***Insert Company Name***

**Environmental and Social Management System Manual**

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| ***General Instructions***1. *Insert company logo in the header*
2. *Insert company name where indicated (“[insert company name]”)*
3. *Consider the guidance / follow the instructions given in the instruction boxes*
4. *Review the Environmental and Social Management System Manual and customise accordingly, if required*
5. *Delete the instruction boxes throughout when the document is completed, including this box.*
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| **Type of Document:**  | Manual |

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**Amendments**

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| *Instruction Box – Delete when complete.*General Instructions for Customisation and Compliance |
| Your Company is required or wishes to establish and maintain an ESMS that is appropriate to the nature and scale of the business and commensurate with the level and type of company environmental and social (E&S) and occupational, health and safety (OHS) risks and impacts. The purpose of an ESMS manual is to provide a structured framework for identifying and managing E&S and OHS risks.This document provides a template from which your company can develop an environmental and social management system (ESMS) manual to ensure consistent application and implementation of E&S and OHS policies, procedures and plans across your company. This will help to ensure compliance with local E&S and OHS laws and regulations, good international industry practices (GIIP), and the international lender standards such as the International Finance Corporate (IFC) Performance Standards on E&S Sustainability (2012).An ESMS manual should cover all of an organisation’s E&S and OHS risk and impacts. At a minimum, this would include your company’s E&S policy/ies, procedures for stakeholder engagement, grievance mechanisms, emergency response, occupational health and safety, waste management, and E&S and OHS monitoring. To ensure the ESMS is practical and meets both investor and operational needs, please consider the following:* Purpose and scope: Define the objectives of the ESMS manual and its applicability within the organisation.
* Specificity: Tailor the policies, procedures, and management plans to reflect the specific E&S and OHS impacts of your company. Include details relevant to your operational context and geographical location.
* Regulatory compliance: Align the ESMS with both international standards (e.g., IFC Performance Standards) and local regulations. Ensure that the document clearly demonstrates how these standards will be met in practice.
* Risk assessment: Include methodologies for identifying, assessing, and managing environmental and social risks.
* Monitoring and evaluation: Establish E&S and OHS performance indicators and mechanisms for regular monitoring and self-evaluation.
* Continuous improvement: Include provisions for reviewing and updating the ESMS to reflect new risks, regulatory changes, and lessons learned.
* Documentation and record-keeping: Specify documentation requirements for compliance and performance tracking.
* Reporting and accountability: Define how and when to report on E&S and OHS performance to stakeholders.
* Cultural and community considerations: Ensure that social aspects, including cultural heritage and community impacts, are addressed, if applicable.

Below is a list of useful resources to consider when customising your ESMS:* [IFC Performance Standards on E&S Sustainability (2012)](https://www.ifc.org/content/dam/ifc/doc/2010/2012-ifc-performance-standards-en.pdf)
* [IFC General Environmental, Health and Safety (EHS) Guidelines (2007)](https://www.ifc.org/content/dam/ifc/doc/2000/2007-general-ehs-guidelines-en.pdf)
* [IFC EHS Guidelines for Annual Crop Production (2016)](https://www.ifc.org/content/dam/ifc/doc/mgrt/annual-crop-production-ehs-guidelines-2016-final.pdf)
* [IFC EHS Guidelines for Food and Beverage Processing (2016)](https://www.ifc.org/content/dam/ifc/doc/2010/2016-annual-crop-production-ehs-guidelines-en.pdf)
* [IFC EHS Guidelines for Perennial Crop Production (2015)](https://www.ifc.org/content/dam/ifc/doc/mgrt/final-perennial-crop-production-november-2015.pdf)
* [IFC ESMS Toolkit and Case Studies – Crop Production](https://documents1.worldbank.org/curated/en/414331491570397072/pdf/114083-WP-IFC-ESMS-Toolkit-Crop-Production-PUBLIC.pdf)
* [IFC ESMS Implementation Handbook – General (2015)](https://www.ifc.org/content/dam/ifc/doc/mgrt/esms-handbook-general-v21.pdf)
* [ESMS Self-Assessment and Improvement Guide](https://www.ifc.org/content/dam/ifc/doc/2010/esms-self-assessment-en.xlsx)
* [BII Sector Profiles](https://toolkit.bii.co.uk/sector-profiles/) including [Agriculture and Aquaculture](https://toolkit.bii.co.uk/sector-profiles/agriculture-and-aquaculture/), [Food and Beverages](https://toolkit.bii.co.uk/sector-profiles/food-and-beverages/) and [Forestry and Plantations](https://toolkit.bii.co.uk/sector-profiles/forestry-and-plantations/)
 |

**Abbreviations and Acronyms**

| **Abbreviations and Acronyms** | **Definition** |
| --- | --- |
| **ALARP** | As Low As Reasonably Practicable |
| **E&S** | Environmental and social |
| **EHS** | Environmental, health and safety |
| **ESMS** | Environmental and social management system |
| **ESG** | Environmental, social and governance |
| **FAO** | Food and Agriculture Organisation |
| **H&S** | Health and safety |
| **HR** | Human resources |
| **IFC** | International Finance Corporation |
| **IBRA** | Issue based risk assessments |
| **OHS** | Occupational, health and safety |
| **PS** | Performance Standard |
| **PPE** | Personal protective equipment |
| **PDCA** | Plan, Do, Check, Act |
| **WBG** | World Bank Group |

# Introduction

## Context

[Insert a brief description of company operations and locations covered by this ESMS]

Inherent to the success of the company is the effective management of environmental and social (E&S) and occupational health and safety (OHS) risks, and the delivery of positive and lasting impacts that benefit the local communities in which the company is located.

## Purpose of this Document

This document describes the environmental and social management system (ESMS) that is implemented by [insert company name] to manage E&S and OHS impacts and risks associated with its operational activities to ensure compliance with national and international requirements.

The ESMS is intended to be a “living document” in the form that it is periodically edited and updated to reflect latest experiences and learnings from ongoing operational activities. The ESMS is applicable to all activities of the company.

## Structure of the ESMS

The structure of the proposed ESMS is underpinned by the Plan, Do, Check, Act (PDCA) cycle which is an ongoing feedback loop for iterations and process improvements (**Figure 1.1**).



**Figure 1.1: PDCA Cycle for Improvement and Implementation of Change in the ESMS**

The operationalizing of the above structure is indicated in **Figure 1.2**.



**Figure 1.2: [insert company name] Policies and Operational Environmental and Social Systems**

## Guiding Frameworks

The ESMS has been developed in line with requirements from the International Finance Corporation (IFC) Performance Standard 1: Assessment and Management of Environmental and Social Risks and Impacts (PS 1).

Additionally, the ESMS structure and content has been developed in line with the following requirements:

* National environment, social, health, safety and labour laws and standards in the host countries of [insert company name], including requirements for public disclosure and engagement;
* Relevant international conventions and treaties adopted by host countries;
* International Labour Organization core conventions;
* Guidelines that set out international best practice such as [delete any not applicable]:
	+ - World Bank Group’s (WBG) General Environmental, Health and Safety (EHS) Guidelines);
		- WBG Industry specific guidelines, as applicable (i.e. EHS Guidelines for Annual Crop Production, EHS Guidelines for Perennial Crop Production);
		- Financierings-Maatschappij voor Ontwikkelingslanden Position Statement on Animal Rights (March 2018);
		- Principles of responsible investment in agriculture and food systems (Food and Agriculture Organisation (FAO);
		- FAO Voluntary Guidelines on the Responsible Governance of Tenure of Land, Fisheries, and Forests in the Context of National Food Security;
		- Principles of Responsible Investment in Agriculture and Food Systems;
		- Good Agricultural Practice;
		- Core labour standards of the International Labour Organisation (ILO);
		- United Nations (UN) Guiding Principles of Business and Human Rights;
		- UN Declaration of Rights of Indigenous Peoples; and
		- UN Basic Principles and Guidelines on Development-based Evictions and Displacement.

## ESMS Disclosure

This ESMS Manual and/or selected ESMS documentation will be shared with contractors, suppliers and others, as required.

# Planning

## E&S Policy

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| --- |
| *Instruction Box – Delete when complete** *You may want to integrate your E&S policy with other policies on health and safety, quality management, or security. If not, provide an additional short section on each of your other E&S and OHS related policies below.*
* *The section below is generic. Review and modify as required for your company.*
 |

The [insert company name] E&S Policy is included in **Annex A**. This policy provides a common understanding of the core values and commitments of [insert company name], establishes the expectations for conduct, and defines how external stakeholders can expect [insert company name] to operate.

The E&S Policy has been communicated to and made available to all employees. The policy will be reviewed annually and updated as the Company grows and changes.

## E&S and OHS Risks and Impacts

An understanding of the hazards, risk, impacts and consequences of [insert company name] and its activities are necessary to determine and apply appropriate risk mitigation strategies and controls, and to provide adequate resources accordingly. The purpose of the risk assessment process is to identify and evaluate the E&S and OHS risks and impacts associated with [insert company name]’s operational activities, including contractor activities and supply chain risks over which [insert company name] has control or influence. The Baseline Risk Assessment Procedure and Risk Assessment Matrix is provided in **Annex B**.

## Regulatory Compliance

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| *Instruction Box – Delete when complete** *Define the process for ensuring compliance with E&S and OHS laws and regulations and state the frequency of the compliance audits and who is responsible for conducting them.*
* *The section below is generic. Review and modify as required for your company.*
 |

[insert company name] aspires to achieve regulatory compliance across all relevant laws, policies and regulations as a part of its effort to ensure uniform standards are maintained at Group Level and operational level.

[insert company name] commits to complying with applicable E&S and OHS laws and regulations, including:

* Applicable international and national laws and local regulations (regulatory compliance);
* Permits, approvals, permissions and licenses (permits compliance); and
* Other company commitments made as part of an Environmental Impact Assessment or Environmental and Social Impact Assessment permitting or stakeholder engagement activities.

[insert company name] has identified the E&S and OHS legal requirements applicable to its operations, which are documented in an E&S and OHS Legal Register (**Annex C**). The register has been prepared at Group level and is therefore applicable to all operations. Each operation will review the legal register [annually] and determine how it applies to site operations.

The E&S and OHS Legal Register will remain up to date through access to new or amended legislation. This includes [company to specify, e.g., subscription to an update service, access to a government service, periodic reviews of government websites, or appointing an external services provider]. The [insert role], will be responsible for maintaining the E&S and OHS Legal Register as well as ensuring the register of other requirements (this includes other requirements such as commitments made to stakeholders) is updated in the event of new requirements or changes to existing obligations.

Corrective action plans to address compliance failures will include, updating safety protocols, modifying E&S and OHS protection measures and / or revising employee training programs.

# Performing

## Management Procedures

[insert company name] has developed procedures or plans to manage and address E&S and OHS risks and impacts in accordance with the guiding frameworks (Section 1.4) and identified compliance obligations.

The following procedures and plans have been developed in standalone documents:

* Emergency Preparedness and Response Plan (**Annex D**);
* Waste Management Plan (**Annex E**);
* Water Management Plan (**Annex F**);
* Hazardous Materials Management Plan (**Annex G**);
* Biodiversity Management Plan (**Annex H**);
* Human Resources/ Labor Management Plan (**Annex I**);
* Retrenchment Plan (**Annex J**);
* Occupational Health and Safety Plan (**Annex K**);
* Community Health, Safety and Security Management Plan (**Annex L**);
* Supply Chain Management Plan (**Annex M**);
* E&S Monitoring and Review Plan (**Annex N**); and
* Template Management Plan (**Annex O**).

In order to action the management plans, the following standalone documents have been developed:

* [Training Register](https://slrgroup.sharepoint.com/%3Ax%3A/r/sites/ibis/Projects/Clients/0130%20-%20ResponsAbility/0130-4586%20-%20ResponsAbility%20-%20Development%20and%20Implementation%20of%20ESMS%20Templates%20for%20CSA%20Fund/6.%20Reports%20and%20Presentations/1.%20Draft/1.%20Mike%20%28to%20review%29/CSA_ESMS_Training%20Register%20Template_Draft_25.10.2024.xlsx?d=w0120430adcdb4f6bbd65f5a636d834b9&csf=1&web=1&e=Oupcvl) (**Annex P**);
* Training Matrix (**Annex Q**);
* [Incident and Corrective Action Management Register](https://slrgroup.sharepoint.com/%3Ax%3A/r/sites/ibis/Projects/Clients/0130%20-%20ResponsAbility/0130-4586%20-%20ResponsAbility%20-%20Development%20and%20Implementation%20of%20ESMS%20Templates%20for%20CSA%20Fund/6.%20Reports%20and%20Presentations/1.%20Draft/1.%20Mike%20%28to%20review%29/CSA_ESMS_Incident%20and%20Corrective%20Action%20Management%20Register_%20Template_Draft_25.10.2024.xlsx?d=wb35d2b962e5641d99038e72b0da5bbac&csf=1&web=1&e=SKg53V) (**Annex R**).
* [Permit Register](https://slrgroup.sharepoint.com/%3Ax%3A/r/sites/ibis/Projects/Clients/0130%20-%20ResponsAbility/0130-4586%20-%20ResponsAbility%20-%20Development%20and%20Implementation%20of%20ESMS%20Templates%20for%20CSA%20Fund/6.%20Reports%20and%20Presentations/1.%20Draft/1.%20Mike%20%28to%20review%29/CSA_ESMS_Permit%20Register%20Template_Draft_24.10.2024.xlsx?d=w1814771c4d034f1d85f3b25c6f316728&csf=1&web=1&e=YdWMkm) (**Annex S**); and
* [ESMS Action Plan](https://slrgroup.sharepoint.com/%3Ax%3A/r/sites/ibis/Projects/Clients/0130%20-%20ResponsAbility/0130-4586%20-%20ResponsAbility%20-%20Development%20and%20Implementation%20of%20ESMS%20Templates%20for%20CSA%20Fund/6.%20Reports%20and%20Presentations/1.%20Draft/1.%20Mike%20%28to%20review%29/CSA_ESMS_ESMS%20Action%20Plan_%20Template_Draft_24.10.2024.xlsx?d=w0c09f38c8d7b4168aab2b694d95911da&csf=1&web=1&e=xfDpbv) (**Annex T**).

## Document Control Procedure

|  |
| --- |
| *Instruction Box – Delete when complete** *In this section define the requirements for document control, procedure numbering and identification, document approval, version control etc. Your ESMS documents should be classified according to their purpose or department and it should include a procedure for periodic revisions of your documents.*
* *The section below is generic. If you have already developed a document control procedure for your company, include it here and modify if required.*
 |

### Document Control Procedure

ESMS documentation will be managed within a document management system which is a secure electronic directory, subject to regular back-up. The system will be maintained by the E&S / Sustainability Manager, and will be accessible to all employees at [insert company name] and will contain the most up-to-date versions of each ESMS document. All documentation is clearly identifiable by a numbering system in accordance with this ESMS document control procedure.

### Document Numbering and Identification

ESMS documents will be named with a unique identification number and descriptive name to help in easy identification by employees, using the following nomenclature:

**Table 3.1: Document Identification and Nomenclature**

| **Level** | **Function / Department** | **Document Type and Symbol** | **Document Number** |
| --- | --- | --- | --- |
| Group [**GRP**]Rwanda [**RWA**]Ethiopia [**ETH**] | Environmental, health and safety [**EHS**]Labour, community and security [**LCS**] | Manual [**M**]Policy or Procedure [**P**]Registers, forms, checklists and other supporting documents [**R**] | 01, 02, 03, 04, etc |

The function or department is based on the department in which the procedures resides.

Multiples of the same document types are sequentially numbered (e.g., GRP-EHS-P01, GRP-EHS-P02, etc.).

Examples of procedure identification and numbering:

* GRP-EHS-M ESMS Manual;
* GRP-EHS-P01 Water Management Procedure;
* GRP-EHS-P02 Hazardous Materials Management Plan;
* RWA-EHS-P02 Hazardous Materials Management Plan,
* GRP-LCS-P01 External Grievance Mechanism; and
* GRP-LCS-P02 Retrenchment Management Procedure.

Supporting documents such as templates for registers, forms etc. will include the procedure number in which the document is mandated. The following is an example of supporting document numbering:

* RWA-EHS-P02-R01 Hazardous Materials Inventory Register

*The ‘R01’ in the numbering indicates that the document is the first register/ form/ checklist/ other supporting document for use under procedure RWA-EHS-P02 Hazardous Materials Management Plan.*

Group and each site will retain an ESMS Document Register, which will list the document reference number, name, version and revision date of all documents including supporting documents) that form part of the Company’s ESMS. The Document Register will be maintained and updated when new documents are developed or existing documents are revised.

### Document Approval

Only approved documents can be placed within the document management system. Document approval is shown by a traceable approval (either electronic or hardcopy) from the [Chief Executive Officer] e.g., email or signed copy. This includes documents that have been changed and have been re-approved. All document approvals must be archived in the company SharePoint in a dedicated folder (for example, Confirmation of ESMS Document Approval).

### Version Control

Changes to documents will be indicated by a change in the version number. Documentation that has been replaced by a newer version or is no longer needed is removed from access in the document management system.

### Printing of Documentation

All ESMS-related documents are considered uncontrolled when printed (there may be different versions in different hardcopies across the company), therefore the keeping of documents in a printed form, other than for the purpose of short-term use in a particular application, is discouraged.

## Organisational Structure and Competence

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| --- |
| *Instruction Box – Delete when complete** *Document who is responsible for the different aspects of E&S and OHS risk management and performance, including effective implementation of the ESMS. This can be presented in an organogram (depicting the E&S governance structure and reporting lines) and/or a table of roles and responsibilities in larger and more complex organisations or both. Two examples of company organograms are given in the text below.*
* *The section below is generic. Review and modify as required for your company.*
 |

Effective implementation of an ESMS is only as good as the people who implement it. The E&S Organisational Structure and Responsibilities document (**Annex U**) details the roles of those responsible for E&S and OHS as well as their responsibilities. These personnel are based in the organisation within our countries of operation and offices, as shown in the organogram in **Figure 3.1**.

*[Examples of approaches to organograms (depicting the E&S governance structure and reporting lines) are presented below.* *A table of roles and responsibilities, in larger and more complex organisations or both, could also be inserted in addition or instead.]*

**Figure 3.1: Company Organogram - Example 1 (complex)**

**Figure 3.2: Company Organogram - Example 2 (simple)**

## Training and Capacity Building

|  |
| --- |
| *Instruction Box – Delete when complete** *Document who is responsible for identifying the E&S and OHS training needs, what E&S and OHS training will be covered and who will roll out E&S and OHS training.*
* *The section below is generic. Review and modify as required for your company.*
 |

### Company Employees

[insert company name] is committed to providing appropriate E&S and OHS training and capacity building to [insert company name] employees to:

* Ensure continuous improvements to its institutional capacity and organisational structures,
* To support the effective implementation and management of the ESMS, and
* To ensure personnel are equipped with the necessary skills and expertise to effectively identify, evaluate, and manage E&S and OHS risks and opportunities.

[insert company name] will undertake ongoing training across the organisation, particularly for those responsible and/or accountable for the implementation of the ESMS in order to enhance and maintain the capacities of staff and to raise awareness of the E&S and OHS risks in the organisation.

[Iinsert company name] provides training to all employees and managers, ensuring that:

* Personnel are aware of the importance of developing and implementing [insert company name] E&S policies and procedures and fulfilling requirements, especially in relation to their role and responsibilities, and that failure in fulfilling these requirements may lead to significant impacts to personnel, the community and the environment;
* Personnel within the organisational structure with direct responsibility for operational level environmental, social, health and safety performances have the knowledge, skills, and experience necessary to perform their work, including current knowledge of the applicable laws, regulations and requirements of IFC Performance Standards and Guidelines; and
* Personnel possess the knowledge, skills, and experience to implement the specific measures and actions required under the ESMS and the methods to perform such actions in a competent and efficient manner.

[insert company name] will undertake an annual evaluation of training needs associated with this ESMS and, on this basis, develop and maintaining a Training Needs Matrix and a Training Plan. The Training Needs Matrix and a Training Pan will be developed by the [ESG Manager] with support from the HR Manager and the [Operations / Facilities Manager]. Together they assess training needs across all departments and capture this in the Training Needs Matrix.

At a minimum, all employees and new hires will receive training that addresses:

* Environmental and social policies;
* Social objectives;
* The ESMS Manual and the procedures, programmes and plans applicable to the employee’s role;
* Significant regulatory or community stakeholder concerns that must be considered in day-to-day operations; and
* The implications of not conforming with the ESMS requirements.

### Contractors, Customers and Agency Workers

At a minimum, all contractors, customers and agency workers on-site should receive induction training that addresses:

* Overview of environmental and social policies;
* The ESMS Manual and the procedures, programmes and plans applicable to their role;
* Significant regulatory or community stakeholder concerns that must be considered in contractor’s activities; and
* The implications of not conforming with the ESMS requirements.

All E&S and OHS training and capacity building programs will be coordinated, facilitated and in most instances led by the [ESG Manager]. Training needs which can’t be met internally, will be offered by accredited third party service providers.

Records are required to be kept and chosen methods of assessing competency need to be included in the annual Training Plan.

## Communications

|  |
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| *Instruction Box – Delete when complete** *The section below is generic. Review and modify as required for your company.*
 |

### Stakeholder Engagement Plan

Stakeholders are individuals, groups, or organisations that have an interest in, or are affected by, a company’s activities, decisions, and outcomes. These stakeholders can be internal (within the company) or external (outside the company), and their needs, concerns, and expectations can have a significant impact on the company’s success or failure.

Understanding stakeholder concerns allows [insert company name] to identify and mitigate risks early. For example, local communities may have concerns about environmental impacts, and addressing these concerns proactively can prevent opposition or delays.

[Insert company name] has developed a Stakeholder Engagement Plan (SEP) (**Annex V**) in order to direct our engagement and communications with our stakeholders.

### Internal Grievance Mechanism

An Internal Grievance Mechanism needs to ensure that employee grievances, suggestions and objections are captured and considered. The Internal Grievance Mechanism is designed to be a transparent process that is gender responsive, culturally appropriate, and readily accessible to all employees at no costs and without retribution.

[Insert company name] has developed an Internal Grievance Mechanism (**Annex X**) in order to receive and respond to employee grievances.

### External Grievance Mechanism

An External Grievance Mechanism needs to ensure accessibility, transparency, fairness, timeliness, and effectiveness in resolving grievances. It must protect complainants, address grievances promptly and proportionately, and integrate lessons learned into continuous improvement.

[Insert company name] has developed an External Grievance Mechanism (**Annex Y**) in order to receive and respond to stakeholder grievances.

# Monitoring

|  |
| --- |
| *Instruction Box – Delete when complete** *Document the procedure performance evaluation and improvement with respect to monitoring E&S, legal compliance and ESMS implementation*
* *The section below is generic. Review and modify as required for your company.*
 |

## Performance Monitoring

Monitoring and measurement data will be collected to assess the effectiveness of managing and mitigating risks and enhancing E&S and OHS performance, including the assessment of the level of compliance with legal and other requirements and determining the extent to which objectives are being achieved.

### Monitoring Programme

[insert company name] will conduct the required Monitoring Programmes as per the requirements captured in the individual procedures. These includedetails for the following:

* Parameters to be monitored;
* Sampling locations;
* Limits/targets;
* Monitoring frequency;
* Monitoring equipment calibration requirements (including frequency); and
* Responsibilities for monitoring.

Monitoring can be conducted by internal resources, or where specialist expertise is required, by external professional service providers.

Monitoring results will be evaluated, interpreted, and reported to management, and actions defined where necessary, for example where defined limits or objectives/targets are being exceeded.

## Monitoring and Evaluating Compliance

|  |
| --- |
| *Instruction Box – Delete when complete** *Document the procedure for monitoring and evaluating compliance with respect to implementation of the ESMS, E&S and OHS legal requirements and frequency of internal and external audits.*
* *Define measures to monitor compliance with legal and other requirements (as included in the E&S and OHS Legal Register) on an ongoing basis to understand the compliance status and undertake actions where non-compliances are identified. This may include, for example, inspections and internal audits, to assess compliance as well as any external audits as may be required by the authorities.*
* *In addition, a legal compliance audit may be conducted periodically to confirm the Company’s compliance with its legal obligations, unless an audit frequency is defined by specific permit/licence conditions. The audits will include legal requirements, including conditions of permits and licences, and other requirements that the site has agreed to.*
* *Internal and external audits will also form compliance evaluations.*
* *The section below is generic. Review and modify as required for your company.*
 |

To ensure on-going compliance with respect to E&S and OHS legal requirements, [insert company name] will ensure that the following is implemented:

* Real-time monitoring systems to track E&S and OHS performance (e.g., air quality sensors, noise level meters, chemical exposure tracking);
* Regular physical inspections of the workplace and operations to identify unsafe practices, environmental violations, or health risks;
* Regular audits of safety procedures, employee health practices, waste management, and environmental protection efforts to ensure compliance with E&S and OHS standards; and
* Regular emergency response drills for fire, chemical spills, or other hazards. Provide safety and health training to all employees.

To evaluate compliance, [insert company name] will regularly measure [define frequency] E&S and OHS performance against set KPIs, organisational policies and compliance requirements by performing both internal and external audits. All findings will be documented in compliance reports for internal and external review and include corrective actions to address any compliance failures.

Additionally, [insert company name] will identify the root causes of non-compliance incidents, whether they result from inadequate training, insufficient resources, or improper implementation of procedures.

## Reporting

### Routine Reporting of KPIs

On a monthly basis, the ESG Manager / Sustainability Manager captures progress on KPIs on a standard template including:

* KPI results to be reported including trend over time;
* Scope/Boundary of the KPI;
* Definition of the KPI; and
* Method of calculation.

Consolidated versions of the report will be made available to be presented to the Board and, where relevant, Stakeholders (e.g., Investors).

The results of compliance audits will be reported as follows (following the audit):

* To site management;
* To relevant authorities, as required by permits/licence or as required by law; and
* To the Board (and Investors) as part of the quarterly reporting

# Improving

## ESMS Management Review

The ongoing effectiveness of [insert company name]’s ESMS (inclusive of company E&S and OHS and social policies, procedures, plans, risk assessments) and its alignment with investors’ requirements is subject to ongoing review through internal audit. It will also be reviewed to reflect changes in applicable legal requirements, changes in international standards and guidance, and in response to lessons learned from accidents and incidents.

The ESMS should be reviewed every two years to assess whether it remains effective and continues to address the E&S and OHS risks associated with the company’s operations. If there are substantial changes to the operations, a more frequent review (e.g., annually) may be required to ensure that the system remains fit for purpose. The review process should be viewed as part of a continuous improvement approach. If any gaps or deficiencies are identified during the review, corrective actions should be implemented to enhance the ESMS’s performance

The management review will be scheduled and prepared by the [insert role], attended by all Managers and led or facilitated by the Managing Director. The review will include consideration of the following aspects:

* Status of actions from previous management reviews;
* Changes in the following:
	+ - Operations;
		- External and internal factors that are relevant to the site;
		- The needs and expectations of interested parties, including compliance obligations; and
		- Risks and opportunities, aspects and impacts;
* The extent to which established objectives have been achieved;
* Information on the company’s E&S and OHS performance, including trends in:
	+ - Non-conformities and completion of corrective actions;
		- Monitoring and measurement results;
		- Fulfilment of its compliance obligations;
		- Audit results; and
		- Internal complaints and grievances.
* Adequacy of resources;
* Stakeholder engagement results, including grievances raised; and
* Opportunities for continual improvement.

Material related to these topics should be prepared beforehand by the Environmental Manager to ensure an effective and efficient review.

Records of the management reviews will be documented, including actions and responsibilities, and should detail the following:

* Conclusions on the continuing suitability, adequacy and effectiveness of the site level management system;
* Decisions related to any need for changes to the management system, including resources;
* Continual improvement opportunities;
* Actions, if needed, when objectives have not been achieved; and
* Any implications for the strategic direction of the organization.

Based on results within these performance reviews, senior management will ensure that the necessary actions are delegated and tracked to completion.

# Annex A: E&S Policy

# Annex B: Baseline Risk Assessment Procedure and Matrix

# Annex C: E&S and OHS Legal Register

# Annex D: Emergency Preparedness and Response Plan

# Annex E: Waste Management Plan

# Annex F: Water Management Plan

# Annex G: Hazardous Materials Management Plan

# Annex H: Biodiversity Management Procedure

# Annex I: Human Resources/ Labor Management Plan

# Annex J: Retrenchment Management Procedure

# Annex K: Occupational Health and Safety Plan

# Annex L: Community Health, Safety and Security Management Plan

# Annex M: Supply Chain Management Plan

# Annex N: E&S Monitoring and Review Plan

# Annex O: [Add any additionally developed] Management Plan

# Annex P: [Training Register](https://slrgroup.sharepoint.com/%3Ax%3A/r/sites/ibis/Projects/Clients/0130%20-%20ResponsAbility/0130-4586%20-%20ResponsAbility%20-%20Development%20and%20Implementation%20of%20ESMS%20Templates%20for%20CSA%20Fund/6.%20Reports%20and%20Presentations/1.%20Draft/1.%20Mike%20%28to%20review%29/CSA_ESMS_Training%20Register%20Template_Draft_25.10.2024.xlsx?d=w0120430adcdb4f6bbd65f5a636d834b9&csf=1&web=1&e=Oupcvl)

# Annex Q: Training Matrix

# Annex R: [Incident and Corrective Action Management Register](https://slrgroup.sharepoint.com/%3Ax%3A/r/sites/ibis/Projects/Clients/0130%20-%20ResponsAbility/0130-4586%20-%20ResponsAbility%20-%20Development%20and%20Implementation%20of%20ESMS%20Templates%20for%20CSA%20Fund/6.%20Reports%20and%20Presentations/1.%20Draft/1.%20Mike%20%28to%20review%29/CSA_ESMS_Incident%20and%20Corrective%20Action%20Management%20Register_%20Template_Draft_25.10.2024.xlsx?d=wb35d2b962e5641d99038e72b0da5bbac&csf=1&web=1&e=SKg53V)

# Annex S: [Permit Register](https://slrgroup.sharepoint.com/%3Ax%3A/r/sites/ibis/Projects/Clients/0130%20-%20ResponsAbility/0130-4586%20-%20ResponsAbility%20-%20Development%20and%20Implementation%20of%20ESMS%20Templates%20for%20CSA%20Fund/6.%20Reports%20and%20Presentations/1.%20Draft/1.%20Mike%20%28to%20review%29/CSA_ESMS_Permit%20Register%20Template_Draft_24.10.2024.xlsx?d=w1814771c4d034f1d85f3b25c6f316728&csf=1&web=1&e=YdWMkm)

# Annex T: [ESMS Action Plan](https://slrgroup.sharepoint.com/%3Ax%3A/r/sites/ibis/Projects/Clients/0130%20-%20ResponsAbility/0130-4586%20-%20ResponsAbility%20-%20Development%20and%20Implementation%20of%20ESMS%20Templates%20for%20CSA%20Fund/6.%20Reports%20and%20Presentations/1.%20Draft/1.%20Mike%20%28to%20review%29/CSA_ESMS_ESMS%20Action%20Plan_%20Template_Draft_24.10.2024.xlsx?d=w0c09f38c8d7b4168aab2b694d95911da&csf=1&web=1&e=xfDpbv)

# Annex U: E&S Organisational Structure and Responsibilities

# Annex V: Stakeholder Engagement Plan

# Annex X: Internal Grievance Mechanism

# Annex Y: External Grievance Mechanism