

Havenhill_DARES (50117)
Project Basic Information

Country: Nigeria	Region: West Central Africa	Project No.: 50117
Project Legal Name: Havenhill_DARES	Company Legal Name: Havenhill Synergy Ltd	
Project Business Sector: V-BF - Solar - Renewable Energy Generation	Owning Department /Division: Regional Industry - INF Africa	
Environment Category: B		

IFC's Disclosure Requirements

Date of initial ESRS disclosure
10/29/2025

Date of revised ESRS disclosure

Date of clearance by client for factual accuracy
10/22/2025

Board Approval Date

Project Description

Havenhill Synergy Limited ("Havenhill" or "the Company"), founded in 2010, is a clean technology utility company that uses renewable (solar) energy to generate clean, safe, cost-effective and sustainable electricity in urban and rural areas in Nigeria. The Company has installed 35 mini-grids in several states, including Federal Capital Territory, Oyo, and Kwara, and in the process of identifying more sites across other States. The total installed capacity is 2.7MW with 20,340 connections realized, impacting 90,000 people, 3,000 MSMEs and over 65 healthcare centers.

The proposed IFC investment consists of a revolving loan of up to USD16.8m to partly finance the company's 4-year capital expenditure plan to construct and operate 43 mini-grids solar sites with an aim to connect 80,000+ off-grid consumers by 2026. The mini-grids sites will comprise i) installed photovoltaic (PV) solar power of between 50 - 800kWp capacity; ii) battery storage of between 200 - 1,645Wh capacity; iii) diesel generator sets of between 60 - 500kVA capacity, and; iv) local low voltage power distribution network without transformers (the "Project"). The loan shall be secured entirely through an assignment of amounts due to Havenhill under the World Bank (WB) financed Nigeria Distributed Access through Renewable Energy Scale-up ("DARES") project (disclosed on the WB Website - P179687). The DARES project builds on the achievements of the WB financed Nigeria Electrification Project (NEP), which has supported the establishment of 125 mini-grids and the sale of over a million Solar Home Systems, through which more than 5.5 million Nigerians have gained access to electricity. Land for the mini-grids is acquired in accordance with the procedures set out in the World Bank-approved Resettlement Policy Framework (RPF) developed under the DARES Platform, which serves as a core E&S instrument for projects implemented through this program.

Proceeds from IFC financing will only be used for the construction and operation of the 43 mini grids. The mini-grids will mostly be in villages, on small plots of land of ~ 0.25ha, purchased on a willing buyer-willing seller basis in Niger, Nasarawa, Kogi, Taraba, Kwara, Benue states. The construction period of each mini-grid system is around 4 weeks and construction, and operation and maintenance (O&M) will be managed in-house by the Company.

Overview of IFC's Scope of Review

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The review was conducted between 7th April and 15 July 2025, through IFC site visits (company offices and two operational mini grid sites) and Environment and Social (E&S) due diligence carried out by an independent consulting Firm. The review included i) meetings with Havenhill senior management, including E&S and Human Resources (HR) management teams; ii) meetings and interviews with site management teams at Kwali and Olamaboro mini grid sites which are representative of the Havenhill portfolio in terms of size, variation in geography and type of E&S risks; iii) interviews with select members of the public and clients at the host communities in Kwali and Olamaboro, with interest in both male and female community members and project clients; iv) a review of the company's E&S risk management policies, procedures and plans. IFC also undertook a desktop E&S screening of the 33 proposed mini-grid sites.

Identified Applicable Performance Standards

While all Performance Standards are applicable to this investment, IFC's environmental and social due diligence indicates that the investment will have impacts which must be managed in a manner consistent with the following Performance Standards.

PS1-Assessment and Management of Environmental and Social Risks and Impacts
PS2- Labor and working conditions
PS3-Resource Efficiency and Pollution Prevention
PS4-Community Health, Safety and Security

Environmental & Social Categorization and Rationale

This is a Category B project according to IFC's Policy on Environmental and Social Sustainability as the Environmental and Social impacts associated with the project are limited, generally site-specific, and readily addressed through mitigation measures - primarily due to the small physical footprint (≤ 10 ha per site) and the use of existing community footprints in locating the mini grids. Key E&S risks and issues associated with the Project are: (a) corporate E&S management systems and staffing to manage the operations in line with IFC PSs requirements; (b) adequate E&S screening and assessment for proposed mini-grids; (c) assurance of fair, safe and healthy working conditions for workers in compliance with country's labor laws and IFC PS2 requirements, including Gender-Based Violence and Harassment (GVBH), management of contractor workers and solar equipment supply chain; (d) occupational, health and safety management (e) air quality, wastewater, and solid waste management in line with World Bank Group (WBG) Environment, Health and Safety (EHS) Guidelines; (f) community risks due to operations, transport and security; and (g) stakeholder engagement and community grievance management.

Environmental & Social Mitigation Measures

(Observations that are not to be disclosed must be recorded in ESG360)

IFC's appraisal considered the environmental and social management planning process and documentation for the Project and gaps, if any, between these and IFC's requirements. Where necessary, corrective measures, intended to close these gaps within a reasonable period of time, are summarized in the paragraphs that follow and (if applicable) in an agreed Environmental and Social Action Plan (ESAP). Through implementation of these measures, the Project is expected to be designed and operated in accordance with Performance Standards objectives.

Applicable PSs summary

PS1-Assessment and Management of Environmental and Social Risks and Impacts

Environmental and Social Policy and Management System: Havenhill has developed an E&S Management System (ESMS) following guidelines for the DARES Platform E&S Management Framework (ESMF) approved by the World Bank. This ESMF serves as an E&S assessment and management tool for DARES projects and provides guidance for satisfactory E&S performance management during project planning design, construction and operation phases in line with the applicable WB E&S Standards (ESS). Also, the ESMF is supported by separate instruments such as Resettlement Plan Framework (RPF), Labor Management Plan (LMP) and Stakeholder Engagement Plan (SEP) prepared for the DARES Projects, based on WB's ESS. These documents serve as anchor E&S instruments for RESCOs selected to participate in the

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DARES program.

The Havenhill management system comprises a Health, Safety and Environment (HSE) Policy, an E&S Management Framework and a suite of E&S procedures. The E&S Management Framework is designed to cover all three project phases: Pre-construction, Construction and Operation; and includes respective procedures to be applied in each phase. The procedures address risk related to occupational health and safety, emergencies, land acquisition, waste, road transportation, stakeholder engagement and training and competency. Most of these procedures were developed for company operations in Niger State. Havenhill will update the HSE Policy to include statement of commitment on management of relationships with external stakeholders and mitigation of adverse social and socio-economic impacts to communities where they operate; update the E&S management framework to include scope of application of the existing E&S procedures to cover all Project sites; update the Emergency Preparedness and Response Plan (EPRP - update details below); develop a security management procedure; update the supply chain procedure and develop a supply chain Code of Conduct; develop a chance-find procedure for addressing potential cultural heritage risks; update the Land Procurement Process document and the Land Acquisition section of the ESMS to include the requirements that - site screening and land acquisition processes will operationalize the PS5 avoidance principle; only sites with no physical or economic activities that do not trigger involuntary displacement as defined in IFC PS 5 will be selected; and add requirements for monitoring of land related social risks; and develop an E&S monitoring and reporting procedure and associated Key E&S Performance Indicators (KPIs) to assess the effectiveness of risk mitigation in alignment with the requirements of the DARES ESMF and IFC PS 1 (ESAP #1).

Identification of Risks and Impacts: At site selection and pre-construction phase, the ESMS has listed risk assessment steps, mainly site eligibility criteria and E&S risk assessment and E&S management plan development. All potential sites are screened for E&S risks and impacts and any sites that fall within the exclusion criteria are not selected. The DARES ESMF mini grid site exclusion list includes sites located in legally protected areas (e.g., national parks, conservation areas, forests), in internationally recognized areas, in critical natural habitats and where mini grid construction and operation will cause significant degradation of natural habitats (e.g., mangroves); hosts cultural heritage or sacred sites; is under active dispute or litigation; is environmentally high-risk (flood-prone, erosion-prone); belongs to vulnerable groups; or serves as a primary source of livelihood. Once sites are selected, environmental and construction permits are obtained in batches for several sites prior to the start of the construction activities, as guided by the regulatory authorities. The findings of IFC virtual screening of the 33 proposed pipeline mini grid sites indicate three of the sites are in communities that have settled for decades in sections of areas previously nationally classified as forest reserves (further discussion under PS 6). Prior to commencement of activities on each site, sufficient time will be provided to allow for harvesting of crops in cases where farming is ongoing. The low voltage distribution lines are designed to run along the village roads, and their design is compliant with the national technical requirements, hence pose low E&S risk. Therefore, the E&S risk profile of the mini grid sites ranges from low to medium and can be managed by the company's E&S risk management system. In accordance with the national law, Havenhill conducts E&S impact Assessments, and develops and submits ESMPs for batches of mini-grid projects per State to the relevant State authorities for permitting. These ESMPs include detailed environmental and social baseline assessments, impact identification, mitigation strategies, stakeholder engagement, and decommissioning plans. Similarly, for the project sites, the company will conduct the E&S Assessments and prepare the ESMPs in line with IFC PS 1 and national regulatory requirements; and obtain the environmental permits prior to project commencement.

Land Acquisition: Havenhill has acquired all the Project's 33 mini grid sites from private owners via willing buyer-willing seller agreements. No physical or economic displacement occurred during the acquisition of these sites and no outstanding community grievances were reported related to the land acquisition process. There will be no additional land acquisition for the distribution lines, which will be laid along the existing road servitudes. Similarly, for all future sites to be considered for the mini-grid Project, Havenhill will, as part of its ESMS upgrade, apply site selection criteria that avoid physical or economic displacement, as defined in IFC Performance Standard 5. Should a negotiated acquisition not be achieved, the client will consider alternative sites and not resort to any form of eminent domain. These commitments will be achieved by implementation of the updated Land Procurement Process document and the Land Acquisition section of the ESMS in ESAP #1 above.

Management Programs: To manage E&S risks and impacts associated with the construction and operations phases of the mini grid sites, the company has developed an E&S Management Plan (ESMP) that covers a batch of sites in a State, from a typical solar mini grid Environment and Social Assessment and drafted in line with the DARES Program ESMP template. In addition, the company implements the Health and Safety

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Management Plan (H&S-MP) to identify and manage safety risks. The ESMP and H&S-MP are supported by associated sub-plans and other risk management procedures. For land acquisition, the Company implements a Land Procurement Process document which entails the steps to be followed. Going forward, Havenhill will i) review the E&S risks and impacts associated with the Project construction and operations in line with PS 1 requirements and WBG General EHS Guidelines and EHS Guidelines for Electric Power Transmission and Distribution; ii) update the standard ESMP and H&S-MP templates (also based on any site-specific issues identified following the E&S site screening) as appropriate; iii) develop a Contractor Management Procedure which includes E&S procurement criteria, contract provisions to comply with Nigerian laws and regulations, Havenhill policies and IFC PS 2; and update the Health and Safety Management Plan by including standard templates for method statements, and standard operating procedures for electrical safety. These updated E&S risk management materials will be implemented at all Project sites (ESAP #2).

Organizational Capacity and Competency: Havenhill has designated personnel responsible for E&S management in their operations. The team comprises the HSE and Quality Manager who oversees the team from the company head office, an HSE Associate who covers all mini grid sites under construction, providing technical HSE support to site engineers on HSE risk management at such sites and a community liaison officer who coordinates land acquisition and continual community engagement across the sites. During site construction and operation, the site managers are the primary designated on-site HSE leads. Due to the expected surge in sites under construction due to this program and the expected increase in the scope of E&S risk oversight on site contractors, the company will add HSE Associates for each State and train all site engineers on E&S risk management to ensure E&S risks are adequately managed at every site (ESAP #3).

Emergency Preparedness and Response: Havenhill has a standard Emergency Preparedness and Response Plan (EPRP) for all project sites in Niger State to ensure the safety of its employees, contractors, and visitors. The EPRP covers fire, electric shock, medical and security emergencies, and identifies key personnel, anticipated emergencies, and general response actions. Per ESAP #1 above, the EPRP will be updated to include emergency scenarios related to severe weather (including heatwaves, heavy rains and flooding), diesel fuel leaks and spillage and collapse of structures (especially for distribution poles) and include emergency response contact numbers. The company will also develop and implement Project site-specific EPRPs that reflect the specific risks and layout of each Project location and train on-site teams on emergency response.

Supply Chain: Havenhill procures solar panels, batteries, and associated equipment from 'Tier 1' suppliers and have low leverage on influencing the suppliers' E&S policies. As required in ESAP #1 above, Havenhill will i) develop and implement a supply chain Code of Conduct prohibiting child and forced labor and containing other relevant EHS requirements, including a supplier registration/evaluation sheet that includes these labor and HSE provisions; (ii) develop a process for verifying supplier adherence to the E&S requirements in the Code of Conduct, and; iii) in the PV solar equipment supply contracts, require the supplier to contractually commit to E&S policies that are consistent with core international standards and compliance with Nigerian and international laws and regulations. These provisions will be applied for all solar PV equipment procurement for the Project.

Monitoring and Review: The ESMS provides periodic monitoring and external audits of projects internally and by third parties and reporting to applicable stakeholders. The document also provides for setting up monitoring parameters and frequency. These are essential for consistent and adequate monitoring of each mini-grid site and at the corporate level, and for appropriate resources allocation. Going forward, as required in ESAP #1 above, the E&S Monitoring and Reporting Procedure will include key E&S indicators to be monitored, levels of E&S monitoring and a clear reporting structure from the lowest monitoring site to the Board of Directors. The E&S monitoring will also include issues related to land acquisition and use (per ESAP#1 above), both from internal monitoring and external stakeholders (including external grievances raised) and the monitoring framework will also support continuous improvement of the system and risk responses. The Procedure will be implemented at all Project sites.

PS2- Labor and working conditions

The labor force at Havenhill Synergy comprises 80 employees - 75% male and 25% female. About 65% of the workers are permanent employees, 30% are on timed contracts and 5% are National Youth Service interns. The workforce is expected to grow as the company expands its mini-grid coverage. During mini-grid site construction, workers are recruited from the localities by contractor companies, and their numbers are based on workforce needs at each phase of construction.

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HR Policies and Procedures. Havenhill implements a Compliance Manual as the overall human resource management guide. The company also has a Gender and Social Inclusion Policy and a policy on Female Participation in Mini-Grid Communities. The Compliance Manual focuses on workforce integrity, ethical conduct, safety, and the prevention of harm, and includes statements on zero-tolerance stance on bullying, sexual exploitation, abuse and harassment (SEAH). While the Policy also promotes a gender-sensitive workplace and prohibits discrimination and harassment, the measures to address gender-based violence (GBV) and grievance redress mechanism needs improvement to meet PS 2 requirements, including to adequately address child/forced labor and freedom of association and collective bargaining as required in IFC PS 2. Havenhill will therefore update these human resources policies/procedures to ensure that they promote fair, safe, and inclusive employment practices (including for third-party workers) in compliance with Nigerian labor law, IFC PS 2 and DARES requirements, and implement them at all Project sites. Havenhill will also develop a formal grievance redress mechanism with a segregated process to managing GBV/ SEAH complaints. The mechanism will cover the company's direct workforce and third-party workers, both in compliance with Nigerian labor law, IFC PS 2 and DARES requirements; and will be implemented at all Project sites. Havenhill will also develop mechanisms to monitor implementation of these policies to ensure effectiveness (ESAP #4).

Working Conditions. The Gender and Social Inclusion Policy outlines a commitment to equality, diversity, and inclusion in the workplace and includes a reporting mechanism for policy violations via supervisors or a dedicated compliance email. There are no workers' organizations within Havenhill and no evidence of child or forced labor within the operations. Given that most workers are locally recruited, no company accommodation is provided by Havenhill. The employee contract documents include salary, working hours, probation, and benefits.

Occupational Health and Safety; The Havenhill Health and Safety Management Plan is the primary safety risk management tool for implementation of the HSE-MS at project sites. Although drafted for projects in Niger State, the document will be updated and replicated across future sites. The Plan includes clearly defined roles and responsibilities across all organizational levels, rigorous training and competency programs, and structured hazard and risk management processes, and mandates work method statements, daily toolbox talks, the use of appropriate Personal Protective Equipment (PPE), and robust emergency response procedures for fire, medical, and security incidents. It also includes protocols for incident reporting, investigation, and corrective actions, alongside regular HSE audits and contractor management. In addition, the company has procedures for work at height, use of ladders, manual work, incident investigation and PPE use. The core Company staff have knowledge of key OHS risk management requirements and oversee their implementation at sites; and the visited project sites have safety signage, firefighting equipment, toilets, and first aid arrangements. As part of ESAP #2 (update of the Health and Safety Management Plan), Havenhill will i) prepare standard templates for method statements and ensure these are well understood by all relevant staff and adequately implemented at the project sites; ii) develop procedures for electrical safety and for safe installation and servicing of power distribution network in compliance with WBG General EHS Guidelines and EHS Guidelines for Electric Power Transmission and Distribution, and train all relevant workers on implementation of these procedures, and; iii) ensure that the Health and Safety Management Plan and all implementation procedures and templates are retained at each site (virtually or physically) for use by site workers. These updated safety risk management materials will be implemented at all Project sites.

Workers Engaged by Third-Party: Two contractors are currently engaged by Havenhill for installation of solar panels, stringing and routing of cables, DC and AC electrical connections and terminations, as well as system earthing and grounding. These companies have retained 17 workers for these tasks. The Health and Safety Management Plan requires that contractors are inducted into the HSE-MS and that the Head of Projects and Team Leads shall ensure compliance to all HSE requirements. Havenhill will develop documented mechanisms to discharge this requirement; for cascading HR and OHS requirements to third parties through legally enforceable agreements; and for ensuring compliance to Nigerian labor and working conditions - in the Contractor Management Procedure to be developed under ESAP #2 above.

PS3-Resource Efficiency and Pollution Prevention

Solar mini-grid projects are not expected to materially consume key resources (e.g., energy, water) or result in significant emissions or pollution during operations. EHS risks are largely associated with the construction phase and are typically site-specific, short-term in nature, and managed through the implementation of the ESMPs.

Water Use: Water resource needs during construction and operations will be limited to domestic needs and

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for cleaning of panels and will be sourced from onsite water wells, as is the case for existing sites. Due to the small size of the solar plants, the volume of water requirement for cleaning is expected to be small and will not affect community water supplies.

Air emissions and Greenhouse Gases: The operations at the solar mini-grid sites are expected to produce minimal air emissions during the operational phase. However, site construction activities and transportation associated with the projects may generate dust and vehicle emissions, which will be managed within the site HSE management plans. Greenhouse gas emissions ("GHG") from the project during construction are predominantly associated with the transport of project components and on-site equipment and machinery. Immaterial GHG emissions are expected during site operations, mainly from occasionally used back-up generators. Annual GHG emissions are expected to be less than 25,000 tons of CO2 equivalent (tCO2eq/year).

Wastewater: Wastewater from the washing of solar panels using biodegradable soaps drains into the soils on-site. The project sites have ventilated improved pit (VIP) latrines which can be emptied by a sewerage contractor when required, for offsite disposal. As per the accepted standard, the latrines are sited at least 30 meters from known water sources and do not reach the groundwater table to avoid microbial contamination. Given that these are standard and generally approved latrines that are generally only used by the few staff retained per site, soil and ground water pollution related to their usage is not expected. Similarly, no adverse impact on groundwater is expected.

Hazardous materials handling, and Waste: Hazardous materials handled at the solar mini-grid sites include batteries (e.g., lead-acid or lithium-ion), electronic parts (e-waste), and diesel fuel. No documentation was provided related to hazardous material inventory, staff training on hazardous materials, or emergency response measures in the event of leaks or spills. Waste (general and hazardous) generated at the mini-grid sites includes construction waste (i.e., wood, concrete, packaging material, metal scrap), domestic waste (particularly food waste and plastic water sachets used by the project workers), batteries and damaged PV modules and electronics. The overall volumes of both types of waste generated by each mini-grid site during both construction and operations phases are minimal and expected to remain as such. Havenhill has in place a Waste Management Procedure and Plan applicable to its solar mini-grid operations in Niger State, that are compliant with Nigerian laws. Going forward, the company will i) document hazardous material inventory and train the site workers on hazardous materials handling and emergency response; ii) install waste storage facilities at all Project sites, and; iii) document waste transfer and disposal process to ensure compliance with the Waste Management Plan, national regulatory requirements and IFC PS3 at all Project sites. (ESAP #5).

PS4-Community Health, Safety and Security

Road Safety & Traffic Management: The transportation of mini-grid components and equipment to the site and staff movements to and from site represents the key safety risk to workers, other road users and communities adjacent to the roads being used. Havenhill's Traffic Management Plan is designed to ensure the safe movement of vehicles to and from the site during the solar mini-grid projects in twelve communities in Niger State. The Plan outlines procedures and protocols for site access, traffic routing, and management, emphasizing the safety of road workers and all road users. No related incidents or accidents were reported at the sites visited. This Plan will be adopted and implemented at all Project sites.

Security Management: Each mini-grid site will be fenced off with a single controlled access point and access control and security is provided on a need/on call basis by two unarmed, locally employed watchmen. This will be the case for all future sites. Considering the broader security context in Nigeria, including reported cases of kidnapping, violent crime, and inter-communal tensions in some regions, the company will undertake a security risk assessment of all its Project sites and develop a Security Management Procedure (as required in ESAP #1) to support the safe and secure development and operations of the Project, in line with IFC PS4 requirements.

Stakeholder Engagement

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The first phase of stakeholder engagement occurs during land acquisition, where the village power committees (working with the Havenhill team) sensitize the local community members about the potential power project (mini grid), its benefits, and identification of interested community members (potential customers), to help identify and secure land access and screen potential workers. From the project onset, the company implements the Stakeholder Engagement Plan (SEP) and an External Grievance Redress Mechanism to guide ongoing consultations with external stakeholders. The SEP is appropriate to the size of project sites and activities, in line with IFC PS1 requirements. Similarly, the Grievance Redress Mechanism outlines grievance system that manage three different levels of target stakeholders, namely, workforce, customer and residents, and has a provision for anonymous reporting via a hotline number. The company will ensure that all requisite grievance documentation forms/logs are retained at the sites and awareness is created among the communities regarding the anonymity, confidentiality, and gender-sensitive provisions of the grievance redress mechanism; and all the grievances received and included in the E&S monitoring process per procedure proposed in ESAP #1 (ESAP #6).

Broad Community Support

Not Applicable

BCS Comment :

Local Access of Project Documentation

Managing Director/CEO
info@havenhillsynergy.com

Environmental & Social Action Plan (ESAP)

Is there an ESAP to be disclosed for this project?

Yes

Mitigation Measures / Environmental & Social Action Plan (ESAP)

SNo	Description	Anticipated Completion Date
1	a) update the HSE Policy to include statement of commitment on management of relationships with external stakeholders and mitigation of adverse social and socio-economic impacts to communities where they operate; b) update the scope of application of E&S procedures to cover all Project sites; c) update the Emergency Preparedness and Response Plan (EPRP); d) develop a chance-find procedure for addressing potential cultural heritage risks; e) develop a security management procedure; f) update the supply chain procedure and develop a supply chain code of conduct; g) update the Land Procurement Process document and the Land Acquisition section of the ESMS to include the requirement on selection of only sites with no physical or economic activities that do not trigger involuntary displacement as defined in IFC PS 5, and requirements for quarterly monitoring of land related social risks; and h) develop an E&S monitoring and reporting procedure and associated Key E&S Performance Indicators (KPIs) to assess the effectiveness of risk mitigation	3/31/2026
2	Add HSE Associates for each State and train all site engineers on E&S risk management to ensure E&S risks are adequately managed.	3/31/2026

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3	a) Update the human resources policies/procedures that promote fair, safe, and inclusive employment practices (including for third-party workers) in compliance with Nigerian labor law, IFC PS 2 and DARES requirements, and implement these at all Project sites. b) Develop a formal grievance redress mechanism with a segregated process to managing GBV/SEAH complaints. The mechanism will cover the company's direct workforce and third-party workers, both in compliance with Nigerian labor law, IFC PS 2 and DARES requirements; and implement these at all Project sites.	3/31/2026
4	a) review the E&S risks and impacts associated with the Project construction and operations in line with PS 1 requirements and WBG General EHS Guidelines and EHS Guidelines for Electric Power Transmission and Distribution; b) update the standard ESMP and H&S-MP templates (also based on any site-specific issues identified following the E&S site screening) as appropriate; c) develop a Contractor Management Procedure which includes E&S procurement criteria, contract provisions to comply with Nigerian laws and regulations, Havenhill policies and IFC PS 2; d) update the Health and Safety Management Plan by including standard templates for method statements and standard operating procedures for electrical safety;	3/31/2026
5	a) retain all requisite grievance documentation forms/logs at the sites, and; b) create awareness among the communities regarding the anonymity, confidentiality, and gender-sensitive provisions of the grievance redress mechanism.	3/31/2026
6	a) document hazardous material inventory; b) install waste storage facilities at all Project sites, and; c) document waste transfer and disposal process to ensure compliance with the Waste Management Plan, national regulatory requirements and IFC PS3 at all Project sites.	3/31/2026

Activity Log/Comments

Workflow Initiated by Kepher Ochieng Ounda (Draft Environmental and Social Review Summary) Oct 27, 2025 02:44 PM ET

Comments:

Cleared by Rosa I. Orellana (ESRO Clear) Oct 28, 2025 02:39 AM ET

Comments:

CRU Member Approved and Appraisal Disclosure Initiated by Ejura Phoebe Audu Oct 29, 2025 12:23 PM ET

Comments:

Client clearance received on 10/22/2025.

Supporting Documents

S.No.	Document Details
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