

### A.3.4. Template of the ESMP mandatorily annexed to the Financing Agreement (FA)

#### General considerations

1. **Infrastructure Credit Guarantee Company Plc (*InfraCredit*)** is planning to implement the **InfraCredit Counter Guarantee Facility (*LEAF*)** project (the ***Project***). The Bank has agreed to provide financing, implementation support and monitoring for the Project.
2. **InfraCredit** will implement measures and actions of this Environmental and Social Management Plan<sup>1</sup> (***ESMP***) so that the Project meets all the requirements of the Bank Environmental and Social Operational Safeguards (***OS***) and the National policy and legal requirements.
3. Where the ESMP refers to specific plans, whether they have already been prepared or are to be developed, the ESMP requires compliance with all mandatory provisions of such plans.
4. The table below summarizes the material measures and actions that are required, the basis of the requirement, the timing of the measure or action, and the criteria to be used for determining whether the required measure or action has been successfully achieved. **InfraCredit** is responsible for compliance with all requirements of the ESMP even when implementation of specific measures and actions is conducted by an entity different from **InfraCredit**.
5. Implementation of the material measures and actions set out in this ESMP will be monitored and reported to the Bank by **InfraCredit** as required by the ESMP and the conditions of the legal agreement, and the Bank will monitor and assess progress and completion of the measures and actions throughout implementation of the Project.
6. As agreed by the Bank and **InfraCredit**, this ESMP may be revised from time to time during Project implementation, to reflect adaptive risk management of project changes and unforeseen circumstances or in response to assessment of project performance conducted under the ESMP itself. In such circumstances, **InfraCredit** will propose and agree changes with the Bank, and then update the ESMP to reflect such changes.

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<sup>1</sup> The ESMP refers to all the E&S risks/impacts and measures, as approved in all the disclosed E&S documents and agreed between the Bank and Borrower. For projects involving multiple subprojects, that are identified, prepared and implemented during the course of the project, the Borrower will need to demonstrate to the Bank, before the project appraisal, through the preparation of E&S documentation of a sample of subprojects, that it has the capacity to carry out appropriate environmental and social assessment of subprojects, and prepare and implement such subprojects in accordance with the national laws and the OSs. (*Section III.2.3 of Bank's ESP and section D of OSI*)

<b>Material Actions<sup>2</sup> to Manage the Project's E&amp;S Risks and Impacts</b>		<b>Basis for Requirement</b>	<b>Key Performance Indicator</b>	<b>Indicative Timing/Deadline</b>
Periodic E&S implementation report to the Bank		Bank's ESP and OS1	Reports submitted in time, in good standard	Two weeks after the due period
1	Recruitment of E and S specialists as part of the Project implementation unit	Disclosed ESIA, OS1	Seasoned E&S specialists in the PIU	By Project effectiveness date
2	Establishment of the Project Grievance Redress Mechanism (GRM) and disclosure to Public	OS1, OS10 and National requirements	Project level: GRM procedure disclosed, log established.  InfraCredit: Internal & External Redress Mechanism Procedure and channels disclosed (company website, hotlines)	Before commencement of site activities  Available
3	Payment of compensation and reinstallation of affected people	SO10	Project-level: Verification before guaranteed issuance (RAP prepared, approved, disclosed).  InfraCredit: Not Applicable	As per regulatory schedule and always before related activities start  RAP to be fully implemented (compensation paid and PAPs resettled) prior to commencement of project activities.  Not Applicable
4	Incorporation of site-specific E&S measures in the request for proposals	SO1 & national requirements	All RFPs/ Contracts include E&S requirements and project specific E&S clauses	Prior to procurement for each project

<sup>2</sup> Please add any relevant key actions and/or indicate "Not applicable" in the third column ("Basis for requirement") for actions that are not applicable to the project.

5	Submission of high-risk activity's Contractor ESMP ( <i>C-ESMP</i> ) to Bank clearance	Bank's ESP and OS1	As necessary on Project-by-Project basis, All category 1 (high risk projects) is formally disclosed to the AfDB and undergo enhanced due diligence applying the AfDB OS in line with GIIP.	Before Financial close (FC)
6	Establishment of the Contractor's Grievance Mechanism (GM) and information of workers	OS1, OS2, SO10 and Bank's Disclosure and Access to Information Policy	Grievance mechanism in place; roles/responsibilities and channels defined; workers informed at induction and through regular communication; grievance log maintained and updated; anonymous reporting available with timely resolutions.	Before commencement of site activities for projects and to all InfraCredit contract staff and workers.
7	Obtaining nationally required licenses prior commencement of subjected activities (excavations, tree-cutting, working at height, working in confined spaces, etc.)	OS1, OS2 and national labor laws	All permits or licences or approvals obtained and valid; legal register updated; renewals tracked; no-permit/no-work enforced.	Before commencement of regulated activities; renew/maintain as required
8	Preparation, approval, and disclosure of specific E&S documents during Project implementation, including prior review of Category 1 terms of reference by the Bank	Bank's ESP, OS1 and national requirements	All required instruments (ESIA, ESMP, RAP, etc.) prepared, approved, and disclosed.  Category 1 ToR submitted for prior review/no-objection; commitments integrated into contracts.	As per regulatory schedule and always before related activities start
9	Engagement with concerned stakeholders of each relevant specific E&S activity	OS1, OS10, Bank's Disclosure and Access to Information Policy	Stakeholder Engagement Plan implemented; inclusive consultations, minutes/attendance and	Continuous; intensified before key decisions/works

			action tracker maintained; periodic public updates provided.	
10	Establishment of Emergency Preparedness and Response mechanism	OS1 & OS4, national legislation on contingencies et	Emergency Preparedness Response plan in place, roles/contacts and notification protocols defined; emergency drills conducted and recorded; equipment (first aid, firefighting, spill kits) verified; lessons learned logged.	Before commencement of site activities; reviewed annually and after any incident.
11	Appropriate and timely handling of complaints/grievances	Bank's ESP and OS1	Acknowledgement ≤5 working days; resolution ≤30 working days; escalation protocol applied; quarterly statistics and trends reported.	Throughout implementation
12	Notification to riparian or alert to downstream exposed peoples	Bank's ESP and OS1, applicable International Treaty/Convention ratified	Evidence of notification/consultation with riparian/downstream stakeholders and competent authorities (where applicable).	Before commencement of activities with downstream risk
13	Capacity building of key project implementers	OS1	Annual E&S/OHS training plan approved; % staff trained vs plan; post-training evaluations and refresher records maintained.	Plan approved within 60 days of effectiveness; refresh annually
14	Implementation of ESMS/ESAP <sup>3</sup>	OS1 and OS9, national requirements	ESMS operational; ESAP actions tracked to closure per agreed schedule; quarterly	From effectiveness through operations; ESAP deadlines as agreed

<sup>3</sup> Applies to non-sovereign operations and public sector projects implemented by permanent autonomous Agencies/Institutions.

			progress reports submitted.	
14.1	<i>Approval of any required E&amp;S management procedure</i>	Ditto	SOPs (incident reporting, waste/hazardous materials, traffic, permit-to-work, etc) approved and communicated; staff briefed; compliance evidenced in audits.	Within 60 days of effectiveness
14.2	<i>Establishment of the E&amp;S unit</i>	Ditto	E&S unit staffed and resourced (organogram/TORs approved); reporting line to Project leadership defined.	By effectiveness date
14.3	<i>Capacity Building of the E&amp;S Unit</i>	Ditto	Specialist trainings completed (risk assessment, accident investigation, GBVH, community engagement), mentoring/coaching plan implemented.	Within 90 days of effectiveness; annually thereafter
14.4	<i>Processing the Value Chain E&amp;S due diligence</i>	Ditto	Screening of key suppliers/contractors completed; high-risk vendors assigned corrective actions and timelines; records maintained and re-checked.	Prior to contracting; reviewed annually
15	Suspending works in the event of EOHS risk or incident, immediately notify the Bank, and resume works only upon no-objection of the Bank.	Bank's ESP	Work suspended; immediate containment; notification to the Bank submitted; corrective actions implemented before resumption	Immediately and no later than 72 hours after the occurrence

16	Prepare the root-cause analysis (RCA) of any fatal EOHS incident and implement the Corrective Action Plan (CAP).	Bank's ESP and OS1	Initial alert issued; comprehensive RCA and CAP prepared and approved; CAP actions tracked to closure; lessons learned disseminated; EPR/SOPs updated as needed.	Initial report ≤72 hours; full RCA/CAP within 30 days
17	Disclosure of Project's E&S reports to the public	OS1, OS10, Bank's Disclosure and Access to Information Policy	Public E&S monitoring summaries disclosed, Sustainability reports disclosed, sensitive/personal data redacted, include GRM statistics and actions taken.	Annually