

#	Issue & Task (Description of the requirement to be met by the project proponent)	Indication of Completion (Objective evidence to be supplied by project proponent to IFC)	Required Completion Date (Calendar date, condition of disbursement ETG.)
Integrated Management Systems			
1	<u>Integrated Management Systems:</u> Develop and implement a robust and auditable management system to assess, mitigate, monitor, record and report environmental, health and safety, social and supply chain issues in all the country operations. The system will include: (i) <u>Conduct Gap Analysis between requirements of an Integrated Management System and current operations.</u> Using a professionally qualified professional or consulting firm, conduct a gap analysis of existing operations considering the requirements of the management system. Define the specific activities that must be undertaken to achieve implementation and timetable for completion of the required tasks. This plan will include: responsibility and human resources, budget, timeline and roll out program and training (ii) <u>Implement an Integrated Management System.</u> Implement integrated program for all operations. Present internal audit report against internationally recognized management systems (e.g. ISO14001, OHSAS 18001). This report will include corrective measures, resources, budget and timeline.	(i) Submit the gap analysis report (e.g. ISO 9001-2000, OHSAS 18001, et al) to IFC including appropriate staffing, budgeting, management endorsement, vision and mission statements and associated documentation is in place to implement integrated management system. (ii) Submit adequate evidence to IFC that system implementation is complete. Provide copies of internal audit report to IFC for review and comment.	(i) Within 6 months after loan signature. (ii) 18 months after loan signature.
2	<u>Occupational Health & Safety:</u>	(i) Submit OHS recording and monitoring	(i) Within 3 months after loan signature.

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	As part of the integrated management system described above, develop and implement occupational health and safety recording and monitoring program for all ETG operations. The occupational health and safety system should include but not be limited to procedures on; • improved and better management of ambient working conditions • incident reporting and recording, • incident and accident investigations, • lifting of bags.¹	program to IFC for review and comment. Provide copies of procedures. (ii) Submit clear and comprehensive implementation plan that includes; • responsibility and human resources, • budget, • timeline and roll out program and training (iii) Implementation of system as presented in the implementation plan.	(ii) Within 6 months after loan signature. (iii) 18 months after loan signature.
3	<u>Occupational Health & Safety:</u> Develop procedures for the following: • safety procedures with regards to traffic movement within warehouses including the development of walkways that are separated from the drive ways where necessary, • speed limits and signs within the warehouses • housekeeping procedures The procedures defined above are to be applied to all trading and processing facilities	(i) Provide copies of procedures to IFC for review and comment.	(i) Within 6 months after loan signature.
4	<u>Occupational Health & Safety:</u> Develop and implement procedures for transportation fleet safety management (including on sub-contractors). This will include procedures on;	(i) Provide copies of procedures to IFC for review and comment. (ii) Provide contractual agreements produced	(i) Within 6 months after loan signature. (ii) Within 12 months after loan signature.

¹ For the most part, the work involves offloading and loading of bags of commodities and/or fertilizer

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	- record maintenance on all fleet and the total number of mileage covered with or without incidents - incidents related to commodities transfer, and - speed limits to be adhered to during ETG commodities transfer including measures to be taken for deviation from these limits		
5	<u>Community Health & Safety:</u> Develop and implement a system to review, record and monitor incidents and accidents associated with the transportation of agricultural commodities².	(i) Submit recording and monitoring program to IFC for review and comment. Provide copies of procedures. (ii) Submit clear and comprehensive implementation plan that includes; - responsibility and human resources, - budget, - timeline and roll out program and training (iii) Implementation of system as presented in the implementation plan.	(i) Within 3 months after loan signature. (ii) Within 6 months after loan signature. (iii) 18 months after loan signature.
6	<u>Supply Chain:</u> As part of the management systems develop and implement procedures to ensure compliance of suppliers with IFC PS1, PS2 and PS6. These procedures will include: Mapping the supply chain: develop and implement written procedures for the buying centers, including recording, and tracking of all individual farmers, their	(i) Submit procedures to IFC for review and comment. Provide copies of procedures. (ii) Submit clear and comprehensive implementation plan that includes; - responsibility and human resources, - budget, - timeline and roll out program and training (iii) Implementation of system as presented in the implementation plan.	(i) Within 6 months after loan signature. (ii) Within 9 months after loan signature. (iii) 18 months after loan signature.

² Reporting system to be linked to the ongoing information management system development

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	produce, area of sourcing and quantities. • Risk assessment of the supply chain: develop a risk assessment tool to screen potential high risk areas/region/countries for sourcing. Develop and implement written procedures to identify harmful child labor, forced labor, misuse of pesticides and fertilizers, land disputes and biodiversity issues related to farmer encroachment into protected areas or areas of high biodiversity. • Agreement with farmers: include provisions into agreements with farmers to ensure no child labor, no forced labor, and no issues related to biodiversity or land disputes. • Monitoring of supply chain: develop a system to monitor impacts, risks and issues in the supply chain.		
7	Include requirement for compliance with system developed above in General Conditions of Agreement as a basis upon which performance is evaluated for the country and site managers plus all contractors involved in the supply chain.	• Submission of text to be included in General Conditions of Agreement.	• 18 months after loan signature.
8	<u>Appoint an Environmental & Social Manager:</u> This manager will have direct line of communication and reporting to senior management. Train and install professionals at each plant to manage environmental, health and safety and social aspects of their operations. Ensure close coordination with	• Submit adequate evidence to IFC that an adequate plan and appropriate staffing, budgeting, management endorsement, vision and mission statements and associated documentation are in place to institutionalize the functions of the department.	• Condition of first disbursement

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	safety coordinators in each operation, and undertake all activities required to implement environmental, health and safety and social policy at all levels of operations, and ensure compliance with host country environmental regulatory and IFC guideline limits.		
Labor and working conditions			
9	<u>Revise Human Resources Policy/Procedures:</u> Modify existing procedures to fully comply with the requirements of IFC's Performance Standard 2: Labor and Working Conditions Develop. This policy needs to be communicated and displayed in clearly visible and accessible areas at all sites.	Provide copy of new and/or revised procedures demonstrating full transparency in accordance with PS2 to IFC for review and comment.	Condition of first disbursement
10	<u>Revise Occupational Health & Safety Policy/Procedures:</u> Modify existing procedures to fully comply with the requirements of IFC's Performance Standard 2: Labor and Working Conditions Develop. This policy needs to be communicated and displayed in clearly visible and accessible areas at all sites.	Present to IFC an Occupational Health & Safety policy for review and comment.	Condition of first disbursement
Pollution Prevention and Abatement			
11	<u>Pesticide Management Plan:</u> Develop a Pesticide Management Plan (PMP) in line with IFC guidelines on crop production and WHO pesticide classification system to ensure that pesticides sold and used comply with international requirements which may include host country	Submit PMP to IFC for review and comment. The plan will include procedures, appropriate staffing, budgeting, management endorsement, vision and mission statements and associated documentation.	3 months after loan signature.

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	commitments. Where necessary purchased phase out plan should be added.		
12	<u>Life and Fire Safety:</u> Improve fire life safety at all operations and emergency response plans. (i) Perform an audit of all operations using IFC EHS Guidelines as reference. Audit report will include corrective measures, responsible people, budgeting, and timeline. (ii) Develop and implement an emergency response plan for all operation.	(i) Submit audit report to IFC for review and comment. (ii) Submit to IFC emergency response plan and implementation schedule for review and comment.	(i) 6 months after loan signature. (ii) 6 months after loan signature.
Land acquisition and development			
13	Develop and implement a land acquisition procedure in compliance with the requirements set under PS 5: Land acquisition and involuntary resettlement.	Submit procedure to IFC for review and comment.	Condition of first disbursement
14	Closely monitor and report on the Mpongwe “squatters” issue development and resolution and putting in place a contingency plan for helping to provide a solution should the court course be resolved	(i) Prepare contingency plan. (ii) Include issue in annual monitoring reports.	(i) Within 3 months of loan signature. (ii) Every year
Grievance mechanism at company and subsidiaries			
15	- ETG will develop a formal system to deal with external queries, concerns, and grievances for its operations in the countries they operate. - ETG will also formalize and implement such a procedure for all its operations.	- Provide IFC with a copy of the written procedure for review and comment. - Provide IFC with evidence of implementation. - Report on grievances	2 months after loan signature 3 months after loan signature - In the annual monitoring report (AMR)