

Environmental and Social Management System Manual

April 2020

Environmental and Social Management System	Procedure	Phase: Project Feasibility	April 2021
Manual	Status: Active	ES DUE DILIGENCE	Version: 01

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1. PROJECT FEASIBILITY

Project feasibility study is exercised for new opportunities including both new development project (i.e. green field development) and acquired plant or project (i.e. brown field development). High-level ES risks are identified at an early stage as part of feasibility study.

1.1 ES DUE DILIGENCE

Intent

To identify and assess the environmental and social risks, non-compliances and opportunities associated with the brownfield site targeted for development, thus informing investment decisions.

Requirements

- 1. Conduct a desktop study to review target's information. Information can be based on document requested from the target in addition to publically available sources.
- 2. Conduct the ES due diligence to a degree commensurate with the potential ES risks prior to completing any transaction.
- 3. Define the scope of the ES Due Diligence based on the specific concerns of the proposed brownfield site and requirements. For example, additional consideration on biodiversity, indigenous people or cultural heritage.
- 4. Identify and engage a qualified ES expert/ consultant to conduct an ES Due Diligence (including site visits) of the target brownfield/ site. Assigned personnel conducting ES Due Diligence will be responsible for assessing potential non-compliance and risks, as well as defining a monetary value and timeframe for rectifying the identified issues.
- 5. Identify any "Critical Risks" or potential areas of vulnerabilities which may cause an impact on the investment in the target, business growth assumptions or cash flow projections.
- 6. Develop findings from ES Due Diligence into an ES action plan in order to factor into in business investment (e.g. investment cost, remediation cost or additional studies and fees).

Relevant Document

- Tool ES Risk Screening
- Tool ES Due Diligence



1.2 Post-Merger and Acquisition

Intent

To ensure that the acquired target complies with EGCO's environmental and social expectations and standards. To confirm that the environmental and social action plan established during the due diligence process has been implemented.

Requirements

- 1. Ensure that environmental and social action plan determined during the due diligence process is implemented at the acquired target.
- 2. Report the progress of actions on a monthly basis to assure completion within the defined timeframe.
- 3. Conduct a gap analysis of the acquired target in order to identify elements of EGCO Group's Environmental and Social Management System/ tools required to be adopted. Hence ensuring uniformity between newly acquired target and existing facilities.
- Capture and disseminate ES related lesson learnt from merger and acquisition process to relevant personnel, or interested persons for future reference- creating a knowledge sharing database.

Relevant Document

N/A



2. APPENDIX

2.1 ESMS DOCUMENT INDEX

ESMS Element	Procedure	Tool			
4.1 Project Feasibility					
Greren Field Development					
4.1.1 ES Risk Screening	-	ES Risk Screening			
4.1.2 Stakeholder Identification	Stakeholder Analysis and Engagement	Stakeholder Mapping Tool Engagement Plan Template			
4.1.3 ES Obligations and Permit	-	-			
Brown Field Development	Brown Field Development				
4.1.4 ES Due Diligence	ES Due Diligence	ES Due Diligence			
4.1.5 Post Merger and Acquisition	-	-			
4.2 ES Impact Assessment And Engineering Preparation					
4.2.1 ES Implace Studies and Management Plans	ES Impact Assessment Study	Outline of Impact Assessment			
4.2.2 Bidodiversity Action Plan Development		-			
4.2.3 Resettlement Plan Development	_	Outline of Resettlement Plan			
4.2.4 Indigenous People Plan Development		Outline of Indigenous People Plan			
4.2.5 Design	-	-			
4.2.6 Stakeholder Analysis and Engagement	Stakeholder Analysis and Engagement	Stakeholder Mapping Tool Engagement Plan Template			
4.2.7 EPC Bidding (TOR) & Contracting	-	Contract terms – EHS Management Section			
4.3 CONSTRUCTION					
4.3.1 Site Preparation	-	-			
4.3.2 Induction	-	-			
4.3.3 Execution (Construction and Installation)	- Supplier Code of Conduct - ES Management for Construction	Inspection Checklists			
4.3.4 Testing & Commissioing	-	-			
4.3.5 Operation and Maintenance Manual Development and Training	-	-			



ESMS Element	Procedure	Tools			
4.4 OPERATION					
Planning					
4.4.1 Management Leadership and Commitment	-	-			
4.4.2 Risk Assessment	ES Risk Assessment	ES Risk Assessment Template			
4.4.3 Management of Change	Management of Change	Change Management Request Form			
4.4.4 Requirement and Compliance	-	-			
4.4.5 Goals and Improvement Plan	-	ES Goals and Action Plan Template			
4.4.6 Stakeholder Engagement	Stakeholder Analysis and Engagement	Stakeholder Mapping Tool Engagement Plan Template			
mplementation					
4.4.7 Competency, Trianing and Awareness	-	Training Needs Matrix			
4.4.8 Contractors and Suppliers Management	Supplier Code of Conduct	-			
4.4.9 Operational Controls	-	-			
4.4.10 Emergency Preparedness and Response	Emergency Preparedness and Response	-			
4.4.11 Communication and Grievance Mechanism	Grievance Management	Grievance Form			
4.4.12 Incident Management	Incident Reporting and Investigation	Incident Investigation Form			
Evaluation		•			
4.4.13 Monitoring and Reporting	-	ES Performance Indicators Template			
4.4.14 Assessment and Verification	Internal and External Audit	Compliance Audit Protocol			
mprovement					
4.4.15 Handling of Non-conformities	Handling of Non-conformities	Corrective Action Request Form			
4.4.16 Management Review	-	-			
1.5 ASSET RETIREMENT					



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