

Environmental & Social Management System ESMS Manual:

Project: Zrenjanin Wastewater Treatment Plant, Serbia.

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1. Document Revision History

Revision No.	Date	Originator	Changes
00	18.12.2025	Karthik Namadevan	Initial Issue

2. Purpose

The primary purpose of this Environmental and Social Management System (ESMS) Manual is to offer comprehensive guidance to all Business Units (BUs) within Metito Utilities Limited (MUL) and its subsidiaries. This guidance ensures that MUL's operations are fully aligned with the organization's environmental and social commitments, policies, and local regulatory obligations.

This manual establishes an Environmental and Social Management System (ESMS) that functions as a unified framework for both Project Development and Operations & Maintenance (O&M) activities. This framework enables MUL to maintain consistent standards across all business operations for:

- Environmental protection
- Social responsibility
- Occupational health and safety
- Governance

The ESMS is designed to align with international standards such as ISO 9001 (Quality), ISO 14001 (Environment), ISO 45001 (Occupational Health & Safety), and ISO 26000 (Social Responsibility), as well as the International Finance Corporation (IFC) Performance Standards, the African Development Bank (AfDB) Integrated Safeguards System (ISS), Good International Industry Practice (GIIP) and any other relevant standards.

Furthermore, this Manual is a core component of MUL's broader Environmental, Social, and Governance (ESG) Strategy, providing a systematic approach to identifying, assessing, mitigating, and monitoring E&S risks and opportunities throughout the project lifecycle. It aims to embed sustainability and responsible governance principles into business decision-making to ensure long-term value creation and compliance with international expectations. The ESMS is a dynamic framework that undergoes periodic reviews and updates (upon significant changes or as determined by the Top Management Team) to ensure continuous improvement and adaptability.

Through its implementation, MUL reaffirms its dedication to environmental stewardship, social equity, operational excellence, and corporate accountability, showcasing its leadership in sustainable water, wastewater, and desalination management.

3. Scope and Applicability

The ESMS covers all Business Units (BUs) within Metito Utilities Limited (MUL) and its subsidiaries, encompassing all their products and services.

To facilitate implementation, guidance documents have been developed for BUs and may be modified to suit specific site conditions. These supporting guidelines are intended to aid BUs that require assistance and are not meant to replace existing subsidiary facility programs.

Additionally, this Manual will be shared in its entirety with:

- Existing and prospective tenants of MUL's integrated industrial platforms.
- Contractors responsible for Engineering, Procurement, and Construction (EPC).

This broad dissemination ensures that their methodological approaches align with this Manual and that any environmental and social gaps within specific projects are identified and addressed in accordance with all stated policies and standards.

This ESMS Manual is a corporate-level framework applicable across all Metito Utilities Limited (MUL) projects and operations. For the Zrenjanin Wastewater Treatment Plant Project, the ESMS is implemented through a combination of:

- MUL Corporate oversight and governance
- The Project Company / SPV management team
- Appointed Contractors and Subcontractors under an EPC-type delivery structure; and
- Independent third parties, including the Owner's Engineer acting as the Expert Supervision Agency in accordance with Serbian law.

References within this Manual to "EPC Contractor" shall, for the Zrenjanin Project, be understood to refer collectively to the appointed main Contractor(s) and their Subcontractors, whose environmental, social, health, and safety obligations are contractually governed by MUL's ESMS, the Construction EHS Management Plan (C-EHSMP), and associated project-specific management plans.

4. Introduction

Since its inception in 1958, Metito has established itself as a global leader in the design and supply of water and wastewater treatment systems and water desalination solutions. With over a thousand successful installations worldwide, Metito has built a strong reputation for professional excellence, underpinned by a proven track record of reliable performance.

In today's dynamic and competitive business environment, the effective implementation of new technology is paramount. Metito Utilities Limited (MUL), building on Metito's foundational expertise, is specifically committed to developing and maintaining the specialized skills required to evaluate, select, and implement state-of-the-art water treatment technologies. This approach integrates Metito's theoretical knowledge with the practical experience of an established engineering and contracting company.

MUL operates as a global investor and operator across water, wastewater, and alternative energy assets. It distinguishes itself with a market-oriented approach, robust financial foundation, and an experienced management team. MUL actively develops, invests in, owns, and operates critical infrastructure for water treatment, wastewater treatment, surface water treatment, and desalination. Its offerings include expert project design, engineering, and financial structuring, complemented by advanced management solutions.

Each project undertaken by MUL is meticulously designed to create value for clients, with critical consideration given to:

- Whole-of-life approach: Ensuring value creation for both clients and the communities served.
- Economic viability and sustainability: Collaborating with clients and governments to integrate projects within broader sector plans, thereby enabling future strategic developments.
- Creative and viable financing structures: Tailoring solutions to address country and client-specific water, energy, financial capacity, capital availability, and overall challenges.
- MUL's impressive portfolio comprises more than 30 concessions, predominantly wholly owned by Metito, which collectively boast an installed capacity of 1.3 million m³/day.

Project Finance Structured Schemes MUL possesses extensive experience in developing operational water assets under various established models, including BOT (Build-Operate-Transfer), BOO (Build-Own-Operate), full concessions, and PPP (Public-Private Partnership). With a strong financial capability and a strategic appetite for investing in water assets, MUL adeptly plans, designs, builds, and operates world-class water facilities. Its expansion into the alternative energy sector further cements MUL's unique proposition, leveraging unmatched project finance experience that transcends traditional sectors and organically extends to cover other utilities.

MUL's business models include:

- Greenfield Projects
- Brownfield Projects

Consulting and Management Contracts Under its Management Services Contracts, MUL is dedicated to optimising the operational and commercial performance of downstream or fully integrated utilities. This is achieved by:

- Improving the reliability of water supply and wastewater collection systems.
- Harnessing alternative energy where feasible.
- Ensuring the sustainable commercial viability of the utility.
- Enhancing management capabilities.
- Providing comprehensive know-how transfer to the utility's staff.

MUL conducts thorough assessments and diagnoses of a utility's current status, covering all relevant areas such as operations and maintenance, commercial functions, accounting and financial management, organizational structure, and human resources. Based on this, specific objectives, indicators, and targets

are established for regular monitoring, and a detailed work plan is defined to outline the necessary actions. Subsequent activities focus on designing bespoke programs and action plans for developing suitable processes, procedures, tools, and systems. During implementation, MUL actively manages all daily processes, placing significant emphasis on staff training to ensure the effective and sustainable transfer of knowledge and competencies, and to improve performance.

Comprehensive Utility Services and Solutions MUL offers a range of comprehensive utility services, including:

- Operations and Maintenance
- Customer Service, Metering, Billing, and Collection Management Contracts
- Non-Revenue Water (NRW) Reduction

*This introduction provides an overview of Metito Utilities Limited (MUL) at the corporate level. The specific profiles and detailed introductions of all other group companies, business units, subsidiaries, and projects are provided in the **Annexure** section for comprehensive reference and alignment purposes.*

4.1 Project Phase and Schedule: Construction and Operation & Maintenance

The key phases anticipated for the construction and subsequent operation and maintenance of the water treatment plant (STP/WWTP/Portable Water/Desalination) are summarized below:

Construction Phase:

Phase 1: Project Planning, Engineering, and Documentation: This initial phase encompasses obtaining all necessary permits and approvals, conducting essential site-specific studies (e.g., geotechnical, topographical, hydrological, environmental impact assessments), and preparing the comprehensive detailed design and engineering specifications for all project components.

Phase 2: Procurement and Logistics: This phase involves the procurement of all required materials, equipment, and components for the project, covering civil, mechanical, electrical, and instrumentation works. It also includes the transportation, customs clearance (if applicable), and organized delivery of these items to the project site.

Phase 3: Contractor and Subcontractor Engagement: This includes the tendering process, evaluation, and selection of all specialized contractors and subcontractors essential for the Project, such as civil, mechanical, electrical, instrumentation, and specialized process equipment installers.

Phase 4: Site Mobilisation and Early Works: This phase involves establishing the construction site infrastructure, including site preparation, access road development, perimeter fencing, the installation of

temporary site offices, workshops, storage facilities, and designated laydown areas, along with utility connections.

Phase 5: Civil Works Construction: This core phase includes the execution of all structural elements, such as foundation pouring, tank construction (e.g., aeration tanks, sedimentation tanks, clearwells), building structures for control rooms and chemical storage, pipe trenches, and other necessary civil infrastructure.

Phase 6: Mechanical, Electrical, and Instrumentation (MEI) Installation: This phase involves the installation of all process equipment (e.g., pumps, blowers, filters, membranes, clarifiers), piping networks, electrical distribution systems, control panels, SCADA (Supervisory Control and Data Acquisition) systems, and instrumentation crucial for plant operation. This would also include the construction and equipping of any necessary on-site substations or power supply infrastructure.

Phase 7: Pre-Commissioning, Testing, and Commissioning: This critical phase includes rigorous pre-commissioning checks, functional testing of individual equipment, integrated system testing (e.g., hydraulic tests, electrical tests, control logic verification), and performance commissioning to ensure the plant operates in accordance with design specifications and required output quality. Detailed inspection and verification of quality records are paramount to a robust, reliable system.

Project Closure and Decommissioning Phase:

Project closure and decommissioning shall be planned and executed to ensure environmental protection, worker safety, and community well-being. MUL commits to responsible site reclamation in accordance with Good International Industry Practice (GIIP), applicable Serbian legislation, and IFC Performance Standards.

Closure activities shall include, as applicable:

- Safe dismantling and removal of temporary facilities and construction infrastructure
- Proper disposal or recycling of waste materials and hazardous substances
- Rehabilitation of disturbed land areas to stable and safe conditions
- Verification that no residual contamination poses risks to human health or the environment; and
- Final environmental and safety inspections prior to site handover or release.

Where required, a site-specific Decommissioning and Site Restoration Plan shall be developed prior to closure activities.

Operation & Maintenance (O&M) Phase:

This phase encompasses the regular daily operation of the water treatment plant, desalination facility, or wastewater treatment plant, including all necessary maintenance activities to optimize desired treatment results, efficiency, and the overall lifespan of the system. Maintenance is broadly categorized into:

Preventive Maintenance: This involves scheduled routine services, inspections, and component replacements aimed at preventing equipment failures, minimizing downtime, and ensuring the plant continuously operates at its optimum performance level. The frequency and scope of preventive maintenance are influenced by factors such as the chosen technology, site environmental conditions, warranty stipulations, and seasonal operational variations.

Corrective Maintenance: This addresses unexpected breakdowns or operational issues, involving the diagnosis, repair, or replacement of faulty components to restore the plant to its normal operating condition as quickly and efficiently as possible.

4.2 Involved Entities: Construction and Operation & Maintenance Phases

Several key entities are involved in the construction, operation, and maintenance phases of an STP/WWTP/Portable Water/Desalination plant project. The responsibilities and general roles of each entity are outlined below:

Project Company (Sponsor/Owner): The Project Company (hereafter referred to as the Sponsor) is the ultimate owner and proponent of the Project. This entity is responsible for the overall project vision, securing financing, making strategic decisions, and ensuring the project's success, while retaining ownership of the completed facility.

Owner's Engineer (OE): Appointed by the Sponsor, the Owner's Engineer provides independent technical oversight throughout the project lifecycle, primarily during the construction phase. The OE ensures that the EPC Contractor adheres to all technical project specifications, design requirements, quality standards, and regulatory compliance. They serve as the Owner's technical representative.

For the Zrenjanin WWTP Project, the Owner's Engineer (OE), acting as the Expert Supervision Agency under Serbian law, shall be appointed prior to the commencement of main construction works. The OE will be mobilized during the early construction phase to provide independent oversight of technical, environmental, social, health, and safety performance, including monitoring of C-EHSMP implementation and contractor compliance.

Engineering, Procurement, and Construction (EPC) Contractor: This entity is responsible for the comprehensive, turnkey development of the Project. Their responsibilities typically include:

- **Detailed Design:** Finalizing the engineering designs, process flow diagrams, and equipment specifications based on the Project Company's requirements.

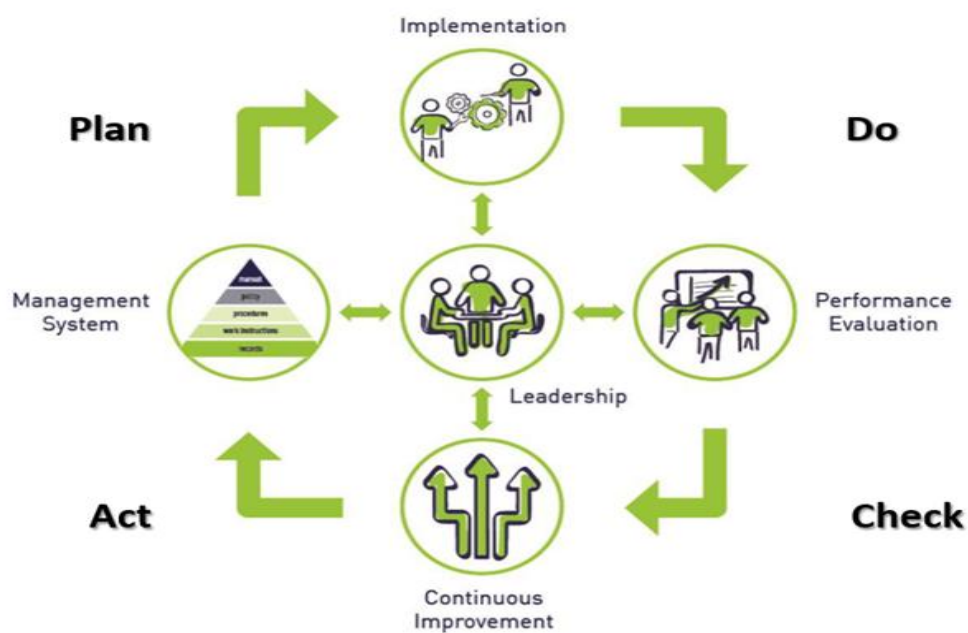
- **Procurement:** Sourcing and supplying all necessary materials, specialized equipment (e.g., membranes, pumps, treatment units, automation systems), and components.
- **Construction:** Executing all civil, mechanical, electrical, and instrumentation works, including site preparation, installation of process units, piping, power systems, and control infrastructure.
- **Testing & Commissioning:** Ensuring the plant is fully tested, commissioned, and operational to meet performance guarantees before handover.
- **Subcontractors:** Various specialized subcontractors are engaged by the EPC Contractor during the construction phase. These typically include firms responsible for specific trades such as civil works (foundations, tank construction), mechanical installation (equipment placement, piping fabrication), electrical works (power distribution, motor control centers), instrumentation & controls, and potentially specialized process installations (e.g., membrane system integration).
- **Operations & Maintenance (O&M) Contractor:** This entity is responsible for the ongoing Operation and Maintenance (O&M) of the completed water treatment or desalination facility. Their scope typically includes:
 - **Daily Operation:** Managing the day-to-day running of the plant to ensure continuous production of treated water or wastewater effluent meeting specified quality standards.
 - **Preventive Maintenance:** Implementing scheduled maintenance programs for all plant equipment and systems to prevent failures and optimize operational efficiency and asset lifespan.
 - **Corrective Maintenance:** Responding to and rectifying any unscheduled breakdowns or malfunctions promptly.
 - **Chemical Management:** Managing the storage, dosing, and handling of all required process chemicals.
 - **Performance Monitoring:** Continuously monitoring plant performance parameters, water quality, and energy consumption.
 - **Regulatory Compliance:** Ensuring ongoing adherence to all relevant environmental, health, and safety regulations.

4.3 Overview of ESMS

The Metito Utilities Limited (MUL) Environmental and Social Management System (ESMS) provides a systematic process for the identification, assessment, and mitigation of environmental and social aspects (or hazards). This system is designed to facilitate the avoidance or minimization of negative impacts (or risks) and, conversely, to promote and realize positive impacts for the workforce, the communities in which MUL operates, and society as a whole.

The ESMS functions as a dynamic and continuous process, initiated and actively supported by management. Its implementation involves robust engagement among management, workers, third-party suppliers and contractors, and other stakeholders, including communities directly or indirectly affected by MUL's activities. This system empowers the Company to continually enhance its ESMS performance year-on-year and proactively anticipate future changes. This is achieved through an ongoing process of planning, doing, checking, reviewing, and acting, all aligned with the ISO 14001 Plan-Do-Check-Act (PDCA) model, as illustrated in Figure 1, to ensure continuous improvement.

Figure 1: Elements of an ESMS based on the IFC PS 1



PLAN

The planning processes of the ESMS include the following activities and considerations:

- Defining the Project's policies, objectives, and requirements for environmental and social performance.
- Identifying environmental and social impacts and risks of the operations.
- Developing mitigations and operational controls to address impacts and risks; and
- Developing the management plans to achieve these objectives (that collectively produce the ESMP).

DO

Implementation of the ESMS through Environmental and Social Risks management includes:

- Implementing various environmental and social management plan(s); and
- Implementing mitigation and management controls.

CHECK

The assessment of the ESMS includes:

- Assess all environmental and social risks associated with project operations.
- Assessing and evaluating performance against policies and objectives; and
- Checking that mitigations and management controls are effective.

ACT

Improving ESMS performance involves making corrections to plans, mitigations or controls in response to performance monitoring.

Table-1: Associated documents of ESMS:

PDCA	SN.	Activities	Description	Evidence
PLAN	1	Leadership commitment	The policy developed under this ESMS will be communicated throughout all levels of the organization. This communication aims to clearly articulate MUL's commitment to effective environmental and social management, which is actively realized through the establishment, documentation, implementation, maintenance, and continuous improvement of its ESMS.	▪ E&S Policy
	2	Objectives, Targets and Plan	Define objectives, targets, criteria, and actions for managing potential impacts.	E&S goals, KPI, and Objectives

	3	Compliance with applicable legislation	Identify and provide access to legal requirements and other obligations	Applicable legal and other frameworks
	4	Environmental Aspect & Impact Assessment and Risk Assessment	Identifying associated impacts & risks throughout the Project life	- Environmental Aspect & Impact Procedure - Hazard Identification and Risk Assessment Procedure
DO	5	Roles and Responsibilities	Establish roles and responsibilities for the implementation of ESMS & providing sufficient management sponsorship of human resources.	Roles and Responsibilities
	6	Contractors, Suppliers and Vendors	Considering E&S management and performance in the selection and management of third-party services	- Contractor Management - Contractor identification and selection - Induction training - Supplier code of conduct
	7	Competency, training and awareness	Make personnel aware of their responsibilities and enable them to be competent to meet their responsibilities	Competency, training and awareness procedure
	8	Operational Control and Maintenance	Implement operational controls and maintain equipment to uphold E&S performance and compliance, and to manage impacts and risks EA	Environmental: - Air Emissions Management, - Water & Wastewater Management, - Noise and Vibration Management, - Waste Management, - Dust Management, - Biodiversity Conservation & Management,

				▪ Traffic and Transportation Management, ▪ Environment Monitoring Framework. Social: ▪ Stakeholder Engagement ▪ Security Management ▪ Labour Camp/Accommodation ▪ Internal Grievance Redressal Mechanism ▪ External Grievance Redressal Mechanism Occupational Health & Safety: ▪ Accident & Incident Investigation ▪ Permit to work system ▪ Personal Protective Equipment ▪ Lock out and tag out ▪ Confined Spaces ▪ Hot Works ▪ Working at Height ▪ Electrical Safety Management ▪ Slips, trips, and falls ▪ Pressure Vessels Management ▪ Ergonomic Management ▪ Emergency Response & Fire Protection ▪ Medical & First Aid
	9	Documented Information	Control and maintain documents and records associated with E&S	▪ Control of Documents Procedure ▪ Control of Records Procedure

			management	
CHECK	10	Assessing, correcting and improving performance	- Promptly report non-conformances. - Implement corrective and preventative actions to reduce recurrence. - Undertake audits, inspections, monitoring, and reviews. - Report ESMS performance and compliance to Top Management.	- Control of Non-conforming Outputs Procedure - Non-conformity and Corrective Actions Procedure - E&S Performance Monitoring, Reporting & Communication - Internal and External Audits - Internal Audit Procedure
ACT	11	ESMS Review and updation.	Evaluate the ESMS for suitability, adequacy, and effectiveness, then identify and implement improvement actions to drive continuous enhancement. Adapt the ESMS in response to evolving project requirements, organizational changes, personnel updates, operational modifications, and process revisions.	- Management Review Procedure - Control of Documents Procedure - Control of Records Procedure

5. Applicable Legislation, Standards and Other Requirements

The reference framework that guides the development of the Corporate ESMS of MUL takes into consideration the following key standards:

- IFC Performance Standards (PS), 2012
- World Bank Group (WBG) & IFC Environmental, Health and Safety (EHS) General Guidelines, 2007
- International Labour Organisation (ILO) Core Conventions
- Applicable local, national and international environmental and social (including occupational health and safety) legislations
- Other applicable laws and regulations, including country obligations under relevant international treaties such as the UN

- Declaration on the Rights of Indigenous Peoples, and International Covenant on Economic, Cultural and Social Rights
- IFC ESMS Development Toolkits.
- African Development Bank Integrated Safeguard System (ISS)

The present section provides a brief overview and understanding of these aforementioned standards.

5.1 Summary of International (USA, UK & EU) E&S Regulations

This document summarises key Environmental & Social (E&S) international regulations applicable to water, wastewater, and desalination projects across the US, UK, and EU regions, categorised under Environment, Health & Safety, Social, and Land-related domains.

Environment			
Name of Regulation / Framework (Jurisdiction)	Pre-Construction	Construction	O&M
Environmental Impact Assessment: NEPA (US) / EIA Regulations (UK) / EIA Directive 2011/92/EU	✓	—	—
Biodiversity & Protected Areas: ESA (US) / Habitats Regulations (UK) / Habitats & Birds Directives (EU)	✓	✓	✓
Water Resources & Abstraction: CWA / Water Resources Act / WFD	✓	✓	✓
Wastewater/Discharges: CWA NPDES / EPR / UWWTD	—	✓	✓
Drinking Water Quality: SDWA / Water Supply Regs / Drinking Water Directive	—	—	✓
Air Emissions & Combustion: CAA / EPR (MCPD) / IED	—	✓	✓
Marine Environment (Desalination): CWA §316(b) / Marine Licensing / MSFD	✓	✓	✓
Chemicals & Product Stewardship: TSCA / UK REACH / EU REACH	✓	✓	✓

Waste & Resource Management: RCRA / Waste Regs / Waste Framework Directive	—	✓	✓
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Social			
Name of Regulation / Framework (Jurisdiction)	Pre-Construction	Construction	O&M
Public Participation & Access to Information: NEPA / EIA Regs / Aarhus Convention	✓	—	—
Cultural Heritage: NHPA / Ancient Monuments Act / Valletta Convention	✓	✓	—
Labour & Working Conditions: FLSA / Equality Act / Working Time Directive	✓	✓	✓
Community Health, Safety & Security: Public Health & Civil Protection	✓	✓	✓

Occupational Health & Safety			
Name of Regulation / Framework (Jurisdiction)	Pre-Construction	Construction	O&M
General OHS: OSHA / HSWA & CDM / EU Framework Directive	✓	✓	✓
Hazardous Processes: EPA RMP / COMAH / Seveso III	✓	✓	✓
Chemical Exposure: HazCom / COSHH / Chemical Agents Directive	✓	✓	✓
Specific Risks: Confined Space, LOTO, WAH	—	✓	✓
Noise & Vibration: Local rules / BS 5228 / END	—	✓	—

Land-Related

Name of Regulation / Framework (Jurisdiction)	Pre-Construction	Construction	O&M
Land Acquisition & Compensation: URA / Compulsory Purchase / National Expropriation	✓	—	—
Contaminated Land / Brownfields: CERCLA / Part 2A / ELD	✓	✓	✓
Wetlands / Protected Land Use: CWA §404 / Habitats Regs / Natura 2000	✓	✓	✓

5.2 IFC Performance Standard

The International Finance Corporation (IFC) Performance Standards (PS) on Environmental and Social Sustainability stipulate that any project must meet certain requirements throughout the life cycle of an investment. This applies to investments by the IFC itself, or by other relevant intermediary financial institutions and commercial banks, including Equator Principles Financial Institutions (EPFIs) that adopt these standards. These Performance Standards are further supported by both general and sector-specific guidelines for the effective management of Environmental, Health, and Safety (EHS) issues.

IFC Performance Standard	Key Requirements	Typical Deliverables for the Water Sector
PS1 – Assessment & Management of E&S Risks & Impacts	Requires ESMS, ESIA, stakeholder engagement, monitoring, and emergency preparedness.	ESIA/ESMP, SEP, ER Plan, Climate Risk Screening.
PS2 – Labor & Working Conditions	Fair terms, OHS, worker grievance, and non-discrimination.	Labour Camp/Accommodation, OHS Plan, Worker Grievance.
PS3 – Resource Efficiency & Pollution Prevention	Efficient use of water/energy, control of effluents, emissions and wastes.	Water Balance, Energy KPIs, Brine Modelling, Waste Plan.

PS4 – Community Health, Safety & Security	Avoid adverse community impacts, manage security and emergencies.	CHSS Plan, Traffic and Transportation Management Plan (TMP), Security Risk Assessment.
PS5 – Land Acquisition & Involuntary Resettlement	Avoid/minimize displacement, compensation, livelihood restoration.	Resettlement Action Plan (RAP)/Land Acquisition and Resettlement (LRP), Entitlement Matrix, Monitoring.
PS6 – Biodiversity Conservation & Sustainable Management	Protect biodiversity, critical habitats, and ecosystem services.	Biodiversity Baseline, Biodiversity Action Plan (BAP), and Marine Ecology Studies.
PS7 – Indigenous Peoples	Free, prior, informed consent (FPIC); cultural protection.	Indigenous Peoples Plan (IPP)/Framework, FPIC Documentation.
PS8 – Cultural Heritage	Protect cultural heritage; implement chance-find procedures.	Cultural Heritage Management Plan (CHMP), Chance-Find Procedure, Archaeology Brief.

5.3 IFC Performance Standard and African Development Bank Integrated Safeguard System (ISS)

MUL aims to ensure IFC compliance across its corporate, project and operation & maintenance level practices. This framework provides a uniform and consistent standard for the Company's entire portfolio, regardless of national borders or project types. It effectively offers MUL a robust technical structure for addressing a wide range of environmental and social risks and concerns.

In instances where the IFC Performance Standards and AfDB Integrated Safeguards System (ISS) requirements, guidelines, and documents do not specifically address certain environmental and/or social aspects, other applicable international standards will be considered. These may include, for example, those from the World Health Organisation (WHO), the International Labour Organisation (ILO), and the International Union for Conservation of Nature (IUCN).

IFC Performance Standard	AfDB ISS Operational Safeguards
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Performance Standard 1 (PS 1): Assessment and Management of Environmental and Social Risks and Impacts	Operational Safeguard (OS1): Assessment and Management of Environmental and Social Risks and Impacts
Performance Standard 2 (PS 2): Labour and Working Conditions	Operational Safeguard (OS2): Labour and Working Conditions
Performance Standard 3 (PS 3): Resource Efficiency and Pollution Prevention	Operational Safeguard (OS3): Resource Efficiency and Pollution Prevention and Management
Performance Standard 4 (PS 4): Community Health, Safety and Security	Operational Safeguard (OS4): Community Health, Safety and Security
Performance Standard 5 (PS 5): Land Acquisition and Involuntary Resettlement	Operational Safeguard (OS5): Land Acquisition, Restrictions on Access to Land and Land Use, and Involuntary Resettlement
Performance Standard 6 (PS 6): Biodiversity Conservation and Sustainable Management of Living Natural Resources	Operational Safeguard (OS6): Habitat and Biodiversity Conservation and Sustainable Management of Living Natural Resources
Performance Standard 7 (PS 7): Indigenous Peoples	Operational Safeguard (OS7): Vulnerable Groups
Performance Standard 8 (PS 8): Cultural Heritage	Operational Safeguard (OS8): Cultural Heritage
No direct IFC equivalent	Operational Safeguard (OS9): Financial Intermediaries
Performance Standards 1 & 7 are related	Operational Safeguard (OS10): Stakeholder Engagement and Information Disclosure

Additionally, the ESMS Manual has been developed in accordance with other key Good International Industry Practice (GIIP) Environmental and Social (E&S) requirements, which are summarized below,

GIIP Requirement	Summary and Relevance
------------------	-----------------------

International Labour Organization (ILO) Conventions	MUL adheres to the principles enshrined in the eight fundamental conventions of the International Labour Organization (ILO). These principles cover critical aspects such as the prohibition of forced labor, freedom of association, the right to collective bargaining, equal remuneration, the abolition of forced labor (in all its forms), non-discrimination, minimum age for employment, and the elimination of child labor. This commitment reflects MUL's dedication to upholding international best practices in labor and human rights.
IFC Good Practice Notes	IFC issues good practice notes that are related to the EHS management of development projects. The key relevant good practice notes include the following: ▪ IFC Good Practice Note on Non-Discrimination and Equal Opportunity ▪ IFC Good Practice Note – Managing Retrenchment ▪ IFC Handbook for Labour and Working Conditions - Measure & Improve ▪ Your Labour Standards Performance ▪ EBRD and IFC Guidance Note on Workers' Accommodation ▪ IFC Good Practice Note – Addressing Grievances from Project-Affected ▪ Communities ▪ IFC Good Practice Manual – Doing Better Business Through Effective Public Consultation and Disclosure ▪ IFC Handbook – ESMS Implementation
UN Requirements for Security Management	The UN issued several charters related to security force management. The key items that are applicable to the Project and O&M sites include: ▪ UN Basic Principles on Use of Force & Firearms by Law Enforcement ▪ Officials ▪ UN Code of Conduct for Law Enforcement Officials ▪ UN Voluntary Principles on Security and Human Rights

6. Definitions and Terminologies

Abbreviation/Definition	Description
S. No.	Serial number
Rev. No.	Revision number
ADH	Alpha Dhabi Holding
API	American Petroleum Institute standards
AWID	Africa Water Infrastructure Development
BII	British International Investment
BOO	Build Own Operate
BOOT	Build Own Operate Transfer
BOT	Build Operate Transfer
BU	Business Unit
CSR	Corporate Social Responsibility
DAF	Dissolved Air Flotation
DNV	Det Norske Veritas
E&S	Environmental and Social
EIA/ESA	Environmental Impact Assessment/Environmental & Social Assessment
ERP	Emergency Response Plan
ESG	Environment, Social, Governance
ESMS	Environmental and Social Management System
ESS	Environmental and Social Standards
GHG	Greenhouse gas
GIIP	Good International Industry Practice
HOD	Head of Department
HSBC	Hongkong and Shanghai Banking Corporation

Abbreviation/Definition	Description
IFC	International Finance Corporation
IGF	Induced Gas Flotation
ILO	International Labour Organization
IMS	Integrated Management System
ISO	International Organization for Standardization
IT	Information Technology
KPI	Key Performance Indicators
MHL	Metito Holdings Limited
MoECC	Ministry of Environment and Climate Change
MOL	Metito Overseas Limited
MUL	Metito Utilities Limited
NGOs	Non-governmental organizations
O&M	Operations & Maintenance
PPE	Personal Protective Equipment
QHSSE	Quality, Health, Safety, Sustainability and Environment
RA	Risk Assessment
RO	Reverse Osmosis
SDGs	Sustainable Development Goals
SEP	Stakeholder Engagement Plan
TOT	Takeover Operate & Transfer
Environment	Surroundings in which the organization operates, including air, water, land, natural resources, flora, fauna, humans, and their interrelationships.

Abbreviation/Definition	Description
Hazard	A dangerous phenomenon, substance, human activity, or condition which affects the Environment, Health, Safety and Social impact.
Hazard Identifications	A source with the potential to cause injury or ill health. Hazards can include sources with the potential to cause harm or hazardous situations, or circumstances with the potential for exposure leading to injury and ill-health.
Incident	An occurrence arising out of, or in the course of, work that could or does result in injury and ill health.
Legal Register	A compilation of applicable legislation.
Management Review	A process that requires top management (Management representative) to review the ESMS to ensure its continuity, suitability, adequacy, effectiveness and alignment with the strategic direction. The process shall be conducted periodically and as needed. The method can be, but is not limited to, a meeting of top management to review and discuss the implementation of the ESMS.
Opportunities	In this document, the results of risk assessment and risk treatment processes should be considered as an integral part and/or one of the presentation methods of the term "risks and opportunities".
Risk Assessment	The process of evaluating the risk(s) arising from a hazard(s), taking into account the adequacy of any existing controls, and deciding whether or not the risk(s) is acceptable;
Risks	Risk" is the effect of uncertainty; "Opportunity" is the circumstance or set of circumstances that can lead to improvement of performance.
Social Aspect	Social aspects are elements of life that relate to other people or society as a whole. This includes any system or convention for organising, cooperating and getting along as groups, including elements of shared experience.

7. Policies

7.1 Environmental & Social (E&S) Policy Statement

MUL acknowledges its corporate responsibility to protect the environment, conserve natural resources, and promote social well-being in all areas of its operations, projects, and long-term investments. This Environmental and Social Policy applies to all MUL offices, operational facilities, and project sites, forming a core element of the company's Integrated Management System (IMS), which aligns with ISO 9001, ISO 14001, ISO 45001, and ISO 26000 standards.

MUL is committed to conducting its activities in a manner that supports sustainable development, ensures regulatory compliance, and strengthens community resilience. To achieve this, Metito will:

- a) **Comply with Environmental and Social Requirements**
Comply with all applicable environmental and social laws, regulations, permits, and international standards in every jurisdiction where MUL operates.
- b) **Prevent Pollution and Promote Sustainable Resource Use**
Prevent pollution and minimize emissions, waste generation, and resource consumption through efficient use of energy, water, and materials while promoting circular economy principles such as reduction, reuse, and recycling.
- c) **Integrate Sustainability into Design and Operations**
Incorporate sustainable, climate-resilient, and nature-based solutions into project design, construction, and operations to protect ecosystems and enhance long-term environmental performance.
- d) **Protect Biodiversity and Ecosystems**
Identify, assess, and manage biodiversity and ecosystem risks through appropriate mitigation and conservation measures, ensuring no net loss of biodiversity in line with Good International Industry Practice (GIIP).
- e) **Manage Climate Risks and Support Adaptation**
Evaluate and mitigate project-level greenhouse gas emissions and climate change risks, integrating adaptation and resilience measures into planning, design, and operational decision-making.
- f) **Uphold Social Responsibility and Human Rights**
Respect and promote the rights, safety, and well-being of employees, contractors, and affected communities by maintaining inclusive, equitable, and safe working environments that are free from discrimination or exploitation.
- g) **Engage Stakeholders and Communities**

Maintain transparent, inclusive, and meaningful stakeholder engagement throughout the project lifecycle to understand concerns, manage expectations, and co-create sustainable value with communities.

h) Empower Local Participation and Development

Contribute to local economic growth by promoting local hiring, skills development, and community investment programs that create shared value and long-term benefits.

i) Apply Rigorous Risk Management

Identify, assess, and control environmental and social risks associated with all business operations, applying the precautionary principle particularly in sensitive or high-risk environments.

j) Promote Accountability and Continuous Improvement

Establish measurable environmental and social performance objectives, monitor results, and conduct regular audits and reviews to ensure continual improvement and transparency.

k) Work Collaboratively with Partners and Stakeholders

Collaborate with suppliers, contractors, regulators, and communities to raise environmental and social performance standards across the value chain.

l) Integrate Environmental and Social Considerations Across the Lifecycle

Embed E&S considerations at every stage of a project—from concept and feasibility through construction, operation, maintenance, and decommissioning—to ensure responsible management of impacts and legacy.

It is the duty of Metito's management to demonstrate visible leadership and accountability in implementing this policy, ensuring that all employees, contractors, and partners uphold its principles. Through this commitment, MUL strengthens its role as a responsible and sustainable leader in the global water and wastewater industry—delivering long-term value for people, planet, and prosperity.

7.2 Quality, Health, Safety & Environment (QHSE) Policy Statement

MUL is committed to excellence in everything we do — delivering high-quality, sustainable, and safe water and wastewater solutions that protect people, the environment, and future generations. As a global investor, developer, and operator of essential infrastructure, we take pride in upholding the highest standards of quality, health, safety, and environmental responsibility across all projects, operations, and business units.

Our integrated, process-driven management system — certified to ISO 9001 (Quality), ISO 14001 (Environment), and ISO 45001 (Occupational Health & Safety) — ensures that QHSE principles are

embedded in our culture, decision-making, and day-to-day operations. Through integrity, innovation, and continuous improvement, we aim to deliver lasting value to our clients, communities, and stakeholders.

Our Commitments

a) Leadership, Governance & Compliance

- Comply with all applicable legal, regulatory, contractual, and other QHSE requirements across every jurisdiction in which we operate.
- Lead with accountability, integrity, and transparency, ensuring strong governance and ethical conduct at all organizational levels.
- Integrate QHSE considerations into business planning, project delivery, and operational management to safeguard people and the environment.

b) Health & Safety First

- Strive for a zero-harm workplace, preventing injury, illness, and unsafe conditions through proactive risk management and safety leadership.
- Empower every individual to take ownership of safety and to exercise the "Stop Work Authority" whenever conditions are unsafe.
- Continuously strengthen our safety culture through engagement, awareness, and behavioral safety programs.

c) Quality Without Compromise

- Deliver reliable, efficient, and resilient solutions that meet or exceed customer expectations and contractual obligations.
- Maintain robust quality assurance and control systems, ensuring consistency, compliance, and continuous improvement throughout all processes.
- Promote innovation, efficiency, and technical excellence in all aspects of project delivery and operations.

d) Environmental Stewardship

- Minimize environmental footprint by conserving natural resources, reducing waste, and preventing pollution.
- Promote sustainable water and energy use, integrate circular economy principles, and adopt nature-based solutions where possible.
- Support biodiversity, ecosystem protection, and climate resilience in the design, construction, and operation of all assets.

e) Continuous Learning & Improvement

- Establish measurable QHSE objectives and key performance indicators (KPIs) aligned with corporate goals and stakeholder expectations.
- Conduct regular audits, reviews, and lessons-learned sessions to identify opportunities for improvement.
- Foster a culture of innovation and knowledge sharing to elevate QHSE performance across the organization.

f) People, Culture & Engagement

- Build a strong QHSE culture through training, capacity building, and visible leadership commitment.
- Encourage collaboration, accountability, and inclusivity, ensuring every employee and partner plays an active role in achieving our QHSE vision.
- Recognize and reward behaviors that contribute to excellence in quality, health, safety, and environmental protection.

g) Transparent Communication

- Maintain open, honest, and proactive communication with employees, clients, contractors, and regulators on QHSE matters.
- Report performance transparently and ensure this policy is visible, accessible, and understood at all levels.

MUL will review these policies periodically to ensure its continued relevance, effectiveness, and alignment with Metito's purpose, growth, and sustainability commitments. It is communicated to all employees, partners, and stakeholders, forming an integral part of Metito's operational and governance culture.

All personnel working on MUL projects—during both construction and operation & maintenance phases—are required to fully comply with the provisions of this Environmental and Social Management System (ESMS) policies and procedures. The ESMS provides the overarching framework through which MUL ensures that its activities meet all applicable environmental and social obligations, in line with corporate policies, regulatory requirements, and international best practices.

All visitors, suppliers, contractors and service providers accessing MUL premises, project sites, or operational facilities are likewise expected to respect and adhere to the principles, controls, and behavioral standards set out in this ESMS.

The ESMS defines and communicates the expected environmental and social working practices for all MUL employees and contractors. These requirements extend to external partners, subcontractors, and tenants operating under MUL's portfolio, who must align with the same standards of environmental protection,

social responsibility, and sustainability performance. MUL shall ensure that these obligations are embedded in contractual arrangements and monitored for effectiveness.

Where national laws and international regulatory or lender standards differ, MUL will apply the more stringent or higher-value requirement to ensure full compliance and uphold good international industry practice (GIIP).

Because national legislative frameworks may vary between countries of operation, this ESMS manual shall be read in conjunction with the relevant host-country environmental, labor, health, and social regulations, as well as with applicable international frameworks such as the IFC Performance Standards, African Development Bank Integrated Safeguards System (ISS), and ISO management system requirements.

8. Roles and Responsibilities

8.1 Corporate Level

MUL shall establish, maintain, and continually enhance an organizational structure that clearly defines roles, responsibilities, accountabilities, and authorities for the effective implementation of the Environmental and Social Management System (ESMS).

MUL recognizes that sound governance, management commitment, and accountability are critical to achieving consistent environmental and social performance across all business units, projects, and operational sites. Accordingly:

- Dedicated management representatives at corporate, project, and operations levels shall be appointed with clearly defined responsibilities for implementing and maintaining the ESMS.
- Lines of responsibility and authority shall be clearly established, documented, and communicated to ensure coordination between departments, project teams, and contractors.
- Key environmental and social responsibilities shall be integrated into job descriptions, performance evaluations, and functional objectives to reinforce accountability and ownership.
- Adequate management sponsorship and allocation of human, financial, and technical resources shall be ensured on an ongoing basis to maintain and continually improve the ESMS and overall E&S performance.

This section presents the organizational structure of MUL at the corporate level, illustrating the key departments and their interlinkages. The structure is supported by a summary of roles and responsibilities that describe the functional accountability of each department and key personnel involved in environmental and social performance management.

The ESMS organizational model is implemented across two interconnected levels:

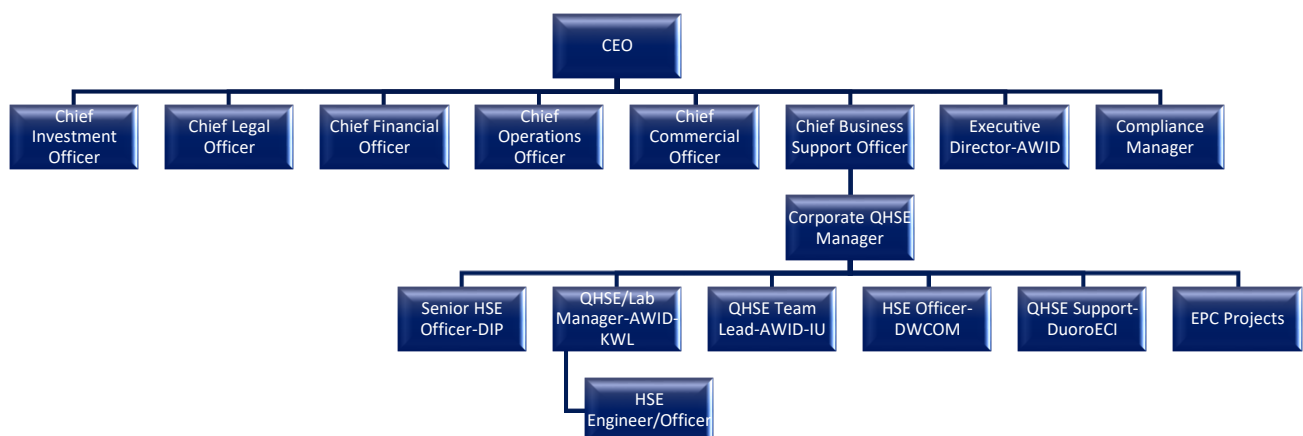
i. Corporate Level Integration

- The QHSE & Sustainability Department, led by the Corporate QHSE Manager, is responsible for the overall development, oversight, and continual improvement of the ESMS framework.
- Corporate management provides strategic direction, ensures adequate resourcing, and monitors performance through periodic reviews and audits.
- Departmental heads are accountable for embedding E&S requirements into their respective functions (Engineering, Operations, HR, Procurement, etc.) and ensuring compliance with this ESMS.

ii. Project and Operations & Maintenance (O&M) Level Integration

- Each project and O&M site shall implement the ESMS in accordance with the corporate framework, ensuring site-specific environmental and social management plans are effectively applied.
- Project Managers and O&M Managers shall designate site-level E&S focal points to coordinate implementation, monitoring, and reporting.
- Contractors and service providers engaged on MUL projects are required to align their management systems with MUL's ESMS requirements and demonstrate conformance through regular performance reviews and audits.

Through this structured approach, MUL ensures that environmental and social responsibilities are systematically integrated at every level of management and operation—reinforcing accountability, effective communication, and continual improvement across all business activities.



Responsibilities are allocated to ensure effective implementation:

Functions	Responsibilities
Top Management	1) Resource Allocation: Allocate adequate resources (time, budget, expertise, staffing, infrastructure) for full and effective ESMS implementation across all operations. 2) Responsibility Designation: Appoint qualified personnel with clear E&S roles, responsibilities, and authorities at all levels, ensuring transparent reporting and accountability. 3) Leadership & Communication: Communicate the importance of E&S performance regularly, promoting a strong E&S culture through visible leadership, open dialogue, and sustainability integration into decision-making. 4) Performance Oversight: Review ESMS performance reports, address non-conformities and stakeholder concerns promptly, and drive continual improvement via management reviews, audits, and lessons learned. 5) Competence Building: Ensure mandatory ESMS/E&S training for all personnel and encourage professional development in sustainability and E&S disciplines. 6) Visible Engagement: Conduct management walkdowns and site visits to reinforce E&S expectations, acting on observations to foster a proactive and learning-based culture. 7) Employee Participation: Encourage all personnel to report E&S concerns or improvement ideas without reprisal, and positively respond to feedback. 8) Stakeholder Engagement: Engage openly and professionally with communities and regulatory agencies, supporting processes to identify and mitigate E&S risks. 9) Emergency Readiness: Actively participate in emergency preparedness drills and reviews to ensure readiness for incidents or community-related emergencies.

	10) Audit & Improvement Champion: Participate in ESMS audits, ensuring prompt addressing of findings and championing the use of audit outcomes for system and performance improvement. 11) Recognition & Reinforcement: Recognize, promote, and reward good E&S performance and behaviors, reinforcing commitment to continuous improvement and sustainable value creation through positive leadership.
Corporate QHSE Manager	1) ESMS Implementation & Oversight: Support effective ESMS implementation, monitoring, and continual improvement across all MUL business units, projects (including AWID assets), and O&M sites. Facilitate cross-functional integration of E&S principles. 2) Documentation & Maintenance: Maintain and update all Corporate ESMS documentation (manuals, procedures, records) and ensure accuracy, alignment, and timely reporting with relevant departments. 3) E&S Assessment & Due Diligence: Support E&S screening, ESDD, and ESIA for new projects, ensuring findings are incorporated into decision-making and reflected in ESAPs/ESMPs across all MUL sites. 4) Training & Capacity Building: Identify and coordinate ESMS induction and job-specific E&S training needs (IFC PS1, ISO 45001) to strengthen staff competence and awareness. 5) CAPA Management: Ensure all gaps, findings, and non-conformities are recorded, tracked, and addressed promptly, monitoring CAPA effectiveness through follow-up reviews. 6) Compliance & Legal: Ensure compliance with all applicable E&S legislation, permit conditions, and lender requirements, coordinating with legal advisors on regulatory updates. 7) Stakeholder Engagement: Conduct/facilitate community meetings, manage grievances, and support SEP/GRM implementation at corporate and project levels. 8) Liaison & Coordination: Align HR policies with E&S standards (with CBSO), coordinate with Compliance Manager (whistle-blowing, GRM, SEP), ensure ESMS integration with AWID sites, and serve as focal point for external stakeholders (IFC, BII, World Bank, authorities, certification bodies).

	9) Monitoring, Auditing & Reporting: Oversee site-level E&S monitoring, review audit findings (ensuring CAPA closure by plant-level ESMS Managers), and consolidate corporate E&S performance reports for management, lenders, and authorities. 10) Emergency Preparedness & Incident Management: Support EPRP implementation at all sites, participate in drills and post-incident reviews, and integrate learnings into preventive measures. 11) Overall Accountability: The Corporate QHSE Manager acts as a central link, reporting to the Chief Business Support Officer, accountable for identifying, mitigating, and monitoring E&S risks according to IFC Performance Standards, lender requirements, and Metito's sustainable development commitments across all MUL assets.
HSE Coordinator	1) Coordination & Collaboration: - Coordinate all ESG activities across the organization, ensuring alignment with corporate sustainability and ESMS commitments. - Collaborate cross-departmentally to integrate ESG principles into business planning and operations. - Support Corporate QHSE Manager and Head of ESMS in consolidating ESG data, aligning KPIs with ESMS reporting. 2) Monitoring & Performance Tracking: - Monitor, collect, and analyze ESG-related KPIs (environmental, social, governance). - Maintain the corporate ESG dashboard and report progress against targets. - Identify ESG trends, gaps, and improvement opportunities, providing recommendations. 3) Reporting & Disclosure: - Prepare periodic ESG reports for internal management, lenders, and external stakeholders. - Support annual sustainability/ESG disclosures (GRI, SASB, IFC, etc.). - Ensure ESG performance data is verifiable, accurate, and consistent. 4) Compliance & Assurance:

	- Coordinate internal and external ESG audits, verifying compliance with policies and standards. - Ensure ESG audit findings are addressed via corrective/preventive actions. - Maintain awareness of evolving ESG legislation and lender requirements for proactive compliance. 5) Stakeholder Engagement & Communication: - Engage with internal/external stakeholders to communicate ESG commitments and updates. - Facilitate stakeholder feedback, supporting SEP and Grievance Mechanism implementation. - Promote transparency and collaboration in ESG communications. 6) Capacity Building & Awareness: - Support ESG training, workshops, and awareness campaigns to strengthen organizational understanding. - Encourage employee participation in ESG initiatives across MUL sites. 7) External Partner Collaboration: - Liaise with investors, lenders (IFC, BII, World Bank), consultants, and verifiers for ESG data, audits, and reviews. - Coordinate with community/environmental partners for social investment and biodiversity initiatives. 8) Overall Accountability: The HSE Coordinator, reporting to the Corporate QHSE Manager and collaborating with the Head of ESMS, ensures consistent integration of ESG objectives across all projects and operations, supporting MUL's sustainability vision by ensuring measurable, transparent, and internationally aligned E&S governance practices.
Community Liaison Officer (CLO)- Designated	1) Stakeholder & Community Engagement: - Plan and conduct formal/informal consultations with local communities, landowners, authorities, and affected stakeholders throughout the project lifecycle (planning, land acquisition, construction, operations). - Support SEP implementation, ensuring transparent, inclusive, and culturally appropriate engagement. - Maintain records of all stakeholder meetings, issues, and commitments for traceability.

	2) Land Acquisition Support: ▪ Collaborate with Land Acquisition teams to support community engagement and facilitate negotiation processes. ▪ Assist in E&S screening/due diligence for land transactions, addressing social risks and cultural sensitivities. ▪ Provide timely and accurate communication on compensation, eligibility, and grievance mechanisms to affected parties. 3) Site ESMS & Safety Implementation: ▪ Support site-level ESMS and Safety Management System implementation, focusing on community-related commitments. ▪ Collaborate with Project Managers/HSE to minimize community health, safety, and security risks from project activities. ▪ Immediately report community-related incidents, near misses, or grievances to Corporate QHSE Manager and Project Management. 4) Relationship Management & Communication: ▪ Build and maintain positive, trust-based relationships with community representatives, leaders, local NGOs, and authorities. ▪ Clearly communicate project E&S impacts, mitigation measures, and opportunities to stakeholders. ▪ Identify and report emerging community issues, risks, or expectations for proactive resolution. 5) Grievance Redress & Conflict Resolution: ▪ Act as the primary contact for receiving, documenting, and forwarding community grievances via the GRM. ▪ Ensure grievances are logged, acknowledged, and escalated for timely resolution. ▪ Follow up with complainants to ensure satisfactory resolution and documentation. 6) Internal & External Coordination: ▪ Coordinate with internal departments (HR, Procurement, Legal, Operations) for consistent social safeguards and E&S commitment alignment.
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	▪ Liaise with external stakeholders (government, local councils, NGOs) for regulatory compliance. ▪ Support community investment, livelihood restoration, or CSR initiatives under MUL’s social sustainability framework. 7) Monitoring, Reporting & Documentation: ▪ Maintain detailed records of community interactions, feedback, and commitments in the Stakeholder Engagement Log. ▪ Prepare periodic Community Relations Reports summarizing engagement, grievances, and KPIs. ▪ Contribute inputs for corporate and project-level E&S performance reporting to IFC, BII, and other stakeholders. 8) Overall Accountability: Reporting to the Project Manager and coordinating with the Corporate QHSE Manager and ESG Coordinator, the CLO ensures transparent, fair, and respectful community relationships, fostering goodwill, minimizing social risks, and supporting MUL’s commitment to inclusive and sustainable development.
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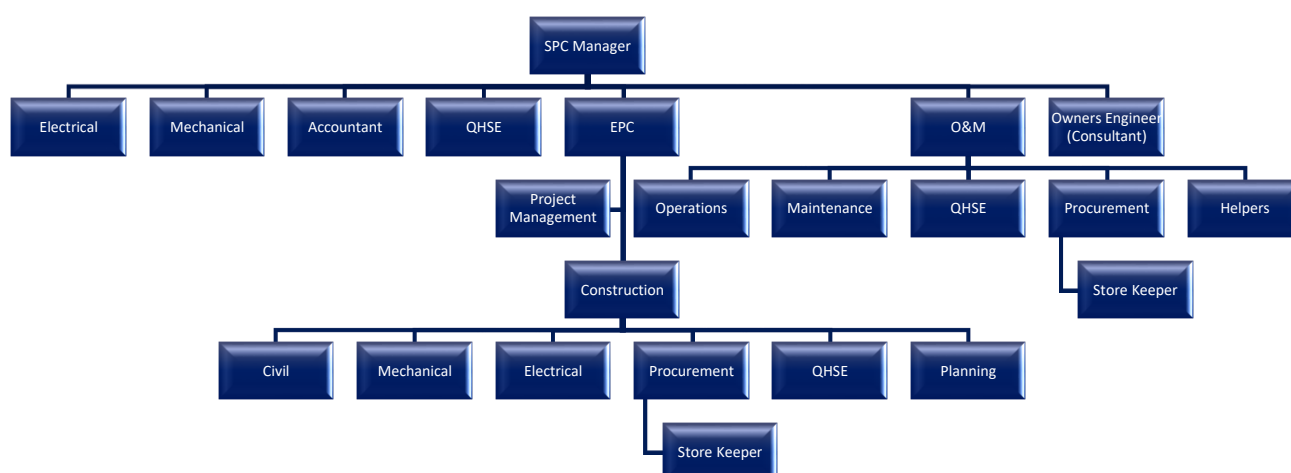
8.2 Construction Phase

The figure below illustrates the organizational structure for the construction phase of Metito Utilities Limited (MUL) projects. This structure defines the lines of authority, reporting relationships, and key responsibilities of personnel involved in implementing the Environmental and Social Management System (ESMS) during construction activities.

This chart represents a generic construction-phase organizational framework that outlines how MUL manages environmental, social, health, and safety responsibilities during project execution. The structure ensures effective communication, accountability, and coordination among corporate, project management, and site-level teams.

For each actual project, the specific project organization chart—reflecting the appointed personnel, reporting hierarchy, and role assignments—will be provided in the **Annexure** section of this ESMS Manual. Any additional or project-specific roles and responsibilities not included in this general framework shall also be described within that **Annexure** section.

Unless otherwise stated, the roles and responsibilities defined in this section shall apply to all MUL construction projects and serve as the baseline requirements for the effective implementation of the ESMS across all sites.



Refer to the **Annexure** section for the detailed project-specific organizational structure. The organizational framework provided herein illustrates the core ESMS implementation structure. However, it is essential to note that each project plan will specify roles and responsibilities, clearly distinguishing between contractors and suppliers where applicable. This overview of the organizational structure is not exhaustive of every role provided by the EPC Contractor.

Functions	Responsibilities
SPC Manager	- Provide overall strategic management, coordination, and leadership for the comprehensive implementation of the ESMS. - Ensure strict compliance with the IFC Performance Standards, AfDB Integrated Safeguards System (ISS), and other applicable international best practices for environmental and social management. - Oversee the environmental and social performance of EPC Contractors, ensuring their adherence to approved Method Statements, Environmental and Social Impact Assessments (ESIAs), Risk Assessments, and all stipulated Environmental, Social, Health & Safety (ESHS) Procedures.

	▪ Review and formally approve the Contractor's ESHS Plans, Emergency Response Plans, Traffic Management Plans, Waste Management Plans, and Community Engagement Plans, verifying their alignment with the Corporate Environmental, Health, Safety, and Social Management Plan (CEHSSMP) and project-specific ESMP. ▪ Coordinate effectively with the appointed Environmental and Social Consultant and Expert Supervisor to diligently monitor site ESHS performance, analyze incident trends, assess social impacts, and verify compliance levels. ▪ Lead and facilitate regular (e.g., monthly and quarterly) ESHS performance review meetings, diligently track the progress of corrective actions, and ensure the timely closure of all non-compliances and audit findings. ▪ Authorize and oversee the accurate and timely reporting of major ESHS incidents, environmental breaches, social grievances, and community-related concerns to relevant regulatory authorities, lenders, and key stakeholders. ▪ Ensure the allocation of adequate resources, including qualified personnel, necessary training, and sufficient budget, to effectively achieve environmental and social compliance and performance objectives. ▪ Facilitate and actively participate in both external and internal ESMS audits, ensuring the timely submission of comprehensive audit responses and the effective implementation of all recommendations. ▪ Serve as the primary liaison and key contact point for regulatory authorities, lenders, project-affected communities, and other external stakeholders regarding all environmental, social, health, and safety matters.
Project Manager	▪ Oversees the comprehensive implementation and adherence to the Company's Environmental and Social Management System (ESMS) and Quality, Health, Safety, and Environment (QHSE) Management System across the entire Project Site. ▪ Ensures the effective implementation of all environmental, social, health, and safety requirements specified in the project-specific Corporate

	Environmental, Health, Safety, and Social Management Plan (CEHSSMP) and relevant project plans. ▪ Provides full support and guidance to the Construction Manager, Site Engineers, QHSE Engineers/Officers, and all project personnel in enforcing all Quality, Health, Safety and Environment & Social (QHSE) matters. This includes active participation in client and internal QHSE meetings, overseeing QHSE training for staff and operatives, and promoting a strong QHSE culture. ▪ Serves as a visible role model by personally demonstrating exemplary adherence to all ESMS and QHSE policies, procedures, and safe work practices. ▪ Ensures that all environmental incidents, social grievances, accidents, and near-miss cases are officially reported, thoroughly investigated, and submitted in a timely manner to the Client, concerned authorities, and internal stakeholders, along with proposed corrective and preventive actions.
Construction Manager	▪ Champion the implementation of the company's comprehensive Environmental and Social Management System (ESMS) across the Project Site. ▪ Ensure the diligent implementation of the Corporate Environmental, Health, Safety, and Social Management Plan (CEHSSMP) and all project-specific ESHS plans on the Project Site. ▪ Verify that all necessary QHSE risk assessments, including method statements and hazard analyses, are conducted within their areas of responsibility, and proactively seek specialist QHSE advice when required. ▪ Ensure the provision of adequate QHSE resources, including personnel, equipment, and budget, to support project activities. ▪ Actively communicate with Consultant Engineers, Environmental and Social Advisors, and attend all relevant QHSE meetings. ▪ Provide full support and collaboration to the QHSE Engineer/Officer and their team. ▪ Ensure that all QHSE inspections, audits, and monitoring activities are carried out rigorously and within the scheduled periods.

	▪ Ensure that all environmental incidents, social grievances, accidents, and near-misses are promptly and accurately reported, investigated, and addressed. ▪ Serves as a key custodian of project-specific QHSE documentation and holds significant responsibility for all QHSE aspects associated with the Project within their scope. ▪ Ensure the names and contact details of the following key personnel and emergency information are prominently displayed on the site notice board: ○ First Aid Team ○ Fire Fighting Team ○ Emergency Contacts ○ Key HSE Personnel ▪ Ensure that all construction activities are undertaken with strict adherence to the Project's Environmental, Social, Health, and Safety Plan, Consultant ESG requirements, and MUL's contractual and statutory ESHS obligations. ▪ Ensure that all personnel under their supervision work in a safe and environmentally responsible manner, complying with all aspects of the Project's Environmental, Social, Health, and Safety Plan, Consultant ESG requirements, and MUL's QHSE standards; leading by personal example.
Site Engineer / Project Engineer (Civil / Electrical / Mechanical)	▪ Acts on behalf of the Construction Manager in QHSE matters during the Construction Manager's absence. ▪ Supervises and monitors all work execution to ensure full compliance with established QHSE standards, procedures, and quality requirements. ▪ Recognizes and upholds that responsibility towards QHSE is paramount and equal to the commitment towards productivity and project delivery. ▪ Proactively prevents any unsafe or environmentally non-compliant activities from being carried out by ensuring that all necessary QHSE documentation, such as Permit to Work, specific Risk Assessments, Environmental Assessments/Aspects Identification, and Social Impact Considerations, has been obtained, reviewed, and appropriately addressed for every activity.

	▪ Actively promotes and participates in Site QHSE Inspections, QHSE Training sessions, and Audits as required by the project schedule and ESMS. ▪ Participates in the investigation of all environmental incidents, social grievances, accidents, and near-misses in conjunction with the QHSE Engineer/Officer, contributing to root cause analysis and corrective actions. ▪ Ensures that all QHSE non-conformances identified during inspections, audits, monitoring, and/or meetings are promptly addressed, recorded, and closed out. ▪ Effectively executes the Project's Environmental, Social, Health, and Safety Plan in close coordination with the Construction Manager and QHSE Engineer/Officer. ▪ Leads by personal example, demonstrating full commitment to safe, environmentally sound, and socially responsible work practices at all times.
Site HSE Officer / Engineer	▪ Proactively identifies hazards and possesses the authority to stop any activities where there is imminent danger to the lives of personnel, project assets, the environment, or the surrounding community during the project execution phase. ▪ Identifies environmental, social, and safety hazards, assesses risks, and ensures that appropriate corrective and preventive actions are promptly taken to rectify or mitigate them effectively. ▪ Ensures that all relevant Method Statements, Risk Assessments, and Environmental/Social Impact Assessments (ESIA) for all project activities are developed, available, reviewed, and approved prior to commencement. ▪ Implements and continuously monitors the effectiveness of Risk Assessments and Environmental/Social Impact Assessments, ensuring compliance with mitigation measures. ▪ Develops, outlines, and presents comprehensive QHSE induction training and regular safety and environmental awareness programs for all project personnel.

	▪ Conducts periodic and thorough checks of the Permit to Work (PTW) System as outlined in the Project QHSE Plan, ensuring strict adherence and effectiveness. ▪ Organizes and conducts regular toolbox talks, including specific briefings on new or high-risk activities as necessary. ▪ Establishes and clearly designates Emergency Assembly Areas, and actively participates in the execution and drills of the Project Emergency Response Plan in case of an emergency. ▪ Monitors the availability, condition, and functionality of all firefighting and emergency response equipment, reflecting findings in checklists and ensuring immediate rectification of any identified issues. ▪ Acts as a trained first responder when required, coordinating effectively with ambulance services and hospitals in the event of an emergency or medical incident. ▪ Produces, updates, and maintains all project-related QHSE documents and records for accurate tracking, reporting, and future reference, including those required for Consultant Engineers' inspections, internal/external audits, and regulatory compliance. ▪ Facilitates and supports all QHSE-related audits conducted by Consultants, Regulatory Authorities, or Third Parties, ensuring smooth processes and timely provision of information. ▪ Conducts site QHSE briefings for visitors and third parties, as well as comprehensive QHSE Safety Inductions for all new employees and contractors on the project site. ▪ Leads by personal example, consistently demonstrating adherence to all QHSE policies, procedures, and best practices.
Community Liaison Officer (CLO)	▪ Serve as the primary point of contact and facilitate effective two-way communication between the project and local communities/stakeholders regarding all project-related environmental, social, health, safety, and economic concerns and opportunities. ▪ Implement the Project-specific Stakeholder Engagement Plan (SEP), ensuring that all community engagement activities are thoroughly

	documented, conducted in a culturally appropriate and accessible manner, and align with IFC PS1 requirements for disclosure and consultation. ▪ Manage the Project's Grievance Redress Mechanism (GRM), ensuring all grievances and feedback from affected communities are systematically recorded, promptly investigated, and resolved within agreed-upon timeframes and in a transparent manner. ▪ Facilitate and organize community meetings, public awareness sessions, and targeted consultations on potential project impacts, proposed mitigation measures, community benefits, and safety procedures. ▪ Ensure timely, accessible, and culturally appropriate communication with vulnerable groups within the affected communities, and ensure their specific concerns and inputs are actively sought, documented, and addressed in line with IFC PS1 principles for assessment and management of environmental and social risks and impacts. ▪ Maintain an updated and comprehensive stakeholder database and a detailed grievance register; submit periodic, consolidated reports on stakeholder engagement and grievance management to the SPC Manager and Project Company. ▪ Collaborate proactively with local authorities, emergency services, non-governmental organizations (NGOs), and community leaders to address concerns related to community safety, local employment opportunities, and broader social development initiatives related to the project. ▪ Promptly report any recurring or critical community issues, significant social risks, or unresolved grievances to the SPC Manager for immediate escalation and the implementation of corrective action. ▪ Support the effective communication of emergency alerts, planned construction activities, or any operational changes that may potentially affect nearby residents or community access. ▪ Verify that all community-related commitments, agreements, and mitigation measures established during the Environmental and Social Impact Assessment (ESIA) process are effectively implemented, monitored, and reported.
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Owners Engineer	▪ Sponsor will appoint an Owner's Engineer (OE) for the project to ensure that the EPC Contractors are adhering to the technical project specifications. ▪ Ensure EPC Contractors adhere to all technical project specifications, design requirements, and contractual obligations. This includes a thorough review of detailed designs and compliance with relevant codes and standards during the design and planning phases. ▪ Provide oversight during the construction phase, monitoring site activities to ensure compliance with approved designs, quality assurance/quality control (QA/QC) procedures, and all relevant health, safety, and environmental (HSE) regulations. ▪ Verify the EPC Contractor's adherence to the project's Environmental and Social Management System (ESMS), including the implementation of the Corporate Environmental, Health, Safety, and Social Management Plan (CEHSSMP) and project-specific Environmental and Social Management Plans (ESMPs). ▪ Conduct independent HSE inspections and audits to ensure the EPC Contractor maintains high standards of occupational health and safety, environmental protection, and social responsibility. ▪ Review and provide technical feedback on the EPC Contractor's QHSE plans, such as Waste Management Plans, Emergency Response Plans, and Community Engagement Plans, ensuring their alignment with the overall project ESMS and international best practices, including IFC Performance Standards. ▪ Monitor and report on the EPC Contractor's QHSE performance, identifying potential non-conformances, and recommending corrective actions to mitigate environmental and social risks. ▪ Act as a technical advocate for the Owner's interests towards all third parties, including regulatory bodies, lenders, and other stakeholders. ▪ Support the Owner in safeguarding their investment by ensuring alignment with industry standards and minimizing risks related to quality, cost, and schedule throughout all project development phases
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Supervisor / Foreman / Technician	▪ Ensures the safety, health, and well-being of all personnel under their supervision during the execution of work, while also safeguarding the environment and client assets. ▪ Carries out all assigned tasks in strict compliance with the Project's QHSE Plan, site-specific procedures, and relevant permits. ▪ Conducts daily toolbox talks for all personnel on the Project Site, often organized in coordination with the QHSE Engineer/Officer, before commencing any operational phase. These talks are crucial for identifying potential QHSE hazards involved with the specific job, discussing mitigation measures, and reinforcing safe work practices. ▪ Takes an active and constructive part in monthly QHSE performance review meetings and other relevant QHSE forums. ▪ Ensures that all personnel under supervision are properly trained, competent, and authorized for their specific duties to carry out the work scope effectively and safely. ▪ Ensures organized, clean, and environmentally responsible workplaces to facilitate the safe and efficient execution of activities, adhering to good housekeeping standards. ▪ Ensures that appropriate Personal Protective Equipment (PPE), where applicable, is correctly selected, used, and maintained by all personnel. ▪ Promptly reports all incidents, accidents, near-misses, and environmental or social concerns by following the established reporting chart and procedures described in the Construction Environment, Health & Safety Management Plan and the broader ESMS. ▪ Ensures all lifting equipment and appliances within their area of responsibility are in good condition, properly inspected, certified, and operated by qualified personnel. ▪ Acts as Safety/Fire Watch when designated and initiates the Emergency Procedure as outlined in the Project Emergency Response Plan when required. ▪ Ensures that a clear, adequate, and safe means of access and egress is maintained throughout each workplace and work area.
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Workers / Helpers	▪ Takes reasonable care to protect the health and safety of themselves, other workers present, and the environment while performing all work tasks. ▪ Actively cooperates with supervisors and management to ensure the project is completed safely, efficiently, and in an environmentally and socially responsible manner. ▪ Makes appropriate, safe, and environmentally sound use of all machinery, equipment, tools, hazardous substances, and other working equipment. ▪ Wears and properly maintains all required Personal Protective Equipment (PPE) at all times, as instructed and provided. ▪ Immediately reports to their superior any deficiencies in safety, environmental concerns, social issues, or any hazardous or unsafe conditions encountered. ▪ Does not remove, modify, or tamper with any safety signs, control devices, environmental protection measures, or social safeguard barriers at the site without explicit permission. ▪ Does not undertake any work or activity for which they have not received adequate training, authorization, and a clear understanding of the associated QHSE risks and mitigation measures. ▪ Strictly follows all road/traffic safety rules, in addition to basic and personal safety rules, and project-specific environmental and social guidelines. ▪ For designated tasks involving vehicles, inspects vehicles as per the provided checklist and submits records to the QHSE Engineer/Officer or assigned personnel.
Contractors, Subcontractors, Vendors and Suppliers	▪ Comply with all applicable legal and regulatory requirements and adhere strictly to all contractual obligations pertaining to environmental protection, social responsibility, occupational health and safety, and labor conditions. This includes full adherence to the Project Construction Environment, Health, Safety, and Social Management Plan (CEHSSMP), IFC Performance Standards, and World Bank Group (WBG) Environmental, Health, and Safety (EHS) Guidelines relevant to their activities.

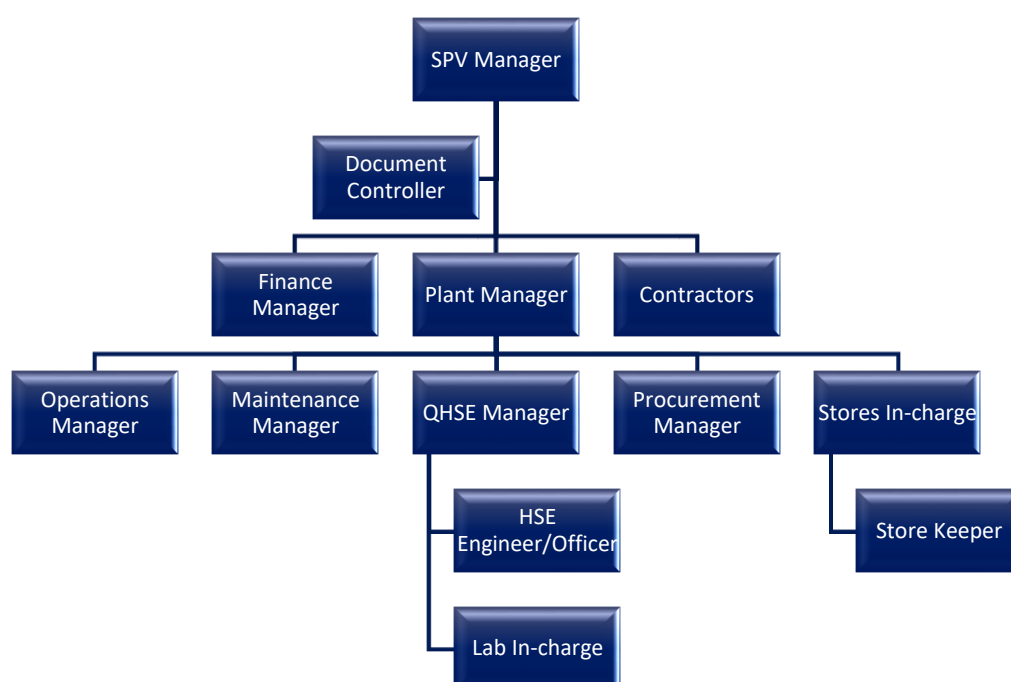
- Develop and implement their own project-specific Environmental and Social Management Plan (ESMP) and Health & Safety (H&S) specifications, aligned with the overall Project ESMS and CEHSSMP. This includes submitting a detailed CESMP for review and approval before commencing construction activities.
- Provide a comprehensive organizational chart detailing key personnel (directly reporting to their site manager) and including a dedicated QHSE Engineer/Officer. This QHSE personnel's primary function is to assist their site manager in ensuring all activities comply with the approved CEHSSMP and international standard safe and environmentally sound working practices.
- Ensure sufficient and adequately qualified manpower (staff and workers) are deployed on the project site to execute tasks safely and effectively.
- Ensure that all their personnel, including any sub-subcontractors they may employ, are fully aware of and comply with all project-specific QHSE requirements.
- Provide appropriate QHSE training and awareness programs for all their personnel and any further subcontractors they may engage on the project, ensuring competence in QHSE matters.
- Proactively identify and analyze all job-specific hazards through Job Hazard Analyses (JHA) or Risk Assessments and Environmental Aspects Assessments. Subsequently, they shall apply all necessary preventive and protective measures, including the provision and correct use of appropriate Personal Protective Equipment (PPE).
- Establish and maintain robust QHSE record-keeping systems as described in the CEHSSMP and their own ESMP, ensuring that all records are accurately kept, easily retrievable, and auditable.
- Fully cooperate with MUL in the investigation of all environmental incidents, social grievances, accidents, or near-misses to identify root causes, establish effective corrective actions, and prevent recurrence.
- Actively participate in required weekly/monthly QHSE meetings and comply with all client/consultant coordination directives and requirements, contributing to a proactive safety culture.

	- Implement and manage specific plans as required by their scope of work, such as Waste Management Plans, Hazardous Product and Spills Management Plans, and Emergency Preparedness Plans, ensuring they comply with EHS Guidelines and IFC standards. - Adhere to all ESMS and contractual requirements related to labor conditions and community engagement, including establishing and making available a Grievance Mechanism for their employees and addressing any project-related social impacts.
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8.3 Operations & Maintenance Phase

The organizational structure provided below details the key roles and reporting lines for the Operation & Maintenance (O&M) phase of the Project. This section specifically identifies the lines of authority and outlines the roles and responsibilities of personnel involved in the implementation and management of the Environmental and Social Management System (ESMS) during O&M activities.

It is important to note that this represents a general O&M organizational structure. For the specific, detailed organizational structure applicable to a particular site or project, please refer to the relevant **Annexure** section. The roles and responsibilities defined within this general section will serve as the primary reference; any additional or project-specific responsibilities not covered here will be detailed and made available in the **Annexure** section, as dictated by specific project or O&M requirements.



Functions	Responsibilities
SPV Manager	As stated in section 8.2, but only for Operations and Maintenance activities.
Plant Manager	- Provide strategic direction and leadership for all O&M activities, ensuring alignment with MUL's overall business objectives, ESMS policies, and performance targets. - Oversee the day-to-day operations and maintenance of the plant, ensuring continuous, efficient, and safe functioning of all physical assets. - Foster a culture of continuous improvement in all aspects of plant operations, including ESHS performance. - Ensure the plant's full compliance with all relevant national and local environmental regulations, permits, and requirements, as well as international standards such as IFC Performance Standards, AfDB ISS, and World Bank Group EHS Guidelines. - Implement and maintain the plant-specific ESMS as an extension of the corporate ESMS, ensuring proper management of environmental and social impacts, worker health and safety, and community relations. - Establish and oversee operational controls and maintenance programs to manage significant environmental and social aspects, hazards, and issues identified through the ES risk assessment process. - Develop and implement strategies to mitigate environmental risks, manage waste streams effectively, ensure efficient resource utilization (water, energy, chemicals), and control emissions and discharges according to regulatory limits. - Ensure robust occupational health and safety programs are in place and adhered to, protecting plant personnel and visitors. - Maintain proper records and documentation related to ESHS performance, incidents, and compliance for internal review and external audits. - Operational Efficiency & Maintenance Management:

	▪ Optimize plant processes to ensure the desired quality and quantity of treated water, effluent, or desalinated water is consistently produced while meeting all discharge or distribution standards. ▪ Oversee the implementation of preventive and corrective maintenance programs to maximize asset uptime, extend equipment lifespan, and reduce operational costs. ▪ Manage inventory and spare parts to support continuous operation and maintenance activities. ▪ Set production targets and manage resources (personnel, budget, materials) to achieve operational goals efficiently. ▪ Liaise with off-takers, local communities, and other external stakeholders to maintain good relations and address any concerns. ▪ Report on ESMS performance, operational efficiency, and compliance to senior management, clients, and regulatory authorities through daily, weekly, and monthly reports. ▪ Manage and address grievances from employees and the community related to plant operations, ensuring timely investigation and resolution as per the GRM. ▪ Lead, train, and develop the O&M team, fostering a skilled workforce capable of operating and maintaining complex water treatment and desalination technologies. ▪ Ensure that all plant personnel are adequately trained in QHSE procedures, emergency response, and their specific operational tasks.
QHSE Manager	▪ Develop, implement, and continuously improve the Integrated Management System (IMS) covering Quality, Health, Safety, Environment, and Social (QHSE) aspects, ensuring compliance with ISO 9001, ISO 14001, ISO 45001, and ESMS requirements. ▪ Establish and maintain QHSE policies, procedures, and programs to ensure regulatory compliance and adherence to industry best practices and international standards (e.g., IFC Performance Standards, World Bank Group EHS Guidelines).

- Lead the development and update of the plant-specific ESMS, including QHSE risk assessments, impact analyses, and mitigation strategies for O&M activities.
- Monitor evolving industry QHSE regulations, standards, and best practices, and advise on their application to the plant's operations.
- Operational Oversight & Compliance:
- Ensure that all plant operations and maintenance activities comply with QHSE regulations, permits, licenses, and internal standards.
- Provide expert support and advice to the Plant Manager, O&M teams, and all personnel on matters related to QHSE performance.
- Coordinate efforts to ensure the safety of employees, contractors, and visitors, while minimizing operational risks.
- Oversee the management of environmental aspects, including water quality, effluent discharge, emissions, waste management, and resource efficiency.
- Ensure effective implementation of occupational health and safety programs to protect workers.
- Plan, execute, and report on internal and external QHSE audits and inspections in accordance with the annual plan.
- Monitor plant QHSE performance through key indicators, analyze trends, and identify areas for improvement.
- Report on the plant's QHSE performance and compliance to the Plant Manager, senior management, regulatory authorities, and other stakeholders (e.g., lenders) as required.
- Manage document control for all QHSE-related records, procedures, and reports.
- Develop and manage the incident reporting, investigation, and root cause analysis process for all QHSE incidents, accidents, near misses, and environmental or social non-conformances.
- Ensure the timely implementation and tracking of corrective and preventive actions to prevent recurrence of incidents and non-compliances.

	▪ Oversee emergency preparedness and response plans, including conducting drills and ensuring personnel are trained. ▪ Liaise with external regulatory bodies, customers, and the community on QHSE matters. ▪ Manage the plant's Grievance Redress Mechanism (GRM) for internal and external stakeholders, ensuring grievances are recorded, investigated, and resolved. ▪ Support stakeholder engagement activities as per the Stakeholder Engagement Plan (SEP) for O&M. ▪ Cultivate and maintain strong relationships with customers and the supply chain regarding QHSE matters. ▪ Identify QHSE competency gaps among personnel and address them through targeted training programs. ▪ Develop and deliver QHSE training courses using internal and external resources, covering topics like hazard identification, emergency procedures, and safe work practices. ▪ Promote QHSE awareness and culture throughout the organization. ▪ Contractor & Supplier Management: ▪ Ensure that contractors and suppliers working on site comply with all relevant QHSE requirements and the plant's ESMS. ▪ Evaluate suppliers and contractors on their QHSE performance. ▪ Review and approve contractor QHSE plans, method statements, and risk assessments for O&M activities.
Operations Manager	▪ Oversee and manage all daily operational activities of the plant to ensure continuous and efficient production. ▪ Develop and implement operational schedules, procedures, and work instructions to meet quality, quantity, and compliance targets. ▪ Monitor plant performance parameters (e.g., flow rates, water quality, energy consumption) and adjust operations as necessary to optimize efficiency and output. ▪ Ensure compliance with all operational permits, licenses, and discharge consents.

	▪ Manage chemical usage, inventory, and safe handling practices in accordance with ESMS guidelines. ▪ Ensure operational adherence to the plant's ESMS policies, procedures, and the Corporate ESMS requirements. ▪ Implement and enforce all environmental protection measures related to plant operations, including effluent quality, emissions control, and waste segregation. ▪ Ensure safe operating conditions and practices for all operations personnel, upholding occupational health and safety standards. ▪ Identify and assess potential environmental and social risks related to daily operations and implement controls to mitigate them. ▪ Ensure timely reporting of any environmental incidents, social concerns, or safety breaches arising from operations. ▪ Manage operational budgets, optimize resource utilization (water, energy, chemicals, consumables), and identify cost-saving opportunities. ▪ Lead, train, and supervise operations teams, ensuring they are competent and adhere to all operational and QHSE procedures. ▪ Coordinate with the Maintenance Manager to schedule planned outages and maintenance activities to minimize operational disruption. ▪ Track and report key operational performance indicators (KPIs) and compliance metrics to the Plant Manager. ▪ Participate in QHSE performance reviews and contribute to continuous improvement initiatives. ▪ Ensure accurate and timely logging of operational data and records.
Maintenance Manager	▪ Develop, implement, and manage comprehensive preventive, predictive, and corrective maintenance programs for all plant assets (mechanical, electrical, instrumentation, civil structures). ▪ Schedule and prioritize maintenance tasks to maximize equipment reliability and minimize downtime, coordinating closely with the Operations Manager. ▪ Oversee the execution of all maintenance activities, ensuring quality workmanship and adherence to technical specifications.

	▪ Manage spare parts inventory, procurement, and supply chain for maintenance needs. ▪ Ensure all maintenance activities are conducted in full compliance with the plant's ESMS, health, safety, and environmental procedures. ▪ Conduct risk assessments for maintenance tasks, especially those involving hazardous work (e.g., confined space entry, working at heights, lock-out/tag-out). ▪ Implement and monitor environmental controls during maintenance, such as proper waste disposal, spill prevention, and noise management. ▪ Ensure that contractor personnel engaged in maintenance adhere to all project QHSE requirements. ▪ Oversee the safe handling and disposal of hazardous materials generated during maintenance. ▪ Lead, train, and develop the maintenance team, ensuring they have the necessary skills and certifications for their roles. ▪ Promote a strong safety culture within the maintenance department through regular training, toolbox talks, and adherence to safe work practices. ▪ Manage external maintenance contractors and service providers, ensuring their compliance with QHSE standards. ▪ Track and report key maintenance performance indicators (e.g., mean time between failures, mean time to repair, maintenance costs) to the Plant Manager. ▪ Analyze equipment failures and maintenance data to identify trends and implement continuous improvement actions. ▪ Ensure accurate and timely documentation of all maintenance work performed, including work orders, inspections, and repair logs.
Procurement Manager	▪ Integrate QHSE and ESG criteria into the supplier pre-qualification, selection, and evaluation processes for all goods and services. ▪ Assess potential suppliers' and contractors' QHSE performance, management systems, and track records, particularly for hazardous chemicals, complex equipment, and critical O&M services.

- Ensure that suppliers and contractors commit to adhering to the project's ESMS requirements and all applicable QHSE regulations.
- Ensure that all purchase orders, supply agreements, and service contracts include explicit clauses detailing QHSE requirements, performance expectations, and compliance obligations.
- Specify requirements for environmentally preferable products, materials, and services where feasible and economically viable (e.g., energy-efficient equipment, less hazardous chemicals, sustainable sourcing).
- Include clauses for waste management, responsible disposal, and end-of-life considerations for procured items.
- Promote and implement responsible sourcing practices throughout the supply chain, considering ethical labor practices, human rights, and environmental stewardship.
- Work to identify and mitigate QHSE risks within the supply chain, such as child labor, forced labor, unsustainable resource extraction, or significant pollution.
- Manage the procurement of chemicals, ensuring suppliers provide Safety Data Sheets (SDS) and that products meet regulatory and project-specific QHSE standards.
- Monitor the QHSE performance of key suppliers and contractors against contractual obligations.
- Collaborate with the QHSE Manager to address any supplier or contractor QHSE non-compliances and implement corrective actions.
- Maintain records of supplier QHSE performance evaluations and engagement.
- Collaborate closely with Operations, Maintenance, and QHSE teams to understand specific material and service needs, ensuring QHSE considerations are integrated from the outset.
- Provide guidance and training to procurement staff on QHSE requirements, sustainable procurement practices, and supplier QHSE due diligence.
- Ensure procurement processes support the objectives of the project's ESMS and contribute to overall sustainable O&M.

HSE Engineer / Officer	As stated in section 8.2, but only for Operations and Maintenance activities.
Community Liaison Officer (CLO)	As stated in section 8.2, but only for Operations and Maintenance activities.
Supervisor / Foreman / Technician	As stated in section 8.2, but only for Operations and Maintenance activities.
Workers / Helpers	As stated in section 8.2, but only for Operations and Maintenance activities.
Contractors, Subcontractors, Vendors and Suppliers	As stated in section 8.2, but only for Operations and Maintenance activities.

9. Overall Structure for ESMS

9.1 Construction Phase

This section details the overarching structure of the Environmental, Social, Health, and Safety Management System (ESHS MS) for the Project, covering both construction and operation & maintenance phases. The ESHS MS comprises this ESHS MS Manual, various assessment studies, and the associated management plans and programs identified herein, all of which are prepared and implemented to guide Project activities. These associated management plans and programs must be utilized in conjunction with this ESHS MS Manual.

The table below outlines the ESMS-associated documentation required from the EPC Contractor. These associated documents are specifically applicable to and must be implemented by the EPC Contractor and all involved subcontractors. Additional details regarding the requirements for these plans and the overall ESMS framework are provided in Section 11. If the EPC Contractor requires additional time to prepare and submit documentation based on project requirements, they may adapt existing MUL documentation, subject to an agreed timeline. Based on this timeline, all relevant documents must be submitted for review and approval. Alternatively, the EPC Contractor may utilize MUL's pre-approved ESMS documents.

S. No.	QHSE, E&S Documentation Reference
Core Documents	
1	Policies (QHSE, E&S and other relevant policies)

2	ESMS Manual
3	IMS Manual
4	Applicable Legal Register
5	Permits Register
Quality Documents	
1	IMS Certificates
2	Document Control Plan
3	Quality Management Plan
4	Project Management Plan
5	Communication Plan
6	Organization Structure
7	Contractors Management Plan
Occupational Health & Safety Documents	
1	Occupational Health & Safety Management Plan
2	Emergency Preparedness & Response Plan
3	Hazardous Materials Management Plan
4	Site Mobilization Plan
5	Traffic & Transportation Management Plan
6	Training Management Plan
Environmental & Social Documents	
1	Air Quality Management Plan
2	Noise Management Plan
3	Dust Management Plan
4	Water Management Plan

5	Waste Management Plan
6	Biodiversity Management Plan
Social Documents	
1	Labour Camp/Accommodation Management Plan
2	Stakeholders Engagement Plan
3	Gender Equality Plan
4	Labour Camp Plan
5	Archaeological and Cultural Heritage - Chance Find Procedure
Security	
1	Security Management Plan

9.2 Operations & Maintenance Phase:

S. No.	QHSE, E&S Documentation Reference
Core Documents	
1	Policies (QHSE, E&S and other relevant policies)
2	ESMS Manual
3	IMS Manual
4	Applicable Legal Register (O&M Obligations)
5	Permits Register (e.g., discharge, effluent, air emissions, sludge disposal)
Quality Documents	
1	IMS Certificates
2	Document Control Procedure
3	Preventive Maintenance Procedure
4	Calibration of Equipment Procedure

5	Contractors Selection and Evaluation Procedure
6	Management Review Meeting Procedure
7	Internal Audit Procedure
8	CAPA and Continuous Improvements
Occupational Health & Safety Documents	
1	PPE Management Procedure
2	Emergency Preparedness & Response Procedure
3	Confined Space Entry Procedure
4	Logout Tagout System Procedure
5	Work Permit System Procedure
6	Competency, Training and Awareness Procedure
7	Hazardous Substances Handling Procedure
8	Accident Incident Investigation Procedure
9	Contractors' Safety Management Procedure
10	Use of a Powered handheld Tools Procedure
Environmental & Social Documents	
1	Air Quality Management Plan
2	Noise Management Plan
3	Dust Management Plan
4	Water Management Plan
5	Waste Management Plan
6	Biodiversity Management Plan
Social Documents	
1	Labour and Working Condition Management Plan

2	Stakeholders Engagement Plan
3	Gender Equality Plan
4	Labour Camp Plan
5	Archaeological and Cultural Heritage - Chance Find Procedure
6	Corporate Social Responsibility (CSR)
Security	
1	Security Management Plan
2	Site Access Control Procedure

9.3 Identification of E&S Risks and Impacts

SN.	Aspects	Potential Impacts & Risks
Environment		
1.	Land use change	- Land Development - Permanent Change in land use
2.	Soil Contamination	Construction Phase: - Removal of topsoil and vegetation can affect soil erosion - Possibly increase erosion of soils - Construction shall involve extensive disruption to or displacement of soil - Changes in the absorption rates, drainage patterns, or the rate and amount of surface water runoff. - Soil contamination from spillage of oils, chemicals and hazardous substances - Soil contamination from construction debris Operation & Maintenance Phase: - Sewage generated from the domestic activities of workers at the site can be a potential source of contamination if not managed properly.

		▪ If the concentration of toxic metals exceeds the limits in the dust generated, it will be classified as hazardous and will lead to soil contamination and leaching of heavy metals. ▪ Accidental Discharges/Leaks: Soil contamination from accidental discharges or leaks of wastewater, sludge, chemicals (e.g., treatment chemicals like anti-scaling agents, corrosion inhibitors, biocides), or fuels from operational equipment. ▪ Equipment Maintenance Spills: Routine maintenance of operational machinery (e.g., pumps, generators) can lead to small, chronic spills of oils, coolants, and other fluids. ▪ Chemical Storage Leaks: Long-term storage of treatment chemicals can result in soil contamination if containers leak or are improperly managed.
3.	Air Pollution	Construction Phase: ▪ The potential dust sources associated with construction activities are loading and unloading of the materials, topsoil removal, travel over unpaved roads and wind erosion, etc ▪ Fugitive Dust generation due to construction activities ▪ Dust, smoke, fume emissions due to construction machinery, DG sets and vehicle movement ▪ Trucks and heavy equipment must be checked for compliance with emission standards before they are used during construction. Operation & Maintenance Phase: ▪ Dust generation due to maintenance activities ▪ Handling and storage of raw materials ▪ Vehicular emissions from vehicles carrying waste and sludge ▪ Emissions from the Diesel Generator (DG) set stack used during emergencies
4.	Water Resource	Construction Phase:

		- Preparation of the designated area of land for subsequent development activities involves levelling the ground surface, removal of vegetation, stockpiling and generation of construction waste. The site formation may produce large quantities of run-off with high suspended solids loading in the absence of appropriate mitigation measures. - Groundwater consumption in water-scarce areas can affect the community's resources. - Contamination of ground and/or surface water due to improper disposal of wastewater. - Accidental spillage of hazardous chemicals stored on site - Leakages from a pipe burst. Operation & Maintenance Phase: - Discharge of treated effluent that does not meet quality standards, impacting surface or groundwater. - Accidental spills or leaks of process chemicals (e.g., coagulants, disinfectants) used in water/wastewater treatment. - Wastewater system overflows, blockages, pipe bursts, or leaks leading to uncontrolled release of raw or partially treated wastewater. - Energy consumption for pumping and treatment processes, contributing to indirect water impacts through greenhouse gas emissions. - Improper handling, storage, or disposal of wastewater sludge, leading to leachate into ground and surface water. - Water consumption within the plant for backwashing, cleaning, and utility purposes, particularly in water-scarce regions.
5.	Noise Pollution	Construction Phase: Generation of noise from the operation of construction machinery and vehicular movement

		- The major activities, which produce periodic noise, during the construction phase, are Foundation works, Fabrication of structures, Plant/machinery setup, etc. - Trucks and heavy equipment must be checked for compliance with emission standards before they are used during construction. - Noise and vibration are generated during the operation phase due to the compactor, vehicles, JCB and the operation of Machinery & DG sets. Operation & Maintenance Phase: - Operation of heavy-duty machinery such as pumps & DG sets.
6.	Impact on Ecology	- Removal of flora at the site due to the clearing of vegetation may have an impact on the local ecosystem. - Removal of vegetation may also impact small mammals present in the area. - Removal of vegetation may also impact fauna present in the area.
7.	Hazardous Waste	Construction and Operation & Maintenance Phase: Hazardous waste (e.g., waste oil and grease, empty drums, oil-soaked rags, used filters, waste oil, chemical drums or bags, etc) generated during operations, if not handled properly, can lead to soil and groundwater contamination.
Occupational Health & Safety		
8.	Workplace Health & Safety	Construction Phase: - Vehicular Accidents during the movement of construction vehicles/equipment's - Injury due to improper handling, operation and execution, - Occupational hazards like high noise, electric shocks etc., - Working at Height/ Risk of Falling/ Slip/Trips/Inadequate Fall Safe Arrangements

		Operation & Maintenance Phase: ▪ Vehicular Accidents during the movement of raw material and finished goods ▪ Injury due to improper handling, operation and execution, ▪ Occupational hazards like high noise, electric shocks, ▪ Exposure to hazardous substances, etc. ▪ Workers will be exposed to physical and psycho-social hazards ▪ Back and joint injuries from driving heavy-load equipment; ▪ Puncture wounds leading to tetanus, hepatitis, and possible HIV infection; ▪ Emergency/Fire Hazards/Explosion ▪ Electrical Hazards ▪ Working at Height/ Risk of Falling/ Slip/Trips/Inadequate Fall Safe Arrangements ▪ Ergonomics and musculoskeletal issues due to long-standing hours
9.	Air Pollution	▪ Respiratory illness from ingesting particulates, bio-aerosols and volatile organics during waste collection, and from working in smoky and dusty conditions at open dumps; ▪ Headaches and nausea from anoxic conditions where disposal sites have high methane, carbon dioxide, and carbon monoxide concentrations.
Community Health & Safety		
10.	Traffic and Transportation	Construction Phase: ▪ Increase in traffic due to the transportation of material and machinery. ▪ Deterioration of road conditions due to frequent movement of heavy vehicles and equipment. ▪ Disruption of traffic on connecting roads due to unplanned parking and vehicle breakdown. Operation & Maintenance Phase:

		▪ Increase in traffic due to the transportation and delivery of raw materials and the collection of waste at the site. ▪ Random parking of vehicles and unplanned loading/unloading areas can lead to inconvenience.
11.	Air quality, Noise & Odour	Local residents in the vicinity of the project site may be affected by increased noise levels, air emissions, and traffic.
12.	Poor Housekeeping	▪ Improper storage of waste leads to the breeding of disease vectors ▪ Spillage and littering ▪ Discharge of effluents in the open ▪ Stormwater accumulation
Labour		
13.	Terms of Employment	▪ Lack of contracts, use of contracts not understood by workers, or use of contracts with terms that are different from actual working conditions ▪ Inadequate wages, benefits and contracts ▪ Verbal and physical (sexual) harassment ▪ Lack of freedom of association or grievance mechanisms ▪ Discriminatory hiring and promotion practices
14.	Exploitation of migrant or temporary workers by labour contractors, including unlawful wage deductions (e.g. excessive recruitment fees, transportation/housing costs)	▪ Inadequate wages, benefits and contracts ▪ Forced labour ▪ Human rights violations ▪ Deprivation of basic livelihood necessities ▪ Conflict with the local community ▪ Illegal employment, human trafficking ▪ Discrimination ▪ Gender-based violence/discrimination
15.	Supply Chain Risks	▪ Cases of forced/ bonded or child labour ▪ Human Rights violations and abuse ▪ Inadequate payment of wages

16.	Poor Living and Working Conditions	▪ Violation of labour accommodation guidelines ▪ Disciplinary abuse and harassment ▪ Lack of freedom of movement ▪ Lack of clean, adequate space, and livelihood facilities
Land		
17.	Land Procurement	▪ Land acquisition, rehabilitation, and resettlement issues in case the land is not purchased and acquired through the government. ▪ Loss of land-based livelihood, including agriculture/grazing, and economic impact. ▪ Displacement of settlements (at times including tribal population). ▪ Legacy issues. ▪ Community agitation, revolt, and conflicts ▪ Unrest among the community due to the dislocation of any structure or thing of cultural belief ▪ Physical displacement ▪ Economic impacts
18.	Procurement of land in tribal dominated areas	▪ Impact on indigenous people's rights, including land and forest-based rights to settlement, livelihood and income ▪ Marginalisation of vulnerable groups ▪ Threat to indigenous culture and heritage ▪ Degeneration of the socio-economic baseline of that area ▪ Community agitation and revolt.
19.	Impact on Cultural Heritage	▪ Chance finds of items of cultural assets during construction activities ▪ Displacement and relocation of assets of cultural importance

10. ESMS Management Framework

The risk and impact identification process developed is appropriate to the nature and scale of the Project. The process ranges from single-stage screening to a multiple-stage risk and impact identification process, as detailed below.

- Screening and Identification of E&S Impacts

- Environmental and Social Impact Assessments (ESIAs).
- Environmental and social due diligence (in case of projects being financed by Lenders & Equity Partners)

10.1 Purpose of ESMS Screening

The purpose of ESMS Screening for a project, encompassing both Construction and Operations & Maintenance (O&M) phases, is to conduct an initial, high-level assessment to:

- Identify Potential Environmental and Social Risks and Impacts: Quickly determine if a project is likely to have environmental (e.g., pollution, resource depletion) or social (e.g., community displacement, labor issues, cultural heritage impacts) consequences.
- Determine the Level of ESMS Assessment Required: Categorize the project's environmental and social risk profile (e.g., low, medium, high) to decide whether a full Environmental and Social Impact Assessment (ESIA) or a more focused ESMP (Environmental and Social Management Plan) is needed. This prevents unnecessary, extensive assessments for low-risk projects and ensures adequate scrutiny for high-risk ones.
- Define the Scope of Further Studies: Outline the specific environmental and social issues that warrant detailed investigation during the construction and O&M phases. This ensures that resources are focused on the most material risks and opportunities.
- Early Identification of Red Flags/Showstoppers: Highlight any fundamental environmental or social issues that could pose significant challenges, delays, or even render the project unfeasible, allowing for early project design adjustments or rejection.
- Inform Project Design and Planning: Provide initial insights that can be integrated into the project's early design and planning stages, promoting environmentally and socially responsible development from the outset.
- Meet Lender and Regulatory Requirements: Satisfy preliminary requirements from financial institutions (like IFC, AfDB, Equator Principles FIs) and regulatory bodies that demand an initial ES assessment to grant financing or permits.
- Allocate Resources Effectively: Guide the allocation of resources (time, budget, personnel) for subsequent, more detailed environmental and social assessments and management activities.
- In essence, ESMS Screening acts as a gatekeeping mechanism to efficiently direct environmental and social due diligence efforts, ensuring that projects proceed with an appropriate level of E&S oversight tailored to their specific risk profile throughout their entire lifecycle.

10.2 Environmental & Social (E&S) Screening Process:

Following the development of a project idea, an initial Environmental & Social (E&S) Screening (preliminary assessment) will be conducted as an integral part of transforming the project idea into a project concept note. This screening involves a desktop assessment of expected E&S impacts, undertaken by the relevant Project Management and Technical Team. It utilizes both an Exclusion List and an Initial E&S Screening Checklist to evaluate potential risks and impacts systematically. The results of this E&S Screening will be

used to determine the preliminary E&S category of the proposed project. This categorization will be conducted in line with the requirements of the IFC Performance Standards (PS), following the criteria defined in the categorization table provided below (typically comprising Category A, Category B, and Category C projects, as per IFC guidelines).

Categories	Greenfield
Category A - Category "A" projects are those that are likely to have significant adverse environmental and social impacts that are sensitive, diverse or unprecedented. These projects may affect an area broader than the sites or facilities subject to physical works. - These projects are likely to have irreversible land use change for a larger area. - These projects are likely those impacting an ecologically sensitive zone. - Typical project scenarios that would be categorized as A would include projects with critical environmental sensitivities (such as low water availability / over-exploited zone/ notified zones) or critical ecological sensitivities (such as impact on critical habitats) or social sensitivities (economic displacement, physical displacement, land disputes, etc.)	Full Scale ESIA; and any other specialized studies (such as Critical Habitat Assessment, Resettlement Action Plan, Livelihood Restoration Action Plan, Detailed Assessment for Indigenous Community) as applicable.
Category B Category "B" projects are those that are likely to have potentially adverse environmental impacts on human populations or environmentally important areas –including wetlands, forests, grasslands and other natural habitats. But these impacts are likely to be less adverse than those of the Category A projects. These impacts are site-specific, with few, if any, being irreversible, and in most cases, the mitigation measures can be designed more readily than for Category A projects.	Full Scale ESIA

These are projects with limited or reversible land use change over a considerably smaller area and are likely to have no significant impacts on any ecologically sensitive zones.	
Category C Category “C” projects are those that are likely to have minimal or no adverse environmental and social impacts.	Internal E&S checklists, Management Procedural Guidelines and EHS Plan specific to the project lifecycle.

10.3 Implementing ESMS Management Plan

10.3.1 Pollution Prevention Management Plan

The Construction and Operation & Maintenance activities inherent in water treatment projects have the potential to generate a diverse range of pollution sources. These necessitate meticulous planning from the outset to prevent adverse impacts on human health, ecological systems, and other environmental receptors. Such pollutants typically encompass emissions to air, discharges to water, and contamination of soil, among others. Recognizing this, MUL is committed to proactively managing these potential pollution sources. To this end, MUL will implement and adhere to various comprehensive management programs and best practices, ensuring environmental stewardship throughout the project lifecycle.

(i) Ambient Emission Management Plan:

The Ambient Emission Management Plan outlines the comprehensive strategies and procedures to minimize, monitor, and control air pollutant emissions generated by the project's construction and Operation & Maintenance activities, ensuring compliance with all applicable local, national, and international air quality standards and guidelines.

The plan identifies potential sources of emissions —such as dust from site preparation and vehicle movement, exhaust fumes from machinery, and process-related emissions during operation —and quantifies anticipated levels through an emission inventory. Detailed mitigation measures are established for each source, including dust suppression techniques (e.g., watering, covering stockpiles), maintenance of vehicle and equipment engines, optimization of work schedules to avoid peak pollution times, and implementation of best available technologies (BAT) for process emissions.

A robust monitoring program, utilizing both continuous monitoring systems and periodic ambient air quality measurements, is integral to track emission levels, assess the effectiveness of controls, and identify any exceedances. Furthermore, the plan includes clear roles and responsibilities for implementation, regular reporting protocols to relevant authorities and stakeholders, and emergency response procedures for accidental releases. Through these integrated approaches, the Ambient Emission Management Plan aims

to protect ambient air quality, safeguard human health, and ensure environmental stewardship throughout the project's lifecycle.

(ii) Water Management Plan:

A Water Management Plan (WMP) is an essential component of a project's Environmental and Social Management System (ESMS), crafted to guarantee the sustainable and efficient utilisation of water resources, encompassing both supply and demand, as well as wastewater and stormwater management, thereby minimising environmental impacts and optimising operational efficiency.

The primary objectives of this WMP include ensuring the sustainable use of water resources, minimizing overall water consumption through various strategies and technologies, preventing contamination of surface water, groundwater, and soil from project activities, and managing all generated wastewater effectively through proper collection, treatment, and disposal or reuse in an environmentally sound and compliant manner. Furthermore, the WMP aims to ensure strict adherence to all applicable local, national, and international water-related laws, regulations, and standards (such as IFC Performance Standards and World Bank EHS Guidelines), mitigate risks related to water availability and quality throughout the project lifecycle, foster transparent stakeholder engagement, and integrate measures for climate resilience.

A comprehensive WMP, available for both construction and O&M phases, will typically detail the baseline water resource assessment, a robust water supply strategy (including source identification, permitting, estimated demands, and conservation measures), a thorough wastewater management section (covering characterization, collection, treatment, discharge standards, and sludge management), and a robust stormwater management plan to control erosion and pollution.

Additionally, it will outline chemical and hazardous material management procedures to protect water quality, establish a clear monitoring and reporting framework with key performance indicators and reporting requirements, define roles and responsibilities, and include emergency preparedness and response protocols for water-related incidents, all reinforced through continuous training and awareness programs like induction training and Toolbox Talks.

(iii) Waste Management Plan:

A robust Waste Management Plan is integral to a project's Environmental and Social Management System (ESMS), ensuring responsible handling and disposal of all waste streams generated throughout its lifecycle, encompassing detailed procedures for onsite management and final disposal for solid waste (municipal and construction), wastewater, and hazardous waste.

This plan includes a crucial waste inventory identifying the source and anticipated quantities of each waste stream for both the construction and Operation & Maintenance (O&M) phases, enabling proactive planning

and resource allocation. The Waste Management Plan meticulously identifies the final disposal location for each waste stream, confirming that these identified facilities are well-managed, licensed, and possess sufficient capacity to receive project-generated amounts without adversely affecting other projects or users.

Detailed waste management plan or procedures to mitigate environmental impacts include contract arrangements with official, licensed entities for collection and final disposal, specifications for waste containers and collection areas, mandatory utilization of waste manifests by contractors for tracking from generation to final disposal, active identification and consideration of recycling and reuse measures, and strict prohibition of fly-dumping.

A critical element is a final disposal inspection procedure ensuring that selected facilities for solid waste, wastewater treatment, and hazardous waste disposal operate in accordance with Good International Industry Practice (GIIP) and local/national regulations, verifying compliance with permits, environmental standards, and operational best practices.

Procedural actions for waste management are integrated into both initial induction training material for all workers, ensuring immediate awareness of waste protocols, and are continually reinforced through repeated refresher Toolbox Talks. Key Performance Indicators (KPIs) for the Waste Management Plan, such as waste generation, hazardous waste volumes, and training participation, will be monitored, and clearly defined roles and responsibilities will encompass Project Management for overall oversight, the HSE Manager/Engineer for development and monitoring, Site Supervisors/Foremen for daily oversight, Waste Contractors for services, and all Project Personnel for adherence.

(iv) Hazardous Materials Management Plan:

A comprehensive Hazardous Materials Management Plan (HMMP) is a critical component of the project's Environmental and Social Management System (ESMS), designed to ensure the safe and environmentally sound onsite management, handling, and storage of all hazardous materials utilized during construction activities.

This plan begins with the inclusion of a detailed hazardous material inventory, meticulously identifying the source, type, and anticipated quantities of each material, enabling proactive risk assessment and control. It establishes clear hazardous material entry procedures for safely bringing materials onto the site, robust hazardous material labelling procedures ensuring immediate identification of contents, hazards, and safe handling instructions, and stringent hazardous material storage procedures detailing appropriate locations, containment, and segregation requirements to prevent incidents.

Furthermore, a specific refueling procedure is outlined to minimize spills and risks associated with fuel transfer for equipment. All procedural actions for hazardous material management are thoroughly integrated into

- induction training material for workers to establish foundational knowledge upon project entry, and
- continuously reinforced through repeated/refresher Toolbox Talks (TBT), ensuring ongoing awareness and adherence to safe practices.

Monitoring and measuring the effectiveness of the Hazardous Materials Management Plan will involve tracking key performance indicators such as hazardous material incident rates (spills, exposures), compliance with local legal requirements, training completion rates, and quantities of hazardous waste properly managed. For the implementation of this plan, specific duties are assigned: Project Management holds overall oversight, the QHSE Manager/Engineer/Officer is responsible for plan development, monitoring, and compliance, Storekeepers ensure inventory and storage adherence, Site Supervisors/Foremen provide daily oversight and enforcement, and all project personnel are accountable for adhering to safe handling and reporting protocols.

10.3.2 Environmental Monitoring

Environmental monitoring at the project site serves to assess environmental conditions and trends, generating vital information for reporting and adaptive management. MUL, through its respective project Contractors at various project sites, will diligently monitor all projects to ensure strict conformity with applicable laws and regulations. This proactive monitoring aims to mitigate risks to the natural environment and safeguard human health. The comprehensive monitoring program will span both the Construction and Operation & Maintenance phases of the projects.

Regular monitoring of critical environmental parameters is of immense importance, as it provides a continuous assessment of environmental status throughout both stages. The data collected from this monitoring will serve as a crucial indicator for detecting any changes in environmental quality attributable to the Water Treatment Project Portfolio, especially when compared against established baseline environmental conditions. This allows for the timely identification of deviations and the prompt implementation of suitable mitigatory steps to protect and preserve the environment.

Monitoring	Phase
Ambient Air Quality	Construction and Operation & Maintenance
Ambient Noise	Construction and Operation & Maintenance
Ground Water	Construction and Operation & Maintenance

10.3.3 Occupational Health & Safety

Workers across all MUL projects may encounter a range of occupational hazards, including physical, biological, and psycho-social risks. Recognizing the critical need to safeguard its workforce, MUL is committed to identifying and rigorously controlling these occupational health and safety (H&S) risks. To this end, MUL has established minimum mandatory requirements and comprehensive guidelines for the identification, control, and management of such hazards and risks, alongside robust protocols for reporting and investigation of any incidents occurring at its Project Sites. Furthermore, MUL will develop tailored, site-specific plans for occupational health and safety. These plans will empower MUL to proactively identify the distinct Occupational Health and Safety (OHS) risks and hazards associated with both the Construction and Operation & Maintenance phases of its projects, thereby enabling effective management, minimizing incidents, and preventing accidents.

10.3.4 Hazard Identification and Risk Assessment

Hazard Identification and Risk Assessment (HIRA) serves as a critical risk assessment tool, enabling the systematic evaluation of hazards to determine their likelihood of occurrence and the magnitude of their potential impact. This comprehensive HIRA framework has been meticulously prepared at the corporate level, ensuring a standardized approach to assessing Environmental and Social (E&S) parameters. It will be rigorously applied prior to both the Construction and Operation & Maintenance stages across all of Metito Utilities Limited's (MUL) project sites, thereby proactively identifying and managing potential risks throughout the project lifecycle.

10.3.5 Emergency Preparedness and Response

MUL will maintain a comprehensive Emergency Preparedness and Response Plan (EPRP) for all its Plant operations, developed in close collaboration with relevant stakeholders, including contractors, associated facility operators (such as those in residential areas and labour colonies), and local legal authorities. This EPRP will meticulously address the identification of areas where accidents and emergency situations could occur, delineate the communities and individuals who may be impacted, detail robust response procedures, specify the provision of necessary equipment and resources, clearly designate responsibilities, outline communication protocols, and mandate periodic training to ensure an effective and coordinated response.

The QHSE Manager will receive support from the Site Manager/Site Safety Engineer/Officer, contractors' HSE officers (where applicable), and other key personnel for any emergency arising at the Plants. All emergencies occurring at any Plant will be directly communicated to the HSE Engineer/Officer and the QHSE Manager, followed by notification to the Top Management. Furthermore, periodic mock drills and emergency response trainings will be conducted at the project level by the Plant-level Project Manager or Site Supervisor to continuously enhance preparedness and response capabilities.

10.3.6 Accident/Incident Investigation and Reporting

MUL is committed to a proactive and thorough approach to incident management. To this end, MUL will diligently investigate all incidents that occur at its plants, regardless of their severity, to systematically determine their underlying root causes. This comprehensive investigation process aims to go beyond immediate symptoms to uncover systemic failures, contributing factors, and deficiencies in existing controls. Following the identification of root causes, MUL will formulate and implement effective corrective actions or robust controls specifically designed to prevent a recurrence of the incident, thereby continuously enhancing safety, environmental protection, and operational reliability across all its facilities.

10.3.7 Traffic and Transportation Management Plan

A comprehensive Traffic and Transportation Management Plan (TTMP) is essential for mitigating risks and ensuring safety throughout the Construction and Operations & Maintenance phases of a plant. This plan plays a crucial role in preventing personal injuries, damage to plant infrastructure, vehicles, and property, and minimizing risks to community health and safety.

During the construction phase, activities primarily involve the transportation of raw materials and manpower to the site. Subsequently, the O&M phase entails the ongoing movement of raw materials, sludge, waste products, and personnel to and from the plant. These activities, particularly given the scale and frequency of transport, inherently have a significant impact on nearby communities and their surroundings, especially in sensitive areas proximate to schools and hospitals.

To address these concerns and ensure adherence to both regulatory compliance and best practice measures, the TTMP systematically proposes a series of planned activities alongside specific control actions. These measures are diligently followed by MUL, its contractors, and all subcontractors, who collectively work to manage traffic flow, enhance safety, and reduce disturbances from project-related transportation.

10.3.8 Security Management Plan

MUL is committed to safeguarding its assets and personnel through robust security measures across all its facilities. To achieve this, MUL will strategically deploy a combination of security personnel, Closed-Circuit Television (CCTV) surveillance systems, and physical fencing at all its plants. Complementing these physical and technological controls, MUL will develop a comprehensive security personnel management plan. This plan is meticulously designed to foster and maintain a safe and secure work environment, effectively minimize unauthorized access to project sites, and provide continuous protection for all manpower, equipment, and critical components of the project against a wide array of potential security threats.

10.3.9 Labour Camp or Accommodation

(MUL) assumes direct responsibility for the comprehensive management of all workforce-related risks, extending this commitment to ensuring that workers engaged by third parties are provided with safe,

secure, and dignified accommodation. This commitment underscores MUL's dedication to upholding high social performance standards.

Therefore, all accommodation facilities, whether directly managed by MUL or provided through its contractors and subcontractors, will strictly adhere to the Worker's Accommodation Standards as stipulated by the International Finance Corporation (IFC). This includes, but is not limited to, provisions for adequate living space, sanitation, access to potable water, healthcare facilities, recreational areas, and robust security measures, thereby ensuring the well-being and fundamental rights of all project personnel.

Labour Accommodation – Zrenjanin Project Specific Clarification:

For the Zrenjanin WWTP Project, no worker accommodation or labour camps will be provided by MUL or its Contractors. All project personnel are expected to arrange their own accommodation off-site.

Accordingly, the requirements of this section apply only where labour accommodation is provided on other MUL projects. For Zrenjanin, worker welfare will be managed by ensuring compliance with labour standards, occupational health and safety provisions, and access to grievance mechanisms, without on-site accommodation.

10.3.10 Community Health & Safety

MUL is dedicated to safeguarding the well-being of communities that may be affected by its operations. To uphold this commitment, MUL will systematically identify and assess all community health and safety risks and hazards throughout the project lifecycle, including construction, operation, and maintenance.

This comprehensive identification process will inform the development and implementation of robust mitigation measures tailored to effectively manage the identified risks. By proactively addressing potential impacts such as increased traffic, noise, dust, potential for accidental releases, and social disruptions, MUL aims to minimise any adverse incidents or accidents, thereby ensuring the health, safety, and security of neighbouring communities and fostering positive community relations.

10.3.11 Biodiversity Conservation and Management Plan

Biological diversity, encompassing the vast array of life on Earth, is the fundamental resource base on which families, communities, nations, and future generations depend, linking all organisms into interdependent ecosystems where every species plays a vital role. The erosion of this biodiversity not only threatens ecological stability but also directly leads to the reduction and depletion of natural resources, thereby undermining economic prosperity and human development, a concern particularly acute in developing countries where livelihoods frequently depend on natural resources.

Recognizing this profound importance, if any Metito Utilities Limited (MUL) plant site is located near ecologically sensitive areas such as forests or significant water bodies, MUL will implement a comprehensive Biodiversity Management procedure. This procedure is designed to systematically avoid, reduce, and mitigate any potential negative impacts from its operational activities on these crucial natural resources, ensuring environmental stewardship and contributing to the preservation of local and regional biodiversity.

10.3.12 Stakeholders Engagement Plan (SEP)

A stakeholder is precisely defined as "a person, group, or organization that has a direct or indirect stake in a project or organization because it can affect or be affected by the project or organization's actions, objectives, and policies." Consequently, stakeholders exhibit varying degrees of interest, influence, and control over a project. Those with a direct impact on, or who are directly impacted by, the project are classified as Primary Stakeholders, whereas those with an indirect impact or indirect influence are termed Secondary Stakeholders.

This comprehensive Stakeholder Engagement Plan (SEP) will systematically guide Metito Utilities Limited's (MUL) interactions with its stakeholders throughout the entire project lifecycle, explicitly demonstrating MUL's commitment to transparent and responsible engagement while strictly adhering to the requirements of the IFC Performance Standards. The plan has been meticulously formulated based on an extensive stakeholder identification and analysis process, and it will serve as a definitive framework for guiding the engagement process with all identified stakeholder groups.

10.3.13 Internal Grievance Mechanism

MUL is committed to fostering a fair and transparent working environment by providing an equitable platform for all its employees to register complaints and grievances, with the assurance that these will be addressed to a level acceptable to the aggrieved individual.

Grievances can encompass specific complaints regarding actual damages or injury, general concerns about project activities, incidents, and both actual or perceived impacts. The primary purpose of this internal Grievance Redress Mechanism (GRM) is to offer a dedicated forum for internal stakeholders—including employees, contractors, sub-contractors, and all workers (including migrant workers)—to voice their concerns, queries, and issues related to the project.

This mechanism ensures that stakeholders have a clear channel through which their queries and concerns will be addressed, guaranteeing timely responses to each submission. Such a transparent and responsive process is crucial for building trust among stakeholders and preventing minor issues from escalating into significant hindrances to project activities. It is important to note that this internal GRM specifically handles grievances from internal stakeholders and does not cover those raised by external stakeholders, such as

local communities, interested persons, or local governments, who are directed to MUL's separate community grievance redressal mechanism.

10.3.14 External Grievance Mechanism

The purpose of the External Grievance Redress Mechanism (GRM) is to provide an accessible and equitable forum for all external stakeholders to voice their concerns, queries, and issues related to the project. This mechanism offers local communities and other interested parties a structured and transparent channel through which their grievances will be formally addressed, ensuring timely and effective responses to each submission.

The implementation of such a responsive system is pivotal for building and maintaining trust among external stakeholders, proactively preventing minor concerns from escalating into significant hindrances to project activities, and fostering positive relationships. To further reinforce this commitment, MUL will undertake continuous, proactive engagement with the community throughout both the Construction and Operation & Maintenance phases, specifically to address and resolve any community grievances directly related to construction activities or ongoing project operations.

10.3.15 Archaeological and Cultural Heritage - Chance Find Procedure

A Chance Find Procedure is a critical protocol integrated into a project's Environmental and Social Management System (ESMS), specifically designed to manage the unexpected discovery of cultural heritage resources during project activities. This procedure ensures that appropriate actions are taken immediately upon discovery to protect, assess, and, if necessary, recover such finds. It mandates that all project personnel, including contractors and subcontractors, are trained to recognize potential cultural heritage (e.g., archaeological artifacts, human remains, paleontological items, historical structures). Upon discovery, work in the immediate vicinity must cease, the find secured, and the relevant project management and cultural heritage authorities immediately notified. The procedure outlines the steps for the initial assessment, consultation with experts, and communication with local communities or Indigenous Peoples, as appropriate, ensuring compliance with national legislation and international best practices (such as IFC Performance Standard 8). This proactive approach minimizes damage, ensures proper documentation, and facilitates the respectful management of invaluable cultural heritage assets.

10.3.16 Contractor Management

MUL engages with a diverse range of contractors and service providers for essential services, including design, construction, procurement, operation, routine and major maintenance, housekeeping, security management, transport, and labour. To ensure high standards across all engagements, MUL meticulously applies rigorous contractor and supplier selection criteria. This process mandates that all chosen partners meet specific and generic contract requirements concerning Environmental and Social (E&S) compliance management.

Furthermore, MUL actively formulates and executes comprehensive management measures covering critical areas such as construction health and safety, labor accommodation standards, pollution prevention, resource efficiency, robust emergency response protocols, and capacity building requirements. A key aspect of this commitment is the implementation of clear criteria for the performance evaluation of all contractors and service providers.

The selection process for these partners occurs at both the corporate and plant levels, depending on the project's specific needs. Additionally, existing suppliers and contractors undergo a regular grading process, conducted at either the corporate or plant level, based on aspects like price, service quality, and delivery time. Whenever a new need arises, existing partners are re-evaluated, and Requests for Quotation (RFQs) are issued to ensure competitive and qualified engagement.

Contractor Environmental and Social Performance Evaluation:

For the Zrenjanin Project, contractor E&S performance shall be evaluated using defined qualitative and quantitative criteria, including but not limited to:

- Compliance with MUL ESMS, C-EHSMP, and approved method statements
- Compliance with applicable legal, permit, and lender requirements
- Occupational health and safety performance (e.g. incidents, near misses, unsafe acts)
- Environmental performance (e.g. waste management, emissions, spills, housekeeping)
- Social performance, including worker conduct, grievance management, and community interactions
- Timely closure of non-conformities and corrective actions; and
- Participation in audits, inspections, and E&S reporting.

Contractor performance shall be monitored through routine inspections, audits, toolbox talks, incident reviews, and periodic performance reviews conducted by the Project team and the Owner's Engineer. Persistent non-compliance may result in corrective actions, contractual remedies, or suspension of works.

11. Performance Monitoring, Measurement and Reporting

The Project and Operation & Maintenance sites must have a program in place that defines ESMS performance measuring, monitoring, analysis, and evaluation criteria. It can also be aligned with the QHSE implementation in each BUs in conjunction with identified hazards, risks, and opportunities and progress towards achievement of ESMS objectives. The program/procedure shall define, but not limited to:

- What needs to be monitored and measured.
- The methods for monitoring, measurement, analysis, and evaluation to ensure valid results.
- The criteria against which the organization will evaluate its ESMS performance, and appropriate indicators.

- When the monitoring and measuring shall be performed.
- When the results from monitoring and measurement shall be analyzed and evaluated.

The performance measurement and monitoring program/procedure shall also include:

- Use of qualitative and quantitative measurements
- The extent to which legal and other requirements are fulfilled
- Monitoring the effectiveness of controls
- The recording of data to analyze the effectiveness of controls and corrective and preventive actions
- Communicate relevant ESMS performance information both internally and externally, and as required by each facility's compliance obligations.

Project and Operation & Maintenance sites should ensure that data measured and analyzed as a part of the measurement and monitoring program are utilized to identify and implement process improvement opportunities and other related elements. Some examples of the performance indicators were provided below,

Labour & Working Conditions		
1	Number of grievances reported by the workforce.	No.
2	Number of grievances resolved during the reporting period.	No.
3	Average time to resolve (total days taken to resolve/total number of grievances resolved)	rate
4	Number of initiatives taken to improve workers' relations during the reporting period.	No.
5	Number of unionised workers in the company	No.
Safeguarding		
6	Number of safeguarding incidents recorded.	No.
7	Number of safeguarding incidents open during the reporting period.	No.
8	Number of grievances raised in regards to safeguarding issues.	No.
Assessment and Management of Environmental and Social Risks and Impacts		
9	Number of environmental and social trainings. Attach records.	No.
Occupational Health and Safety		
Direct Employees		
10	Total person-hours worked	hrs
11	Total person-hours of OHS training	hrs
12	Number of lost time injuries (LTIs)	No.
13	Lost time Incident Frequency Rate (LTIFR)	rate

14	Total workdays lost due to lost time incident	days
15	Number of Fatalities	No.
Contractors		
16	Total person-hours worked	hrs
17	Total person-hours of OHS training	hrs
18	Number of lost time injuries (LTIs)	No.
19	Lost Time Injury Frequency Rate (LTIFR)	rate
20	Total workdays lost due to lost time injuries (LTIs)	days
21	Number of Fatalities	No.
Direct & Contractors		
22	Total person-hours worked	hrs
23	Total person-hours of OHS training	hrs
24	Number of lost time incidents (LTIs)	No.
25	Lost Time Incident Frequency Rate (LTIFR)	rate
26	Number of investigations conducted for incidents for the year	No.
27	Number of initiatives planned for improving the performance for the year	No.
Resource Efficiency and Pollution Prevention		
28	Annual monitoring of air/wastewater/noise emissions as a result of company operations	No.
Water Consumption		
29	Municipal water consumption (avg. 360)	m3
30	Groundwater consumption (avg. 1,000,000)	m3
31	Other water consumption i.e. river, tankered	m3
32	Volume of freshwater produced from desalination (avg. 350,000)	m3
33	Volume of freshwater treated	m3
34	Number of environmental incidents (i.e. fires, explosions, spills (>200L), breaches of permits)	No.
35	Total number of consumers with improved access to water service	No.
36	Total number of consumers served who are women, if available	No.
37	Total number of consumers served who are men, if available	No.
Waste		
38	Total quantity of non-hazardous waste	Ton
39	Total quantity of hazardous waste	Ton

40	Total quantity of waste recycled (Paper, steel, wood, & Plastic, etc.)	Ton
41	Volume of wastewater treated	m3
Greenhouse Gas Emissions, Physical Climate Risks, Adaptation & Resilience		
Company Calculated Greenhouse Gas Emissions Emitted		
42	Scope 1 emissions (Direct emissions from the activities of the organisation or under its control)	tCO ₂ e
43	Scope 2 emissions (Indirect emissions from electricity purchased and used by the organisation)	tCO ₂ e
44	Scope 3 emissions (Indirect emissions from the activities of the organisation)	tCO ₂ e
Grid Electricity and Fuel Consumption		
45	Grid electricity (avg. 1,780,000)	MWh
46	Coal	tonnes
47	Diesel (including HSD for power generation, vehicle consumption, diesel generators, etc)	Litres
48	Petrol	Litres
49	HFO (Heavy Fuel Oil)	Litres
50	LFO (Light Fuel Oil)	Litres
51	Natural gas	m3
52	Other (please specify, including units)	
Renewable Energy Consumption and Generation by Site		
53	Solar: Total amount of renewable energy generated on-site	MWh
54	Solar: The amount of renewable energy consumed from on-site	MWh
55	Wind-Total amount of renewable energy generated on-site	MWh
56	Wind-Amount of renewable energy consumed from on-site	MWh
57	Hydropower: Total amount of renewable energy generated on-site	MWh
58	Hydropower: The amount of renewable energy consumed from on-site	MWh
59	Biomass: Total amount of renewable energy generated on-site	MWh
60	Biomass: Amount of renewable energy consumed from on-site	MWh
Community Health, Safety and Security		
61	Number of Community Fatalities recorded	No.
62	Number of other serious Community accidents reported	No.
63	Number of emergency drills conducted with community participation	No.
64	Number of community grievances recorded	No.

65	Number of community grievances resolved	No.
66	Number of security emergency situations	No.
Land Acquisition		
67	Provide the area of additional land acquired or leased.	Hectare
Biodiversity		
68	Number of incidents impacting biodiversity and/or ecosystem services (eg. water)	No.

11.1 Reporting

This section covers the reporting and notification associated with the implementation of the ESMS. The Project or the BUs implementing the ESMS will identify and report the following documents, but not limited to:

11.1.1 Daily Reporting

- Reporting of unforeseen significant HSE risks, accidents, and emergencies.
- Daily reporting of incidents (near misses and accidents) and HSE non-compliances
- Daily logging of incidents, HSE non-compliances, corrective actions, preventative actions, grievances, grievance resolution (with the relevant evidence) and training on the relevant registers, as per the HSE requirements.

11.1.2 Weekly Reporting

Mostly applicable for the Construction phase, when applicable, the O&M HSE team will prepare weekly reports with, among others, the following information:

- Overall summary of findings and observations regarding EHSS aspects from walkovers, inspections and audits performed during the week.
- HSE non-compliances and HSE risks
- Corrective and preventive measures implemented

11.1.3 Monthly Reporting

- Environmental and Social assessment and improvement findings
- Incident notifications
- Non-conformance/ noncompliance and corrective actions
- Key Performance Indicators
- Environmental and social training conducted.

11.1.4 Annual Reporting

Based on the agreement, the Annual Monitoring Report (AMR) will be prepared and submitted.

11.1.5 Incident notification and reporting

Project Site and BUs will notify the Corporate following any environmental or social incidents during their Monthly reporting period within the timeframe as per their respective Accident Incident reporting procedure. BUs will ensure that all environmental and social incidents are appropriately documented, and relevant parties are notified as per their incident reporting procedure.

11.1.6 Statutory notification and reporting

Projects will meet all statutory notification and reporting requirements based upon the legal requirements for their respective regions.

11.2 Documented Information

The section covers the reporting and notification process, which ensures that the BUs adapt to recording relevant environmental and social performance requirements. The documented information will include the following documentation, but not limited to:

- Environmental and social policy, objectives, and targets.
- Description for the scope of the ESMS
- Description of the main elements of the ESMS and their interaction, and reference to related documents
- Documents, including records, to ensure effective planning, operations and control of processes that relate to significant environmental and social aspects.

Additionally, Projects and all BUs will have the Control of Documents Procedure, which outlines the minimum document control requirements. Control of Records Procedure describes the process used to ensure that required records are maintained to provide evidence of conformity to the applicable requirements and the effective operation of the IMS as well.

11.3 Record Control

BUs must have a complete listing of ESMS required records that identifies:

- Retention and disposition requirements
- The location of all records
- The department/individual responsible for maintaining all records.

All records must be accessible, suitable for use, legible and maintained according to legal and other requirements. All records must meet the retention/disposition schedule, adequately protected (e.g., from loss of confidentiality, improper use, or loss of integrity) and be updated appropriately with control of changes (e.g., version control). Documented external information determined to be necessary for the planning and operation of the IMS shall be identified, as appropriate, and controlled.

12. Competency, Awareness, and Training

Project Team and BUs must create a documented training plan that includes:

- A listing of job categories with required training associated with each position/duty
- Training content
- Delivery methods
- Frequency of training
- Methods for ensuring and documenting evidence of competence (e.g., evaluating the effectiveness of actions taken).

The training content must be aligned with company policies and local regulations. Training must be conducted, reviewed, and tracked in accordance with the plan. If the Project Team or BUs choose to outsource training to external vendors, the selected companies must have all required qualifications/certifications and ensure the intended outcomes of the IMS will be achieved, as it pertains to competence, awareness, and training. Each facility shall have an effective system to ensure that affected employees are given sufficient training to accomplish their expected tasks correctly (e.g., training, work instructions, standard work, diagrams, procedures, etc.), can identify non-conformities, and are competent for the tasks they are assigned to complete.

Minimum Training Requirement for the Project Team and Contractors during Construction and Operation & Maintenance Phase:

S. No.	Type of Training	Project Team	Contractor
a)	HSE Induction Training	Yes	Yes
b)	Fire Safety	Yes	Yes
c)	First-aid	Yes	Yes
d)	Electrical Safety	Yes	Yes
e)	Manual Handling	Yes	Yes
f)	Equipments Handling	Yes	Yes
g)	Emergency Preparedness	Yes	Yes
h)	Lock out Tag out	Yes	Yes
i)	Working at Height	Yes	Yes
j)	Chemicals Handling	Yes	Yes

k)	Ergonomics	Yes	Yes
l)	HIRA & EIA	Yes	Yes
m)	Near-miss reporting	Yes	Yes
n)	Incident investigation and reporting	Yes	Yes
o)	HR Induction	Yes	Yes
p)	Spill Control	Yes	Yes
q)	PPE Training	Yes	Yes
r)	Biodiversity, Pollution prevention	Yes	Yes
s)	SEP and Grievance Mechanism	Yes	Yes

The above-listed trainings are the minimum requirements which will be undertaken at the inception stage once the employee/worker joins the Company and/or Project. Based on the Project requirements, additional training needs to be provided by the Project Team. Post that, monthly refresher trainings can be undertaken, especially for the workers, as per their skill level.

Annexures:

Annexure 1: Introduction

Serbia – Zrenjanin Wastewater Treatment Project

The Republic of Serbia, particularly its municipalities and cities, currently faces significant challenges with potable water deficits and inadequate infrastructure for water and wastewater treatment. Recognizing the critical importance of securing an adequate water supply and robust wastewater treatment facilities to support Serbia's planned growth and cater to its population's needs, the Government of the Republic of Serbia and the Government of the United Arab Emirates entered into an Agreement on Cooperation on February 17, 2013. This overarching agreement fostered cooperation between governmental and private sector entities from both nations.

Building upon this bilateral accord, the Ministry for Agriculture, Forestry and Water Management of Serbia, and Metito Utilities Limited (MUL), an international water company with extensive experience in financing and developing major water and wastewater treatment projects, signed a Memorandum of Understanding (MoU) on February 26, 2019. This MoU specifically focused on the development and

implementation of water and wastewater treatment projects across Serbia, including in the Vojvodina province, under a Build, Operate, and Transfer (BOT) model negotiated directly.

MUL is uniquely positioned to undertake the development of multiple water and wastewater treatment projects in the Republic of Serbia, offering flexible engagement models such as Build, Operate, and Transfer (BOT), or Operation & Maintenance, Engineering, Procurement, Construction and Finance (EPCF). Within this framework, Metito (acting as MUL for this project) signed the contract for the Zrenjanin Wastewater Treatment Plant on November 9, 2020. This project, classified as a Direct Negotiation Project between MUL and the City of Zrenjanin, is currently progressing towards financial closure.

As the sole Sponsor for this vital project, Metito holds comprehensive responsibility for the Zrenjanin Wastewater Treatment Plant. This includes the full spectrum of activities: design, development, financing, engineering, procurement, construction, commissioning, operation, maintenance, handover, and transfer of a new sewage treatment plant. This facility will have an ultimate capacity of up to 25,000 m³ per day, significantly addressing the City of Zrenjanin's wastewater treatment needs. The Contract governing this project is construed and governed in accordance with the laws of the Republic of Serbia, fully adhering to the country's PPP law and Law of Public Procurement. This initiative represents a crucial step towards improving public health, environmental quality, and supporting sustainable urban development in Zrenjanin and the broader Republic of Serbia.

Annexure 2: Project Specific Organisation Structure

