



HEALTH, SAFETY, ENVIRONMENTAL & SOCIAL MANAGEMENT SYSTEM MANUAL

JUNE 2023

Revision History

| Revision Date | Description | Sections Affected | Revised By | Approved By |
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1.0. Terms and Definitions

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| continuous improvement | Recurring process of enhancing the HSES Management System in order to achieve improvements in overall environmental performance consistent with the organisation's environmental policy. |
| corrective action | Action to eliminate the cause of a detected nonconformity. |
| HSES Committee | A committee chaired by the COO and lead by HSES manager that meets regularly to monitor and assess the HSES Management System, Policy, Procedures and Impact, with a focus on promptly carrying out corrective actions to rectify any nonconformities and on continuous improvement and implementation of preventative actions. |
| HSES Impact | Any change to the environment, whether adverse or beneficial, wholly or partially resulting from Health, Safety, Environmental and Social risks. |
| HSES Management System | PowerGen's HSES management system used to manage Health, Safety, Environmental and Social risks, including but not limited to this manual and to the HSES Policy and HSES Procedures, as the context requires. |
| HSES Performance | Measurable results of an organisation's management of its Health, Safety, Environmental and Social risks. |
| HSES Policy | Overall intentions and directions of PowerGen's HSES Performance, as formally adopted by Top Management. |
| HSES Procedures or HSESPs | The specified policies, standards and directives list in Appendix A. |
| nonconformity | Non-fulfilment of a requirement under the HSES Policy. |
| PowerGen or the organisation | PowerGen Renewable Energy as a holistic organisation, including all subsidiaries, as the context requires |
| preventive action | Action to eliminate the cause of a potential nonconformity with the HSES Management System. |
| Top Management | Refers to leaders who have highest hierarchy positions. In this document perceived as CEO and COO of PowerGen. |
| HSES Record | Document stating results achieved or providing evidence of activities performed. |

1.1 Company Profile

PowerGen Renewable Energy (hereafter referred to as PowerGen) is one of the leading electricity minigrid developers in sub-Saharan Africa, having successfully installed over 100+ minigrids within the region. The company is based in Kenya, Nigeria, Sierra Leone and Democratic Republic of Congo with 100+ employees. PowerGen deals mainly with solar energy (solar photovoltaics) powered minigrid systems with installation capacity up to 5MW in rural, peri-urban and urban areas. Their current portfolio ranges between 3kW and 5MW system installations. PowerGen carries out all project development activities in-house under a private utility owner-operator model but contracts certain components of the development process, depending on the scope and location of the project. Development activities range from site identification and screening, to surveying, system design, procurement, construction, installation, operation & maintenance (O&M), and customer service.

1.2 Purpose of this Manual

This manual sets out the Health, Safety, Environmental and Social (HSES) Management System of PowerGen's activities and contains:

- a) The HSES Commitment and Policy;
- b) Statements of responsibility and authority;
- c) An overview of the company's HSES Procedures;
- d) The identification of the resources and training allocated to management, performance of work and verification activities including but not limited to internal audit;
- e) The appointment of the HSES Manager and supporting personnel; and
- f) The arrangement for periodic HSES performance reviews.

2.0 HSES Policy



Health, Safety, Environment & Social (HSES) Commitment and Policy

Company Commitment

PowerGen is committed to conducting business operations in a responsible and sustainable manner. We recognize the importance of addressing health, safety, environmental and social (HSES) issues and their impact on our stakeholders, including our employees, customers, communities, investors, and shareholders. This means integrating HSES considerations into our decision-making processes, operations, and corporate culture and continuously reviewing and improving our HSES performance through the policy framework outlined below:

Compliance with Legal and Regulatory Requirements

We are dedicated to complying with all applicable health, safety, social and environmental laws, regulations, and standards in every aspect of our business operations. We actively monitor and assess our compliance status and take appropriate corrective actions to ensure ongoing adherence.

Health and Safety

We provide a safe and healthy working environment for all our employees, contractors, and visitors. We identify and assess workplace hazards and implement appropriate controls to prevent incidents. We mandate HSES Procedures, regular training, and development programs to enhance employee awareness and competency.

Environmental Sustainability

As a renewable energy company, we are committed to minimizing our environmental footprint and promoting sustainable practices. We strive to minimize waste generation, conserve resources, reduce greenhouse gas emissions, and promote the use of renewable energy sources throughout our operations.

Stakeholder Engagement

We actively engage and communicate with our stakeholders, including employees, contractors, customers, regulatory bodies, investors, and the local communities in which we operate. We seek their input, address their concerns, and collaborate to promote health, safety, environmental sustainability, and social responsibility.

Transparency and Reporting

We maintain transparent reporting mechanisms to communicate our HSES performance, goals, and achievements to our stakeholders. We set targets for performance goals, and we strive for open dialogue, sharing information, and promoting accountability.

By adhering to this HSES policy, we aim to fulfill our commitment to protecting people and the environment and to promoting sustainability in all our activities.



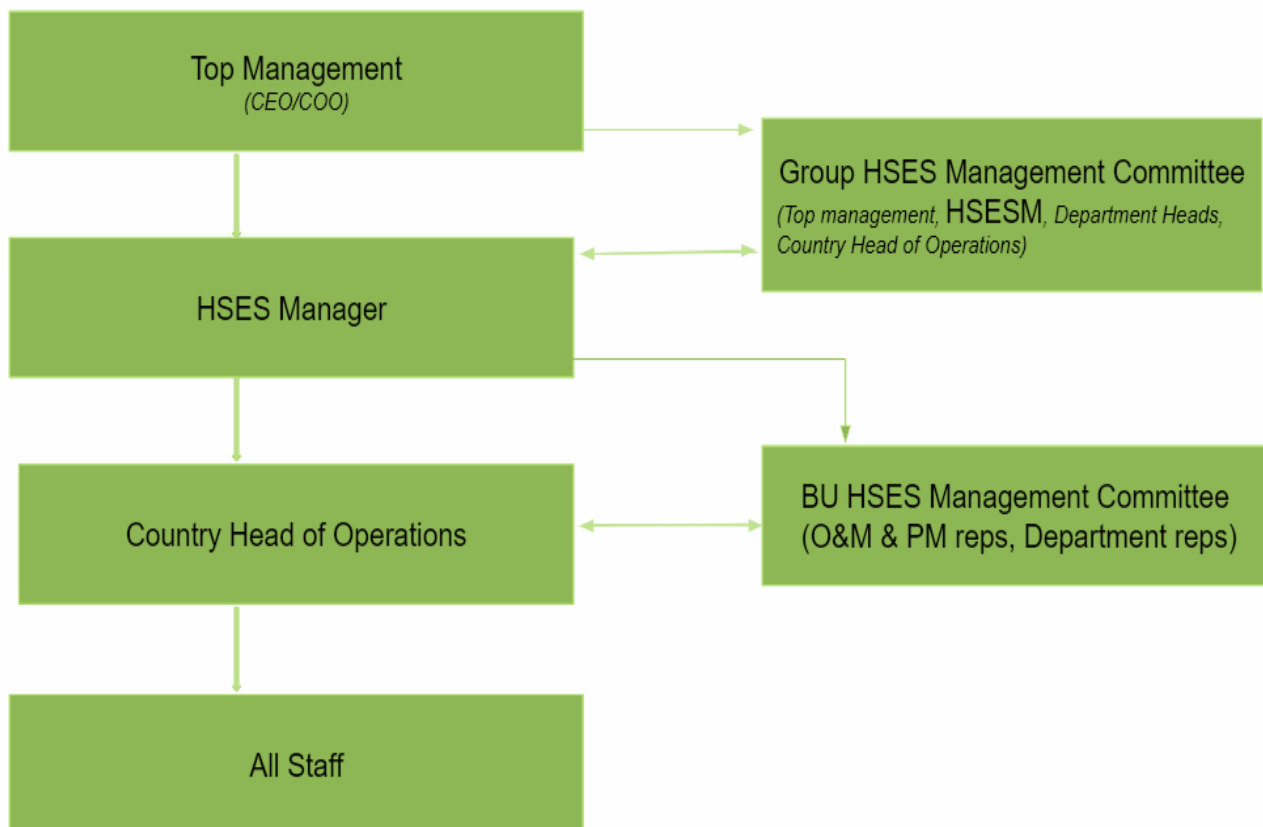
Aaron Cheng, CEO
June 27, 2023

2.1 Organization Chart

PowerGen has an organisation chart that covers all business functions. It is available on request.

2.2 HSES Organisational Structure

The company has in place a simple HSES organisational structure (see below) to ensure the management system is implemented throughout all operations project sites.



2.2.1 Top Management

Top Management is responsible for:

- Endorsing the HSES Policy;
- Ensuring appropriate resource allocation to enable the effective operation and continuous improvement of the HSES Management System.

2.2.2 Group HSES Management Oversight Committee

The HSES Committee regularly and systematically examines the HSES Management

System to ensure its suitability, adequacy and effectiveness. The HSES Committee shall be composed of executive, HSES personnel, senior leadership, and other key employee representatives.

The HSES Committee shall provide HSES guidance and ensure compliance to various requirements in all markets, visibility/ reporting of HSES Impacts, achievement of milestones, and continuous improvement of systems.

The HSES Committee shall meet at least once every quarter to discuss critical HSES matters and will be chaired by the COO.

2.2.3 HSES personnel

The appointed HSES personnel has the responsibility and authority for:

- a) Ensuring that HSES requirements are established, implemented and maintained;
- b) Regularly reviewing the HSES Policy and Procedures for effectiveness and ensuring that the necessary changes are made;
- c) Leading the HSES Committee to establish and implement the HSES Policies and Procedures and monitoring performance and HSES Impacts;
- d) Reporting on HSES Performance to the Senior Management Representative (SMR) for review and as a basis for continuous improvement of HSES.

The HSES personnel, the SMR, and the HSES Committee shall undertake an HSES management review annually to ensure commitment, integration of the HSES Policy with business strategies, and continuous improvements are being met.

2.2.4 Country Head of Operations

The Country Manager who is appointed has the responsibility and authority for:

- a) assisting the HSES manager to ensure the HSES Management System is effectively implemented and maintained;
- b) assuming the responsibility and action of the HSES manager when the HSES manager is unavailable.

2.2.5 Business Unit (BU) HSES Committee

Each BU will maintain a subcommittee dedicated to the HSES Management System. BU's HSES Committee will comprise of the following individuals:

- i. Country Head of Operations

- ii. A representative from the Installations team
- iii. A representative from the Customer team
- iv. A representative from the O&M team
- v. Senior Management Representative

This committee is responsible for:

- a) the establishment and implementation of the HSES Management System;
- b) the establishment and review of BU HSES Performance;
- c) the internal communication of environmental matters between BU management and employees;
- d) promoting environmental awareness among BU staff (including but not limited to full time employees, vendors and contractors);
- e) the review of complaint records, nonconformity, corrective action and preventive action reports and the adoption of preventive actions as necessary; and
- f) any other HSES activities that are assigned by the HSES manager.

2.2.6. All Employees

All employees are responsible for:

- a) working in accordance with the documented HSES Policy and Procedures; and
- b) reporting problems or nonconformities associated with HSES issues and the HSES Management System to their respective manager and/or the HSES Committee.

3.0 Legal/ Regulatory Framework

This manual includes by reference the below standards, and all PowerGen employees, vendors, contractors, partners, agents, representatives and advisors are responsible for adhering to applicable law and may be updated from time to time.

- IFC Performance Standards (PS) for Environmental and Social Sustainability, 2012
- OPIC Environmental and Social Policy Statement, 2010
- The United Nations Sustainable Development Goals (SDGs), 2015
- The International Labour Organization Labour & Human Rights Standards
- The Occupational Health & Safety Act of Kenya 2007
- The Environmental Management & Coordination Act of Kenya 1999
- United Nations Paris Agreement (2015) External on Climate Change
- NEMSA Electrical Safety Standards and Regulations
- The African Development Bank Environmental & Social Standards

- (others provided for by PowerGen legal and and country business units)

4.0. HSES Management System Requirements and Procedures

PowerGen's HSES Management System is developed to manage HSES risks in order to limit the impact on the environment and communities. Procedures for each component are given in the relevant HSES Procedures (HSESPs) listed in Appendix A.

5.0 HSES Management System Documents

The purposes of these HSES Management System documents are as follows:

| | |
|---------------------------------|---|
| HSES Policy | Describes the intention and principles to be adopted in relation to HSES Performance, including but not limited to compliance with legal and regulatory requirements, health and safety, environmental sustainability, stakeholder engagement and transparency and reporting. |
| HSES Procedures (HSESPs) | Defines the roles, responsibilities, and actions to be taken to ensure that activities are performed in compliance with HSES Policy, and the HSES Management System is implemented in accordance with its terms. |
| HSES Records | Information maintained for audit and compliance purposes, as well as for the assessment of HSES Impact and performance. |

6.0. HSES Objectives

PowerGen's HSES Policy is included in Section 2. It outlines the company's commitments with respect to its operations, activities, and overall social and environmental performance. During the development of this policy, the nature, scale and environmental impacts of PowerGen's activities were considered. The directives set forth in this Section 7 supplement and expand upon the HSES Policy standards.

6.1. Establishing Objectives

Based on the HSES Policy and consideration of HSES risks, HSES compliance objectives shall be established, implemented and maintained at each function and level within PowerGen in accordance with regular review of key performance indicators and established objectives.

When establishing and reviewing its objectives, PowerGen shall take into consideration the legal and other requirements, significant environmental risks, technological options, financial/operational/business requirements, and the views of interested parties, and ensure that the objectives are consistent with the environmental policy, including commitment to pollution prevention, to compliance with applicable law and other requirements, and to continuous improvement.

Top Management shall approve the objectives proposed by the HSES Committee before implementation. The HSES manager shall also maintain previous objectives, targets and programmes as HSES records for three years.

6.2 Resources, Roles, Responsibility and Authority

Top Management shall commit to provide resources (such as human resources with specialised skills, organisational infrastructure, technological and financial resources) essential to the implementation and control of the HSES Management System. The roles, responsibilities and authorities of key personnel shall be defined, documented, and communicated in order to facilitate effective HSES management.

PowerGen shall maintain an HSES Committee chaired by the COO that oversees effectiveness of the HSES Management System. PowerGen shall also employ HSES personnel, including an HSES Manager, who work closely with all department heads to ensure smooth implementation and maintenance of the HSES Management System. The responsibilities of such personnel are described in Section 3 of this manual.

6.3 Competence, Training and Awareness

PowerGen shall ensure all persons performing tasks for the company or on its behalf, whose work may have a significant impact on the environment, are competent on the basis of appropriate education, training and/or experience, and shall retain associated records.

PowerGen will need to ensure that all people performing tasks for or on behalf of the organisation, including but not limited to contractors, sub-contractors, temporary staff and remote workers, have had an appropriate assessment of their potential to cause a significant HSES Impact and the associated competence required to maintain HSES Policy.

PowerGen shall establish, implement and maintain procedures to identify the training needs associated with its HSES risks and its HSES Management System, and develop programs to ensure awareness and competence, at each relevant function and level, by addressing:

- the roles and responsibilities in achieving conformity with the HSES Management

System;

- the importance of conformity with the HSES Policy, the procedures and the requirements of the structured HSES Management System;
- the significant HSES risks and related actual or potential impacts associated from their work activities and the environmental benefits of improved personal performance;
- the potential consequences of departure from specified operating procedures;

6.4 Documentation

The HSES Management System documentation encompasses three levels as described below:

- (1) *HSES Management System Manual* (this document), which includes PowerGen's HSES Policy (specifying the principal objectives and HSES commitments of PowerGen) and objectives. It demonstrates the company's HSES commitment to continuous improvement in HSES Performance.
- (2) *HSESPs*, which include all procedures that PowerGen shall follow. These procedures provide a description of the HSES Management System elements and define who should do what, how and when.
- (3) *HSES Records*, which arise from the implementation of this HSES Management System Manual.

6.5 Operational Control

PowerGen shall establish, implement and maintain operational control procedures to manage its significant HSES risks.

PowerGen shall ensure that all operations and activities, carried out by PowerGen's employees or contractors/suppliers that are associated with significant risks are properly controlled, and that appropriate operational control procedures, in terms of HSESPs are communicated to personnel whose tasks may result in significant HSES risks. PowerGen shall influence its staff and contractors by communicating its HSES Policy and other relevant HSESPs and/or HSES Impacts to them.

6.6. Review

While implementing the HSES Management System, PowerGen shall monitor and measure the key characteristics of its operations and activities on a regular basis. These results shall be recorded together with any nonconformity, corrective action and preventive action. As part of the review process, a periodic audit on the HSES

Management System shall provide a basis for management review.

6.7 Nonconformity, Corrective Action and Preventive Action

Continuous improvement of the HSES Management System can be achieved by identifying nonconformities, correcting nonconformities, and taking preventative actions to stop nonconformities from occurring and/or reoccurring. Regarding any nonconformity and its subsequent corrective / preventive action, PowerGen shall establish, implement and maintain a procedure which defines the responsibility and authority to:

- handle and investigate such nonconformity;
- take action to mitigate the impacts caused;
- initiate and complete corrective and preventive actions;
- ensure that the corrective or preventive actions taken to eliminate the causes of such actual and/or potential nonconformity are appropriate to the magnitude of problems and commensurate with the HSES Impacts encountered;
- record the results of corrective and/or preventive actions taken;
- review the effectiveness of such corrective and/or preventive action(s) taken;
- implement and record any changes in the documented procedures resulting from such corrective and/or preventive action(s); and
- ensure that any necessary changes are made to HSES Management System documentation.

6.8 ESIA & ESMP

PowerGen is committed to conducting Environmental and Social Impact Assessments (ESIA) and developing Environmental and Social Management Plans (ESMP) for all projects before they commence as one of the important steps in ensuring responsible and sustainable project development.

The ESIAs are conducted as per IFC standards and country regulations. Through the assessments PowerGen determines the potential environmental and social impacts of proposed projects. This includes identifying and evaluating the likely effects on natural resources, ecosystems, communities, and other stakeholders. The ESIA helps understand the potential risks and opportunities associated with projects and the team can make informed decisions regarding project design, mitigation measures, and monitoring plans.

Based on the findings of the ESIA, PowerGen develops an ESMP. This plan outlines the specific measures and actions that will be implemented to avoid, mitigate, or manage

identified environmental and social impacts. The ESMP typically includes strategies for environmental protection, community engagement, stakeholder consultation, health and safety measures, and monitoring and reporting procedures.

6.9 Occupational Health and Safety

PowerGen shall provide a safe and healthy work environment, taking into account inherent risks in its particular sector and specific classes of hazards in PowerGen's work areas, including physical, chemical, biological, and radiological hazards, and specific threats to women. PowerGen shall take steps to prevent accidents, injury, and disease arising from, associated with, or occurring in the course of work by minimising, as far as reasonably practicable, the causes of hazards in a manner consistent with prudent industry practice. This is done through:

- identification of potential hazards to workers, particularly those that may be life-threatening;
- provision of preventive and protective measures, including modification, substitution, or elimination of hazardous conditions or substances;
- training of workers;
- documentation and reporting of occupational accidents, diseases, and incidents; and
- emergency prevention, preparedness, and response arrangements.

6.10 Emergency Preparedness and Response

Procedures to clearly define the action to be taken in the event of an emergency or potential emergency shall be carried out in accordance with the HSES Emergency Preparedness and Response Plan (as listed in Appendix A). The emergency procedures shall be regularly reviewed and updated. All visitors and suppliers arriving on sites and offices shall be instructed on the emergency arrangements prior to being allowed on site. Practice drills for particular emergency situations, including rescue operations shall be undertaken.

Each site's emergency and evacuation plan shall include a list of nearest hospitals and their contacts, procedures for reaching the hospital(s), police, fire and other relevant emergency response providers hotline telephone numbers, and a map of itinerary.

Potential emergencies may include (but are not necessarily be limited to): fire, security attacks, thunderstorm, personal injury from an animal or snake bite, personal emergencies, fall from height, electrocution, failure of temporary or permanent works, collapse of excavations/towers and gantries, invasion of site due to protest action, earthquake, bomb threats and asphyxiation, violent robbery, terrorism, armed or other regional conflict and other disasters.

Arrangements shall be made for emergency medical treatment and evacuation of any victim in the event of an accident or dangerous incident occurring, and the chain of command and the responsible persons with their telephone numbers for quick communication shall be adequately publicised and conspicuously displayed in the workplace.

6.11 Infectious and Communicable Diseases Control and Prevention

PowerGen will take proactive measures and guidelines to control and prevent the spread of infectious and communicable diseases at its workplaces. The organisation aims to protect the health/ well-being of the workforce and maintain a productive work environment.

In this context infectious/ communicable diseases refers to any illness that can be transmitted through direct or indirect contact, including but not limited to respiratory infections, gastrointestinal illnesses, and bloodborne pathogens. These include Cholera, HIV/ AIDs, Covid 19, Tuberculosis among others.

PowerGen Management shall ensure compliance with local, state, and other relevant regulations regarding infectious and communicable disease control and prevention. Some of the measures that may be put in place may include travel restrictions & guidelines, vaccinations, hygiene practices, cleaning and sanitation, physical distancing, personal protective equipment and a clear system of reporting.

The risk of infectious and communicable diseases shall be part of Environmental Social and Impact Assessments (ESIA) for projects and appropriate mitigation measures identified. Mitigation shall include disseminating such information during project implementation. All contractors will be expected to disseminate information to the workers as part of their daily briefings. Other interventions shall be risk and case-specific, for example in controlling spread of HIV/AIDs the organisation shall provide appropriate support for the infected and affected workers and promote a progressive and non-discriminatory working environment, that is free of stigma and respects individual human rights.

6.12. Labour and Work Conditions

PowerGen has established a Labour and Working Conditions Policy that aims to establish worker-management relationships by treating the workers fairly and providing them with safe and healthy working conditions. The objectives of the policy are:

- a) To promote the fair treatment, non-discrimination, and equal opportunity of workers.
- b) To establish, maintain, and improve the worker-management relationship.

- c) To promote compliance with national employment and labour laws.
- d) To protect workers, including vulnerable categories of workers such as children, migrant workers, workers engaged by third parties, and workers in PowerGen's supply chain.
- e) To promote safe and healthy working conditions, and the health of workers.
- f) To avoid the use of forced labour.

Equal opportunity shall be the guiding principle for all employment opportunities at PowerGen. This also addresses working conditions, terms of employment, retrenchment, grievance mechanism, workers' accommodation and occupational health and safety (OHS) issues. PowerGen shall implement mechanisms to ensure workers are protected including vulnerable categories of workers such as children, migrant workers, workers engaged by third parties, and workers in PowerGen's supply chain. PowerGen will not employ child labour or forced labour.

PowerGen also extends its Labour & Working Conditions Policy to all suppliers, contractors and third-party service providers.

6.13. Contractors/ Suppliers HSES Management

PowerGen has established and will maintain a guidance manual for all operations undertaken by vendors, contractors and subcontractors on PowerGen sites and premises. The organisation endeavours to achieve high social, safety and health standards in its business operations and the protection of the physical environment. To achieve this, prior to commencing work on the applicable premises, contractors and subcontractors must know their duties and understand their obligations regarding safe practices for themselves, others and the regulations covering the type of work they will be carrying out.

As part of the request for proposal (RFP) process, PowerGen provides to all third-party vendors with the Contractor HSES Management Manual (as noted in Appendix A), and the PowerGen supply chain team will carry out due diligence on such vendors to ensure their practices align with the with HSES Policy and Procedures.

During project execution there shall be inspections and audits to monitor adherence to contract terms and conditions as well as additional guidance.

There shall be a post-job HSES evaluation process, depending on demonstrated performance, contractors will either remain on the approved contractor pre-qualification list or will not be considered for future work at PowerGen.

6.14. Grievance Redress Mechanism

PowerGen is committed to providing a transparent, accessible, and effective mechanism for internal and external stakeholders to express their grievances and seek redress for any issues they may have with its organisation.

PowerGen will ensure that employees, local communities, and other stakeholders are engaged and informed with meaningful information regarding operations of the organisation that directly or indirectly influence their wellbeing and work. The organisation shall set up a grievance redress procedure that describes the approach for handling enquiries and grievances regarding PowerGen's HSES Performance and addressing deviations from the requirements of PowerGen's HSES Management System to ensure a systematic process is developed to identify and address nonconformities.

The organisation has a grievance procedure that provides both internal and external mechanisms for submitting notices, comments and/or complaints via an accessible online platform where PowerGen Global Help form can be accessed. This form provides provisions for reporting both internal and external to reports regarding suspicion, concern or knowledge of any compliance issue. Reporting and addressing suspected violations of the law or the PowerGen Business Principles (PGBP) is of critical importance in protecting the PowerGen reputation and brand value.

Grievance redress principles:

1. **Accessibility:** The grievance redress mechanism shall be accessible to all individuals, irrespective of their location, gender, age, or any other factor.
2. **Confidentiality:** The company will maintain confidentiality throughout the grievance redress process, and the information shared by the grievant will be kept confidential unless disclosure is required by law.
3. **Timeliness:** The company will strive to resolve grievances within a reasonable timeframe, and the grievance redress mechanism shall be designed to ensure prompt and timely resolution.
4. **Impartiality:** The company will ensure that the grievance redress mechanism is impartial, and decisions will be taken based on merit and evidence.
5. **Transparency:** The grievance redress mechanism shall be transparent, and all parties involved in the process shall be informed of the status of the grievance at each stage of the process.

PowerGen management will continuously monitor and evaluate the effectiveness of the grievance redress mechanism and make necessary improvements to ensure efficiency.

6.15 Security Risk Management

PowerGen recognizes that security risk analysis is a critical aspect of its operations and is committed to ensure risk management, the safety and security of personnel, stakeholders, and assets. PowerGen will complete a security risk assessment for each new project. A tailored security plan will be made for high risk areas, otherwise PowerGen's default protocol will apply.

1. Identification of the security risks: The company shall identify the security risks that may arise during its operations and projects' lifecycle. This may include civil unrest, kidnapping, gender-based violence, sexual exploitation and abuse, sexual harassment (SEAH) risks, riots, mob violence, etc. The assessment shall ensure all potential significant threats and vulnerabilities are identified.
2. Implementation of risk management plan: Based on trends and anticipated risks, a risk management plan shall be developed to address identified security risks. The risk mitigation measures shall also be captured in operations risk assessments. The plan should include mitigation measures, response procedures, and protocols for reporting and monitoring security incidents. The organisation shall also establish comprehensive policies on gender equality, SEAH and violence. The policies shall detail the handling procedures in the event of occurrence.
3. Integration of security measures into the HSES Management System: This includes integrating security protocols into the project's policies, procedures, and training programs. The HSES Management System shall also include a monitoring and evaluation framework to assess the effectiveness of security measures.
4. Engagement with stakeholders: PowerGen shall engage with relevant stakeholders, including local communities and security agencies, to ensure that security risks are understood and managed appropriately. This includes conducting awareness-raising campaigns and developing community-based initiatives.
5. Implementation and continuous improvement: Risk management plans shall be reviewed and updated regularly to ensure that it remains relevant and effective in addressing security risks. This includes conducting periodic security risk assessments and monitoring security incidents.

To effectively combat the identified threats, security will be proactive, rather than reactive. Clearly written procedures for identified threats shall be required. The provision of effective proactive security shall cover a variety of subjects and may include: crisis management, personal security and communications.

6.16. Stakeholders Consultation and Engagement

Stakeholder consultation and participation are critical components of effective health, safety, environmental and social management systems. PowerGen shall consult and involve

stakeholders in the development, implementation, and monitoring of our HSES Management System on a project-by-project basis.

PowerGen shall follow the below principles for stakeholder consultation and participation:

- Engagement with stakeholders will be timely, meaningful, and transparent.
- Consultation will be conducted in an appropriate language, accessible to all stakeholders, and with due consideration of cultural, social, and gender-specific norms.
- Stakeholders will be provided with relevant information and opportunities to express their views and concerns.
- The outcomes of stakeholder consultations will be considered in decision-making processes.
- Stakeholder feedback will be acknowledged and addressed in a timely and appropriate manner.
- Our organisation will respect the rights of stakeholders, including the right to privacy, confidentiality, and non-discrimination.

The consultation process will be tailored to the specific needs and expectations of the stakeholders, the nature and scale of the operation/ project, and the relevant legal and regulatory requirements.

The table below highlights the types of stakeholders involved at each stage of engagement:

| Type of Stakeholder | Stage of Engagement | Team Responsible | Engagement Method | Engagement Reasons |
|---|--------------------------------|---|-------------------|---|
| Relevant Regulatory Authorities & Government Officers | Permit & Information Gathering | Commercial Development & Customer Teams | Physical meetings | To get relevant permits & gather information about sites |
| Community Leaders & Customers | Onsite Surveys | Customer Team | Physical meetings | To introduce the project & conduct site, customer and technical surveys |
| Community | Customer | Customer & | Physical | To conduct |

| | | | | |
|---------------------|---------------------|--------------------------|--|---|
| Leaders & Customers | Acquisition | Project Management Teams | meetings | customer sign up & training |
| Customers | Customer Management | Customer and O&M Teams | Phone calls, SMS and through local agents & onsite technicians | To communicate issues/feedback and resolve minor technical issues |
| Customers | Customer Engagement | Customer and O&M Teams | Physical meetings | To resolve major technical issues and engage/gather feedback from customers |

7.0 Land Acquisition

PowerGen shall ensure land acquisition is conducted ethically, legally, and in a socially and environmentally responsible manner. Currently land is leased from the community through a process that entails community engagement and agreement signing.

In future projects where the organisation may consider purchasing land the following principles shall be followed;

- **Needs Assessment:** A thorough needs assessment shall be conducted to identify the specific land requirements for its operations, projects, or programs.
- **Stakeholder Engagement:** PowerGen will engage with relevant stakeholders, including local communities, indigenous peoples, and other affected parties, to ensure their meaningful participation in the land acquisition process.
- **Due Diligence:** PowerGen shall conduct due diligence to assess the legal status of the land, including land ownership, land rights, and any potential conflicts or competing claims
- **Negotiation and Agreement:** The organisation will strive to reach mutually beneficial agreements that address the concerns and needs of all parties involved.
- **Compensation and Resettlement.** If land acquisition involves the displacement of local communities or individuals, the organisation will ensure fair compensation for their land, assets, and livelihoods.
- **Documentation and Reporting:** PowerGen shall maintain comprehensive records and documentation related to land acquisition, including agreements, compensation packages, and grievance resolutions.

8.0 Control of Records

Records shall be maintained to keep track of PowerGen's HSES Performance, to demonstrate conformity to the requirements of the HSES Management System, legal compliance and the results achieved. Records shall be maintained for three years.

9.0. Management Review

Top Management shall review the HSES Management System periodically to ensure its suitability, adequacy and effectiveness.

This review shall be spearheaded by the group HSES Committee. The committee shall comprise of key senior leadership team members and executives. The committee shall be chaired by COO and meet periodically as outlined in Section 2.2.2. The review shall be conducted at least once every year.

Appendix A: HSES Procedures and Standards

(Procedures access [link](#) (internal access only))

- EP-01 Identification of HSES Risks
- EP-02 HSES Training Procedure
- EP-03 HSES Emergency Preparedness and Response
- EP-04 Environmental Monitoring and Evaluation of Compliance
- EP-05 Enquiry Grievance Nonconformity Handling
- EP-06 Control of Records
- EP-07 HSES Commitment and Policy
- EP-08 Labour Policy
- EP-09 Contractor HSES Management Manual
- EP-10 Accident Reporting/ Investigation Procedure
- EP-11 PPEs Policy
- EP-12 HSES Committee Manual
- EP-13 Health & Safety Plan
- Whistle blowing policy: [Global Helpline Form](#)