



LA BANQUE AGRICOLE

# **Environmental and Social Management System**

## **Environmental and Social Policy Note**

*Final version*

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## 1. ENVIRONMENTAL AND SOCIAL MANAGEMENT SYSTEM APPLICATION SCOPE

La Banque Agricole (LBA) was created in 1984. It aimed at distributing loans to promote economic activity in rural, urban and peri-urban areas. The Environmental and Social Management System of LBA essentially consists of *three* elements:

- LBA environmental and social policy;
- The roles and responsibilities of the staff responsible for the ESMS implementation;
- The system of implementation monitoring and assessment

These main elements are backed up by a series of procedures listed below:

- Preliminary review of transactions;
- Transaction classification according to the environmental and social risks they pose;
- Application of E&S due diligence measures, Decision making process;
- Monitoring E&S performance of the client / company in which LBA invests and
- Management of the non-compliance cases with relevant E&S norms by the client / company in which LBA invests;

ESMS applies to the Bank's operations, to all projects funded by LBA and to its partnerships. As part of the environmental and social assessment process, LBA will ensure that projects funded by the bank comply with:

- LBA Exclusion List
- National environmental and social laws in Senegal
- IFC Performance Standards
- Any other relevant risk factor

The Environmental and Social Governance Policy is adopted in February 2018 and updated in December 2019 after the bank's rebranding confirming the change from CNCAS to La Banque Agricole. The ESMP is designed to promote the sustainability of the bank's activities by protecting the environment and people from the possible negative impacts of financing. The Bank requires borrowers / clients and partners to comply with the Bank's ES Policy when preparing and executing funded projects and activities

La Banque Agricole's Environmental Governance policy and the ESMS are revised periodically to ensure their continued applicability to the bank's assets.

## 2. LBA ENVIRONMENTAL AND SOCIAL POLICY

LBA is committed to promoting sustainable development in all its operations, its financing and cooperation activities due to the positive impact of the environmental and social dimension on its financial performance. It aims at promoting projects with high environmental and social added value. This policy describes LBA social responsibility, its approach to the environmental and social impacts of the projects it funds, as well as its partnerships with various stakeholders. This policy also covers direct impacts related to the LBA operation.

### 2.1. Bank's commitments in Corporate Social Responsibility (CSR)

According to the ISO 26000 standard, the social responsibility of an organization is its responsibility towards the impacts of its decisions and of its activities on society and the environment; resulting in a transparent and ethical behavior.

To fulfill this responsibility, LBA integrates environmental and social criteria into its operations and its relationships with various stakeholders. As a responsible bank, LBA seeks to comply with regulations, best practices and create long term value for its shareholders, customers and other stakeholders (Appendix 1).

Through this policy, LBA aims at:

- carrying out its activities responsibly;
- maximising the creation of sustainable value benefiting its shareholders, its customers and the society in which it operates;
- preventing and minimizing any negative impacts that may result from its activities;
- fighting corruption, money laundering, conflicts of interest, insider trading and other bad governance practices through awareness, prevention and sanction;
- improving the bank's reputation.

This policy will be governed by integrity principles, prudent risk management and transparency. To comply with these principles, LBA would like to:

- combat climate change through the promotion of green financing and compliance with environmental regulations;
- fight corruption through awareness-raising, prevention and sanctions;
- Encourage and support its employees' capacity building and their professional development;
- develop an institutional information and communication policy on Environmental Social Responsibility.
- place customers at the centre of its activities in order to establish long-term relations with them based on mutual trust;
- support the development of communities in which the bank operates through fundraising and social programmes;
- work for a reasonable use of energy, water and other natural resources;
- work for clean and responsible waste disposal throughout its branch and office network;
- ensure that working conditions are based on compliance with bank rules and operating principles and confidence;
- promote equal opportunities between men and women
- ensure a healthy and safe work environment for employees
- define and implement a responsible procurement policy;
- respect diversity, promote equal opportunities for employment, freedom of association and non-discrimination based on sex, age, race, disability, etc.;
- promote the employees' health and safety;
- explore incentive options that reward outstanding employee contributions to the bank's good performance;
- gradually integrate *environmental criteria into product development*;
- promote measures to fight climate change through actions such as *funding low carbon emissions or renewable energy projects*;
- promote respect for the legal obligations and avoid behaviors contrary to regulations and internal policies that may tarnish the LBA reputation;

- respect Human Rights in accordance with the different national and international standards;
- measure and disclose its environmental and social performances;
- provide an adequate mechanism to report CSR policy violations available to all employees. The Bank sets up a *procedure to report the harmful and poor behaviour in the workplace*. This procedure includes protection for the whistleblower, and disciplinary action against anyone harassing the whistleblower.

## 2.2. Projects funding commitments

### 2.2.1 Contexte

The environmental and social policy is the basis of the Environmental and Social Management System (ESMS).

LBA recognises that environmental and social risks can compromise natural resources, have a negative impact on communities and economic productivity. It should be noted that good environmental practices have a considerable positive affect on the environment, communities and the economic development in respect of our position as the leading bank in the agriculture sector. With this in mind, LBA developed an environmental and social management system in compliance with national and international requirements in the field, in order to manage the environmental and social impacts directly and indirectly related to the bank's operations and activities.

### 2.2.2. Objective

As a financial institution, the risk is inherent in all our activities, and its management is crucial to our success. In developing an environmental and social management system, we aspire to be a leading company in the Senegalese financial sector by ensuring that our activities respect and are consistent with sound environmental practices.

As part of the bank's guidelines for managing the environmental and social risks inherent in its activities, La Banque Agricole undertakes to:

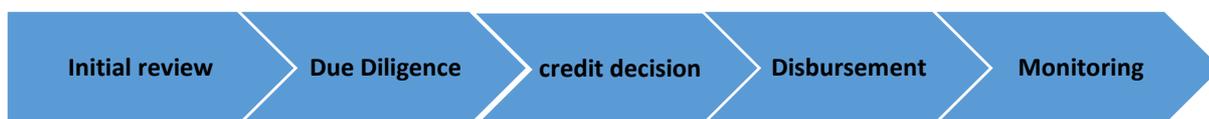
- Analyze environmental and social risks in all its credit operations, including the assessment of the cumulative risks / impacts and the risks / impacts of the associated facilities;
- That all funded projects ultimately meet the requirements of this policy. Customers will have to manage environmental and social issues in accordance with this policy and a mitigation hierarchy (i.e. avoiding impacts and, where this is not possible, reducing or minimizing impacts or by compensating for the impacts);
- Ensure, through its assessment and monitoring of environmental and social aspects, that projects are designed and implemented in accordance with the exclusion list, environmental and social laws in force in Senegal, standards performance of the International Finance Corporation (IFC), GCF policies and standards and any other relevant risk factor;
- Avoid, as far as possible, the negative impacts of activities on the environment and the people concerned, while optimizing the potential benefits of funding;
- Minimize, mitigate and / or compensate for the negative impacts of projects / activities on the environment and the people affected, failing to avoid them;
- Help borrowers / clients, project promoters to strengthen their safeguard systems and develop their capacity to manage environmental and social risks;
- Collaborating up with its clients to implement this policy, government and non-government technical services to help the credit beneficiaries to add value to their activities, improve their long-term sustainability and reinforce their capacity in environmental and social management. The Bank will promote good practices at its customers' level;
- Including environmental and social requirements and their communication in the funding agreements;
- Periodically checking compliance with environmental requirements by conducting sites assessments, and if required, in company of specialists aware of such issues.
- Looking for the suitable solution should the bank notice that a customer is violating this policy, in collaboration with said customer;

- Ensuring that projects or activities funded in whole or in part by the Special Fund and Cooperation fund conform to this policy;
- Ensuring that the activities of financial institutions in the co-financing of projects meet the requirements outlined by this policy;
- Ensuring that projects, dependent on third parties activities it funds, meet the requirements of this policy;
- Evaluating a project non-compliance, from design to operation, in order to propose the necessary measures to ensure compliance with this policy;
- Not to knowingly fund projects that do not respect the country's obligations regarding international treaties and conventions ratified by Senegal in the field of environmental and social obligations;
- Promoting projects and initiatives with high environmental and social added value;
- Allocating human and financial resources necessary for the implementation of this policy;
- Implementing a grievance mechanism to assess and investigate complaints related to the environmental and social impacts of projects it funds. Individuals or organizations who believe that a project funded by the Bank prejudice them can complain and seek a resolution of the problem;
- Allowing easy access to information for shareholders and investors, enabling them to exercise their rights to check that the bank's financing comply with their requirements.

The Management and Studies Control Department (*DCGE*), through the head of environmental studies, is responsible for monitoring, implementing and continuously improving the *SGES*. The bank executive board ensures the availability of sufficient human and financial resources to successfully support LBA environmental policy implementation.

### 3. REVIEW OF THE ENVIRONMENTAL AND SOCIAL DIMENSION IN THE CREDIT REVIEW PROCESS

The environmental and social risk management process is designed to take account of environmental and social considerations at all stages of the review and credit instruction process in accordance with the generic schema below. For each step, the aspects and analysis to consider in the environmental and social risks assessment associated with the activity to finance are described.



#### 3.1 Initial review



In the initial stage, the potential project is controlled according to LBA Exclusion List (see Appendix 2). If the potential project involves an activity that is on this list, the promoter is informed, and no further attention is given to funding the activity.

If the project does not involve an excluded activity, a preliminary categorization of the E & S risks will be assigned to the project, based either on the Environmental and Social Pre-Selection Form (Annex 3) or on the E&S Risk Categorization Procedure, depending on the scale and nature of the activity. At the end of this evaluation, projects are put into three categories depending on their impact on the environment. Each category corresponds to an environmental risk and specific requirements due diligence process. The E&S risk category determines the level of due diligence required for the project, and the potential need to resort to external expertise.

The investment will be classified according to the following categories:

**Category A (high risk):** Projects have negative environmental and / or social impacts that:

- (i) are potentially significant, varied, irreversible or unprecedented;
- (ii) affect a wider area than the sites or facilities are physically affected;**
- (iii) are not easily corrected by preventive measures or mitigation measures.

*Very high-risk projects are those that trigger one or more performance standards (PS) of the IFC PS 5, 6, 7 or 8, or that potentially constitute a social/political conflict or serious security problems posing a significant threat to the project.*

*Projects involving the following activities will normally be included in Category A (although this depends on the location and magnitude of impacts):*

- Construction or rehabilitation of rural roads in ecologically sensitive or at risk areas;
- Conversion of important areas of natural forests or other wild lands;
- Loss of natural habitat and loss of biodiversity or environmental services provided by a natural ecosystem;
- Wetland development;
- Groundwater based development in which there is reason to believe that the depletion of this resource may result from the effects of climate change or overexploitation;
- Development of fishing activities in situations where there is little information on sustainable yield;
- Significant increase in the use of phytosanitary products;

- Risk of destruction and pollution due to climatic or geophysical hazards (storms, floods, landslides, earthquakes);
- Conversion and loss of physical cultural resources;
- Projects that may have significant negative social impacts for local communities (including indigenous peoples) or other parties affected by the project;
- High probability of physical relocation or economic displacement;
- Large scale irrigation systems;
- Drainage or correction of natural water bodies (eg lake drainage, stream corrections);
- Industrial facilities (other than small-scale artisanal production);
- Manufacture and transport of hazardous and toxic materials.

**Category B (medium risk):** Projects have negative environmental and / or social impacts that:

- (i) are less dangerous than those in category A;
- (ii) are site-specific and are rarely irreversible;
- (iii) can be easily corrected by appropriate preventive measures and / or mitigation measures.

This category concerns projects with mostly reversible negative social and environmental impacts which usually extend beyond the site's limits; impacts that can be addressed through the implementation of relevant mitigation measures; or

Projects involving the following activities will normally be included in Category B, depending on the location and magnitude of the impact:

- Construction or rehabilitation of rural roads in "non-sensitive areas";
- Small-scale irrigation and drainage projects and reservoirs, including dams (except in wetlands);
- Agricultural intensification and / or extension of cultivated area in "non-sensitive areas";
- The development of livestock routes;
- Artisanal fisheries where there is information on sustainable yield;
- Aquaculture;
- Management or rehabilitation of watersheds;
- Large-scale soil and water conservation measures;
- Small and micro enterprise development projects;
- Credit operations through financial intermediaries, including credit for pesticides / other plant protection products, livestock purchase, irrigation, etc.
- Development of the value chain based on natural resources;
- Projects involving credit operations through financial service providers, credit for pesticides / other plant protection products, purchase of livestock, irrigation, etc.
- Projects involving operations that could have minor negative impacts on cultural resources;
- Low probability of physical relocation or economic displacement.

**Category C (low risk):** Category C projects are low risk projects that:

- (i) are negligible or non-existent;
- (ii) are limited, few in number, generally "in situ"; and largely reversible and easily addressed through the implementation of mitigation measures.

Category C projects are projects likely to have little or no negative environmental / social impact

Projects involving the following activities will normally be included in Category C, depending on the location and magnitude of the impact:

- Technical assistance grants for agricultural research and training;
- Replacement and modernization of industrial machinery;
- Small changes in light industry;
- Other small scale projects without apparent environmental impacts.

## 3.2 Due Diligence



In the case of a low risk client/project, the environmental and social due diligence process will ensure that the client is not involved in an activity registered in the exclusion list. *A verification of the compliance to regulations ensures that the client has the adequate environmental and social permit and license for the activity sector- ie certificate of environmental compliance, environmental clearance operation authorization*.... A literature review and existing information suffice in the case of low risk projects.

In the case of a medium-high/high risk client or project, on top of thoroughly checking the exclusion list and verifying regulatory compliance, environmental and social risk assessment will include an in-depth analysis of the E&S risk and the impacts associated with the project. An in-depth analysis of the E&S risk will usually go through the following steps:

- ❖ a comprehensive large-scale review, involving a review of available information office;
- ❖ a review of external factors (based on information available to the public);
- ❖ and a site visit by the head of Environmental and Social Studies (ESS), with the support of external consultants if necessary.

**The in-depth analysis** will address:

- ❖ **Environmental considerations**: environmental risk management practices, incidents and accidents records, energy consumption and use, waste management, climate change, wastewater management, impact on biodiversity, and any other relevant aspects.
- ❖ **Social considerations**: health and safety of the communities, economic and physical movement, commitment with stakeholders, cultural heritage, indigenous people and other relevant aspects.
- ❖ **Labor and working conditions**: child labor / forced labor, working hours, employees' organization, non-discrimination, health and safety at work, independent contractors and any other relevant aspect.

On a case-by-case basis, this analysis can be based on environmental and social safeguards documents (ESIA, PAR, PEP, AE...) that the client must prepare in accordance with regulatory requirements.

The conclusions and recommendations of the environmental and social due diligence will be documented in the environmental and social Checklist (*Cf Appendix Checklist*). This review results will be presented as a report on E&S risks associated with the project and shared in meetings with management and other stakeholders.

For credit applications or projects with a high risk category, an external expert / consultant should be responsible of undertaking environmental and social due diligence.

Tableau 1

Categories	Category A	Category B	Category C
Generale description	Category A projects are those that are likely to have adverse environmental and / or social impacts that are potentially significant, varied, irreversible or unprecedented; affect a wider area than sites or facilities subject to physical interventions; and are not easily corrected by preventive measures or mitigation measures.	Category B projects are those that are likely to have negative environmental and / or social impacts on human populations and environmentally significant areas that are less hazardous than those in Category A; are site specific and are rarely irreversible; and can be easily corrected by appropriate preventive measures and / or mitigation measures	Category C projects are those that are likely to have negative environmental or social impacts that are negligible.
Assessment requirement	<p>Compliance with the Exclusion List and the country's E &amp; S laws and regulations.</p> <p>These projects are subject to in-depth analysis by an external expert.</p> <p>In some cases, an ESIA will be required for these projects, as well as an ESMP and other additional studies, if necessary.</p>	<p>Compliance with the Exclusion List and the country's E &amp; S laws and regulations.</p> <p>These projects are subject to an in-depth analysis conducted internally by the training officer with the support of the REES, or an external expert, if necessary.</p>	<p>Compliance with the Exclusion List and the country's E &amp; S laws and regulations.</p> <p>Based on internal project analysis, key issues and gaps in E &amp; S would be identified and mitigation measures of the project would be discussed and planned with the client.</p>

### 3.3 Credit decision



As part of the credit application in-depth review, the decision-making body (credit Committee, Committee of area...) will study the project E&S risks assessment, taking into account E&S considerations in the credit approval decision.

Based on the E&S due diligence conclusions and recommendations, the decision-making body ensure that the E&S issues discussed and considered in the decision to allow funding. The decision-making body approves the E&S conclusions and financing conditions. Where appropriate, it may set additional E&S condition to be considered regarding the financing conditions.

### 3.4 Disbursement



The loan agreement with the client must include the social and environmental conditions for financing.

All contracts must include a generic E&S provision that compels the client to not conduct an activity registered on the exclusion list and to operate in accordance with the national laws and regulations. In special cases where corrective measures are needed to put the customer in compliance with the applicable E&S requirements, the head of environmental studies working with the chief legal officer will ensure that the necessary E&S conditions and plan of action are being annexed to the contract. The E&S plan of action details actions that the customer needs to undertake to ensure compliance with the applicable requirements. For each action, the expected deliverable, the responsible party, and the time frame should be defined.

### 3.5 Monitoring



Regular monitoring of environmental and social issues is needed to ensure compliance with the applicable requirements, and to ensure that the customer is implementing the E&S plan of action. **Customers will be monitored on an annual basis**, unless stated otherwise in the contract due to the potential environmental and social risks the project involve.

This follow-up will be done by the one responsible of environmental issues who, if required, will visit some costumers at least once a year to monitor the enforcement of and compliance with current environmental and social requirements and/or the plan of action. For some clients with considerable environmental issues, LBA can recruit an external consultant or appeal to the regional Committee for environmental and Social monitoring to perform environmental monitoring.

#### **The environmental and social monitoring goals are to:**

- ☞ Ensure that the project/Costumer comply with the environmental and social conditions, including the Environmental and Social Action Plan;
- ☞ Keep track of changes in the implementation of the client's activity that can lead to new E&S risks and impacts;
- ☞ Evaluate the client's progress in the implementation of agreed E&S action items; and
- ☞ Assess incidents or accidents that result in the loss of human lives, serious injuries, that can have significant impact on the environment or that are a considerable breach of the law;
- ☞ Ensure compliance with the Requirements and Standards with Performance Standards that frame the Bank's ES Policy and the Directives of the bank's Partner donors in terms of ES risk management and monitoring, in particular the FVC;
- ☞ Ensure that performance and efficiency in the implementation of the Environmental and Social Management System are periodically reported to General Management and that the lessons learned are integrated into any revision of the ESMS

## 4. ECONOMIC, ENVIRONMENTAL, AND SOCIAL PERFORMANCE:

The report levels to provide regarding the E&S performance will be the following:

- ❖ Annual *SGES* report
- ❖ Incidents/ accidents report
- ❖ Annual Environmental and Social Performance Monitoring Report (*RASPES*)

### 4.1 Annual ESMS report

After the end of the fiscal year but not later than fifteen (15) days before the annual investors meeting, LBA must deliver copies of the annual *SGES* report. The report should contain at least:

- information on the *SGES*;
- all the *SGES* updates made during the reporting period;
- Information on its implementation
- Information on the portfolio E&S risk profile, including high-risk transactions and significant portfolio exposures, by credit product and by sector.

### 4.2 Annual Environmental and Social Performance Monitoring Report (*RASPES*)

All the clients/ projects funded are required to monitor et annually report on their Environmental and social performances to LBA through key performances index provided in the “Annual Environmental and Social Performance Monitoring Report (*RASPES*)” model found in the appendix.

### 4.3 Incidents / Accidents report

Any client or project must inform LBA of any work, health and safety, security or operation environment work incident or accident, as soon as possible and in any event within three (03) days after being informed of the event. As soon as it is reasonably possible, but ultimately within a period of thirty (30) days of the first LBA notification report, the client and/or project should provide a detailed incidents / accidents report indicating the nature of the incident / accident of each case, the circumstances and the impact or effect arising or that may arise and measures taken or plans to consider, to remedy and avoid any future similar event.

## 5. ROLES AND RESPONSIBILITIES

### 5.1 E&S responsibility of every entity involved at the credit report assessment level

At each stage of the assessment, the level of involvement is set and the roles and responsibilities of the concerned employees in risk assessment are given in the following table:

#### 5.1.1 Prior to disbursement

Level of involvement	Initial screening	Due Diligence	Credit decision	Contracts and disbursement
Loan officer / account manager	Controls projects based on the exclusion list and assigns the E&S.	Carries out the Environmental and social due diligence.	Enters the summary of E&S due diligence in the credit decision memo. Selects the E&S measures.	Communicates with the customer regarding the E&S legal agreement and Plan of Action, and inserts the customer's E&S obligations in the loan agreement.
Branch Manager / Office Manager		Verifies and confirms the control based on the exclusion list and the E&S risk category. Carries out a counter-analysis of the E&S risks and impacts. Can seek the help of the Head of ESS (REES).	Reviews and confirms the E&S assessment summary found in the credit memo and the E&S corrective measures.	Confirms that all ES commitments are taken into account in the loan agreement.
Head of Network		Confirms the Environmental and social due diligence. Requires an additional due diligence (if necessary) in relation to the Head of ESS (REES)	Confirms the E&S assessment summary found in the credit memo and the E&S corrective measures to undertake.	
Head of the Environmental and Social Studies (REES)	Weighs in regarding the E&S risk category and Offers explanations and advice on due diligence.	Provides support on environmental and social due diligence including the recruitment of experts if necessary.  Coordinates the review of key environmental and social safeguard documents (ESIA, PAR, stakeholders engagement plan...)	Examines the Credit Committee memo regarding E & S considerations.	Examines the environmental and social aspects legal clauses in loan agreements.
The decision-making body			Ensures the inclusion of E&S considerations in the final funding decision. Offers input on additional environmental and social corrective measures.	
Director of Legal Affairs and Collections				Works with the Credit and Network department and the head of environmental studies to ensure that legal agreement contains the relevant E&S clause and an E&S plan of action.

### 5.1.2 After disbursement

	Constant Monitoring	Annual E&S report
Loan officer / account manager	Performs a regular review of the E&S plan of action with the customer, including site visits to ensure constant compliance with E&S requirements. Ensures that credit renewal includes E&S considerations.	Contributes to the E&S annual report on customers and portfolio.
Branch Manager / Office Manager		Contributes to the E&S annual report on the customers and portfolio.
Head of Network		Contributes to the E&S annual report on the customers and portfolio.
The Head of environmental and social studies ( <i>REES</i> )	Offers advice on the E&S activities monitoring. Carries out periodic site visit, on a case-by-case basis, for high-risk clients/projects.	Writes the E&S annual report in cooperation with the Head of the Credit and Network and any other partners involved in the funding of the Bank's activities.
Director of Legal Affairs and Collections	Ensures appropriate corrective measures in case of a serious breach of E&S obligations.	

## 5.2 Accountabilities and Responsibilities

### a) The Head of the Environmental and Social Studies, *ESS / (REES)*

The head of the ESS is responsible for the general supervision of E&S risk management at LBA, as well as the monitoring of the *SGES* implementation. As part of its responsibilities regarding the monitoring of *SGES* implantation, he updates the *SGES*, as appropriate, when the E&S risk profile or the applicable requirements change. The head of environmental studies supports the Credit and the Network department staff in identifying, analyzing and assessing the E&S risks and impact, including the review of project documents specific to the client, ensuring that credit decisions are backed by an appropriate environmental and social review, as well as the determination of environmental and social clauses that should be included in the loan agreement. The head of environmental studies is also responsible for assessing agents training needs for a perfect implementation of the *SGES*. He also sees to the coordination of such training.

The head of ES is the link with the bank on all questions regarding the *SGES*, gets the support and necessary authorization from senior management to ensure that the *SGES* is operational.

### b) Management Control and Studies Department, *DCGES / (MCSD)*

The MCSD is responsible for the coordination and collection of data and information related to the ESMS implementation, including data on the E&S risk profile portfolio and other information needed to produce the E&S reports. The MCSD also assists the head of the environmental and social studies in activities regarding the ESMS implementation.

### c) Credit and Network Department, *DCR / (CND)*

CND employees, including officer assessing credit application (credit officer, account manager), the branch manager / office Manager, and the head of network, are mainly responsible for the identification and assessment of potential E&S risks and impacts related to loan applications. With the support of the head of the environmental and social studies, the CND officers select projects based on the exclusion list, assign the E&S risk category, and carry out environmental and social due diligence. They are also responsible for defining the necessary corrective measures that will make the client comply with the applicable E&S requirements.

### d) Credit Committee

The credit committee is the body approving the final loan application, including the final confirmation and approval of the environmental and social assessment, the environmental and social action plan and the legal commitments to be included in the loan agreement.

### e) Legal Affairs and Collections Department, *DAJR / (LACD)*

The employees of the LACD make sure the funded projects comply with the applicable E&S legal requirements and that the loan agreement contains clauses requiring the project to comply with the applicable E&S requirements, including the exclusion list and E&S national laws and regulations.

#### **f) Inspection and Audit Department, *DAI* / (*IAD*)**

The IAD team conducts periodic review of the environmental management system to check that the ESMS is appropriately implemented, and that the Bank is in compliance with its E&S risk management policies and procedures.

#### **g) Compliance and Operational Risk Department, *DCRO* / (*CORD*)**

This department assists operational entities and the head of environmental studies to integrate E&S risk in the risks management process and to ensure operational procedures comply with the *SGES* requirements.

The risk management component means that risks are apprehended and mapped (identification and assessment) and subjected to a control plan (mitigation plan) to bring them back to an acceptable and compatible level with LBA objectives.

As such the CORD could provide a methodological support to the risk level definition, E&S risks formulation, gross and residual risk assessment, conception and consignment of the plans of action in the Bank Global Risk Control Plan.

As for the other Bank processes, the *DCRO* will assist the various entities, in collaboration with the head of ESS, to ensure the compliance of their procedures with the *SGES* requirements.

#### **h) Senior Management**

The executive manager is responsible of ensuring that the necessary human and financial resources, including partnership development, and capacity building to successfully implement the *SGES*, are available.

## **6. STAKEHOLDER COMMITMENT AND COMMUNICATION**

LBA will set up a mechanism to manage complaints in accordance with international good practice to manage and handle complaints. Moreover, LBA will ensure that the category A and B clients/projects, in which it invests, establish and implement the Stakeholder Engagement Plan, which will be designed according to the IFC performance standard.

## 7. CAPABILITIES AND SKILLS

To ensure the success of LBA Environmental and Social Management System implementation, it is essential to support key managers and staff members through a reliable training plan in line with the ESMS goals. Indeed, the actual implementation of ESMS and E&S requirements calls for a management team that has all the knowledge and resources referring to the requirements.

LBA will ensure that all training needs are met for the ESMS successful management. At least, all workers will receive general orientation training on the bank environmental and social policy. For concerned employees, an additional training specific to each individual role must be organized in accordance with the developed ESMS training plan.

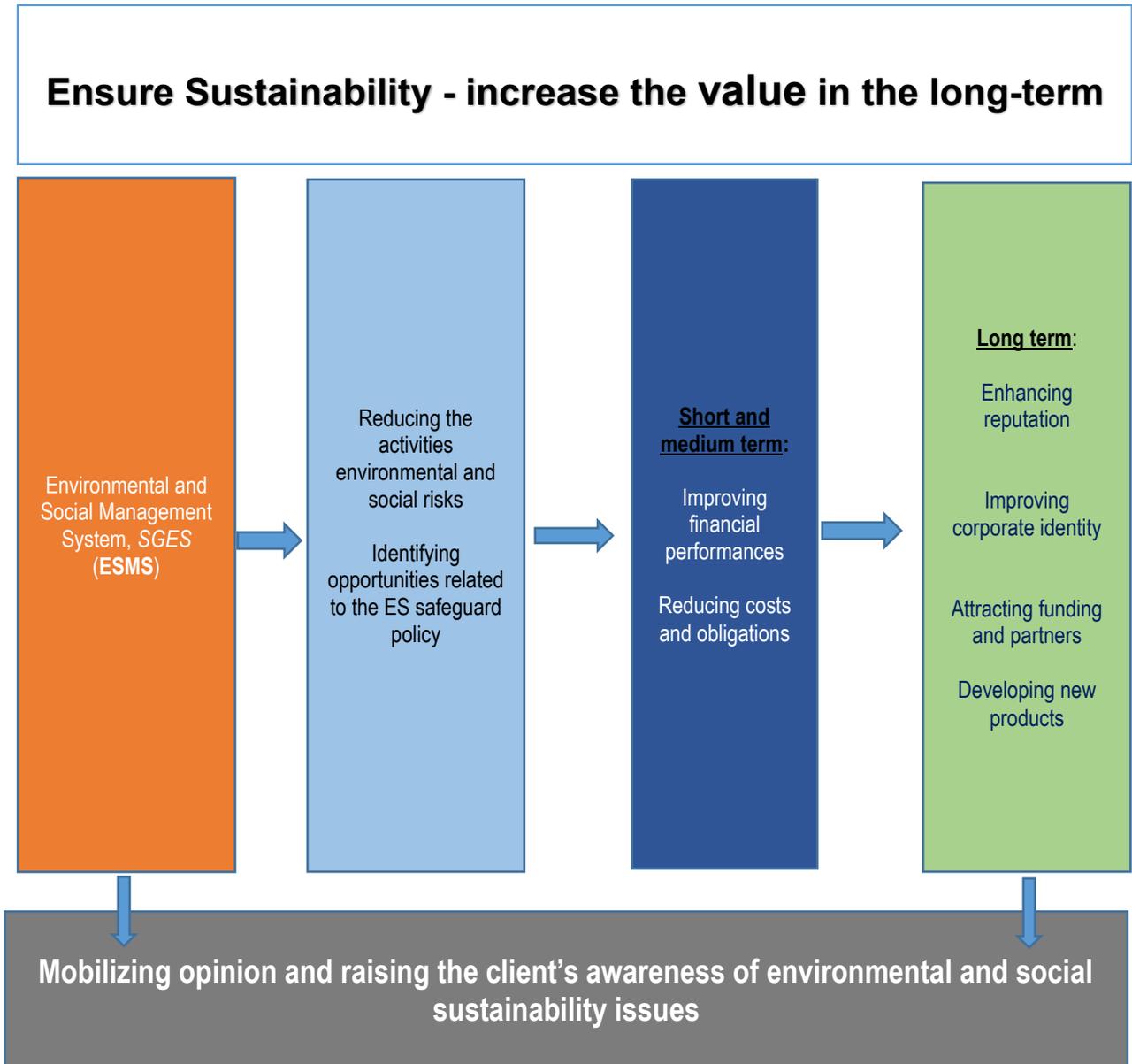
## 8. CONSTRAINTS AND ARRANGEMENTS FOR OPTIMAL IMPLEMENTATION OF ESMS

We have identified a number of risks that can be considered as constraints for optimal implementation of the ESMS. For each identified risk / constraint, provisions should be made by LBA for optimal implementation of the ESMS.

- The lack of control of the categorization tool by loan officers that may lead to a poor appreciation of the level of E & S diligence to be applied to each credit file;
- The lack of integration of environmental and social tools and procedures in the process of granting credit by agents due to lack of required E & S capacity and / or lack of time due to already high workload;
- Low E & S capacity of loan officers to carry out environmental and social due diligence. It involves asking sales and finance professionals to apply environmental and social tools; this can greatly slow down the process of managing credit files;
- Overworking and a bottleneck at the top level due to the obligation to validate all environmental and social decisions made in the agencies
- Failure to carry out environmental monitoring in a systematic way to ensure compliance with applicable requirements, and to ensure that the client implements the E & S. action plan by the Environmental Monitoring Manager. The latter is in charge of a transversal mission at national level within LBA which may not allow him to free up sufficient time to carry out environmental and social monitoring missions;
- An extension of the duration of the investigation of the credit files due to the obligation to provide the E & S documents by the customers which could make renounce some agents of LBA the obligation to apply the process of integration of the E & S aspects in the credit process;
- The non-updating of all credit commitment procedures by integrating the environmental and social risks of LBA activities. As a reminder, LBA is in the process of formalizing its credit commitment procedures and this process has not yet been completed; all new engagement procedures should systematically integrate environmental and social aspects

# APPENDIX

## Appendix 1: Added value of LBA ESMS implementation



## Appendix 2: List of exclusion of the LBA

1. Production or illegal trade of any product or illegal activity under the Senegalese legislation or the international regulations/conventions or agreements;
2. Production or activity requiring forced labour<sup>1</sup> or child labour<sup>2</sup> ;
3. Animal, plant or other natural product trade regulated by the CITES<sup>3</sup>;
4. Fishing activity using gear or any type prohibited by the Senegalese fishing code;
5. Any transaction involving or requiring the destruction<sup>4</sup> of a critical habitat<sup>5</sup>, and all forestry project that does not implement a development and sustainable management plan;
6. The production, use or trade of dangerous material such as unlinked asbestos fibres or products containing PCB<sup>6</sup> ;
7. The production, use or trade of pharmaceutical products, pesticides/herbicide, products destroying the ozone layer<sup>7</sup> or any other dangerous products subjected to an international gradual suppression;
8. Cross-border waste trade, except for those who are accepted by the convention of Basel and underpinning regulations;
9. Production or trade<sup>8</sup> :
  - Weapons and ammunition;
  - Tobacco;
  - Hard liquor destined for human consumption;
10. Play houses, casinos, or any equivalent company<sup>9</sup> ;
11. Any trade related to pornography or prostitution;
12. Any transaction leading to irreversible change or the significant displacement of a critical cultural heritage<sup>10</sup> element;
13. Production and distribution or participation in racist, anti-democratic media or any media advocating discrimination of part of the population;
14. Diamond mining and Diamond trade if that the host country has not adhered to the Kimberley process;
15. Any sector or any service being subjected to an embargo from the United Nations, the European Union and/or from France in a given State, without limitation of the absolute or relative amount.

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<sup>1</sup> Forced labour is any work or service done involuntarily, and acquired through threat, force or sanction as defined by the ILO convention.

<sup>2</sup> Employees must be aged at least 14 as defined by the fundamental human rights of the ILO Convention (convention on the minimum age C138, art.2) unless local legislation specify a mandatory school attendance or a minimum age for work. In such circumstances, the highest age should be retained.

<sup>3</sup> CITES: Convention on international trade of wild flora and fauna species threatened with extinction (Washington, D.C., 1993).

<sup>4</sup> Destruction means (1) the elimination or severe reduction of the habitat integrity caused by a major change and long-term use of the soil or water resources or (2) the modification of habitat in such a way that the habitat capacity to fulfil its role is lost.

<sup>5</sup> The term critical habitat encompasses natural and modified habitat that deserve special attention. It includes (i) areas with a high biodiversity value such as it is defined by the IUCN classification criteria, including the habitat necessary to the survival of endangered species mentioned in the IUCN red list or any other national law; (ii) areas that are of significance for endemic species or areas with a limited perimeter; (iii) areas that are critical for the survival of migrating species; (iv) areas that welcomes a significant number of herding species; (v) areas with a unique gathering of species, with species that regrouped due to key evolution processes or that fill key ecosystem services; (vi) and territories with an essential social, economic or cultural biodiversity significant to the local communities. Primaries or high conservation value forest must also be seen as critical habitat.

<sup>6</sup> The PCB, Polychlorinated Biphenyl, are a group of highly toxic chemicals likely to be found in oil-filled electric transformers, capacitors and switches dating back to 1950 to 1985.

<sup>7</sup> All chemical component that reacts with, and destroy, the stratospheric ozone layer and lead to the formation of "holes" in the layer. The Montreal Protocol listed ODS (Ozone Depleting Substances), their reduction goals and elimination deadline.

<sup>8</sup> To be excluded, these activities must amount for 10% of the turnover or financed volume. In cases where a financial intermediary is used, said activities must not go above 10% of its activities portfolio outstanding amount.

<sup>9</sup> All direct funding of these projects and activities including hotel with a casino for example. This does not include urban development plans that could later integrate such projects.

<sup>10</sup> Any internationally or nationally heritage recognized as historical, social or/and cultural interest is considered "critical cultural heritage".

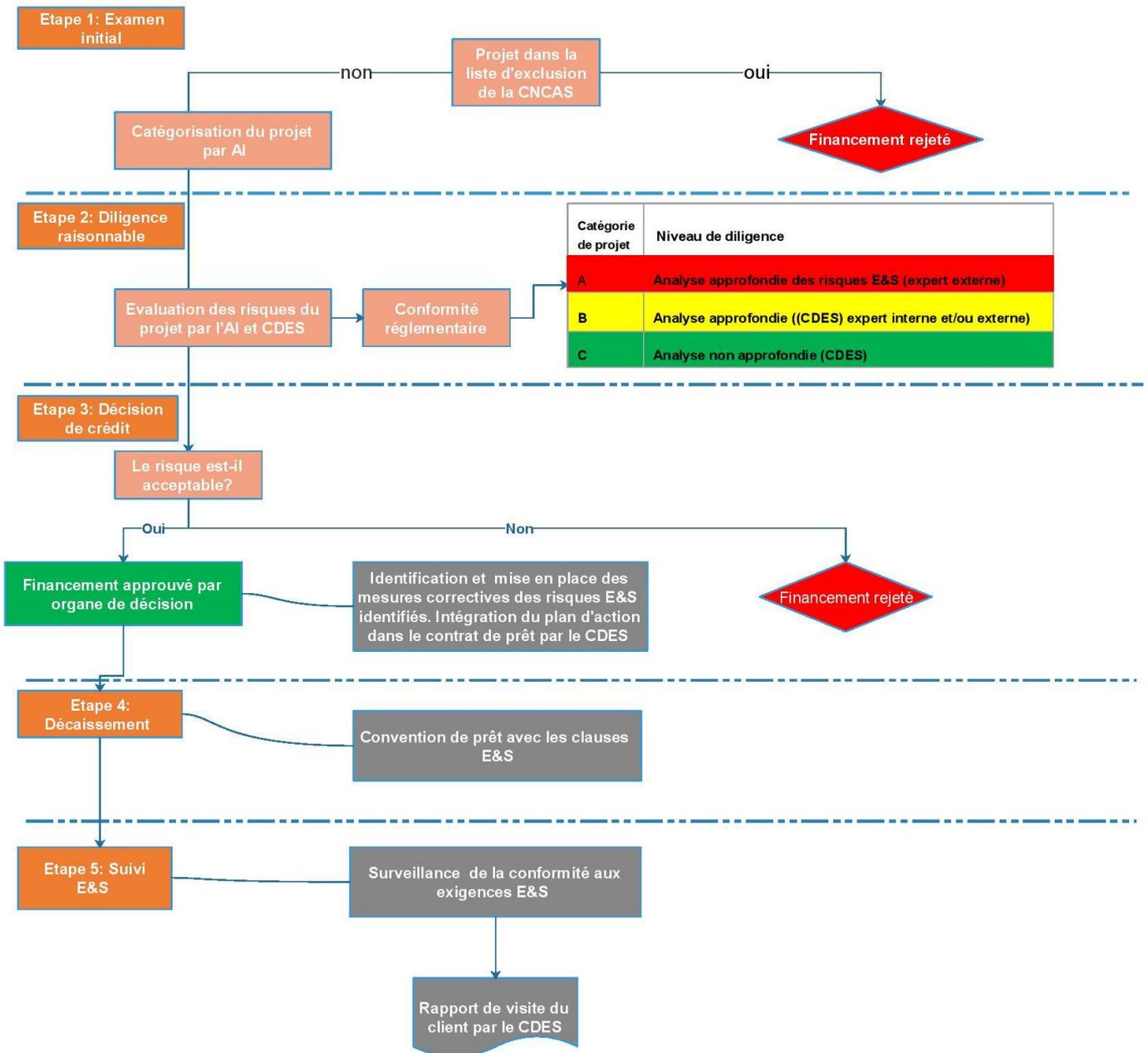
## Appendix 3: Environmental and social pre-screening form

GENERAL INFORMATION ON THE CUSTOMER				
I. Name of investment / Project: .....		Nom of company : .....		
Name Promoter / Project Manager: .....				
Full Address / Telephone: .....				
Activity area: .....				
Portfolio Responsible: .....		Account N° : .....		
Requested Financing by : <input type="checkbox"/> ew Costumer      ou <input type="checkbox"/> stumer      Evaluation date : .....				
ENVIRONMENTAL AND SOCIAL ASSESSMENT GUIDE				
N°	QUESTIONS	RESPONSE		
		YES	NO	N/A
1	<b>I. IMPACT OF THE PROJECT ON THE LIFE OF THE COMMUNITY</b>			
	a) Was the population excluded (not involved) / injured in the choice of site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	b) Will the activity / project affect the lifestyle of the residents?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	b.1) environmental aspect	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	b.2) social aspect	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	b.3) cultural aspect	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	c) Was the site selected for the project legally acquired?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	d) If yes, do you have legal authorizations to present us and to prove it?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	c) Is the site chosen for the activity located near a community area (health center, market, church, school, restaurant)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2	<b>II. RATIONAL USE OF RESOURCES AND POLLUTION PREVENTION</b>			
	a) Is the project likely to generate hazardous waste (solid and liquid)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	b) Is the project likely to affect the atmosphere (dust, various gases) in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	c) Does the implementation of the project require the use of hazardous products?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	d) Is there equipment and infrastructure for their management?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	e) Will the project require the use of large volumes of construction materials in local natural resources (sand, gravel, laterite, water, construction wood, etc.)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	f) Does the project include measures for conservation of natural resources and promotion of energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	g) Will the project trigger the temporary or permanent loss of habitat, crops, farmland, grazing, fruit trees and domestic infrastructure?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3	<b>III. RISK MANAGEMENT AND ENVIRONMENTAL AND SOCIAL IMPACTS</b>			
	a) Will the implementation of the activity involve the systematic felling of trees or clearing on the site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	b) If yes, do you have an authorization issued by the competent service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	(c) is the site selected for the activity located near a shoreline or fragile ecosystem area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	d) Is the site chosen for the activity located in or near a protected area (historic park, natural habitat, nature reserve, wetlands (lakes, rivers, seasonal flood zones)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	e) If yes Does the Proponent have an Exploitation Authorization issued by the competent authority?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	f) will the execution of the works constitute a threat to the biodiversity of the area (flora and fauna)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	(g) can the project's implementation lead to contamination of existing water points and / or groundwater?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	h) Could certain project activities contribute to the ecological degradation of the area (earthworks, etc.)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	i) Has an Environmental and Social Impact Assessment (ESIA) for the new project been carried out in the 3 years preceding the application for funding?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	j) Is there an Environmental and Social Management Plan (ESMP) put in place for work related to investment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	(k) is the land occupied by any occupants / infrastructure?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	(l) is involuntary resettlement necessary to release the right of way?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	m) Does the project risk not creating local jobs?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4	<b>IV. CULTURAL HERITAGE</b>			
	a) Could the project change one or more historic, archaeological, or cultural sites, or require excavation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	b) Would the project have an adverse effect on the aesthetic value of the landscape?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5	<b>V. HEALTH AND SECURITY OF THE COMMUNITIES</b>			
	a) Can the project lead to accident risks for workers and / or populations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	b) Can the project cause health risks to workers and / or the population?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	c) Can the project lead to an increase in the disease vector population?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	d) Has the project provided an appropriate framework to ensure community safety / does the proponent have agents to ensure the safety of workers and communities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	e) Does the project risk not creating local jobs?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	f) Has the Project developed and implemented a grievance mechanism that allows affected communities to express their concerns about	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6	<b>VI. GENDER CONCERNS</b>			
	a) Is the project likely to promote exclusion of women and / or other vulnerable groups?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<b>VII. INDIGENOUS PEOPLES</b>			
	a) Does the project guarantee full respect for indigenous peoples, including their rights, dignity and aspirations	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



## Appendix 4: Simplified diagram of the ES Assessment in the process

### Review of the Funding Application



## Appendix 5: Categorization of E&S Risks

E&S risk category	Category Description	Examples
Low risk	The activity is likely to have little to no negative environmental/social impact.	<ul style="list-style-type: none"> <li>• Consulting companies</li> <li>• Software Development</li> <li>• Retail bank</li> <li>• Tech Support</li> <li>• Service industries</li> <li>• Restaurants</li> </ul>
Moderate risk	The projects having limited negative social and environmental impacts that are specific to the site and easy to treat through well-known alleviating measures	<ul style="list-style-type: none"> <li>• Agribusiness (small scale)</li> <li>• Tourism</li> <li>• General manufacturing</li> <li>• Greenfield projects in the existing industrial zone</li> <li>• Construction materials production</li> <li>• Fruits, vegetables, fish or meat processing and conservation; production and treatment of vegetal oil and meat; dairy product manufacture</li> <li>• Market gardening, agroforestry</li> </ul>
		<ul style="list-style-type: none"> <li>• Mines (small scale)</li> <li>• Telecommunication</li> <li>• Hazardous household waste disposal operations</li> <li>• Industrial chemistry, without the bulk storage of inflammable, explosive or hazardous substances.</li> </ul>
High Risk	The activities in this category are likely to have significant adverse effects on the environment and/or society and are sensitive, various or unprecedented. A potential impact is considered as 'sensitive' if it is potentially irreversible (for example lead to the loss of a major natural environment), it affects vulnerable groups or ethnic minorities, involves involuntary displacement and migration, or affects important cultural heritage sites.	<ul style="list-style-type: none"> <li>• Large dams and reservoirs</li> <li>• Forestry and logging industry (on a large scale)</li> <li>• Extractive industries, including mining, major oil and gas project,, and large pipelines</li> <li>• Major ports and port developments</li> <li>• Projects which include the manufacture, use or disposal of significant quantities of pesticides and herbicide in the environment.</li> </ul>

## Appendix 6: Model of Environmental and Social Action Plan

Identified issues	Required action	Responsible person	Cost/ Budget

## Appendix 7: LBA Commitments on Corporate Social Responsibility (CSR)

According to ISO 26000, an organization's social responsibility is its responsibility for the impacts of its decisions and activities on society and the environment, resulting in transparent and ethical behavior.

To fulfill this responsibility, LBA integrates environmental and social criteria into its operations and relationships with various stakeholders. As a responsible bank, LBA seeks to comply with regulations, best practices and create long-term value for its shareholders, clients and other stakeholders (Annex 1).

Through this policy, LBA wishes to:

- Conduct business responsibly;
- Maximize the creation of sustainable value that benefits its shareholders, customers and the company in which it operates;
- Prevent and minimize the negative impacts that could result from its activities;
- Fight corruption, money laundering, conflicts of interest, insider trading and other bad governance practices through awareness, prevention and punishment;
- Improve the reputation of the bank.

This policy will be governed by principles of integrity, prudent risk management and transparency. To respect these principles, LBA commits itself to:

- Combat climate change by promoting the financing of low-carbon or renewable energy projects, and compliance with environmental regulations;
- Fight corruption through awareness, prevention and sanctions;
- Encourage and support the capacity building of its employees and their rise to the professional level;
- Develop an information and institutional communication policy on social and environmental responsibility;
- Put customers at the center of their activities in order to build lasting relationships with them, based on mutual trust;
- Support the development of the communities in which the bank operates through financing activities and social programs;
- Work for the rational use of energy, water and other natural resources;
- Work for a clean and responsible disposal of waste throughout its network of agencies and offices;
- Ensure that working conditions are based on compliance with the Bank's rules and operating principles and on trust;
- Promote equal opportunities between men and women;
- Guarantee its employees a safe and healthy working environment;
- Define and implement a responsible procurement policy;
- Respect diversity, promote opportunities equal to employment, freedom of association and non-discrimination based on gender, age, race, disability, etc. ;
- Promote the health and safety of employees;
- Explore incentive options that reward employees for exceptional contributions to the bank's good performance;
- Gradually integrate environmental and social criteria into product development;
- Promoting compliance with legal obligations and avoiding conduct contrary to internal regulations and policies that could tarnish the reputation of LBA;
- Respect human rights in accordance with different national and international standards;
- Measure and disclose its environmental and social performance;
- Provide an appropriate mechanism to report violations of the CSR policy available to all employees. The bank sets up a procedure for reporting misdeeds and bad conduct in the workplace. This procedure includes whistleblower protection and disciplinary measures for anyone who harasses the person who reports.

## Appendix 8: Environmental and Social Performance Monitoring Report Template

### **ANNUAL ENVIRONMENTAL AND SOCIAL PERFORMANCE MONITORING REPORT (AESPMR)**

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REPORTING PERIOD: from (month/year) to (month/year)

DATE OF COMPLETION OF THE APMR: (day/month/year)

# SECTION I

Summary of the main E&S aspects during the reporting period

**The objective of this section is to identify the main E&S progress / activities / incidents during the reporting period (including a summary of the main findings recorded throughout the reporting period e.i. nonconformities, significant incidents, social disturbances improvements and significant initiatives on E&S performance etc.)**

## PROJECT STATUS

Select the project current status and provide a brief description of its evolution in comparison with the project during review period. For example, has the construction been started or completed? Has new equipment been installed? Has production capacity increased? Have new investments been taken into account regarding new projects?

Design  Construction  Expansion  Operation  closing  other (specify)

Ongoing new investment?  Yes  no

Please provide the details in section IV of this *RASP* (APMR.)

## **PS1: EVALUATION OF THE MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS**

### **Objectives**

This Performance Standard emphasizes the importance of good management of the environmental and social performance of the project throughout its lifespan by targeting the following objectives:

Identify and assess the environmental and social risks and impacts of activities.

- Adopt a hierarchy of mitigation measures so as to anticipate and avoid impacts, or when this is not possible, mitigate as much as possible, and when residual impacts persist, to compensate for the risks and impacts faced by workers, affected communities and the environment.
- Promote better environmental and social performance of customers through the efficient use of management systems.
- Ensure that grievances from affected communities and external communications from other stakeholders are answered and are managed appropriately.
- Promote and provide the necessary means for a concrete dialogue with the affected communities throughout the project cycle to cover the issues that could affect these communities, and ensure that relevant environmental and social information is disclosed and disseminated.

### **Operationalization**

PS1 applies to commercial activities that present risks and / or environmental and / or social impacts. Operational implementation for the client will include, among other things:

Describe any changes in the organizational structure to manage the social, environmental, health and safety, and work aspects during the reporting period. Describe the number of staff in charge of E&S issues.

Describe the level of environmental, social, health and safety training offered to staff. Fill in the appendix with the list of subjects, the training hours and the number of participants.

During the reporting period, are you aware of any events that may have caused damage; caused injury or death or other health problems; attracted the attention of third parties; affected the work of the project or the local populations; affected cultural property; or created liabilities for your company?

YES       No

Provide additional details

Describe any public consultation in progress and its popularization, contact with non-governmental organizations (NGOs), civil society, local communities or public relations actions on environmental and social aspects.

Briefly describe the new initiatives implemented during the period considered or additional management on E&S aspects (for example, energy / water savings, sustainability report, waste reduction, etc.

Briefly describe the number and type of comments and / or grievances received by the company in relation to the E&S questions? How many have been resolved and how many are pending? (Please attach a table with grievance settlement register)

## SP2. WORK AND WORKING CONDITIONS

### Objectives

- Promote fair treatment, non-discrimination and equal opportunities for workers.
- Establish, maintain and improve relationships between workers and management.
- Promote respect for national labor and employment law.
- Protect workers, including vulnerable categories of workers such as children, migrant workers, workers recruited by third parties, and workers in the customer's supply chain.
- Promote safe and healthy working conditions and protect workers' health. Avoid the use of forced labor.

### Operationalization

The applicability of this Performance Standard is defined during the environmental and social risk and impact assessment process, while the implementation of the measures necessary to meet the requirements of this Performance Standard is managed by the management system. environmental and social aspects of the client.

Ensure non-discrimination and equal opportunities for workers and respect for national labor and employment law.

Describe how to handle vulnerable categories of workers such as children, migrant workers, workers recruited by third parties, and workers in the customer's supply chain

Have you changed your Human Resources (HR) policies, work procedures or working conditions during the period of review?

Yes  no

Please, provide additional details

Please provide the following information regarding your workforce:

Site	Number of direct employees	Number of female employees	Number of employees made redundant	Number of recruited employees	Number of contractors <sup>11</sup>
.....					
.....					

Please provide the supply chain management system procedure, including a copy of the suppliers Code of conduct. Provide details regarding the implementation and application of the code of conduct, and external and internal audits.

## PS3: RATIONAL USE OF RESOURCES AND POLLUTION PREVENTION.

### Objectives

Performance Standard 3 recognizes that increased economic activity and urbanization often generate increased levels of air, water and soil pollution and consume resources that are not inexhaustible. which could pose a threat to local populations and the environment. This standard aims to:

- Avoid or reduce negative impacts on human health and the environment by avoiding or reducing the pollution generated by project activities.
- Promote more sustainable use of resources, including energy and water.
- Reduce GHG emissions related to projects.

<sup>11</sup> Contractors carry out basic function on behalf of the company on its the company's premises.

## **Operationalization**

Describe all the changes brought about by the project in its development, assess the likely impacts on the surrounding communities, and propose mitigation measures and monitoring of the dynamics

Propose mitigation and monitoring measures for impact management and ensure regular reporting of changes

In addition to verifying the measures for the rational use of resources and the fight against pollution required by the Performance Standard, if the project does not generate another significant source of emissions in an already degraded area. In this case, verify if the client consider additional strategies and adopt measures to avoid or reduce the negative effects. These strategies include, among other things, the assessment of other possible project locations and emission compensation measures.

For the use of pesticides or other chemical inputs, the customer will opt for products with low toxicity to humans, recognized as effective against target species and having minimal effects on non-target species and on the environment. And that the chemical inputs used are approved and produced by an entity currently approved by competent regulatory bodies

## **PS4 - HEALTH, SAFETY AND SAFETY OF THE COMMUNITY**

Performance Standard 4 recognizes that the activities, equipment and infrastructure associated with a project can increase the risks and impacts to which communities are exposed.

### **Objectives**

- Anticipate and avoid, during the duration of the project support, the negative impacts on the health and security of the Affected Communities which may result from ordinary or non-ordinary circumstances;
- Ensure that the protection of personnel and property is ensured in accordance with applicable human rights principles and in such a way as to avoid exposing affected communities to risks or to minimize them

### **Operationalization**

The scope of this Performance Standard is determined during the process of identifying environmental and social impacts and risks. The actions necessary to meet the requirements of this Standard are managed through the client's Environmental and Social Management System. The operationalization process could include among others the following actions:

Describe the main changes implemented in the fields of occupational health and safety (OHS) during the period considered, for example hazard identification, substitution of chemicals, new controls, etc.

Check the actions taken by the client to avoid or reduce the potential for community exposure to hazardous materials and substances that may be released by the project

The client will design, build, operate and decommission structural elements or components of the project in accordance with the safety standards required by law, taking into account the risks to which third parties are exposed or the affected Communities

Check the actions taken by the client to prevent or reduce the transmission of contagious diseases that may be associated with the influx of temporary or permanent labor for the project.

Check that the client has put in place a grievance mechanism allowing affected communities to express their concerns regarding security measures and the actions of security personnel

## Occupational health and safety indicators

Provide details for non-fatal injuries during the reporting period.

Company staff or contractor?	Number of days lost in total	Injury description <sup>12</sup>	Cause of the accident	Corrective measures to avoid it happening again

Describe in detail the deaths and vehicle accidents, including corrective measures (provide copies of the OSH investigation and anomalies remedial plan).

## Significant incidents

Date of incident	Incident Type (See below)	Brief description of the incident	Death? (Y/N)	# death	Preventive measures taken following the incident

## PS5 – ACQUISITION OF LAND AND INVOLUNTARY RESETTLEMENT

Performance Standard 5 recognizes that the acquisition of land and restrictions on its use by projects can have negative impacts on the people and communities who use the land. Involuntary resettlement refers to both physical displacement (moving or losing a shelter) and economic displacement (loss of assets or access to assets resulting in loss of source of income or livelihood ) as a result of the acquisition of land and / or a restriction on the use of land related to the project.

### Objectives

- Avoid, and whenever this is not possible, limit involuntary resettlement by considering alternative designs to projects.
- Avoid forced eviction.
- Anticipate and avoid, or when it is not possible to avoid, limit the negative social and economic impacts resulting from the acquisition of land or restrictions on its use by: (i) providing compensation for the loss of 'assets at replacement price<sup>4</sup> and by (ii) ensuring that resettlement activities are accompanied by appropriate communication of information, informed consultation and participation of those affected.
- Improve or at least restore the livelihoods and living conditions of displaced people.
- Improve the living conditions of physically displaced persons by providing adequate housing with security of tenure<sup>5</sup> in resettlement sites.

### Operationalization

The applicability of the Standard is defined during the environmental and social risk and impact assessment process, while the implementation of the measures necessary to meet the requirements of the Standard is managed by the environmental and social management system of the client, whose requirements are described in the Performance Standard

This Performance Standard applies to physical and / or economic movements linked to the following types of land transactions:

- Land rights or the right to use land acquired by expropriation or other binding procedures in accordance with the country's legal system;

<sup>12</sup> Injury: Inability to work for at least a full working day beyond the day when the injury or illness occurred.

Lost working days are the number of working days (consecutive or not) during which the employee was absent from work or limited to the activity of restricted work due to a work accident or disease, beyond the day of injury or the onset of the disease

- Land or land use rights acquired by settlements negotiated with owners or persons who have a legal right to the land if the expropriation or other compulsory legal procedure resulted from the failure of negotiations;
- Some projects where unintentional restrictions on land use and access to natural resources cause a community or groups within a community to lose access to the use of resources in areas for which they have recognized customary or traditional use rights;
- Certain projects requiring the eviction of people occupying the land without having customary, traditional or recognized rights of use;
- Restriction of access to land or use of other resources, including natural resources and communal goods, such as marine and aquatic resources, wood and wood and non-wood forest products, fresh water, medicinal plants, hunting, gathering, grazing and cultivation areas.

At the start of the activities, the client will be asked to explore all possible design alternatives for the project in order to avoid or limit physical and / or economic displacement, while balancing the costs and the environmental, social and financial benefits, paying particular attention to the impacts on the poor and vulnerable groups.

When displacement cannot be avoided, ask for the type and terms of compensation for loss of assets offered by the client to communities and displaced persons, as well as other assistance enabling them to improve or, at least, to restore their living standards or livelihoods as provided for in this Performance Standard

Does the client also offer communities and displaced persons the opportunity to take advantage of the appropriate benefits linked to the implementation of project activities?

Check if the client put in place a grievance mechanism that will allow the client to receive and respond in a timely manner to specific compensation and resettlement concerns raised by IDPs or members of host communities, including a mechanism for impartial resolution of disputes

## **PS6 - CONSERVATION OF BIODIVERSITY AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES**

Performance Standard 6 recognizes that the protection and conservation of biodiversity, the maintenance of ecosystem services and the sustainable management of living natural resources are of paramount importance for sustainable development.

### **Objectives**

- Protect and conserve biodiversity;
- Maintain the benefits of ecosystem services;
- Promote the sustainable management of living natural resources by adopting practices that integrate conservation needs and development priorities.

### **Operationalization**

Appreciate how the client seeks in priority to avoid impacts on biodiversity and ecosystem services

When it is not possible to avoid impacts, identify and describe the actions and measures to be implemented to limit the impacts and restore biodiversity and ecosystem services

See if the client is willing to use competent external experts with appropriate experience to help him develop a risk and impact mitigation strategy in accordance with this Performance Standard and to verify the application of the measures provided for in this effect.

In areas of natural habitat, see if the Client or the promoter favors mitigation measures aimed at ensuring zero net loss of biodiversity when practicable

## **PS7 – INDIGENOUS PEOPLE**

### **Objectives**

This PS aims to protect the interests of communities or groups of Indigenous Peoples who maintain a collective attachment (or whose identity as a group or community is linked) to distinct ancestral habitats or territories and their natural resources. In this perspective, this PS is designed to integrate questions concerning Indigenous Peoples in the various stages of the project, from design to implementation, ensuring the preservation of their rights and the avoidance of any discrimination that may have location. It also aspires to promote the principle of equity and respect for their dignity.

### **Operationalization**

The project Promoter or the Client requesting financing from the bank will identify, through a process of identification of environmental and social risks and impacts, all the indigenous peoples' communities likely to be affected by the project, as well as the nature and magnitude of economic, social and cultural impacts. The Project Promoter is required to comply with the main requirements mentioned below:

- a) Guarantee full respect for indigenous peoples, including their rights, dignity and aspirations
- b) Guarantee and conserve the livelihoods of indigenous communities
- c) Respect their Culture, knowledge and practices
- d) Avoid / minimize the negative impacts of the project (on indigenous peoples)
- e) Provide benefits and opportunities for sustainable and culturally appropriate development
- f) Guarantee free, prior and informed consent in certain circumstances.

## **PS8 - CULTURAL HERITAGE**

Performance Standard 8 recognizes the importance of cultural heritage for present and future generations

### **Objectives**

Performance Standard 8 recognizes the importance of cultural heritage for present and future generations. In accordance with the Convention for the Protection of the World Cultural and Natural Heritage, the purpose of this Performance Standard is to protect the cultural heritage and to help clients do the same in the course of their commercial activities. The objectives are:

- Protect the cultural heritage against the negative impacts of project activities and support its preservation;
- Promote the equitable distribution of the benefits of the use of cultural heritage.

### **Operationalization**

The applicability of this Performance Standard is defined during the process of identifying environmental and social risks and impacts, while the implementation of the measures necessary to meet the requirements of the Standard is managed by the Environmental Management System and social (SGES) of the client.

Ensure that the Client complies with the relevant national legislation relating to the protection of cultural heritage, in particular that relating to the implementation of the obligations incumbent on the country under the Convention for the Protection of the World Cultural and Natural Heritage

Evaluate what the client offers in terms of identification and protection of cultural heritage by ensuring the application of internationally recognized practices of protecting cultural heritage, studying it in the field and supporting it with documents.

Decline measures on incidental discoveries and the actions envisaged to refrain from disturbing them until competent specialists have not carried out an assessment and measures in accordance with the requirements of this Performance Standard are taken.

When the client's project location shelters a cultural heritage or prevents access to previously accessible cultural heritage sites and that the Affected Communities use or, in living memory, have used for long-established cultural purposes, the client must, on the basis of public consultations, allow continuous access to the cultural heritage site or provide an alternative access route taking into account predominant health, safety and security considerations

## Section II RASP / (APMR)

### Deviation / non-compliance

Find below the identified deviation / non-compliance regarding the following: (i) environmental and social action plan; (ii) the non-compliance with the Senegalese environmental and social regulations.

If there are any non-compliance or deviation, please log them and provide additional information, if necessary.

Area of interest	Non-compliance identified	Corrective action plan	State of completion	Date of completion
Environmental and Social Action Plan				
Local environmental and social regulation				

Please explain the cause and, where appropriate, describe the corrective measures considered to prevent recurrence.

## Appendix 9: Environmental Health and Safety World Bank Guidelines (WBG)

### REPORTS TO ILLUSTRATE COMPLIANCE WITH ENVIRONMENTAL POLICIES, WBG GUIDELINES AND SENEGALESE REGULATIONS

#### Management of hazardous substances (such as pesticides, fertilizers, etc.)

Dangerous substances are substances which represent an undue risk to the property, the environment or human health because of their physical and/or chemical characteristics. Examples include explosives, the toxic or flammable gases, strong and flammable liquids, oxidizing substances, radioactive and corrosive substances.

The customer is required to monitor the methods of collection, storage and removal of dangerous substances,<sup>13</sup> and report these methods and measured quantities to the IFC. Please refer to the guidelines on the management of hazardous substances for more information.

#### Hazardous substances management plan summary

Hazardous substances (UN/CAS name and number)	Classification or division <sup>14</sup>	Annual quantity	Maximum amount kept on site
Hazardous substances used			
Hazardous waste generated			

Settings (Same settings as above)	Sofitex method of storage, handling and processing <sup>15</sup>	Customer's disposal method <sup>16</sup>
Dangerous substances used		
Hazardous waste generated		

<sup>13</sup> Hazardous substances include the flammable, reagents, the radioactive, the corrosive and toxic substances

<sup>14</sup> UN Classification (1. Explosives ; 2. Gas 3 Flammable Liquids; 4. Flammable solids; 5. oxidizing substances; 6. Toxic and Infectious Substances; 7. Radioactive substances; 8. Corrosive Materials; 9. Various hazardous materials)

<sup>15</sup> State how the hazardous substances / wastes are stored on-site (e.g. drums, crates, and other containers) and handled (including transport). If necessary, provide additional sheets to describe in its entirety the elimination, organisations involved in the installations management, branch permit and authorization.

<sup>16</sup> Report only on the method of hazardous waste disposal used.

**State of implementation of the Environmental and social Action Plan Template**

<b>Identified issues</b>	<b>Required action</b>	<b>Person responsible</b>	<b>Cost/ Budget</b>	<b>Status of implementation</b>

**Some key performance indicators to provide**

<b>Health &amp; safety</b>	<b>Environment</b>	<b>Social</b>
<ul style="list-style-type: none"> <li>- Number and severity of injuries;</li> <li>-Number and nature of incidents involving damages in-situ or on the property;</li> <li>-Number and nature of the near misses;</li> <li>-Number of dangerous situations / security observations;</li> <li>Number of trained people</li> <li>-Number of E&amp;S training sessions;</li> <li>-Injuries, incidents prevalence and severity (lost time)</li> </ul>	<ul style="list-style-type: none"> <li>- Number and nature of the environmental incidents;</li> <li>- energy and water consumption</li> <li>- Solid waste disposal volume</li> <li>- liquid waste disposal;</li> <li>- Emission into the air</li> </ul>	<ul style="list-style-type: none"> <li>- Number of complaints and complaints received by internal and external stakeholders;</li> <li>- Performance improvement with clear social benefits</li> <li>- Incidents involving child labor;</li> <li>- Grievances and discrimination complaints and;</li> </ul>

## **Appendix 10: Mechanism for handling complaints and grievances related to Bank financing**

1. The Grievance Mechanism collects and examines complaints or claims related to the impacts arising from the activities financed by the bank. It is an essential element of our Policy for managing the environmental and social risks of our operations. It establishes the operational rules and procedures and will be made available to General Management and shared with our partners and intermediary financing institutions to deal with complaints from all those who have suffered harm resulting from a project or a activity financed by the bank. The Grievance Mechanism will be used as an early warning, assessment and follow-up tool for complaints related to the bank's activities.
2. The Bank's complaints mechanism aims to provide the public with a means of addressing questions or concerns concerning the institution's environmental and social policy and / or projects financed by La Banque Agricole, and the provisions allowing the Bank to respond quickly. The department in charge of institutional communications manages this process of receiving, reviewing and responding to communications from external stakeholders.
3. Anyone, a community or an external stakeholder, such as a civil society organization, can submit their questions or concerns to the Bank by sending an email to [labanqueagricole@labanqueagricole.sn](mailto:labanqueagricole@labanqueagricole.sn) or a physical mail to: General Management of the bank 31-33, rue Amadou Assane NDOYE x Colbert, BP 3890, Dakar, Senegal.
4. When the question or question relates to a project financed by the Bank, the persons affected or concerned are first called upon to discuss the question directly with the project structure. If the question or problem in question could not be adequately addressed at the project level by the structure concerned, the affected parties may address their concerns to the Bank, in writing, by providing the following information:
  - a. Name and contact details of the sender;
  - b. Name of the project and / or structure concerned by the problem;
  - c. Description of the problem and supporting documentation;
  - d. Date of the incident or action giving rise to the complaint (if applicable);
  - e. Specific repair sought and / or requested (if applicable);
  - f. Any other information deemed appropriate by the sender.
5. The department responsible for the Bank's institutional communication will confirm to the sender that the complaint has been received within [48] hours of being sent, and inform them that it will receive a response in writing within 15 working days.
6. The department responsible for the Bank's institutional communication will examine the content of the communication and write a response in relation to the credit officer responsible for financing the project. A draft response will be submitted within 10 working days to the Head of Corporate Communication for approval. If the Head of the department responsible for corporate communications approves the proposal, the department in charge of corporate communications will send the response to the sender. Any modification of the proposal by the communication manager will be shared with the credit manager responsible for financing the project and the final version will be sent to the sender no later than [15] days from receipt of the communication.
7. In the event that the department responsible for institutional communication, in accordance with point 5 of this mechanism and in consultation with the competent credit manager, considers that the sender's concern poses serious environmental and / or social problems for a portfolio project, the competent loan officer will immediately contact the client for any relevant information and may conduct an additional investigation if necessary. If the investigation concludes that the project does not comply with the Bank's E&S policy, the instructing agent informs the Commercial and Marketing Director and the Commitments and Risk Director of this fact. The appropriate E&S Manager or [a designated consultant] will prepare an additional corrective action plan (SCAP) to be discussed and implemented by the client.

8. The department in charge of institutional communication will then send a second response to the sender concerning the steps requested from the client once the SCAP is ready and accepted by the client, but at the latest [60] working days from receipt of the original message.
9. Information concerning this mechanism is annexed to the Environmental and Social Policy and available on the Bank's website as well as in all the offices and agencies of the Bank. There are no costs or fees associated with submitting a question or problem through this mechanism. Parties / people interested and / or impacted by bank financing can submit questions or concerns without fear of reprisal, and can request that The bank does not disclose the names of the people in the structure / project without prior authorization.
10. The Head of Corporate Communication, via the website, is responsible for recording and forwarding all inquiries, complaints received from the public, including the date of receipt; the date the response was sent; and the issues raised.

## Appendix 11: E&S / CSR Bank's Risk Training Plan

ES RISK TRAINING PLAN/ CSR				
MODULE	CONTENTS	OBJECTIVES	TARGETS	MODALITY
<b>E&amp;S risks</b>	<ul style="list-style-type: none"> <li>- Introduction to financial E&amp;S aspects</li> <li>- Introduction to E&amp;S / ESMS policy</li> <li>- Opportunities with investment funds</li> </ul>	<ul style="list-style-type: none"> <li>- <input type="checkbox"/> Sensitize administrators on E&amp;S risks and the Environmental and Social Management System.</li> <li>- Attract investment funds</li> </ul>	<ul style="list-style-type: none"> <li>- Board of Directors</li> <li>- General Management</li> </ul>	One day seminar
<b>Responsible investments</b>	<ul style="list-style-type: none"> <li>- Opportunities with investment funds</li> </ul>	<ul style="list-style-type: none"> <li>- Sensitize administrators on E&amp;S risks and the Environmental and Social Management System.</li> <li>- Attract investment funds</li> </ul>	<ul style="list-style-type: none"> <li>- Board of Directors</li> <li>- General Management</li> </ul>	
<b>Environmental and Social Risk Analysis (ARES)</b>	<ul style="list-style-type: none"> <li>- Introduction: Finance and Sustainable Development</li> <li>- Identification and knowledge of Environmental and Social Risks</li> <li>- Categorization of ES risks</li> <li>- Environmental and Social Risk Assessment</li> <li>- Management of Environmental and Social Risks</li> </ul>	<ul style="list-style-type: none"> <li>- Gain a better understanding of the environmental and social risks relating to loans through the methodology of a case study.</li> <li>- Gain a better understanding of the exposure to environmental and social risks according to the type of financing offered.</li> <li>- Raise awareness of the potential risks associated with different loan products from banks or banking groups, and more particularly in a given sector and its supply chain</li> </ul>	<ul style="list-style-type: none"> <li>- Responsible for the environment</li> <li>- Director of Management Control of Studies and Strategy (DCGES)</li> <li>- Commercial Marketing Director (DCOM)</li> <li>- Director of Compliance and Permanent Control (DCCP)</li> </ul>	E-LEARNING Seminar
<b>Training on national regulatory requirements</b>	<ul style="list-style-type: none"> <li>- Relevant environmental and social regulatory requirements</li> <li>- Facilities for Environmental Protection (ICPE)</li> </ul>	<ul style="list-style-type: none"> <li>- Understand and know the national environmental regulatory requirements and procedures relevant to the business sectors</li> </ul>	<ul style="list-style-type: none"> <li>- Instructor agents</li> <li>- Agency heads</li> <li>- Area Commercial managers</li> </ul>	Seminar
<b>CSR</b>	<ul style="list-style-type: none"> <li>- Definition and dimensions of CSR</li> <li>- Risks and opportunities related to CSR</li> <li>- Integration of CSR into the company's activities</li> <li>- CSR policy</li> <li>- Development of CSR objectives</li> <li>- Implementation of CSR programs</li> <li>- Measuring results</li> <li>- Disclosure of performance</li> <li>- ISO 26,000</li> <li>- CSR performance audit</li> </ul>	<ul style="list-style-type: none"> <li>- Understanding the definition and fundamentals of CSR</li> <li>- Understand the challenges related to CSR as well as the risks and opportunities associated with them with concrete examples</li> <li>- Know the different relevant environmental and social indicators to take into account in a CSR strategy</li> <li>- Know how to assess and communicate a CSR performance</li> </ul>	<ul style="list-style-type: none"> <li>- ALL Agents</li> <li>- Audit Division</li> <li>- DCOM</li> <li>- DCCP</li> </ul>	Seminar
<b>Responsible investments</b>	<ul style="list-style-type: none"> <li>- Definition and principles of responsible investment</li> <li>- Environmental, social and governance criteria (ESG)</li> <li>- Relationship between ESG criteria and financial performance</li> <li>- ESG risk management</li> <li>- Opportunities for new products in the finance sector</li> <li>- Different types of responsible investments and investment funds</li> <li>- The strategies of responsible investors</li> <li>- Responsible investment report</li> </ul>	<ul style="list-style-type: none"> <li>- Understand the definition and principles of responsible investing</li> <li>- Recognize the different responsible investors and their motivations</li> <li>- Know how to develop a responsible investment policy and conduct dialogues with companies</li> <li>- Know how to carry out a portfolio review or a company rating according to ESG criteria</li> <li>- To be able to use investment funds incorporating ESG criteria</li> </ul>	<ul style="list-style-type: none"> <li>- ALL Agents</li> <li>- Audit Division</li> <li>- DCOM</li> <li>- DCCP</li> </ul>	

ES RISK TRAINING PLAN/ CSR				
MODULE	CONTENTS	OBJECTIVES	TARGETS	MODALITY
<b>Responsible sourcing</b>	<ul style="list-style-type: none"> <li>- Definition and principles of responsible procurement</li> <li>- Why buy responsibly?</li> <li>- Main factors to consider for responsible purchasing</li> <li>- Integration of environmental and social criteria in the purchasing policy and strategy</li> <li>- Performance measurement and improvement</li> <li>- Disclosure of performance</li> <li>- ISO 20 400 - Responsible purchasing</li> <li>- Supply chain audit</li> </ul>	<ul style="list-style-type: none"> <li>- Understand the definition and principles of responsible procurement</li> <li>- Become aware of the risks and opportunities linked to the integration of sustainable development criteria into purchasing decisions</li> <li>- Acquire the knowledge necessary for the implementation of responsible purchasing practices</li> <li>- Have tools to assess, audit and disclose responsible procurement performance</li> </ul>	<ul style="list-style-type: none"> <li>- ALL</li> <li>- Human Resources Division</li> <li>- Audit Division</li> <li>- Marketing and Commercial Division</li> <li>- Compliance Division</li> </ul>	
<b>Performance Standard 1: Assessment and management of environmental and social risks and impacts</b>	<ul style="list-style-type: none"> <li>- Environmental and social assessment and management system</li> <li>- Management programs</li> <li>- Capacity and organizational skills</li> <li>- Preparation and response to emergency situations</li> <li>- Monitoring and evaluation</li> <li>- Stakeholder engagement</li> <li>- External communications and grievance mechanism</li> <li>- Continuous disclosure of information to affected communities</li> </ul>	<ul style="list-style-type: none"> <li>- Understand the requirements of NP1 and how to apply it to clients and allow them to: <ul style="list-style-type: none"> <li>• Identify and assess the environmental and social risks and impacts of the project.</li> <li>• Adopt a hierarchy of mitigation measures so as to anticipate and avoid impacts,</li> <li>• Compensate for the risks and impacts faced by workers, affected communities and the environment.</li> <li>• Promote better environmental and social performance of customers through the efficient use of management systems.</li> <li>• Ensure that the grievances of the affected communities and the external communications from other stakeholders are answered and managed appropriately.</li> <li>• Promote and provide the necessary means for a concrete dialogue with the affected communities throughout the project cycle to cover issues that may affect these communities, and ensure that relevant environmental and social information is disclosed and disseminated.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>- Loan Agent</li> <li>- Agency Heads</li> <li>- Commercial Supervisors</li> </ul>	Seminar
<b>Performance Standard 2: Manpower and working conditions</b>	<ul style="list-style-type: none"> <li>- Working conditions and management of relations between management and workers (non-discrimination, equal opportunity, organization of workers, etc.)</li> <li>- Protection of the workforce (child labor, forced labor, etc.)</li> <li>- Occupational health and safety</li> <li>- Workers employed by third parties</li> <li>- Supply chain</li> </ul>	<ul style="list-style-type: none"> <li>- Understand the requirements of NP2 and how to apply it to customers and allow them to: <ul style="list-style-type: none"> <li>• Promote fair treatment, non-discrimination and equal opportunities for workers.</li> <li>• Establish, maintain and improve relationships between workers and management.</li> <li>• Promote respect for national labor and employment law.</li> <li>• Protect workers</li> <li>• Promote safe and healthy working conditions and protect workers' health.</li> <li>• Avoid the use of forced labor.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>- Loan Agent</li> <li>- Agency Heads</li> <li>- Commercial Supervisors,</li> <li>- UR Personal</li> <li>- members of the Health and Safety Hygiene Committee</li> </ul>	Seminar
<b>Performance Standard 3: Rational use of resources and pollution prevention</b>	<ul style="list-style-type: none"> <li>- Rational use of resources (GHG and water consumption ...)</li> <li>- Pollution prevention (waste, management of hazardous materials, Use and management of pesticides...)</li> </ul>	<ul style="list-style-type: none"> <li>- Understand the requirements of NP3 and how to apply it to clients and allow them to: <ul style="list-style-type: none"> <li>• Avoid or reduce negative impacts on human health and the environment by avoiding or reducing the pollution generated by project activities.</li> <li>• Promote more sustainable use of resources, including energy and water.</li> <li>• Reduce GHG emissions related to projects</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>- Loan Agent</li> <li>- Agency Heads</li> <li>- Commercial Supervisors</li> </ul>	Seminar
<b>Performance Standard 4: Health, safety and security of communities</b>	<ul style="list-style-type: none"> <li>- Community health and safety (Design and safety of infrastructure and equipment, Management of hazardous materials and safety, Ecosystem services, Exposure of Communities to disease, preparation and response to emergency situations, etc.)</li> </ul>	<ul style="list-style-type: none"> <li>- Understand the requirements of NP4 and how to apply it to customers and allow them to: <ul style="list-style-type: none"> <li>• Anticipate and avoid, during the life of the project, negative impacts on the health and safety of the affected communities.</li> <li>• Ensure the protection of personnel and property in accordance with applicable human rights principles</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>- Loan Agent</li> <li>- Agency Heads</li> <li>- Commercial Supervisors</li> </ul>	Seminar

ES RISK TRAINING PLAN/ CSR				
MODULE	CONTENTS	OBJECTIVES	TARGETS	MODALITY
	<ul style="list-style-type: none"> <li>- Security personnel</li> </ul>	<ul style="list-style-type: none"> <li>• Avoid exposing affected communities to risks or minimize them.</li> </ul>		
<b>NP5: Land acquisition and involuntary resettlement</b>	<ul style="list-style-type: none"> <li>- Travel (physical, economic)</li> <li>- Responsibilities of the private sector in the context of resettlements supported by the government</li> <li>- Responsibilities of the private sector in the context of resettlements supported by the government</li> </ul>	<ul style="list-style-type: none"> <li>- Understand the requirements of NP5 and how to apply it to customers and allow them to:               <ul style="list-style-type: none"> <li>• Avoid, limit involuntary resettlement by considering alternative designs to projects.</li> <li>• Avoid forced eviction.</li> <li>• Anticipate and avoid, or when it is not possible to avoid, limit the negative social and economic impacts resulting from the acquisition of land or restrictions on its use</li> <li>• Improve or at least restore the livelihoods and living conditions of displaced people.</li> <li>• Improve the living conditions of physically displaced people...</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>- Loan Agent</li> <li>- Agency Heads</li> <li>- Commercial Supervisors</li> </ul>	Seminar
<b>Performance Standard 6: Conservation of biodiversity and sustainable management of living natural resources</b>	<ul style="list-style-type: none"> <li>- General information on biodiversity conservation</li> <li>- Notions on habitat types (critical, modified, natural)</li> <li>- Areas protected by law and areas recognized by the international community</li> <li>- Invasive alien species</li> <li>- Management of ecosystem services</li> <li>- Sustainable management of living natural resources</li> <li>- Supply chain</li> <li>- Management of agricultural waste</li> <li>- Responsible disposal of packaging for inputs and phytosanitary products</li> </ul>	<ul style="list-style-type: none"> <li>- Understand the requirements of NP6 and how to apply it to customers and allow them to:               <ul style="list-style-type: none"> <li>- Protect and conserve biodiversity.</li> <li>- Maintain the benefits of ecosystem services.</li> </ul> </li> <li>- Promote the sustainable management of living natural resources by adopting practices that integrate conservation needs and development priorities.</li> </ul>	<ul style="list-style-type: none"> <li>- Loan Agent</li> <li>- Agency Heads</li> <li>- Commercial Supervisors</li> </ul>	Seminar
<b>Performance Standard 7: Indigenous Peoples</b>	<ul style="list-style-type: none"> <li>- Prevention of negative impacts</li> <li>- Participation and consent</li> <li>- Circumstances requiring free, prior and informed consent</li> <li>- Responsibilities of the private sector when the government is responsible for managing Indigenous Peoples</li> <li>- Mitigation and development opportunities</li> </ul>	<ul style="list-style-type: none"> <li>- Understand the requirements of NP6 and how to apply it to customers and allow them to:               <ul style="list-style-type: none"> <li>• Ensure that the development process fosters full respect for human rights, dignity, aspirations, cultures and livelihoods based on indigenous peoples' natural resources.</li> <li>• Anticipate and avoid the negative impacts of projects on Indigenous Peoples communities</li> <li>• Reduce, restore and / or compensate for these potential impacts.</li> <li>• Promote benefits and opportunities related to sustainable development for Indigenous Peoples who are culturally appropriate.</li> <li>• Establish and maintain with Indigenous Peoples affected by a project throughout its duration a permanent relationship based on Informed Consultation and Participation (UEY).</li> <li>• Obtain the Free, Prior and Informed Consent (FPIC) of Indigenous Peoples when the circumstances described in this Performance Note exist. Respect and preserve the culture, knowledge and practices of Indigenous Peoples.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>- Loan Agent</li> <li>- Agency Heads</li> <li>- Commercial Supervisors</li> </ul>	Seminar
<b>Performance Standard 8: Cultural Heritage</b>	<ul style="list-style-type: none"> <li>- Protection of cultural heritage in the design and execution of projects</li> <li>- Use of cultural heritage by the project</li> </ul>	<ul style="list-style-type: none"> <li>- Understand the requirements of NP6 and how to apply it to customers and allow them to:               <ul style="list-style-type: none"> <li>• Protect the cultural heritage against the negative impacts of project activities and support its preservation.</li> <li>• Promote the equitable distribution of the benefits of the use of cultural heritage.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>- Loan Agent</li> <li>- Agency Heads</li> <li>- Commercial Supervisors</li> </ul>	Seminar

**Annex 12: DISCLOSURE OF ENVIRONMENTAL AND SOCIAL INFORMATION OF ACTIVITIES  
FINANCED BY LBA IN THE GCF FUND**

**COMMITMENT NOTE**

**DISCLOSURE OF ENVIRONMENTAL AND SOCIAL INFORMATION OF ACTIVITIES  
FINANCED BY LBA IN THE GCF FUND**

As part of the implementation:

- On the one hand, its Environmental and Social Management Policy aligned with the Standard Performance of the International Finance Corporation and with international directives in terms of sustainable and responsible financing;
- On the other hand, its Information Disclosure Policy in line with that of the Green Climate Fund (FVC) which recognizes the need to ensure access to information to the public and the participation of stakeholders;

La Banque Agricole (LBA) reaffirms its commitment to work for transparency in all its activities.

In doing so, with the exception of personal data, in particular that of customers, LBA will promote access to any document or information produced in the financing of projects and activities with the GCF Fund.

Such an approach aims to further strengthen public and stakeholder confidence. Moreover, it contributes to the achievement of the objectives on the projects and programs financed on the GCF line.

This commitment also applies to all of the implementing partner entities of La Banque Agricole within the framework of the GCF. So,

Regarding proposals for funding projects and programs that have an environmental or social impact, LBA will disclose and announce to the FVC Council Secretariat, the public and observers, the following information:

For project and programme funding proposals that have an environmental or social impact, LBA shall disclose and announce to the public and, via the Secretariat, to the GCF Board and Active Observers:

- In the case of Category B/I-2 projects, the ESIA and ESMP at least 30 days in advance of the AE's or GCF's Board decision, whichever is earlier;
- In the case of Category B/ I-2 programmes, the ESMS at least 30 days in advance of the AE's or GCF's Board decision, whichever is earlier.

The reports will be available in both English and the local language (if not English). The reports will be available via electronic links in LBA's and the GCF's websites (in the case of the GCF website, upon submission of a funding proposal to the Board) as well as in locations convenient to affected peoples.

**Malick NDIAYE**