

Action Plan – Client Communication Document – Appraisal Disclosure

Project Details:

Project ID : 48019
Project Name : SGG Togo CMT

Action Plan:

Task Title	Task Description	Action Due by (Milestone)	Anticipated Completion Date	Indicator of Completion
Environmental and Social Impact Assessment (ESIA)	SGG will perform E&S impact assessment in line with the requirements of IFC PSs.	30 Days Before Start of Construction		Terms of reference for ESIA . (Condition of First Disbursement) ESIA report to the satisfaction of IFC. (Condition of Second Disbursement or 30 days before the start of construction)
Construction and Operational E&S management plans	Based on the ESIA, SGG will develop a site-specific construction and operational E&S management plans for waste management and hazardous waste management in line with the IFC PSs and national legislation.	30 Days Before Start of Construction		Waste Management Plan - 31 May 2024 or 30 days before the start of construction of the new facility Hazardous Waste Management Plan - 31 May 2024 or 30 days before the start of construction of the new facility

Risk identification and assessment	SGG will cascade down a corporate ESMS and procedures and augment among others internal procedure for identification of E&S risks and impacts in line with IFC PS1	Absolute Date	30-Apr-2024	Togo risk assessment tools in line with IFC PS1
E&S Monitoring	SGG will cascade down corporate level E&S monitoring and reporting requirements in line with IFC PS1.	Absolute Date	15-Jun-2024	ESMS to the satisfaction of IFC
Organizational Capacity and resources	Togo factory will have a qualified HR Executive and a Compliance Executive at the factory level reporting to the central functions.	Absolute Date	30-Jun-2024	CV of HR Executive and letter of hire to the satisfaction of IFC. CV of Compliance Executive and letter of hire to the satisfaction of IFC.
Life & Fire Safety	SGG will: (a) Cascade down established emergency preparedness and response corporate practices to Togo in line with IFC PS1 and national legislation,	Absolute Date	30-Jun-2024	a) Evidence of communication of Life and Fires safety corporate practices to Togo to the satisfaction of IFC. (30 May 2024) b) ToRs for the qualified L&FS professional to the satisfaction of IFC. (30 April 2024)

	<p>(b) Commission a suitably qualified professional acceptable to IFC to prepare a Life and Fire Safety Master Plan and provide professional certification as part of the facility completion tests and that the design of L&FS passive and active systems comply with the requirements of the L&FS section on the WBG General EHS Guidelines and Togo's local building and fire department codes and standards.</p> <p>(c) A corrective action plan with a time frame for implementation to be submitted after the professional's first review.</p>			<p>b) L&FS Master plan and professional certification of the facility (15 May 2024)</p> <p>c) Corrective action plan and confirmation of satisfactory (30 June 2024)</p>
Labor Assessment	SGG will commission a third party labor assessment within 6 months of start of operation in Togo to ensure alignment of labor and working conditions with IFC PS2	Absolute Date	15-Feb-2025	<p>ToRs of the labor assessment to the satisfaction of IFC (30 October 2024)</p> <p>Labor Assessment report and corrective action plan (15 January 2025)</p>

				Evidence of completion of the corrective action plan (15 February 2025)
HR Policies and Procedures	<p>SGG will develop project specific HR policies and procedures in line with IFC PS2 and national law. SGG will further align these policies and procedures by:</p> <ul style="list-style-type: none"> - Extending the scope to include third party and indirect workers - Add a formal freedom of association policy - Update worker grievance procedures - Update the retrenchment policies 	Absolute Date	01-Aug-2024	<p>Togo HR Policies and Procedures to the satisfaction of IFC including:</p> <ul style="list-style-type: none"> - Worker code of conduct - Non discrimination and equal opportunity - Child and forced labor - Freedom of Association - Worker Grievance Procedure - Retrenchment policy
Communication of HR Policies and Procedures	The HR policies and procedures will be communicated to the Togo workers in a language they understand through bulletin boards and regular sensitization activities such as tool box talks and classroom training.	Absolute Date	15-Dec-2024	<p>HR training plan to the satisfaction of IFC (15 June 2024)</p> <p>Evidence of implementation of training plan (15 December 2024)</p>

Formal Worker Contracts	<p>Every worker, direct and indirect, will:</p> <p>(a) be hired through a formal contract in line with IFC PS2 and National Legislation of Togo. The worker contracts will state the nature and category of employment, place of employment, start date and duration of employment, working hours, remuneration, leave, benefits and employees rights and obligations as applicable</p> <p>(b) receive pay slips showing their number of hours worked, wages and statutory social security deductions.</p>	Absolute Date	30-Aug-2024	<p>Copies of Togo workers contract in line with IFC PS2 and national legislation (15 July 2024)</p> <p>Worker pay slips (30 August 2024)</p>
Contractor Management Plan	SGG will develop a contractor management plan defining its approach to managing EHS performance of its contractors, subcontractors and other third parties during the construction and operations phase of the project. The contractor management approach will be	First Disbursement	29-Feb-2024	Contractor Management Plan to the satisfaction of IFC

	consistent with IFC Good Practice Note: Managing Contractor’s Environmental and Social Performance			
Supplier Code of Conduct	SGG will augment its supplier code of conduct with IFC PS2 and will update its supply chain management system with a) the inclusion of contractual clauses for prohibition of forced and child labor, and requiring compliance with the supplier code of conduct in agreements with suppliers; b) A verification process to ensure new suppliers have the policies and procedures in place to meet requirements of the code of conduct, c) A formal process for supplier engagement, remedy or disengagement in case non-compliances with the code of conduct are found	Absolute Date	15-Mar-2024	<p>Sample contracts with suppliers or addendums to the satisfaction of IFC (15 Jan 2024)</p> <p>Updated code of conduct including supplier verification procedures and evidence of implementation (15 March 2024)</p> <p>Updated Supplier code of conduct (15 March 2024)</p>
OHS Management	SGG will align OHS risk management for the operations in Togo with IFC PS2 and WBG General EHS Guidelines by developing an OHS management plan including leading and lagging key	Absolute Date	15-Jun-2024	OHS Management Plan to the satisfaction of IFC

	performance indicators (KPIs) based on an OHS risk assessment and including gender considerations			
Wastewater management	Togo facility will develop a wastewater management plan where the wastewater discharge will be handled in line with WBG EHS General Guidelines and national regulatory requirements and will contractually ensure that the special economic zone operator will manage wastewater in accordance with national requirements and WBG EHS Guidelines.	Absolute Date	15-May-2024	SGG operator contract with the special economic zone operator
Traffic and Vehicle Management	<p>For Togo, SGG will:</p> <p>(a) develop a Traffic and Vehicle Management Procedure and plan to avoid and manage worker safety risks outlining roles and responsibilities, monitoring and audit requirements for the contractors. The plan will include gender provisions, driver training and worker safety measures for bike users</p> <p>(b) develop contracts with transport service providers including commitment to align</p>	Absolute Date	30-May-2024	<p>Traffic and Vehicle Management Procedure and Plan to the satisfaction of IFC. (01 May 2024)</p> <p>Bus driver training plan and evidence of completion (01 May 2024)</p> <p>Contracts with transport service providers to the satisfaction of IFC (30 May 2024)</p>

	with its Traffic and Vehicle Management Procedure including its anti-sexual harassment policy and code of conduct. Formal contracts will be signed with the service provider to ensure commitment			
Security Management	<p>SGG will:</p> <ul style="list-style-type: none"> - Develop a security management procedure and plan considering the operations context in Togo. The plan will be based on a security risk assessment and will ensure screening private security providers based on a valid business license, corporate history as well as company and employee background checks. - include commitment of service providers to SGG code of conduct, environment and social requirements, including prevention of sexual harassment, in the contracts as well as adhering to regular training and audits. 	Absolute Date	15-Jun-2024	<p>Security management procedure and plan in line with IFC PS4 (01 June 2024)</p> <p>Contract with security service providers to the satisfaction of IFC (15 June 2024)</p>

Stakeholder Engagement	SGG will develop a project specific stakeholder engagement plan and community grievance procedure in line with IFC PS1	Absolute Date	15-Jan-2024	Stakeholder Engagement Plan in line with IFC PS1
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