barricades, signs and warning lights). - Demarcate open trenches with high visible temporary fencing, undertake monitoring after rainfall, and prevent flooding of trenches. - Inform relevant authorities immediately in case of damages on utilities such as underground and aboveground electricity lines, water lines, gas lines, oil pipelines, etc. - Establish appropriate site boundary and access controls near settlements to prevent unauthorized entry to construction or activity sites especially by children (e.g., fencing of construction section in the vicinity of settlements or communities).	- Do not leave any holes and openings without secure fencing provided with fixed, clearly marked covers. - Do not exceed the speed limits.
Traffic Management	- Implement speed limits for all project vehicles. - Equip vehicles with reverse signals. Ensure that truck drivers are accompanied by a flagman or watchman while reversing, unloading and loading. - Train all drivers on safety provisions. - Avoid routes with blind curves, blind intersections and very narrow roads alongside steep slopes. - Avoid routes that are frequently used by locals. - Use local traffic signage and collaborate with the responsible local authorities and communities. - Keep access roads in good condition and free from deposits, waste, construction material. - Use flagmen where appropriate and install clear and visible signage. - Avoid vehicle traffic during hours that children are travelling to and from school.	- Do not drive without a valid driver's license. - Do not use cell phones while driving.

Topic	DO	DON'T
Occupational Health and Safety	• Provide health and safety training to all project employees and familiarize workers with the risks related with their activities. • Conduct risk assessment and define mitigation measures for each activity. • Record and report any workplace hazards or any incidents or injuries. • Provide the right personal protective equipment (PPE) and make sure that all employees use them. • Keep PPEs in good condition and change them in case they are damaged. • Prohibit usage of alcohol or illegal drugs. • Use the right tool for the activity. • Use undamaged ladders if you need to climb up. • Implement good housekeeping to prevent trips, slips and falls. • Conduct daily toolbox talks / conversations on health and safety issues before starting works. • Conduct medical examination for all personnel before the activities start. • Provide sufficient drinking water for workforce. • Provide and maintain toilet facilities for workforce separately for female and male workers. • Provide one trained first aiders per 25 employees and adequate amount of first aid kits on site.	• Do not try to repair any broken equipment and machinery if you are not authorized. • Do not use of metal ladders close to overhead power lines. • Do not work without PPE. • Do not work alone or isolated.
Housekeeping	• Keep working areas clean and tidy. • Secure loose materials that have the potential to fall. • Keep aisles, stairways, passageways, ladders, etc. free of obstructions, materials, cables, chords, hoses, etc. • Keep materials away from the edge of excavations, trenches, roofs, etc. • Cover and secure open trenches, holes and other openings. Avoid pools of stagnant water in working areas. • Undertake daily clean-up of activity area.	

Topic	DO	DON'T
Hazardous Material Management	• Store fuels, oils, chemicals and other hazardous materials on a suitably sized impervious and bunded base. • Label the containers clearly with content, handling, storage, expiration, and health and safety information. • Use drip trays during fuelling and maintenance (e.g., changing oil) of equipment. • Install proper warning signs at hazardous material storage yards, lock gates and restrict access to authorized personnel. • Store hazardous waste using secondary containment and restrict access to hazardous waste storage area to prevent harm to construction staff, environment and public.	• Do not smoke close to hazardous materials.
Fire Prevention and Control	• Take all reasonable and precautionary steps to ensure that fires are not started as a consequence of project activities on site. • Provide basic fire-fighting equipment available on site (including but not limited to, rubber beaters when working in grass/bush areas, at least one fire extinguisher of the appropriate type when welding or other 'hot' activities are undertaken). • Store flammable materials under conditions that will limit the potential for ignition and the spread of fires. • Train all employees on the fire risks and how to deal with any fires in case one occurs.	• Do not light fire for any reason, incl. waste burning. • Do not throw your cigarette butts on the ground.
Stakeholders' engagement / Indigenous Peoples (IP)	• Run a FPIC process prior to site sitting and construction design when it may impact IP directly or indirectly. • Take special measures for particular IP village characteristics, such as small population, local conflicts, customs and norms, when evaluating risks. • Build a specific code of conduct for worker-community interaction and on-site behaviour approved by local leaders of the villages under the influence area of the construction. • Strengthen grievance and feedback mechanisms and law enforcement procedures, especially regarding gender-based violence, during the infrastructure and small works period. • Train and raise awareness for the workforce about unacceptable conduct toward indigenous community members, specifically women.	• Do not consider as lower risk the influx of workers in a number that exceeds 50% of the host IP adult population in a village. • Do not start construction work or lodge workers in an IP village or on land traditionally owned by, or under the customary use of IPs without formal and documented authorization through a Free, Prior, and Informed Consent (FPIC) process.

ANNEX E - ESMP Template

Introduction

This template outlines the key elements of an Environmental and Social Management Plan (ESMP) capturing the typical environmental and social (E&S) impacts and associated mitigation measures that need to be considered at minimum in the context of category B moderate risk project activities.

The Applicant - together with the contractor - shall use this document as guidance and amend it to the project specifications, characteristics and risks as identified through the site assessment tool (**Annex A**). Thus, this ESMP template should not be used “as it is” for a project but serves as a basis for a project specific ESMP, commensurate with the relevant E&S risks and expected impacts of the project.

The ESMP is structured as follows:

- A** – General requirements for Environmental, Social, Health and Safety (ESHS) Management;
- B** – Protection of Environment;
- C** – Workers Health & Safety; and
- D** – Labour and Relations with Local Communities.

The items that have been identified as non-relevant by the site assessment (Annex A) do not have to be further considered. However, the bold and underlined ESMP items are always to be considered, regardless of the results of the site assessment.

After the site-specific amendments, the ESMP table below has to be inserted into the project specific E&S management plan (ESMP) report (refer to **section 3.2**). In addition, the Applicant should monitor the implementation of the ESMP by using the guidance and templates given in section 6. Furthermore, the Applicant might need to develop and implement some supportive safeguards tools as a part of the ESMP (e.g., Code of Conduct; Unexploded Ordnance (UXO), Clearance Form; Land Acquisition and Compensation Guidance etc.). This guidance is supplemented by number of annexes (refer to the TFCA FF ESMS Manual) that contain templates that the Applicant should use for the development of the project safeguards.

Annex D, the “Do and Don’t Table” provides guidance on general best practices to be used during (construction) works. These recommendations are to be used regardless the content of the ESMP.

ITEM	MITIGATION, MANAGEMENT AND ENHANCEMENT MEASURES	MEANS OF VERIFICATION	RESPONSIBILITY	MONITORING PROCEDURE
A – General Requirements for ESHS Management				
A1 -Responsibilities and Liabilities¹²	Ensure that all workers, suppliers and possible subcontractors are familiar and comply with the ESHS requirements and specifications of this ESMP.	Induction training performed and recorded. Contracts with subcontractors and suppliers	Contractor/ Applicant	Review of training records Review of Contracts to ensure that project requirements are included
	Adjust this ESMP to the specific project, define the frequency of the monitoring procedure and share it with Applicant and KfW. Identify if further Management Plans have to be prepared.	Final project specific ESMP		
A2. Resources allocated to ESHS Management	Assign ESHS responsible staff ¹³ and define the requirements and responsibilities. Responsible for contact with stakeholders (Relations officer or Community Liaison officer)	Final project specific ESMP Inform the relevant authorities about the ESHS responsible.	Contractor/ Applicant	Review prior to finalization of project specific ESMP
A3. Reporting	Reporting of progress and incidents, accidents, observations, near misses.	Final project specific ESMP Reporting protocol for ESHS incidents	Contractor/ Applicant	Review prior to finalization of project specific ESMP
A4. Code of Conduct	Establish a Code of Conduct taking into consideration legislation, safety rules, substance abuse, environmental sensitivity, communicable diseases, gender issues (sexual harassment), respect for local beliefs and customs, community interactions etc.	Code of Conduct in place and rules shared with personnel (see Annex H)	Contractor/ Applicant	Review of Code of Conduct induction records Review of reported punishable or misconduct behaviour. Review of grievance records
A5. ESHS Training	Provide H&S induction and training and awareness to the workforce regarding H&S risks and mitigation measures (including indirect workers) tailored to project scope.	Training performed and recorded	Contractor/ Applicant	Review of training records

¹²Reminder: Bold and underlined ESMP items are always to be considered, regardless of the results of the site assessment.

¹³Note: in many legislations an ESHS manager is required on sites employing 50 workers or more

ITEM	MITIGATION, MANAGEMENT AND ENHANCEMENT MEASURES	MEANS OF VERIFICATION	RESPONSIBILITY	MONITORING PROCEDURE
B. Protection of the Environment				
B1. Protection of adjacent areas	Restrict excavation activities during periods of intense rainfall. Use temporary bunding to reduce the risk of sediment, oil or chemical spills to the receiving waters.	No excavation during intense rainfall	Contractor/ Applicant	Check weather forecast and inspect the site conditions prior to excavation.
	Carry out excavation works in cut off ditches to prevent water from entering excavations.	No water entering excavations		Random site inspection
	Ensure that means of protection are in place to avoid or minimise adverse effects on vegetation, soils, groundwater and surface water, biodiversity, natural drainage and the water quality in areas within the works area. Construction methods to minimise impacts to the extent possible.	No impacts identified in the adjacent environment	Contractor/ Applicant	Regular monitoring of adjacent natural resources.
	Ensure that work site boundaries and limits are in accordance with plans agreed upon in advance. All construction activities should be carried out within boundaries.	Marking the borders of works site boundaries and usage of warning signs	Contractor/ Applicant	Site inspection prior to commencement of activities.
	Ensure to stay out of surrounding wetland areas.	Pre-construction survey to make sure that site is not in wetland areas	Contractor/ Applicant	During site selection
	Ensure to keep the following distances from permanent water course and outside of floodable areas; sensitive urban services and buildings (health centre, school, water supply for populations); any housing;	Marking the borders of works site boundaries in line with given limits and usage of warning signs	Contractor/ Applicant	Site inspection prior to commencement of activities.
	After construction, form reshaped land so that it is inherently stable, adequately drained and suitable for the desired long-term land use and allows natural regeneration of vegetation	Visual inspection and compares on with adjacent undisturbed areas.	Contractor /Applicant	Regular monitoring

ITEM	MITIGATION, MANAGEMENT AND ENHANCEMENT MEASURES	MEANS OF VERIFICATION	RESPONSIBILITY	MONITORING PROCEDURE
	Minimise visual impacts	Visual inspection and comparison with adjacent undisturbed areas.	Contractor/ Applicant	Review of grievance records
B2. Selection of borrow areas, backfill material stockpile sites and access road	Select borrow areas or areas to be excavated, backfill material stockpile locations and access roads if applicable to the project.	Designated areas selected	Contractor/ Applicant	Once during site selection
	Locate stockpile areas in areas where trees can act as buffers to prevent dust pollution	Designated areas selected	Contractor/ Applicant	Once during site selection
	Deposit any excess material in areas approved by local authorities	Designated areas selected	Contractor/ Applicant	Once during site selection
	Locate disposal site on low value land.	Designated areas selected	Contractor/ Applicant	Once during site selection
B3. Pollution prevention	Ensure all works carried out minimise pollution risk (e.g., liquid effluents, air emissions, noise and vibration management, vehicle and equipment maintenance and selection, fuel, oil and chemical storage and handling) including the whole duration of the project.	Ensure that potential pollutants are not stored and handled within 50 m of sensitive receptors (particularly watercourses).	Contractor/ Applicant	Regular site inspection Review of grievance records
B4. Effluents	Ensure appropriate containment and storage of construction wastewater, including sanitary water. No untreated effluent is discharged.	No untreated wastewater discharge	Contractor/ Applicant	Regular site inspection Review of grievance records
B5. Emissions and dust	Use to the extent possible, vehicles in appropriate technical conditions. Provide emissions control equipment where applicable (e.g., filters).	Technical Specification Sheet	Contractor/ Applicant	Prior to commencement of works and each time new equipment/vehicle is used at the site. Review of grievance records Visual inspection on regular basis
	Use low sulphur content fuels, in line with legal provisions in force as well as local availability.	Technical Specification Sheet	Contractor/ Applicant	Regular documentation inspection

ITEM	MITIGATION, MANAGEMENT AND ENHANCEMENT MEASURES	MEANS OF VERIFICATION	RESPONSIBILITY	MONITORING PROCEDURE
	Ensure vehicles are switched off when not in use. Sensitise drivers.	Engines switched off	Contractor/ Applicant	Site inspection
	Best practice to ensure minimisation of dust emissions (e.g., proper stockpiling, watering etc.) during dry and windy conditions and transportation.	Watering conducted, no dust emissions are observed, no workers' grievances	Contractor/ Applicant	Regular site inspection Review of grievance records
	Ensure speed limits on site. Sensitise drivers.	Speed signs installed. Training performed and recorded. Accident/incident reports	Contractor/ Applicant	Random site inspection Review of grievance records Review of accident/incident records Review of training records
B6. Noise and vibration	Avoid operations and vehicle movements at night.	No work conducted between 10 pm and 7 am No grievances received	Contractor/ Applicant	Random site inspection Review of grievance records Review of accident/incident records Review of training records
	Set traffic speed limits. Sensitise drivers.	Speed limit signs Driver Training Records as part of Induction training	Contractor/ Applicant	Random site inspection Review of grievance records Review of accident/incident records Review of training records
	Locate stationary equipment (such as power generators) as far as possible from nearby receptors (e.g., worker resting areas, populated areas and environmentally sensitive areas). Make sure that noise levels don't exceed 120db in case of equipment or vehicle use.	Distances between equipment and receptors are kept	Contractor/ Applicant	Once prior to commencement of works Monitor noise levels in case equipment is used. Review of grievance records

ITEM	MITIGATION, MANAGEMENT AND ENHANCEMENT MEASURES	MEANS OF VERIFICATION	RESPONSIBILITY	MONITORING PROCEDURE
B7. Waste Management	Identify waste management facilities and waste management contractors.	Waste management through licensed contractors, if feasible	Contractor/ Applicant	Inspect waste management facilities.
	Ensure disposal through waste contractors licensed for treatment/removal/recycling of each of the waste types.	Waste management contracts Waste transfer notes		Proof of contractors' certifications Review of waste transfer records
	Ensure that all wastes produced are properly collected, segregated, stored, transported and treated	Waste collection areas existent, waste inventories Waste transfer notes	Contractor/ Applicant	Random site inspection, Review of waste inventories Review of waste transfer records
	Minimise the waste production to the extent possible.	Records of waste production are kept. Waste Management Plan Training performed and recorded	Contractor/ Applicant	Monitor (e.g., monthly) the amount of waste produced. Review of training records
	Document all waste related operations (type of wastes, quantities produced etc.).	Storage, transport and treatment of waste is documented. Waste transfer notes Waste inventories	Contractor/ Applicant	Review of waste transfer records Review of waste inventories
B8. Vegetation clearing	Appropriate and safe storage of fuels, construction materials, wastes and any materials that can cause spills (e.g., batteries from energy generators).	Safe storage of materials Spill response procedure Spill response and remediation equipment in place.	Contractor/ Applicant	Random site inspection
	Limit vegetation clearing to areas within the site boundary where it is strictly necessary.	Vegetation clearing minimal. Marking the borders of works site boundaries	Contractor/ Applicant	Review of waste transfer records Review of waste inventories

ITEM	MITIGATION, MANAGEMENT AND ENHANCEMENT MEASURES	MEANS OF VERIFICATION	RESPONSIBILITY	MONITORING PROCEDURE
	Describe the methods of vegetation clearance. Ensure that no chemicals/pesticides are used, burning of vegetation is restricted etc. Do not clear vegetation more than two months in advance of operations	No use of fires or chemicals on site Marking the borders of works site boundaries Usage of warning signs	Contractor/ Applicant	Site inspection prior to commencement of activities. Site inspection during site clearance
	Avoid clearing mature trees and endangered species.	No mature trees cleared	Contractor/ Applicant	Site inspection prior to commencement of activities.
B9. Biodiversity	Avoid to the extent possible areas of ecological value.	Areas of ecological value avoided	Contractor/ Applicant	Site assessment prior to site selection. Ecological value assessment if needed.
	Avoid natural habitats disturbance.	No habitats disturbed	Contractor/ Applicant	Inspection of construction practices.
B10. Erosion control measures	If construction takes place on inclined surfaces/ slopes, ensure preventive erosion control measures are applied (e.g., plan to retain trees and other vegetation, use of natural contours for roads and drainage networks, excavated drainage channels).	Preventive temporary and permanent erosion control measures in place Landscape and bio restoration plan in place	Contractor/ Applicant	Random site inspection to check if measures where applied
	Ensure that topsoil is stripped and stored properly. After construction, topsoil will be used for restoration of the area. Topsoil should not be mixed with subsoil, therefore needs to be stored separately.	Topsoil stored and re-used for restoration.	Contractor/ Applicant	Monitor if topsoil is properly stripped and stored
	Optimal stockpiling.	Stockpile height limited	Contractor/ Applicant	Random site inspection
B11. Site rehabilitation	Ensure revegetation and restoration of cleared areas where possible after construction using native species.	Revegetation completed	Contractor/ Applicant	One-time inspection after construction
	Ensure that rehabilitated areas don't pose health and safety risks (such as holes, ponds).	Reinstatement completed	Contractor/ Applicant	Inspection after construction Inspection after heavy rainfalls and snow

ITEM	MITIGATION, MANAGEMENT AND ENHANCEMENT MEASURES	MEANS OF VERIFICATION	RESPONSIBILITY	MONITORING PROCEDURE
	Reinstatement of construction working area to the best possible after construction activities are completed.	Reinstatement completed	Contractor/ Applicant	One-time inspection after construction Inspection after heavy rainfalls and snow
	Rehabilitate borrow areas, backfill material stockpile sites and access roads, where applicable.	Rehabilitation completed	Contractor/ Applicant	One-time inspection after construction Inspection after heavy rainfalls and snow
C. Health of the Safety				
C1. Health and Safety Plan	Develop a Health and Safety Plan.	H&S Plan in place	Contractor/ Applicant	Review of H&S Plan
C2. Accident reporting	Ensure all H&S related incidents (e.g., observations, accidents) on site are recorded and followed up properly. (See the Facility's ESMS Manual, Annex M – Serious Incident Reporting and Management Procedure)	Incident recording process in place	Contractor/ Applicant	Check incident/accident records
C3. Personal protective equipment	Ensure the provision of Personal Protective Equipment (PPE) for workers (hardhats, masks, safety glasses, safety boots etc. depending on project type).	PPE used by everyone on-site. Training performed and recorded	Contractor/ Applicant	Random site inspection Review training records
C4. Emergency scenarios prevention	Ensure immediate cleaning of any spills and remediation of contaminated areas after construction.	Workers trained. Emergency Response Team (ERT) is in place	Contractor/ Applicant	Random site inspection after spill events One-time inspection after construction Review of training records Review of ERT

ITEM	MITIGATION, MANAGEMENT AND ENHANCEMENT MEASURES	MEANS OF VERIFICATION	RESPONSIBILITY	MONITORING PROCEDURE
	Provide necessary prevention equipment and teams on site in line with applicable regulations to respond to emergency scenarios e.g., fire, explosion, floods, natural hazards etc.	Reinstatement completed	Contractor/ Applicant	Regular site inspection Review list of equipment Review of ERT Review of training records
	Maintain high standard in housekeeping on site. Construction materials and light equipment should be stored properly.	Rehabilitation completed	Contractor/ Applicant	Random site inspection
C5. UXO clearance	Ensure UXO clearance as relevant has been completed and approved prior to start of works. If relevant, clearance work should be accompanied by sensitisation / training of community members on emergency preparedness in case of discovery of further UXO and dangerous materials.	Documentation of clearance Training records Note: these risks have to be addressed with specific additional sub plans and in depth risk assessments, by professional bodies.	Contractor/ Applicant	Random site inspection Review documentation and training records
C6. Hazardous materials clearance	Ensure clearance from hazardous and dangerous materials as relevant has been completed and approved prior to start of works. If relevant, clearance work should be accompanied by sensitisation / training of community members on emergency preparedness in case of discovery of further hazardous and dangerous materials.	Documentation of clearance Training records	Contractor/ Applicant	Random site inspection Review documentation and training records
C7. First-aid	Ensure minimum first aid provisions on site (suitably stocked first-aid kits; a person, respectively an adequate number of first-aid helpers and ensure that staff and workers are informed about first-aid arrangements)	Suitable first aid kits on site Ensure the presence of first aid helpers in all shifts. First aid certificates	Contractor/ Applicant	Regular monitoring of first aid kits Review of first aider certificates Review of number of first aiders required by local legislation

ITEM	MITIGATION, MANAGEMENT AND ENHANCEMENT MEASURES	MEANS OF VERIFICATION	RESPONSIBILITY	MONITORING PROCEDURE
C8. Access to health care	Ensure the workforce has access to primary healthcare on site, providing prescriptions and vaccinations.	Healthcare available on site Medical surveillance records	Contractor/ Applicant	Random site inspection Review of grievance records Review of medical records (in case not confidential)
	In case more than 35 workers are present on site, ensure that a hospital, medical clinic or a health centre can be reached within a period of 45 minutes.	Medical centres in the proximity of the site.	Contractor/ Applicant	Medical centres in the proximity of the site identified once prior the commencement of works
C9. Hygiene, accommodation and food	Ensure provision of Health and Safety (H&S) and hygienic and sanitary facilities at the site, including shaded welfare areas, bathrooms, changing rooms and potable water. Ensure toilets and changing rooms are separated between male and female employees.	Appropriate H&S and sanitary facilities provided at site	Contractor/ Applicant	Campsite inspection prior to accommodation of the workers. Regular inspection Review of grievance records
	Ensure the provision of adequate space, supply of water, adequate sewage and garbage disposal system, appropriate protection against heat, cold, damp, fire and disease-carrying animals, adequate sanitary and washing facilities, adequate lighting, and basic medical services, in accordance with all applicable health and safety regulations and norms.	Appropriate conditions for workers on site		Campsite inspection prior to accommodation of the workers. Regular inspection Review of grievance records
	Report any occurrence of any communicable diseases amongst the workforce (STD, HIV/AIDS, TB, malaria and Hepatitis B and C). Sensitise workers.	Communicable Diseases Register Training performed and recorded		Review of diseases register and disease prevention programme if available. Review of training records
	D. Labour and relations with local communities			
D1. Labour conditions	Ensure minimum legal labour standards as per ILO regulations (child/forced labour, sexual assault, no discrimination, equal opportunities, working hours, minimum wages) are met.	Grievance Mechanism Records, Training performed and recorded	Contractor/ Applicant	Review of Inspection reports (also from labour authorities), Review of grievance records Review of training records

ITEM	MITIGATION, MANAGEMENT AND ENHANCEMENT MEASURES	MEANS OF VERIFICATION	RESPONSIBILITY	MONITORING PROCEDURE
	Ensure that all direct and indirect workers have access to and are aware about the Grievance Mechanism where they can raise workplace relevant complaints anonymously. (See the Facility ESMS Manual, Annex L– Project level Grievance Redress Mechanism)	Grievance Mechanism in place and grievances recorded. Training performed and recorded	Contractor/ Applicant	Review of grievance register Review of training records
	Ensure all workers have the same rights and are treated equally.	Non-discrimination policy in place	Contractor/ Applicant	Random site inspection Review of grievance register
D2. Local recruitment	Ensure local communities are preferred for the supply of goods and services to the project and Project personnel, where appropriate.	Appropriate H&S and sanitary facilities provided at site	Contractor/ Applicant	Review procurement and employment rules and records Review of grievance register
D3. Transport	Ensure local communities are preferred for the supply of goods and services to the project and Project personnel, where appropriate.	Appropriate conditions for workers on site	Contractor/ Applicant	Review of grievance register
D4. Community interaction	Engage/ communicate/inform communities. Ensure consultations with the local authorities and communities regarding the construction. Obtain local knowledge regarding chance finds and land acquisition matters.	Minutes of Meetings Grievance Mechanism	Contractor/ Applicant	Review of grievance register Minutes of consultation meetings
	Initiate an efficient Grievance Mechanism to allow potentially affected individuals to raise their concerns.	Grievance Mechanism in place, grievances recorded	Contractor/ Applicant	Review of grievance register

ITEM	MITIGATION, MANAGEMENT AND ENHANCEMENT MEASURES	MEANS OF VERIFICATION	RESPONSIBILITY	MONITORING PROCEDURE
	Engage with the local community and potential affected households to understand their needs and identify the risk of damage to their livelihood basis through the project (e.g., take of pastureland, lack of access to water). Should land acquisition be inevitable, a timely and fair compensation should be given to all affected persons.	Minutes of Meetings Grievance Mechanism records Management Plan for Land Acquisition and Compensation if needed (See Annex G)	Contractor/ Applicant	Review of grievance register and meeting minutes
D5. Damage to people and property	Ensure all contractors implement codes of conduct concerning employment and workforce behaviour (including but not limited to safety rules, zero tolerance for substance abuse, environmental sensitivity of the area, dangers of sexually transmissible diseases and HIV/AIDS, gender equality and sexual harassment, respect for the beliefs and customs of the populations and community relations in general).	Code of Conduct (See Annex H) Grievance Mechanism records	Contractor/ Applicant	Worker interviews, Review of grievance log
	Ensure that site areas are provided with appropriate security, fencing, signage and lighting. Use hazard notices/signs/barriers to protect children and other vulnerable people from harm and prevent access to non-workers.	H&S planning of construction site done; items installed	Contractor/ Applicant	Inspection prior to the activities. Random site inspection Review of grievance register
D6.Land acquisition and land take	Avoid to the extent possible land take of both formal and informal landowners/land users. If land take is inevitable, no forced eviction should take place. Owners should be compensated prior to access to land. Engage with the local community to understand the land ownership and land use.	Grievance Mechanism Management Plan for Land Acquisition and Compensation if needed (See Annex G)	Contractor/ Applicant	Once during site selection Review of grievance log Follow up of land acquisition/compensation process

ITEM	MITIGATION, MANAGEMENT AND ENHANCEMENT MEASURES	MEANS OF VERIFICATION	RESPONSIBILITY	MONITORING PROCEDURE
D7. Traffic management	Ensure safe driving by project personnel (e.g., through training/induction).	Driver Training Records as part of Induction training	Contractor/ Applicant	Review of training records
D8. Fossils/ Archaeological Chance Finds	Establish specific procedures to manage the protection of archaeological and historical sites, chance finds and fossils. Ensure all finds of cultural heritage (e.g., graves, old ceramic, old building fragments) are reported immediately to the relevant authority and avoid excavation in the ultimate neighbourhood of a chance find, fence the chance find and await instructions from the competent authority.	Notification records to relevant authority Training records, Records about chance finds	Contractor/ Applicant	Site inspection

ANNEX F - ESCOP Template

Introduction

The table below provides a template of the environmental and social (E&S) code of practice (ESCOP) that can be used by the Applicant and/or its contractor. In the table term “project” refers to any infrastructure and/or small works like workshops, training centres, administrative buildings, shelter, storage, bridge, aviation tracks, roads, access roads, etc., and are assumed to have low E&S risks.

ESCOP Template

Project name:	
Project Site Location:	<i>Village, district, region, country</i>
The Applicant:	<i>Organisation receiving funding</i>
Implementation Body:	<i>Contracted construction partner</i>
Project Description: Objective and need for/ purpose of the project: Project Features:	<i>Describe:</i> - Type of Infrastructure to be built for this project and its exact location. - Project activities to be carried out (construction, operation and decommissioning). - Type of machinery used. - Key E&S risks and impacts of the activities expected. - Type of E&S provisions required by national legislation (e.g., environmental declaration, etc.) - Organizational structure and responsibilities
Key Risks associated with the project activities triggering ESCOP	<i>If possible and relevant include a location map. Provide quantitative data (volume, length, target population etc.) as available and relevant.</i> <i>Overview of the envisaged schedule, stakeholders involved in the project.</i>

Project Stage: ☐ **Planning** ☐ **Construction** ☐ **Operation**

Permitting obligations associated with this project:

List all permits that need to be granted by the administration of the host country to authorise the project, provide status of the document (incl. if the obligation has been lifted) and information of steps to be taken to receive authorisation to implement the project – if any

Document	Status	Actions
Water discharge permit	Granted	None
Waste management permit	Pending	Needs to be ordered start of operation

Checklist filled in by:	Name, Date and Signature
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The Applicant should also describe stakeholder engagement and grievance mechanism procedure in place for the project, it might use the respective sections of Annex A for the guidance. The Applicant should also ensure that:

- Grievance mechanism is in place;
- Employment will be transparent and non-discriminatory; and
- Recruitment of women and other disadvantaged groups or individuals will be promoted.

As **Annex A**, the “Do and Don’t Table” provides guidance on general best practices to be used during (construction) works. These recommendations are to be used regardless the content of the ESMP

Examples for key environmental, social, and occupational health & safety risks of infrastructure and small construction works and mitigation measures are provided in the table below.

ACTIVITY	KEY RISKS	MITIGATION MEASURES (MAKE SURE MEASURE IS PART OF CONSTRUCTION ACTIVITY SPECIFIC LIST OF REQUIREMENTS AND INCLUDED IN CONTRACTORS' AGREEMENTS)
All activities	Employment of child labour	check material source workforce for personal identity documents, stop any employment/assignment of children and minors <16 years
Work on roads open to traffic Street sweeping/cleaning of public spaces or Rehabilitation of small rural roads	Road accidents due to working in flowing traffic	Protect working area from flowing traffic: • Warning signage and barriers • Speed limits for flowing traffic during working hours • Workers to wear safety vests for visibility. • Works only during daylight. • Workers to be deployed in teams (no work alone permitted)
Borrow pits / breaking of rocks (without machinery)	Eye injuries due to stone splitter (rock breaking)	All workers to wear protective goggles
	Foot injuries (rock breaking)	All workers to wear appropriate shoes (closed, if possible, safety shoes)
Hand-dug well construction/rehabilitation Construction/rehabilitation of latrines Rehabilitation of small water distribution networks	Accidents through collapse of trench/pit/well	• Ensure trenches and pits are stabilized as required (if more than 1.25 m deep). • All earth pits/trenches more than 1.20 meters (or 4 feet) deep that a worker is required to enter, must be shored with timbers or be cut with embankment slopes of 1 to 1 (45 degrees). • When timber shoring is used, it must be installed progressively as the trench is being excavated. • Ladders must be used for getting into or out of a shored trench/pit and be placed so that a worker is protected at all times when using the ladder. • Work must not be performed in a trench/pit unless another worker is working above ground in close proximity to the trench or to the means of access to it. • Buried services such as gas lines, water lines, sewers and electrical services must be located and marked before excavation starts. • Excavations which workers are required to enter must be kept reasonably free of water. • Tools, equipment and excavated soil must be kept at least 1 meter (3 feet) from the edge of the excavation or trench. • Workers to be deployed in teams (no work alone permitted) and at least staff out of trenches. • Consider external variable factors such as weather conditions and take appropriate measures
	Contamination of drinking water	Ensure that well is located within or more than 30 meters distance from potential source of contamination, e.g., latrine

ACTIVITY	KEY RISKS	MITIGATION MEASURES (MAKE SURE MEASURE IS PART OF CONSTRUCTION ACTIVITY SPECIFIC LIST OF REQUIREMENTS AND INCLUDED IN CONTRACTORS' AGREEMENTS)
Rehabilitation of simple structures (ground floor buildings)	Accidents due to collapse of non-stable walls or roofs	Assessment of need for stabilization and implementation of wall/roof stabilization prior to commencement of works
	Falling from heights due to unsafe or damaged ladders	Apply safe work practices for ladders
Working with small electrical equipment	Electric shocks	Apply safe work practices: • Accidental contact with electrical components can have deadly consequences. Always refer to the manufacturer's recommended operating practices prior to using new electrical appliances, tools and equipment. • Use the following guidelines to reduce the risk of personal injury. • All electrical tools and appliances will be double insulated or have a three-prong plug-in. • Only qualified and authorized electricians are allowed to service and repair electrical appliances, tools and equipment. • Prior to operating electrically powered tools and equipment, ensure that you are working on a dry surface. • Tools with damaged cords, grounds and housing units are to be tagged "Out of Service" and sent for repair. • Missing or damaged ground plugs of any appliance, tool or piece of equipment are to be repaired prior to use. • Damaged extension cords shall be tagged "Out of Service", repaired or replaced as warranted. • Always stand to the side of a service box when resetting a breaker. • All electrical tools must be quality approved. • Disconnect power tools from power source before adjusting. Defective equipment needs to be tagged "Out of Service" and removed. • Tools with electrical arcing brushes should be removed when you feel any tingling during use.
Health care service delivery, such as vaccination campaigns	Infections related to medical waste management (sharps and needles), endemic diseases, diseases that can be brought by external workers	Use medical waste management guidance as per WB EHS guidance

ANNEX G - Land Acquisition and Compensation Guidance

Introduction

The Applicant is required to implement an Environmental and Social (E&S) Management Plan (ESMP). As part of this the Applicant has committed to:

- I. Avoid land acquisition from private landowners and associated displacement of persons, and
- II. In cases where this cannot be avoided -
 - a. To document the voluntary land donation, or if this cannot be completed as land will not be donated voluntarily,
 - b. To develop and implement a **Land Acquisition and Compensation Plan (LACP)** (or equivalent document) to ensure that land acquisition, compensation, and resettlement (if any) are properly planned and managed. This will include provisions for resettlement and damage to livelihoods (whatever is applicable).

The LACP may be named differently but should include the content as provided in this guidance document. It should be developed early at the design/ planning phase of the project.

Voluntary land donations

Voluntary land donations are only acceptable provided that the Applicant verifies and demonstrates that all voluntary land transactions meet the following criteria:

CRITERIA	YES, EXPLANATION	NO, EXPLANATION
1. The land in question is free of squatters and no people with customary rights or no legal title are using it;		
2. The land in question is free from any dispute on ownership or any other encumbrances;		
3. No household relocation is involved;		
4. The amount of land being donated is minor and will not reduce the donor's remaining land area below that required (e.g., no more than 10% of total agricultural land holding donated) to maintain the donor's livelihood at current levels;		
5. The donor is expected to benefit directly from the project;		
6. The donor is aware that refusal is an option;		
7. The donor has been appropriately informed and consulted about the project and the choices available to him/her;		
8. A grievance redress mechanism is in place to hear complaints regarding land acquisition;		

CRITERIA	YES, EXPLANATION	NO, EXPLANATION
9. Land transfer will be completed through registration after the donor has confirmed in writing his/her willingness to proceed with the donation;		
10. For community or collective land, donation has occurred with the consent of individuals using or occupying the land.		

The Applicant, through field technical teams, will verify the fulfilment of these criteria and provide further explanations on each criterion. If all criteria are fulfilled, the Applicant will ensure completion of the voluntary land transaction in written consent form (see sample waiver below). The donation will be verified by two witnesses who are community leaders but not beneficiaries of the subproject, to ensure that the land was voluntarily donated without any form of duress. The signed waivers will be submitted to TFCA FF ESMS Officer for verification in order to ensure that the voluntary land donation has been conducted in accordance with the above criteria.

Sample Voluntary Donations of Land Agreement

The following agreement has been made on day of between
Mr./Ms....., aged, resident of zone, district (the Owner)
and (the Recipient/Subproject Proponent).

1. That the land with certificate no..... is a part of, is surrounded from eastern side by....., western side by....., northern side by, and southern side by.....
2. That the Owner holds the transferable rights of land (area in square meters), with plot no..... at the above location (include a copy of the certified map, if available).
3. That the Owner testifies that the land/structure is free of squatters, no people with customary rights or no legal title are using it, no household relocation will be needed and that there is no dispute on ownership or any other encumbrances in regard to the land.
4. That the Owner ensures that the amount of land being donated is minor and will not reduce the Owner's remaining land area below that required (i.e., no more than 10% of total agricultural land holding donated) to maintain the Owner's livelihood at current levels.
5. That the Owner has been appropriately informed and consulted about the project and the choices available (including refusal) as well as possible ways to address grievances.
6. That the Owner hereby grants to the..... (Name of the Recipient) this asset for the construction and development of thefor the benefit of the community and that the Owner's property rights will be handed over to and registered in the name of (Name of the Recipient).
7. That the Owner will not claim any compensation against the grant of this asset nor obstruct the construction process on the land in case of which he/she would be subject to sanctions according to law and regulations.
8. That the (Name of the project Proponent) agrees to accept this grant of asset for the purposes mentioned.

Name and Signature of the Owner

.....
(Signature, name and address)

Signature of Subproject Proponent/Representative

.....
(Signature, name and address)

Witness 1:

1.....
(Signature, name and address)

Witness 2:

2.....
(Signature, name and address)

Land Acquisition and Compensation Plan Template

The text in *italics* and grey highlighted includes instructions for the authors of the Land Acquisition and Compensation Plan (LACP):

1. Introduction

The Project Executing Agency (PEA) <Name of the PEA> is planning to construct a <Name intervention, e.g., school, water distribution system etc.> ("the project"). The project will be constructed at a site in <Name of location/ village/ country>. The construction activities will be executed by the construction contractor (Contractor) <Name of the Contractor> with the following sub-contractors: <Name of the sub-contractors if known already>.

The purpose of this Land Acquisition and Compensation Plan (LACP) is to identify the households affected by land acquisition through the project and to define suitable mitigation, compensation and other forms of support to them. The objective is to assist the affected households in developing their social and economic potential and to improve or at least restore their incomes and living standards to pre-project level.

This LACP provides information on:

- Land acquisition planned for the project;
- Expected socio-economic impacts and groups of affected households;
- The Entitlement Matrix in tabular format with details on entitlements to compensation measures under the provisions of this LACP, referring to different impacts;
- Provisions, responsibilities and processes to implement the LACP; and
- Timeframe of expropriation and LACP implementation.

2. Project Description

Include a short project description based on available documentation and site observations (in alignment with the overall Project Environmental and Social Management Plan (ESMP) if existent) including project context and project activities.

Include a map of the area with the planned project and affected lands.

Explain how acquisition of private land was strived to be avoided and why this attempt was not successful.

3. Project Affected Households

Include a short description of the households affected by land acquisition:

- Amount of land affected by acquisition.
- Current land use
- Income sources and general socio-economic situation of the affected household(s)
- Types of impact (e.g., permanent loss of land, temporary loss of land, loss of access to land, loss of income, resettlement etc.)
- Types of affected households (landowner with a formal land title, landowner without a formal land title land user, community land etc.)

4. Legal and Institutional Framework

Explanation of national law and practice relating to:

- Land acquisition;
- Expropriation;
- Compensation;
- Eligibility rules to compensation; and
- Validation approach.

5. Compensation Approach / Entitlement Matrix

Include a description of the compensation approach. This can be done in form of the Entitlement Matrix (see table below). This table shall include compensation packages for each affected household and needs to be treated confidential. The compensation packages need to be negotiated with the affected households.

AFFECTED PERSON	IMPACT	ENTITLEMENTS	COSTS
Landowner	Loss of land used for cultivation of crops	Compensation to owners for value of land and immovable assets The PEA will coordinate with the landowner to find alternative land for cultivation. If this is not found compensation will be provided to cover any reasonable expenses that are not covered by the compensation payment under the law, as well as differential between replacement cost and valuation of the asset per host country law	
Land User	...	...	

6. Implementation Schedule

Please use the table below:

SUMMARY OF KEY STEPS	RESPONSIBILITY	INDICATIVE DATE
----------------------	----------------	-----------------

Include an outline of the planned schedule for the land acquisition activities, e.g.

- Identify affected households.
- Notify affected households.
- Implement land acquisition/ sign purchase contracts.
- Conduct resettlement (if any)
- Provide supporting measures for livelihood restoration.
- Conduct Monitoring

7. Public Consultation and Stakeholder Engagement

Please including the project's grievance procedure (aligned with SEP if available).

Landowners and users need to be properly informed about how to file grievances or how to take legal action against the land acquisition/ resettlement.

8. Monitoring of Implementation

The overall objectives of monitoring in the LACP context are to verify the following points:

- Actions and commitments described in the LACP are implemented fully and on time;
- Affected households understand their rights;
- Vulnerable people have been assisted according to their special needs (e.g., illiterate, chronically ill, limited mobility);
- Special attention was paid to reach out to female landowners;
- Eligible households receive their full compensation entitlements or other mitigation measures within the agreed time;
- LACP compensation and livelihood support are effective with regard to the enhancement or at least the restoration of livelihoods;
- Complaints and grievances expressed/submitted by affected households are followed up and resolved and that, where necessary, corrective actions are implemented;
- If necessary, changes in LACP procedures are made to improve delivery of compensation/assistance to affected households; and
- All households are considered according to their entitlements.

The overall responsibility of monitoring is with the Applicant. The monitoring will be performed by *internal or external* staff who will receive training with regard to monitoring techniques and recording of monitoring results. Additional experts may be included in monitoring activities on an as-needed basis.

Include a description of how monitoring considerations are considered within the project. Specify responsibilities and timelines for monitoring.

9. Roles and Responsibilities

Include an outline of responsibilities for the land acquisition, compensation (and resettlement) activities. Provide names and positions and also include external agencies if needed.

ANNEX H - Construction Workers Code of Conduct

1. Introduction

As part of the Environmental and Social Management Plans (ESMP) and/or Environmental and Social Code of Practice (ESCP) the Applicant has committed to develop a Code of Conduct. The Code of Conduct should be prepared by the Applicant and/or contractor (referred to as “the Company” in this document) with support from the based on this guidance and will be implemented during construction activities.

The Code of Conduct establishes clear guidelines for daily business conduct and ethical behaviour. Each employee shall be informed of this document and bound by it while employed by the project (which includes employment by project partners/sub-contractors). The Code of Conduct shall be publicly disclosed and made available to local communities in appropriate locations.

NOTE: The content provided within this document/template is specific to the construction context and should not be interpreted as having any connection or overlap with the Law Enforcement Code of Conduct. The purpose of this guidance is to establish clear and effective procedures for constructionrelated operations, and it is intended solely for this purpose.

The text in *italics and grey* highlighted includes instructions for the authors of the Code of Conduct.

2. Introduction, Purpose and Scope

The purpose of the Code of Conduct is to provide guidance to all employees (including those of subcontractors) on how the <*Name of the Applicant/contractor organization*> (hereafter referred as the “Company”) expects them to behave in the workplace, and how they should conduct themselves with project stakeholders (employees, customers, suppliers and members of the public). The purpose and scope of the Code of Conduct will outline the Company management commitments, values and core operating principles. The Code shall make reference to other relevant management plans (e.g., Health and Safety).

3. Responsibilities and Implementation of the Code of Conduct

Describe how the Company will implement the Code and details the responsibilities of managers and employees.

- Commitment that the Code will be shared with employees during onboarding and training (i.e., that the Code is not read only once);*
- Include a requirement for all employees to sign an Acknowledgement Form attached to the Code;*
- Commitment to promptly communicate changes/updates to the Code*
- Commitment to training and continuous improvement; and*
- Include a list of other policies and procedures linked to the Code of Conduct.*

4. Violations and Feedback

Describe how violations of the Code of Conduct and feedback about it will be handled.

- Commitment for all personnel to prevent violation of the Code, to identify and raise potential issues before they lead to problems, to seek guidance when necessary and to report circumstances that are in violation of the Code;
- Describe feedback mechanisms and encourages employees to raise any concerns or provide feedback. Develop safe and confidential ways to report concerns of misconduct and ensure zero tolerance on retaliation; and
- Describes the action that will be taken against those who violate the Code. These may include performance or disciplinary consequences including termination of employment, subject to local laws and regulations. Where an action is also in breach of the law, the employee may be subject to prosecution under civil or criminal law. Include a commitment to value the help of employees who identify possible legal or ethical business misconduct. This will include whistleblowing (i.e., the reporting of wrongdoing that is in the public interest, such as a criminal offence, danger posed by a H&S risk, or a miscarriage of justice).

5. Human Rights and Labour Practices

We will protect human rights as defined in the Universal Declaration of Human Rights (UDHR). No person shall be subject to any discrimination in employment, including hiring, compensation, advancement, discipline, termination or retirement, on the basis of gender, race, religion, age, disability, sexual orientation, nationality, political opinion, social group or ethnic origin.

- We will treat all employees and community members with dignity, respect and justice, taking into consideration their different cultural sensitivities.
- We will not permit any form of violence, harassment or abuse at the workplace or local community.
- We will work with public and private security providers to avoid security arrangements that cause or contribute to human rights violations.

6. Health and Safety

The Company will provide a clean, safe and healthy work environment, taking measures that are considered reasonable to maximise prevention of occupational risk. Measures will be taken to continuously improve the Health and Safety (H&S) performance. Violence and threatening behaviour are not permitted.

All project partners, consultants, agents, sub-contractors and suppliers, will be required to respect and adhere to the Company's H&S requirements.

Please include specific rules around H&S practices (e.g., from ESMP/ESCOP), such as:

- All of us will commit to our roles and responsibilities to ensure a healthy and safe working environment.
- We will report incidents and accidents. These will be investigated, and corrective actions will be taken.
- ...

7. Environment

The Company will do any work-related activities in an environmentally sound manner for the benefit of all project stakeholders and the environment in which the project operates and provides service. The Company will adhere to any environmental management plans and programs throughout all activities performed. Any environmental management plans will be shared by the Company with its employees.

Please include a list of key commitments, e.g.

- We will not do informal harvesting of plants or plant products (such as fruits and nuts);
- We will not dispose solid and liquid wastes of any kind in unauthorized manner while in transit on company business or while living in project-provided accommodation of any kind; and

8. Fair Dealing / Supplier and Client Relationships

The Company will deal responsibly, honestly and fairly with other project stakeholders the customers, suppliers, authorities, competitors and other third parties.

Please include specific commitments related to:

- Bribery and corruption;
- Conflicts of interest;
- Fair competition;
- Confidential information; and
- Insider trading.

The Company will not establish business relationships with companies or individuals that are not in compliance with ethical, H&S, and human rights standards compatible with those adopted by the Company.

9. Relations with the Communities neighbouring the Project

The Company will engage, cooperate and maintain good neighbor relations with local communities.

Please include specific commitments, e.g.:

- Prohibition of illegal substances, weapons and firearms;
- Prohibition of harassment or abuse (physical or verbal);
- Prohibition of nuisance and disturbance in or near communities.
- Respecting the diversity of ethnic or cultural minorities and acknowledging their unique and important interests in lands, waters and environment as well as their history and traditions; and
- Maintaining appropriate standards of dress and personal hygiene.

10. Communication

We will communicate with each other in a fair, open, respectful and responsible manner. This Code of Conduct will be disclosed to all workers at site in the relevant languages. It will also be shared with sub-contractors and partners of the Company for them to distribute in their organizations accordingly.

11. Contact

Please provide contact details of the person responsible for the implementation of the Code of Conduct.

.....

Acknowledgement & Commitment to the Workforce Code of Conduct

I acknowledge that I have received, read, and will comply with the Code of Conduct as it may be amended from time to time. I also acknowledge that I will read and comply with all policies and management plans referenced in this Code, as they may be amended from time to time, to the extent that they apply to my employment activities.

FIRST NAME	LAST NAME	SIGNED	DATE DD/MM/YY	LOCATION	COMPANY	DIRECT MANAGER