

Environmental and Social Management Procedures Manual (ESMP) Working capital financing.

Bank of Africa Group

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1. Introduction

As part of its commitment to promote sustainable development among its clients and to foster sound environmental and social (E&S) management in the activities it funds, the BOA Group ("the Bank") has developed an E&S Management Policy ("the Policy"). The Policy defines the bank's commitments and standards that the BOA Group applies to its clients and its own procedures in all its transactions, but also in the governance of the bank's E&S management.

In order to apply the E&S management policy to the bank's lending operations, the BOA Group has defined its Environmental and Social Management Procedure (ESMP). The ESMP defines the steps and levels of E&S assessment that are required in the lending project cycle in order to properly identify, assess, manage and monitor the E&S risks associated with each transaction.

This document provides a detailed explanation of the ESMP and the various requirements in the project cycle, including risk categorisation, E&S due diligence, contract requirements and monitoring. The manual also assigns responsibilities to the bank staff involved.

2. Environmental and Social Management Methodology

This manual describes the steps and responsibilities of the BOA Group in managing the E&S risks of its financial services. In this context, the BOA Group defines E&S risk as follows:

Environmental and Social Risk is a combination of the probability of the existence of some risks due to the nature and scale of a client's business activities and the severity of the environmental and social impacts resulting from the existence of these risks, as well as its financial, legal and reputational consequences.

2.1 Criteria to be taken into consideration

The BOA Group has set out:

- 4 criteria to be taken into consideration to determine the level of potential E&S risk in the context of **working capital financings**:

Criterion N°	Criterion	Explanation of the criterion
1	Environmental vulnerability	Potential impact of activities on the environment
2	Social vulnerability	Potential impact of activities on the neighbouring population and/or workers
3	Client's E&S reputation	Environmental and/or social incident in the past
4	Loan	Amount of loan
		Duration of loan (in years)

Each criterion is given a score.

The sum of the scores is used to define the E&S complexity score of the credit file and to categorise it: **Level 1**, **Level 2** or **Level 3**:

2.2 Levels of E&S risks

Based on the rating of the criteria described above, an E&S due diligence level is defined. The BOA Group distinguishes three levels of E&S due diligence that represent an increasing level of intensity in the bank's assessment efforts with respect to the client but also the E&S standards that the bank applies to a client.

This E&S risk level approach allows the bank to prioritise its resources and focus on those clients and transactions that require a more in-depth analysis of their E&S risks.

Level 1:

E&S 1 due diligence clients are subject to the BOA Group's Exclusion List, compliance with applicable national laws and regulations and compliance with the International Finance Corporation's (IFC) "Environmental and Social Sustainability Performance Standards"/PS1 and PS2 as a minimum but do not require a specific assessment of their E&S characteristics and Positive Impacts.

Level 2:

E&S 2 due diligence clients are subject to the BOA Group's Exclusion List and require a generic assessment of the associated E&S risks and potential Positive Impacts of the project. This assessment is done at the level of each subsidiary by the Relationship Managers and the Subsidiary E&S Officer. This assessment takes into account compliance with national laws and regulations in force as well as compliance with the International Finance Corporation's (IFC) "Performance Standards for Environmental and Social Sustainability" / PS1 to PS8. Where necessary, the bank can define mitigation measures for the identified risks to the client.

Level 3:

E&S 3 due diligence clients are subject to the BOA Group Exclusion List and require a detailed assessment of the associated E&S risks and the expected positive impacts of the project. This assessment requires input from an internal expert (Group E&S Risk Officer) or an external expert. In addition, the International Finance Corporation's (IFC's) "Performance Standards for Environmental and Social Sustainability"/ PS1 to PS8 must be applied to all E&S 3 due diligence clients. In most cases, the bank sets out the mitigation measures for the identified risks to the client.

Thresholds are established to classify credit files as Level 1, Level 2 or Level 3:

Rules for decision making		
SCORE: < 120	LEVEL 1: No E&S analysis	<i>Note 1: If "Low" environmental vulnerability criterion AND "Low" social vulnerability criterion then no E&S analysis (even if complexity score > 120)</i> <i>Note 2: If project amount in Tranche 3 or total project cost ≥ 2 times Tranche 3 AND duration ≥ 3 years then E&S analysis is mandatory at the level of E&S Group Risk Expert (regardless of complexity score)</i>
SCORE: ≥ 120 and ≤ 210	LEVEL 2: Analysis by Relationship Manager / Subsidiary E&S Officer	
SCORE: > 210	LEVEL 3: Analysis by E&S Subsidiary Officer/ E&S Group Risk Officer	

3. Environmental and Social Management Procedure

In order to apply the values and standards set out in the BOA Group E&S Management Policy to its operations in a structured manner, the bank has developed an Environmental and Social Management Procedure (ESMP). The ESMP provides a framework for all commercial loan applications and clearly describes the E&S risk management measures that must be taken into consideration in the loan procedure, while specifying the responsibilities for each step of the process.

An overview and detailed description of each ESMP step in the credit process is provided in section 3.1.

3.1 Submitting a loan application

During the loan application stage, all loan applications are submitted to the Exclusion List and for each application an E&S risk rating is performed to determine the selected E&S due diligence level.

In the case of due diligence levels 2 and 3, the bank collects the data required to perform the E&S analysis and Positive Impacts.

3.1.1. Checking the Exclusion List

At the initial stage of the investigation, the Relationship Manager submits the loan application to the "BOA Group Exclusion List" (see Annex 1). If the request concerns an activity or product on the list, the potential client will be informed. Any further evaluation of the funding of the transaction will either be rejected or submitted to the Credit Committee for decision, regardless of the amount of the loan involved. If the request does not involve an excluded activity, the Relationship Manager will indicate this in the "E&S Complexity Scorecard" in Excel (illustrated in Annex 2 bis) and will continue with the classification of the loan application.

Responsibilities and documents	Each level of Due Diligence		
Staff member in charge :	Relationship Manager + E&S Branch Manager	Relationship Manager + E&S Branch Manager	Relationship Manager + E&S Branch Manager
Information to be consulted	BOA Group Exclusion List (Annex 1)	BOA Group Exclusion List (Annex 1)	BOA Group Exclusion List (Annex 1)
Document to be filled in:	E&S Complexity Scorecard (Annex 2bis)	E&S Complexity Scorecard (Annex 2bis)	E&S Complexity Scorecard (Annex 2bis)

Points to watch out for:

If the request involves or appears to involve an activity or product on the list, the Relationship Manager must immediately inform his/her supervisor and the Subsidiary E&S Manager.

The Subsidiary E&S Manager will share the information with the members of the Credit Committee and communicate the decision and/or the necessary clarifications to the Relationship Manager.

3.1.2 Classification of loan application: E&S complexity rating

When the Relationship Manager indicates that the request does not relate to an activity or product on the Exclusion List, the customer is informed that the bank is conducting E&S due diligence. As a first step, the Relationship Manager classifies the application as Level 1, Level 2 or Level 3. To complete the complexity rating sheet, the officer refers to the list of projects subject to Environmental Impact Assessment according to the country's national regulations and the environmental and social vulnerability rating framework for activities. In order to obtain the appropriate classification, the Relationship Manager can always be assisted by the Subsidiary E&S Manager or Group E&S Risk Manager if needed. This classification determines the applicable E&S due diligence level: 1, 2 or 3.

The classification is systematically validated by the Subsidiary E&S Manager

Responsibilities and documents	Level 1	Level 2	Level 3
Staff members in charge:	Relationship Manager + validation from Subsidiary E&S Manager	Relationship Manager + validation from Subsidiary E&S Manager	Relationship Manager + validation from Subsidiary E&S Manager and validation Group Risk E&S Manager
Information to be consulted:	E&S vulnerability rating framework for activities	E&S vulnerability rating framework for activities	E&S vulnerability rating framework for activities
Documents to be filled in:	E&S complexity scorecard (annex 2 bis)	E&S complexity scorecard (annex 2 bis)	E&S complexity scorecard (annex 2 bis)

Points to watch out for:

To avoid the risk of negatively impacting the overall credit granting process, the Relationship Manager should immediately start the E&S complexity rating of the project without waiting for the results of the financial analysis of the loan application.

3.1.3 Data collection, E&S analysis (positive impacts and E&S risks), Synthesis

Once the level of due diligence is established, the applicable E&S analysis is performed by the employee designated in the ESMP.

In the case of level 1 due diligence, no E&S analysis is required, but confirmation must be provided that the client is in compliance with applicable national laws and regulations, including licensing measures.

In the case of level 2 due diligence, the Relationship Manager performs a general E&S analysis. He or she gathers information on the positive impacts of the project and on the potential E&S risks related to the client's activities, as well as on the client's ability to manage those E&S impacts identified as negative. This is done based on several potential sources of information such as desk research, internet research and exchanges with the client (telephone, on-site visits). The Relationship Manager records all his or her research and exchanges with the client in the " Client E&S Questionnaire " (Annex 3 bis). From the elements collected, he or she then rates the positive impacts and E&S risks using the Excel file "PI and E&S risk rating" (Annex 4 bis).

For data collection and PI and E&S risk rating, the Project Manager works with the support of the Subsidiary E&S Manager.

The Subsidiary E&S Manager completes the "E&S Fact sheet" (annex 5 bis) with the conclusions and recommendations and, if need be, defines with the client an E&S action plan including the measures to be adopted (annex 6).

In the case of level 3 due diligence, the responsibility for data collection is assigned to the subsidiary's E&S Manager. This collection of client E&S data is based on desk research, client's relevant reports and a mandatory visit to the client in pair with the Relationship Manager. It also examines the client's E&S history in terms of potential non-compliance with national regulations or previous E&S incidents. If the business activity is very specific or has complex E&S related features, the E&S Manager may consult an external expert at the client's expense. Where the client has already contracted a trusted and independent external expert, the bank will verify the expert's report(s) and may use them as a substitute for its own analysis.

All the data collected is documented in the "Client E&S Questionnaire" (illustrated in Annex 3 bis) and transmitted to the Group E&S Risk Officer.

The Group E&S Risk Officer is responsible for completing and amending, if necessary, the "E&S Client Questionnaire" (Annex 3 bis) and the Excel file "PI and E&S risk rating" (Annex 4 bis)

The E&S Group Risk Manager completes the "E&S Fact sheet" (annex 5 bis) with the conclusions and recommendations and the E&S Action Plan including the measures to be adopted (annex 6).

Responsibilities and documents	Level 1	Level 2	Level 3
Staff member in charge :	-	Relationship Manager and Subsidiary E&S Manager	Subsidiary E&S Manager + Group E&S Risk Manager + External expert (if needed)
Information to be consulted	-	Reports on the Internet, Communication with the client IFC performance standards	Reports on the Internet, Communication with the clients, External reporting, IFC performance standards
Document to be filled in:	-	"Client E&S Questionnaire" (Annex 3 bis). "PI and E&S risk rating" (Annex 4 bis) "E&S Fact Sheet" (Annex 5 bis) "E&S Action Plan" (Annex 6)	"Client E&S Questionnaire" (Annex 3 bis). "PI and E&S risk rating" (Annex 4 bis) "E&S Fact Sheet" (Annex 5 bis) "E&S Action Plan" (Annex 6)

Points to watch out for:

The two analyses of financial and E&S risks must be carried out simultaneously in order to optimise the timeframe for presentation to the Credit Committee and take advantage of each communication with the client (telephone, visit, CAF, agency, etc.) to collect the financial and E&S data.

The collection of "Client E&S Questionnaire" data (Annex 3 bis) is a key point to guarantee the quality of the E&S analysis and the final E&S risk level and the relevance of the conclusions and recommendations.

3.2 E&S Check Analysis of the Credit file

When the client's loan request is forwarded to the Credit Analyst, the classification and the E&S analysis performed by the Relationship Manager and the Subsidiary E&S Manager are reviewed.

The E&S check analysis of the credit file consists of:

1/ Checking **the completeness of the file submitted**: all the necessary documents are present, depending on the level of diligence 1, 2 or 3:

- Level 1:
 - E&S Complexity Scorecard (Annex 2 bis)
- Levels 2 and 3 :
 - E&S Complexity Scorecard (Annex 2 bis)
- Levels 3 and 4:
 - "Client E&S Questionnaire" (Annex 3 bis)
 - "PI and E&S risk rating" (Annex 4 bis)
 - "E&S Fact Sheet" (annex 5 bis)
 - "E&S Action Plan" (annex 6)

Points to watch out for:

- Check that the E&S complexity rating sheet has been validated by the Subsidiary E&S Manager (level 1 and 2) and by the Group E&S Risk Manager (level 3)

2/ Check the consistency of the information provided in the file:

Points to watch out for:

- Check the consistency of the contents across documents (X risk mentioned in the questionnaire, in the rating and in the fact sheet).
- Check the consistency between the identified risks and the activities/projects in the file (verification by sampling and use of common sense)
- Check the consistency between the recommendations or corrective measures requested from the client and the content of the E&S analysis presented.

If missing information and/or inconsistencies are identified, the credit analyst returns the file to the Relationship Manager and informs the subsidiary E&S manager.

This review stage of the E&S file before presentation to the Credit Committee is a key one, a real lock to avoid the risk of an incomplete file at the Credit Committee.

Depending on the results of the E&S analysis and the E&S check-analysis, an "E&S Action Plan" (Annex 6) can be adopted by the bank and the potential client. The plan is defined by the Relationship Manager and the potential client, and must be approved by the Country E&S Manager (level 2) or by the Group E&S Risk Manager (level 3). This plan specifies all the necessary actions to be implemented to ensure the control of E&S risks insufficiently managed and taken into consideration by the Client.

Responsibilities and documents	Level 1	Level 2	Level 3
Staff member in charge:	Credit Analyst	Credit Analyst and Country E&S Manager	Credit Analyst and Group E&S Coordinator
Information to be consulted:	"Complexity scorecard" (Annex 2 bis)	"Complexity Scorecard" (Annex 2 bis) " Client E&S Questionnaire " (Annex 3 bis). "PI and E&S risk rating" (Annex 4 bis) "E&S Fact Sheet" (Annex 5 bis) "E&S Action Plan" (Annex 6)	"Complexity scorecard" (Annex 2 bis) " Client E&S Questionnaire " (Annex 3 bis). "PI and E&S risk rating" (Annex 4 bis) "E&S Fact Sheet" (Annex 5 bis) "E&S Action Plan" (Annex 6)
Documents to be validated:	Summary sheet (Annex 5 bis)	Fact sheet (Annex 5 bis) Action plan if applicable (Annex 6)	Fact sheet (Annex 5 bis) Action plan if applicable (Annex 6)

3.3 Credit approval

As part of the overall assessment of the loan application and the analysis of its overall risks, the Credit Committee carefully examines the characteristics of its E&S risks and the positive impacts of the project and decides on the approval of this request and its E&S conditions.

3.3.1 Approval of E&S evaluation and conditions

Based on the conclusions and recommendations of the " fact sheet " (Annex 5 bis), the Credit Committee examines the E&S risk profile of the transaction, the ability of the client to manage the E&S risks identified by the bank. The Credit Committee may confirm or modify the conclusions and recommendations of the credit risk analysis and may modify the E&S conditions. If the Credit Committee defines additional requirements to the loan application, the Relationship Manager contacts the potential client again to discuss these requirements and agree with the client.

Responsibilities and documents	Level 1	Level 2	Level 3
Staff member in charge:	Credit committee	Credit committee	Credit committee
Information to be consulted:	Fact sheet (annex 5 bis)	Fact sheet (annex 5 bis)	Fact sheet (annex 5 bis)
Document to be filled in:	-	-	-

Points to watch out for:

- The Credit Committee should only examine credit files that have a completed E&S fact sheet
- The Credit Committee acts as a lock for the compliance with the ESMP procedure

3.4 Documentation & disbursement

To formalise the potential E&S requirements of a client, all conditions are captured in the legal documentation.

3.4.1 Addition of the E&S clause and terms and conditions of the agreement

Once the bank and the client have agreed on the potential E&S terms (and, if applicable, an E&S Action Plan relating to the loan application), the Legal Officer includes all the details in the loan agreement. All contracts include a Generic E&S legal clause (Annex 7), requiring clients to engage in sound E&S management and comply with applicable national laws and regulations, including licensing requirements. In case of specific E&S conditions, the Legal Officer will be guided in this task by the Subsidiary E&S Manager (level 1 and 2), or even by the Group E&S Risk Manager (level 3) when adding requirements to the agreement, either directly in the document or in an annex to the agreement, detailing the actions and requirements of the client.

Responsibilities and documents	Level 1	Level 2	Level 3
Staff member in charge:	Legal Officer and Subsidiary E&S Manager	Legal Officer, and Subsidiary E&S Manager	Legal Officer, Group E&S Officer and Group E&S Risk Manager
Information to be consulted:	Credit approval	Credit approval	Credit approval
Documents to be filled in:	E&S legal clause (Annex 7)	E&S legal clause (Annex 7)	E&S legal clause (Annex 7)

3.5 Follow-up and E&S compliance monitoring of the client and the action plan

For all clients with an outstanding credit at level 3, the E&S performance and compliance of the client are assessed annually, unless the contract requires a different (more frequent) monitoring cycle due to the E&S characteristics of the client and his or her activities.

In the monitoring process, the Relationship Manager and the E&S Officer ensure that the client complies with the planned E&S conditions and that any planned actions are implemented.

All results are documented in the "monitoring report" (Annex 8).

Responsibilities and documents	Level 1	Level 2	Level 3
Staff member in charge :			Subsidiary E&S Manager with Relationship Manager + if needed E&S Group Risk Officer
Information to be consulted :			Agreement, Action Plan if applicable
Document to be filled in:			" Monitoring report " (Annex 8)

3.6 Renewal of working capital financing.

In the case of a renewal of a working capital financing, the ESMP is resumed at an appropriate stage of the process, depending on the type of loan renewal.

3.6.1 Re-initiating the procedure

When a client applies for a loan renewal, the bank, as a general rule, considered this application as a new loan application and therefore requires a new credit assessment. However, there are circumstances where an accelerated assessment is enough.

If the loan renewal application is made within three years of the previously approved application and concerns similar activities (in terms of type of activity, size and location) to the previous application, the bank checks whether the data and information collected

during the previous loan application are still valid; if the data are still valid, the existing E&S clause will be extended.

If the client applies for a loan renewal after a period exceeding three years and/or after new E&S incidents or events have occurred since the most recent loan application (e.g. accidents, downsizing, fines, strikes, bad press), the renewal is considered as a new loan application and the E&S assessment is restarted from the beginning of the ESMP.

4. Governance

In order to implement the E&S policy and ESMP in a consistent and practical manner, the BOA Group assigns various roles and responsibilities to several positions within the group and the subsidiaries. The following is an overview of the roles and responsibilities at institutional and operational level.

4.1. Institutional responsibility

Two positions are responsible for E&S management policy and ESMP at institutional level.

4.1.1. The Group's Board of Directors

The BOA Group Board of Directors has overall responsibility for E&S policy. It approves all policies and procedures presented by the Group's E&S department and bears ultimate responsibility for the bank's compliance with its own values and standards as set out in its E&S Management Policy. The Board of Directors, and particularly the CEO, also bears ultimate responsibility for the BOA Group's E&S programme and reports regularly and frequently on the bank's E&S commitments to internal and external stakeholders.

4.1.2. Group E&S Risk Manager

The Group E&S Risk Manager has the day-to-day responsibility for the implementation of the E&S policy. He is responsible for the development, maintenance and implementation of all BOA Group policies and procedures. He or she is assisted in this task by the E&S Managers at the level of the individual BOA subsidiaries. The Group E&S Risk Manager is in charge of maintaining the network of Subsidiary E&S Managers and regularly feeds this network with new information and knowledge through meetings, workshops and training sessions. The Group E&S Risk Manager is also responsible for all marketing, communication and information activities regarding the bank's E&S practices at group level. Finally, the Group E&S Risk Manager is responsible for building capacity among all staff to adequately manage E&S risks associated with specific client activities.

The Group E&S Risk Manager reports directly to the BOA Group Risk Control Director.

4.2. Operational responsibility

Operational responsibility for E&S and ESMP management is shared between various departments.

4.2.1. The Commercial Department

The Commercial Department implements the E&S Management Policy and the ESMP procedure for investment and working capital financing applications.

4.2.2. The Credit Department

The E&S Manager has a central role to play in the process, as:

- He/she assists and supports the staff of the commercial department in their E&S mission
- He/she validates the E&S complexity rating of credit files
- He/she participates in the collection of the client's E&S data and the E&S analysis
- He/She contributes to the relevance of the E&S analysis and summary

Credit Analysts ensure the E&S check-analysis of credit files

The permanent risk management controllers check the completeness and relevance of the credit files granted after the fact.

4.2.3. The Group E&S Risk Officer

The Group E&S Risk Officer assists, upon request, the commercial and credit departments of all subsidiaries in identifying, analysing and reviewing E&S risks. In case of high-risk loan applications (level 3), the Group E&S Risk Manager is directly involved in the credit review process as an analyst.

4.2.4. The Credit Committee

The Credit Committee, at subsidiary or Group level, is responsible for approving the analysis and review carried out by the Commercial and Credit Department and the E&S conditions for credit approval.

4.2.5. Group Audit

In its regular monitoring activities, Group Audit verifies the bank's compliance with its E&S Management Policy within the Group and the subsidiaries. The results of these checks will be reported and will include recommendations for improvement.

Annex 1. Exclusion list



Annex 1 Exclusion
List.pdf

Annex 2. E&S Complexity Scorecard (Excel file)



Annex 2bis_BOA
Complexity sheet_M

Annex 3. E&S General Questionnaire (Word file)



Annex 3bis BOA
Client ES Questionn

Annex 4. Positive Impacts and E&S Risks Rating (Excel file)



Annex 4bis E&S
Risk Rating_Workin

Annex 5. E&S Fact sheet (Word file)



Annex 5bis
Summary note_Worl

Annex 6. E&S Action Plan E&S (Excel file)



Annex 6 ES Risks
Action Plan.xlsx

Annex 7. Agreement E&S Clause

For BOA Group's clients to commit to respecting environmental and social regulations, relevant E&S performance standards and, where applicable, the requirements defined by the bank, the BANK OF AFRICA adds a clause to the loan agreement.

Clauses applicable to clients regardless of the level of due diligence:

[...] is committed to managing its activities in a manner that avoids, reduces and/or compensates for damage to the environment, while preserving the health and safety of employees and the surrounding communities by:

- *Not developing any of the activities listed in the exclusion list in Annex 1.*
- *Complying with all applicable local and national social and environmental laws and regulations, including the requirements of international conventions, agreements and prohibitions to which the country has subscribed, as well as the IFC E&S performance standards applicable to the project or client, and anticipating known or expected future changes to these standards.*
- *Not employing children under the legal minimum working age except for work that contributes to the development of children and does not affect their health or personal development or interfere with their schooling.*
- *Ensuring that all its plants, sites and equipment are designed, constructed, operated, maintained and controlled in a safe, efficient and professional manner.*
- *Using and storing chemicals/toxic materials with appropriate precautions.*
- *Taking steps to improve the efficiency of materials.*
- *Reducing the amount of waste by improving the production and/or recycling process.*
- *Disposing of liquid or solid (hazardous) waste with care.*
- *Avoiding or reducing the generation of wastewater and treating it properly.*
- *Avoiding, reducing and controlling air pollution.*
- *Preventing erosion and land degradation.*
- *Taking appropriate steps to protect the health of employees and neighbouring populations.*

[...] shall inform the BOA Group within 5 days of (i) any environmental or social incident that has or could have a negative impact on the environment, health, safety or neighbouring populations and (ii) the corrective measures taken to address these effects. In addition, [...] shall inform the BOA Group of existing or potential environmental and social claims (specify causes and effects).

The BANK OF AFRICA may visit [...] at any time to assess its activities with regard to the environment, health, safety and working conditions in order to verify whether [...] fulfils the conditions of the loan as agreed between the two parties involved. In the event that [...] does not comply with the requirements and conditions set out in the loan agreement, the BANK OF AFRICA and [...] will mutually agree on the corrective measures necessary to bring it into compliance.

Additional clauses applicable to Level 2:

- *Implement all actions in the Environmental and Social Action Plan (if applicable) and communicate periodically on the progress of the implementation of this action plan.*
- *Comply with the IFC E&S performance standards: PS1 to PS8 applicable to the project or client and anticipate known or expected future changes to these standards.*
- *Allow employees or representatives authorised by the bank to conduct environmental and/or social monitoring visits.*

Additional clauses applicable to Level 3 only:

- *Implement all actions in the Environmental and Social action plan and communicate periodically on the progress of the implementation of this action plan.*
- *Comply with the IFC E&S performance standards: PS1 to PS8 applicable to the project or client and anticipate known or expected future changes to these standards.*
- *Allow employees or representatives mandated by the bank to conduct environmental and/or social monitoring visits.*
- *Appoint and maintain, on a full or part-time basis, an Environmental and Social Coordinator responsible for the implementation and upgrading of the Environmental and Social Management System.*

Additional client-specific environmental and social conditions as a result of findings and conclusions made by the bank in the course of its assessment and irrespective of the client's level of due diligence.

Therefore, [...] is determined, in order to mitigate the environmental risks and social impacts identified by the BANK OF AFRICA to take the following steps:

1. *[Step x].*
2. *[Step Y]*
3. *[Step z].*

Annex 8. E&S monitoring report (Level 3 projects)

The following E&S monitoring report is completed as part of the annual monitoring of Level 3 investment projects.



Annex 8
ES_Monitoring Repc