

**Federal Republic of Somalia – Kube Energy Hybrid Solar Photovoltaic Project
Environmental and Social Action Plan (ESAP)– May 12, 2022**

	<i>Action Required</i>	<i>Timeline</i>
<i>No.</i>	<i>PSI Assessment and Management of Environmental & Social Risks and Impacts</i>	
1	Share a copy of the environmental and social impact assessment (ESIA) with the GoSWS.	Prior to signing
2	<p>Using CBE’s Environmental and Social Management System (ESMS), extend the ESMS to the Project and develop associated management plans in line with the requirements of MIGA’s PSs and Somalian and GoSWS regulations, for the construction and operations phase which will be reflected in the Construction and O&M contractor’s ESMS. Plans will include, but not be limited to:</p> <ul style="list-style-type: none"> • Environmental and waste management plan, including pollution prevention plan and water management • Occupational health and safety plan, including the risk assessments and methods statement • Emergency preparedness and response plan • Transport plan • Training plan • E&S monitoring plan • Chance finds procedure which outlines the process to be followed if previously unknown heritage resources, particularly archaeological resources, are encountered during Project-related activities. 	<p>(i) Within 45 days of the Effective Date or prior to commencing construction activities, whichever is earlier.</p> <p>(ii) At least 45 days prior to operations.</p>
3	<p>Designate a qualified health, safety and environment (HSE) Project supervisor who will be field-based and supported by other specialists and management as needed (including the project manager) and who will coordinate with and oversee the construction contractors to ensure that they implement an effective ESMS.</p> <p>Assign HSE responsibilities to field-based staff prior to commencing operations.</p>	<p>Prior to the start of construction</p> <p>Prior to the start of operations</p>
4	Update a stakeholder engagement plan (SEP) to communicate and disclose project-related information to key stakeholders, as well as the establishment of a Grievance Redress Mechanism, and update the SEP when needed.	Within 30 days of the Effective Date

5	Submit a decommissioning and site rehabilitation plan in line with the requirements of the PSs in the event decommissioning occurs before the transfer of ownership to GoSWS.	At least 8 months or as early as possible in the event decommissioning occurs before transfer of ownership to GoSWS
6	Develop the environmental and social management component of the handover strategy (including updated training and capacity building) of the plant to the local government to ensure a smooth transfer of the facilities.	Within 8 months of the transfer to local government
7	In consultation with MIGA, develop an agreed environmental and social performance reporting template which confirms compliance by the Project Enterprise with the Performance Standards, any applicable E&S Management System, the E&S Action Plan, and Applicable E&S Laws; identifies any material non-compliance or failure and the actions being taken to remedy any such deficiency; and sets forth the actions taken by the Project Enterprise to proactively monitor and ensure the compliance of Solar Suppliers with the Project's supplier code of conduct.	Within 30 days of Effective Date
8	In consultation with MIGA, conduct an assessment of potential future flood risks to the Project site. This will include identifying if detailed hydrological studies are required and if the drainage design should be modified to improve flood resilience.	Within 90 days of the Effective Date
<i>PS2 Labor and Working Conditions</i>		
9	Develop and implement a human resources (HR) policy and supporting procedures in line with PS2 requirements.	Within 30 days of the Effective Date
10	Review and revise CBE's code of conduct and environmental, social and governance (ESG) policy to strengthen commitments to protect workers and communities from gender risks; and on responsible procurement to be in line with PS requirements. Integrate modules to training program or awareness activities for improving workers' knowledge of gender risks and prevention tactics.	Prior to signing

11	<p>Develop a project-level grievance mechanism (GM) and communicate to workers including contractors on how to access the GM and lodge a grievance. Include a stream for safe reporting and ethical management of grievances related to reports of workplace sexual harassment into the GM.</p> <p>Integrate a training module to all workers on how to access this grievance mechanism and how it functions.</p> <p>Integrate relevant training to staff who are responsible for managing harassment complaints.</p>	Within 30 days of the Effective Date
12	Develop health and safety guidelines for personnel who are not resident in Baidoa, covering issues such as code of conduct, respectful engagement with communities, accommodation, transport, medical and evacuation procedures, and safety and security protocols, etc.	Within 30 days of the Effective Date
13	Incorporate labor and human resources provision (i.e., in line with the Construction Contract and O&M Contract) into the internal auditing procedures of the Project and contractors.	Within 45 days of the Effective Date
14	For the procurement of main solar panel components and parts, implement a code of conduct that covers suppliers and develop and implement a screening policy and procedures as part of the due diligence process including any potential forced labor and/or child labor in line with the requirements of the Performance Standards.	Prior to Contract Signing
<i>PS4 Community Health, Safety and Security</i>		
15	<p>Develop a security risk assessment of which the findings will be reflected in a security management plan in line with PS4 requirements.</p> <p>Integrate modules (led by a qualified specialist) into existing training program to Project security guards on human rights and gender topics as part of onboarding and refresher trainings.</p>	<p>Within 30 days of the Effective Date</p> <p>Within 45 days of the Effective Date</p> <p>Within 30 days of the Effective Date.</p>