

CONTOURGLOBAL/KIVUWATT

SUPPLEMENTAL ENVIRONMENTAL AND SOCIAL ACTION PLAN (SESAP)

| ACTION | DELIVERABLE | DEADLINE |
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| PS 1 SOCIAL ENVIRONMENTAL ASSESSMENT AND MANAGEMENT SYSTEMS | | |
| <p>1. Implement an Integrated Management System for Environment, Health, Safety and Social matters at the Company</p> <p>Gulf Power Ltd will have its staff responsible for Environmental, Health, and Safety develop a management system that will identify and address environmental, health, safety and social issues and develop programs to manage the following key issues and ensure compliance with EMP and the SESAP: (i) construction waste; (ii) occupational health and safety practices and training during construction and operation; (iii) labor and working conditions including workers' accommodation hygiene and food safety; (iv) air emissions and noise; (v) compliance with permitting requirements; (vi) emergency preparedness and response including first aid; (vii) water resources due to limited supply in the area;(viii) drainage and storm water runoff; (ix) chemical storage and handling; (x) traffic safety; (xi) solid and liquid waste; (xii) equipment maintenance;(xiii) audit protocol for contractors and subcontractors implementation of the construction environmental management plan (included in the EIA); (xiv) community engagement with regards to labor, health/communicable diseases and safety; (xv) environmental and social performance monitoring and internal reporting including verification of monitoring data by a qualified third party consultant.</p> | <ul style="list-style-type: none"> • Provide IFC with the copy of the written ESMS and provide evidence of its implementation. • Provide CVs and ToR of the EHS team. • Provide CV and ToR of the community liaison professional. • Provide CV and ToR of the independent third party expert. | <ul style="list-style-type: none"> • EPC/O&M ESMS to be provided prior to disbursement or commencement of site works whichever comes first. • ESMS for the Company: construction and operation to be provided two months prior to commencement of each phase. • CVs of EHS team and community liaison professional to be provided 2 months prior to commencement of construction. |
| <p>2. Associated Facilities</p> <p>Gulf Power Ltd will ensure that KP&LC provides a copy of the environmental project report for the transmission line and puts in place an environmental and social management plan with adequate screening mechanism and mitigation measures ensuring compliances with IFC</p> | <ul style="list-style-type: none"> • Provide IFC with copy of KP&LC environmental project report and ESMP. | <ul style="list-style-type: none"> • As soon as available but prior to construction of the transmission line and switchyard. |

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| performance standards. | | |
| <p>3. Gulf Power Ltd will develop a stakeholder engagement plan in collaboration with local community to manage concerns, perceptions and expectation of the communities as well as to articulate the Company's community development strategy.</p> | <ul style="list-style-type: none"> • Provide copy of the stakeholder engagement plan. | <ul style="list-style-type: none"> • 2 months prior to commencement of construction. |
| PS3 POLLUTION PREVENTION AND ABATEMENT | | |
| <p>4. Air Emission Monitoring Gulf Power Ltd will conduct seasonal manual sampling for the life time of the Project due to presence of sensitive receptors. Should this indicate that the airshed ambient air quality exceeds EC's or Kenyan's air quality requirements once effective then the Company will implement additional pollution control measures to mitigate this condition. More specifically, in the case of exceedance of sulfur dioxide, reduced sulfur content in fuel will be utilized until emission standards are met; and in the case of exceedance in nitrogen oxides, the Company will utilize approved methods to reduce the concentration of NOx in the engine exhaust. The air quality monitoring program can be revisited if the Company is able to demonstrate at least 3 consecutive years of air quality monitoring data at least 25% less than EC Limits.</p> <p>5. Gulf Power Ltd will ensure that necessary permits will be obtained should an incinerator be built on the site and air emissions will be monitored to ensure compliance with WHO guidelines.</p> | <ul style="list-style-type: none"> • Include ambient air monitoring program in the ESMS include emissions from the potential incinerator • Provide specifications of incinerator. | <ul style="list-style-type: none"> • No later than 2 months prior to operation. |

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| <p>6. Waste Management Gulf Power Ltd will put in place a waste segregation procedure. With regards to hazardous waste and oily sludge, should an incinerator be installed in the Project site, the Company will ensure that it is constructed using international best practices and that air emissions are in compliance required permits and with WHO standards.</p> | | |
| PS4 COMMUNITY HEALTH SAFETY AND SECURITY | | |
| <p>7. Security Personnel Gulf Power Ltd will ensure that security personnel have undertaken necessary screening and training in accordance with good industry practices. Furthermore, it will investigate any credible allegations of unlawful or abusive acts of security personnel, take action (or urge appropriate parties to take action) to prevent recurrence, and report unlawful and abusive acts to public authorities when appropriate.</p> | <ul style="list-style-type: none"> • Provide IFC with copy security personnel screening mechanism. | <ul style="list-style-type: none"> • 2 months prior to commencement of construction |
| PS8 CULTURAL HERITAGE | | |
| <p>8. Chance Finds Procedure Gulf Power Ltd will ensure that the contractor environmental management plan includes a chance finds protocol specifying what procedures in line with PS8 will be undertaken should archeological finds be encountered.</p> | <ul style="list-style-type: none"> • Include chance find procedure in the contractor's EMP | <ul style="list-style-type: none"> • No later than 2 months prior to commencement of construction. |