



# **ENEQ ENVIRONMENTAL AND SOCIAL MANAGEMENT SYSTEM**

## **Internal Manual**

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### **i) TABLE OF UPDATE OF THE DOCUMENT**

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1.0	20.06.2011	Creation
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**ii) CONTRIBUTIONS**

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## 1. Introduction to ENEO

**Energy of Cameroon S.A. (ENEO)** is Cameroon's national electricity utility, operating under a 30-year concession running until 2031. ENEO owns and operates 1,000 MW of generating capacity, as well as the country's distribution networks while the transmission network was transferred to the transmission company, Société Nationale de Transport de l'Électricité (SONATREL) in 2018.

ENEO was privatized in 2001, when 56% of its shares were acquired by AES with the remaining 44% held by the Government of Cameroon. In 2014, AES sold its shares to Actis. In 2017 ENEO underwent a restructure, with the entry of employees into the shareholding structure. Today, 51% of its capital is held by Actis group, 44% by the State of Cameroon and 5% by its employees. ENEO employs around 3,700 people (of which 26% women) spread across five departments as follows: i) Corporate Development, ii) Generation, iii) Distribution & Commercial, iv) Operations, and v) Compliance.

ENEO's generating facilities consist of a total of 37 power stations, including 13 interconnected and 24 remote thermal power plants. ENEO's energy sources consist of 73.30% hydro, 26.60% thermal and 0.04% solar. ENEO is also the off-taker of IPPs, including Kribi (216 MW) and Dibamba (86MW), which were financed by the Bank. As per the latest concession amendment, ENEO is due to create in 2021 a subsidiary ("Eneo Genco") dedicated to generation. ENEO's distribution network consists of 11,450 kilometers of lines from 5.5 to 33 kilovolts, and 11,158 kilometers of lines from 220 to 380 volts. As of December 31, 2020, ENEO had more than 1,483,940 customers, of which approximately 45% were located in the cities of Douala and Yaoundé.

### 1. BACKGROUND to ENEO's ESMS

This Manual describes the Environmental and social Management System (ESMS) for Eneo. It also includes reference to other documents related to environmental management and procedures that provide additional details as required.

Eneo's corporate Environmental Management System was established in 2011 in compliance with the requirements of ISO 14001 :2004. Recently, Eneo decided to migrate to ISO 14001 :2015. Therefore, Eneo is progressively integrating the elements of ISO 14001:2015, national regulations, international conventions and environmental and social safeguards requirements including the IFC Performance Standards and the African Development Bank's Integrated Safeguards System (ISS) and relevant Good International Industry Practice (GIIP) guidelines.

The Eneo ESMS provides a framework for the identification, assessment, and management of environmental and social (E&S) risks and impacts associated with ENEO's operations across Cameroon. The Manual has been approved and adopted by the Managing Director of Eneo. Its requirements apply to all activities inside and outside the premises of Eneo whether these are conducted by our own staff, contractors and suppliers.

The basis for the approach underlying Eneo environmental management system is founded on the concept of Plan-Do-Check-Act (PDCA). Eneo uses the PDCA model with an iterative process to achieve continual improvement. Eneo applies this model to its environmental management system and to each of its individual elements. The model can be briefly described as follows:

- Plan: establish environmental objectives and processes necessary to deliver results in accordance with the organization's environmental policy.
- Do: implement the processes as planned.
- Check: monitor and measure processes against the environmental policy, including its commitments, environmental objectives and operating criteria, and report the results.
- Act: take actions to continually improve.

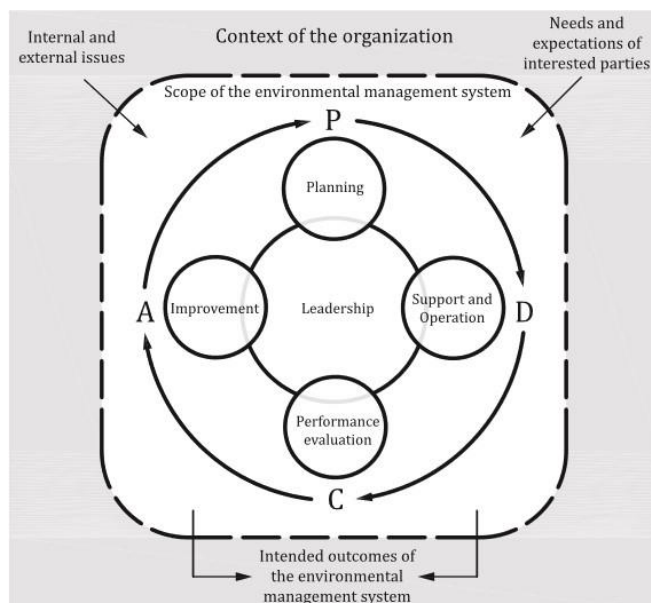


Figure 1 : The PDCA Cycle and elements of Eneo EMS

## 2. SCOPE

This Environmental and Social Management System Manual contains the Environmental and Social safeguards requirements that apply to each of the activities performed by Eneo and its Contractor Companies as well as its assets.

## 3. NORMATIVE REFERENCES

. The Manual is built around the following requirements:

- ISO 14001:2015
- ACTIS ESG Code
- Eneo EP Rev. 3 12/20
- National Legislation and conventions to which Cameroon is a signatory
- International Legislation
- International guidelines and GIPP including International Finance Corporation (IFC) Performance Standards, African Development Bank (AfDB) Integrated Safeguards System (ISS), WB/IFC EHS guidelines, UN Universal Declaration of Human Rights, etc. A benchmark between the IFC Performance Standards and the AfDB ISS Operational Safeguards as applicable to ENEO projects and subprojects is presented in Table A.



**Table A. IFC Standards and AfDB ISS Operational Safeguards benchmarked against each other**

IFC performance standards	AfDB ISS Operational Safeguards
<b>Performance Standard 1 (PS 1): Assessment and Management of Environmental and Social Risks and Impacts</b>	Operational Safeguards 1 (OS1): Environmental and Social Assessment
<b>Performance Standard 2 (PS 2): Labour and Working Conditions</b>	Operational Safeguards 5 (OS5): Labour Conditions, Health and Safety
<b>Performance Standard 3 (PS 3): Resource Efficiency and Pollution Prevention</b>	<u>Operational Safeguards 4 (OS4): Pollution Prevention and Control, Greenhouse Gases, Hazardous Materials and Resource Efficiency</u>
<b>Performance Standard 4 (PS 4): Community Health, Safety and Security</b>	Operational Safeguards 1 (OS1): Environmental and Social Assessment
<b>Performance Standard 5 (PS 5): Land Acquisition and Involuntary Resettlement</b>	Operational Safeguards 2(OS2): Involuntary Resettlement: Land Acquisition, Population Displacement and Compensation
<b>Performance Standard 6 (PS 6): Biodiversity Conservation and Sustainable Management of living Natural Resources</b>	Operational Safeguards 3 (OS3): Biodiversity and Ecosystem Services
<b>Performance Standard 7 (PS 7): Indigenous Peoples</b>	Operational Safeguards 1 (OS1): Environmental and Social Assessment <sup>1</sup>
<b>Performance Standard 8 (PS 8): Cultural Heritage</b>	Operational Safeguards 1 (OS1): Environmental and Social Assessment

In cases where the national legislation, IFC performance standards and AfDB ISS requirements, guidelines and documents do not address some specific environmental and/or social aspect, other applicable international standards will be considered (e.g. those of the World Health Organisation (WHO), International Labour Organisation (ILO) and International Union for Conservation of Nature (IUCN). The more stringent approach will be used whenever considered to reduce risks.

<sup>1</sup> The AfDB does not have a specific Policy on indigenous peoples but is accounted for by its focus on vulnerability and vulnerable persons.

## 4. TERMS AND DEFINITIONS

**Environment:** surroundings in which an organization operates, including air, water, land, natural resources, flora, fauna, humans and their interrelationships. Surroundings can extend from within an organization to the local, regional and global system. Surroundings can be described in terms of biodiversity, ecosystems, climate or other characteristics.

**Environmental aspect:** element of an organization's activities or products or services that interacts or can interact with the environment. An environmental aspect can cause (an) environmental impact(s). A significant environmental aspect is one that has or can have one or more significant environmental impact(s). Significant environmental aspects are determined by the organization applying one or more criteria.

**Environmental condition:** state or characteristic of the environment as determined at a certain point in time

**Environmental impact:** change to the environment, whether adverse or beneficial, wholly or partially resulting from an organization's environmental aspects.

**Environmental management system :** part of the management system used to manage environmental aspects, fulfil compliance obligations, and address risks and opportunities

**Environmental policy:** intentions and direction of an organization related to environmental performance, as formally expressed by its top management

**Top management:** person or group of people who directs and controls an organization at the highest level. Top management has the power to delegate authority and provide resources within the organization. If the scope of the management system covers only part of an organization, then top management refers to those who direct and control that part of the organization.

**Interested party:** person or organization that can affect, be affected by, or perceive itself to be affected by a decision or activity EXAMPLE Customers, communities, suppliers, regulators, non-governmental organizations, investors and employees. To "perceive itself to be affected" means the perception has been made known to the organization.

**Objective:** result to be achieved. An objective can be strategic, tactical, or operational. Objectives can relate to different disciplines (such as financial, health and safety, and environmental goals) and can apply at different levels (such as strategic, organization-wide, project, product, service and process. An objective can be expressed in other ways, e.g. as an intended outcome, a purpose, an operational criterion, as an environmental objective, or by the use of other words with similar meaning (aim, goal, target)

**Environmental objective:** objective set by the organization consistent with its environmental policy.

**Prevention of pollution:** use of processes, practices, techniques, materials, products, services or energy to avoid, reduce or control (separately or in combination) the creation, emission or discharge of any type of pollutant or waste, in order to reduce adverse environmental impacts. Prevention of pollution can include source reduction or elimination; process, product or service changes ; efficient use of resources ; material and energy substitution ; reuse ; recovery ; recycling, reclamation ; or treatment.



**Requirement:** need or expectation that is stated, generally implied or obligatory. “Generally implied” means that it is custom or common practice for the organization and interested parties that the need or expectation under consideration is implied. A specified requirement is one that is stated, for example in documented information. Requirements other than legal requirements become obligatory when the organization decides to comply with them.

**Compliance obligations:** (preferred term) legal requirements and other requirements (admitted term) legal requirements that an organization has to comply with and other requirements that an organization has to or chooses to comply with. Compliance obligations are related to the environmental management system. Compliance obligations can arise from mandatory requirements, such as applicable laws and regulations, or voluntary commitments, such as organizational and industry standards, contractual relationships, codes of practice and agreement with community groups or non-governmental organizations.

**Risk:** effect of uncertainty. An effect is a deviation from the expected — positive or negative. Uncertainty is the state, even partial, of deficiency of information related to, understanding or knowledge of, an event, its consequence, or likelihood. Risk is often characterized by reference to potential “events” (as defined in ISO Guide 73 :2009, 3.5.1.3) and “consequences” (as defined in ISO Guide 73 :2009, 3.6.1.3), or a combination of these. Risk is often expressed in terms of a combination of the consequences of an event (including changes in circumstances) and the associated “likelihood” (as defined in ISO Guide 73 :2009, 3.6.1.1) of occurrence.

**Risks and opportunities:** potential adverse effects (threats) and potential beneficial effects (opportunities) Terms related to support and operation competence ability to apply knowledge and skills to achieve intended results documented information required to be controlled and maintained by an organization and the medium

**Competence:** ability to apply knowledge and skills to achieve intended results documented information required to be controlled and maintained by an organization and the medium on which it is contained. Documented information can be in any format and media, and from any source. Documented information can refer to:

- the environmental management system, including related processes;
- information created in order for the organization to operate (can be referred to as documentation);
- evidence of results achieved (can be referred to as records) ;

**Process:** set of interrelated or interacting activities which transforms inputs into outputs. A process can be documented or not.

**Audit:** systematic, independent and documented process for obtaining audit evidence and evaluating it objectively to determine the extent to which the audit criteria are fulfilled. An internal audit is conducted by the organization itself, or by an external party on its behalf. An audit can be a combined audit (combining two or more disciplines). Independence can be demonstrated by the freedom from responsibility for the activity being audited or freedom from bias and conflict of interest.

“Audit evidence” consists of records, statements of fact or other information which are relevant to the audit criteria and are verifiable; and “audit criteria” are the set of policies, procedures or requirements used as a reference against which audit evidence is compared, as defined in ISO 19011:2011, 3.3 and 3.2 respectively.

**Conformity:** fulfilment of a requirement





**Nonconformity:** non-fulfilment of a requirement. Nonconformity relates to requirements in this International Standard and additional environmental management system requirements that an organization establishes for itself.

**Corrective action:** action to eliminate the cause of a nonconformity and to prevent recurrence. There can be more than one cause for a nonconformity.

**Continual improvement** recurring activity to enhance performance. Enhancing performance relates to the use of the environmental management system to enhance environmental performance consistent with the organization's environmental policy. The activity need not take place in all areas simultaneously, or without interruption.

**Effectiveness:** extent to which planned activities are realized and planned results achieved indicator measurable representation of the condition or status of operations, management or conditions

**Indicator:** measurable representation of the condition or status of operations, management or conditions

**Monitoring:** determining the status of a system, a process or an activity. To determine the status, there might be a need to check, supervise or critically observe.

**Measurement** process to determine a value

**Performance:** measurable result. Performance can relate either to quantitative or qualitative findings. Performance can relate to the management of activities, processes, products (including services) systems or organizations.

**Environmental performance:** performance related to the management of environmental aspects. For an environmental management system, results can be measured against the organization's environmental policy, environmental objectives or other criteria, using indicators.

## 5. ENVIRONMENTAL AND SOCIAL ASPECTS

Environmental or Social Aspect is defined as any element or property of the activities or services of our business that can interact with or affect the Environment or people.

Environmental Impact is any change to the environment, whether adverse or beneficial, wholly or partially, occurring as a result of our activities or services of the company.

ENEO is committed to completing E&S due diligence including the preparation of appropriate environmental and social assessments studies (e.g. ESIA, RAP, E&S Audits, etc) where required for its specific interventions and sub projects in accordance with national legislation and international best practice such as AfDB ISS and IFC PS requirements and GIIP.



Significant Environmental or Social Aspect is one that has or can have a great environmental impact(s) taking into consideration the applicable laws and other requirements, potential risks, costs and future liability, and customer concerns, neighbors and other interested parties.

It is the responsibility of the Director in charge of Quality, Health & Safety and Environment (QHSE) in collaboration with other Directors, Regional Directors, Sub Directors and Managing Director, to develop and maintain an updated inventory of our environmental and social issues, including any major changes happening in the business.

The inventory will include relevant environmental and social aspects required under our control and the ability to influence, for example, those that could potentially be associated with:

- Selection and Purchase of Raw Materials / Supplies.
- Transportation and Handling of Raw Materials.
- Location / Design / Construction of New or Modified Facilities.
- Receiving / Storage / Handling of Raw Materials / Supplies.
- Combustion and Other Transactions in Generation.
- Pollution Control Operations.
- Maintenance of Facilities and Equipment.
- Operation and Maintenance of Vehicles.
- Use and Vetting of the Contractors.
- Materials Recycling and Reuse.
- Biodiversity Management
- Cultural Heritage Management
- Transportation and Disposal.
- Decommissioning of Facility.
- Acquisitions / Business and Investment Assets.
- Physical or economic displacements
- Resettlement and livelihood restoration
- Occupational, Health and Safety<sup>2</sup>

It is also the responsibility of Director in charge of Quality, Health & Safety and Environment (QHSE) in collaboration with other Directors, Regional Directors, Sub Directors and Managing Director, to assess the significance of these important environmental issues, following a documented procedure, technically sound and previously identified using applicable regulations.

<sup>2</sup> ANEO has developed and operationalized an Occupational Health and Safety Management System including the OHS process and procedures.



The required evaluation shall consider relevant criteria required to determine the significance of the Environmental Impact issues which are specifically identified as:

- Quality and effectiveness of existing operational controls.
- Probability of occurrence.
- Degree and scale of impact.
- Duration of impact.
- Limits or standards regulatory / legal constraints.
- Potential regulatory penalties and impact on business reputation.
- Potential impacts and mitigation costs.
- Perceived concerns and expectations of external stakeholders.

When Eneo establishes its own goals, objectives and environmental plans in Section 4.0 special consideration will be given to these significant environmental and social aspects / impacts. Significant impacts for which Eneo does not set a target / specific goal, will still run either through appropriate operational controls or other means.

The identification and impact assessment of relevant environmental and social aspects will be updated annually or when major changes occur in the business.

## 6. LEGAL REQUIREMENTS AND OTHERS

In addition to the issues / significant environmental and social impacts, another contribution to the business plan in terms of environmental management are the legal and other requirements that affect the Generation and Distribution sectors - those requirements that already exist and especially the new or emerging requirements as they arise.

In Eneo the primary responsibility to identify all existing and applicable requirements, legal and otherwise, looking for new requirements / modified and emerging issues, in addition to communicating the implications of these business operations rests in the Directorate in charge of Quality, Health & Safety and Environmental and are as follows:

- All aspects related to regulatory environmental aspect will be obtained only through regulations issued by the Ministry of Environment, Nature Protection and Sustainable Development (MINEPDED) or other relevant Ministerial Department or relevant authority in Cameroon. Constant communication and participation is maintained with the Ministry of Environment and other relevant authorities as applicable.
- Based on the new regulations, standards or national standards will be developed or incorporated into the relevant procedures, disclosed to all personnel involved and trained according to identified needs.
- In order to ensure that all staff implement all changes, modifications in procedures, will be traceable through the document control, likewise supported through the assistance format duly signed by each of the participants.



## 7. OBJECTIVES, GOALS AND PLANS

Eneo, drives continuous improvement in environmental and social performance and helps to advance the broader goals of environmental policy adopted, establishing, implementing and maintaining documented objectives and measurable goals and then manage the business against them.

These objectives and targets are specific to the business and important issues related to meeting our goals in environmental policy, as appropriate, to manage our significant environmental and social aspects and applicable legal and other requirements. Our environmental objectives indicate how the business handles, not just how to carry out the environmental function.

It is the responsibility of the QHSE Directorate to develop and set goals / objectives specific to the business, with special consideration to those identified as significant environmental and social impacts within the Environmental and Social Risk Matrix.

The QHSE Directorate is then also responsible for preparing an Initial Action Plan to achieve each objective and each proposed environmental goal.

Like any other Action Plan, these plans are meant to achieve objectives / proposed environmental goals, developed in terms of immediate usefulness to Operational Management and should include what needs to be achieved, the anticipated benefits, the main activities involved and associated milestones, roles and assigned responsibilities for implementation, any required special type of resource, and the performance measures that will be used to indicate the progress and evaluate the eventual success.

The Environmental Objectives / Goals proposed and associated action plans are reviewed at least once a year as part of the general process of business planning. As the objectives / targets are achieved in previous years or because their importance changes over time due to developments in the same business, they are replaced by new, relevant or otherwise modified as needed.

These proposed goals / environmental objectives are approved by the Managing Director, assigned to a specific team leader (or leaders) within the business who is (are) then responsible for its successful completion. Some targets / goals may be important enough to warrant inclusion in the plan / budget for the business.

The team leader responsible for closure of actions in the action plan / goal assigned then monitors its implementation, delegating daily responsibilities as appropriate.

## 8. RESOURCES, ROLES, RESPONSIBILITIES AND AUTHORITY

In Eneo, it is the responsibility of the QHSE Director and through direct reports, to ensure the allocation of the human, technical and financial resources to implement and effectively maintain the Environmental and Social Management System.

**Annex 2** shows the organizational structure of Eneo as it relates specifically to the roles, responsibilities, authority and responsibilities of the environmental and social management system.



The QHSE Director of Eneo has been appointed as the Environmental Management Representative of the Managing Director.

As Environmental Management Representative: This person is responsible for the following, independent of other duties arising from his/her work :

- Ensure that the Environmental and Social Management System (ESMS) is implemented, maintained and used effectively to manage environmental and social safeguards obligations and business opportunities.
- Participate in the Steering Committee of Safety and Environment, in implementing a management review of the Corporate Environmental & Social Policy to be performed every three years.

### **Roles & Responsibilities**

The following section describes the Roles, Responsibilities and Authorities for the activities associated with the Environmental and Social Management System (ESMS) in Eneo:

#### **Managing Director:**

- Ensure the allocation of human, technical and financial resources to effectively develop, implement and maintain the Environmental Management System.
- Approve and issue the Environmental & Social Policy Statement
- Manage external communications

#### **Chief Operational Officer**

- Participate in the development of the EMS Manual.
- Actively communicate to personal the business expectations for good environmental performance.
- Measure and track progress against goals and environmental objectives.
- Ensure that Environmental Audits are planned and conducted.

#### **Directors, Regional Directors and Sub Directors:**

- Actively communicate to personal the business expectations for good environmental performance.
- Ensure that operational control procedures aimed at managing environmental issues and these procedures are implemented.
- Designate the person or team suitable to cover the non-conformities, monitor performance and make necessary changes to procedures and documents.
- Measure and track progress against goals and environmental objectives.



**QHSE Director:**

- Design/update the Environmental & Social policy
- Review and approve the Environmental Management System.
- Monitor the implementation of the Environment Management System.
- Ensure the compliance of the findings result of the Internal Audits.
- Review and approve the Environmental indicators and goals in accordance with the Policy and Significant Environmental and Social Impacts Matrix.

**HSE Sub-Director**

- Develop the Environmental and Social Management System
- Ensure the implementation of the Environmental and Social Management System within the Company. Follow up the implementation of the Internal Audits Findings.
- Develop and update the Environmental and Social Indicators and Goals
- Identify, track and communicate the issues and implications of new or modified regulations.
- Manage the interface with the regulatory agency.
- Support the efforts of environmental communications.
- Consolidate the performance and report of the Environmental and Social Management Program.
- Develop and propose specific environmental and social safeguards objectives.
- Ensure that changes resulting from the management review are incorporated into the Environmental and Social Management System (ESMS).
- Develop training materials.
- Coordinate trainings for all Eneo and Contractors Personal.

**Regional QHSE Coordinators:**

- Implement the Environmental and Social Management System in the Region.
- Communicate the issues and implications of new or modified regulations in the Region.
- Manage the interface with the regulatory agencies
- Support the Regional Directors in the implementation of the Environmental and Social Management System.
- Track Environmental and Social Performance and report progress to QHSE Directorate.
- Contribute in the development of Environmental Training Matrix and follow implementation



- Conduct Environmental Internal Audits and record the Findings Identified.
- Conduct site environmental inspections to verify the compliance of the Environmental and Social Management System (EMS).
- Manage and report on the performance of the Grievance Redress Mechanism (internal and external for the communities)

#### **Headquarters, Operational Coordinators and Supervisors:**

- Ensure that all personnel participate in training on environmental and social safeguards issues.
- Ensure any improvements to implement environmental control in all the field activities performed by the personnel.
- Ensure the reporting of any environmental or social incident or grievances using the Quick Event Report Form.
- Include in the maintenance and operational procedures all environmental and social aspects and requirement according to the Environmental and Social Management System.
- Ensure the implementation of any recommendations resulting from the environmental inspections findings carried for personnel, equipment and facilities.
- Guarantee the chemical management in any facility of the Company according with the Environmental and Social Management System.
- Implement the Environmental and Social Management System within the Company.
- Ensuring that all ENEO staff have the necessary tools to control and mitigate the environmental and social aspects within the company and at sub project level.

#### **All Operational Personnel:**

- Follow the procedures in the compliance of assessments and self-assessments and address the issues / findings.
- Implement Environmental Controls Records and Documents in their Units.
- Report all incidents and / or environmental near miss occurring during the development of their activities.
- Monitor and report any potential environmental impact that is displayed on the field to your immediate superior.
- Actively participate in all training of environmental procedures.

Conduct all activities with environmental and socially responsibility to control any maneuver to avoid any environmental or social impact.

## 9. COMPETENCE, TRAINING AND AWARENESS

All Eneo new hires receive new employee orientation that includes environmental and social safeguards awareness. Contractors as part of the prequalification and authorization process of empowerment receive guidelines on the existing environmental and social risks and environmental procedures / safety existing prior to taking service.

Eneo team leaders are responsible for ensuring that all other persons performing tasks that can cause environmental or social impacts have the education, experience and appropriate training to do their work so as to comply with legal requirements and also do it in an enabling environment.

Team leaders are largely responsible for creating and maintaining a high level of environmental and social awareness among its entire workforce with respect to:

- Risks and issues relevant exhibitions / significant environmental and social impacts identified in the business.
- Importance to them and the company to comply with all requirements of the Environmental & Social Policy, Environmental Procedures and the Environmental and the Social Management System (EMS), including the potential consequences of non-conformances.
- Personal roles and responsibilities under the Environmental and Social Management System.
- It is the responsibility of the QHSE Director to ensure the team leaders report the following:
- Legal or other requirements, existing, new or modified environmental training related to any authority.
- Any additional environmental or social awareness training guaranteed by the nature of business operations and requirements of the Environmental and Social Management System.
- Availability of suitable training materials and training of qualified suppliers.

The QHSE Directorate is responsible for developing and take over the development and maintenance of the training matrix that contains the entire list of required environmental and social training programs conducted by the business, its frequency and its major job classifications required to receive each one of them.

It is the responsibility of the Director of each Unit to ensure that their group receives the training required by the Training Matrix, also including the recovery of any kind of training in the relevant time.

Records of participation of all people in each training program shall be managed in the files of the QHSE Directorate.

Eneo extends their awareness raising program to the population. As part of this program, all Eneo and Contractor workers undertake face-to-face safety talks on electrical hazards in schools and communities. Safety messages are also broadcast by community radio stations in local dialects under the supervision of Eneo. This programme is driven by specific safety KPIs and goals set at the beginning of each year and monitored throughout the year. Gadgets like posters, exercise books, flipcharts, rulers, flyers and pens are printed with safety messages.

Safety messages are also shared with the public at large on SMS, Facebook, twitter and WhatsApp fora.





## 10. COMMUNICATION

The QHSE Directorate is responsible for managing the interface between Eneo and all relevant agencies of the environmental legislation, including specific responsibilities as regular reporting, shipping documents and correspondence, as well as occasional notices and negotiations, except when question of legal issues for these specific cases will be the responsibility of Managing Director of the Company.

The QHSE Directorate is responsible for ensuring that all communications with environmental regulatory institutions are made accurately and on time.

The promotion of open and frequent communication on all relevant environmental and social aspects with our staff, contractors and suppliers is an important responsibility of all Directors, Regional Directors and Sub directors of Eneo. Team leaders are responsible specifically to clearly convey their own personal expectations for good environmental performance to all persons under their supervision.

Eneo also has a stakeholder Management process managed by the CSR, Communication Departments and Top Leadership. Stakeholders are categorized and selected for specific communication.

The QHSE Directorate supports the efforts of environmental and social communication ensuring operational leaders of the business make effective use of media and communication channels available through the Communications and IT Directorate. They will use official channels such as: the intranet posting all regulations, policies, procedures, likewise, any initiative such as campaigns, programs, activities, incentives and awards.

Responsibility for managing the communication process related to third parties, the Managing Director works together with Communication supported by Legal Department and QHSE Directorate. The responsibilities include:

### Managing Director

- Conduct presentations and meetings with local community groups.
- Receive suggestions from the community.
- Communicate all relevant environmental and social incidents and emergencies to Actis and Lenders

### Communications

- Establish contacts with local media.
- Coordination of special events associated with the environment.
- Establish logistics for the development of communications with the public in the relevant environmental and social incidents and emergencies.
- Disclose all official communication regarding environmental issues to all staff, community, etc.

### Legal

- Handling all claims associated with environmental and social aspects of the community or environmental regulation.

- Monitoring of any financial sanction from the environmental regulatory institution related to issues.
- Advise and review the issue of all official documentation related to environmental regulations.

### QHSE Directorate

- Provide all necessary information to support environmental controls implemented within the company.
- Participate in solving environmental and social problems reported by the population.
- Mitigate any environmental impact establishing procedures to ensure their control.
- Develop programs to improve the environment within the Company.
- Instruct all personnel involved by providing all necessary resources to fulfill them.

### Eneo Grievance Redress Mechanism

Part of our Social & Sustainability Management Plan aims at:

- Demonstrating our commitment towards Societal Dialogue;
- Implementing our business Ethics commitments.

A Grievance is defined as a statement in which a person or group of persons express facing a disturbing concern, regarded as basis for a complaint and request a corrective action.

A Grievance Redress Mechanism (GRM) is a system by which, complaints and dissatisfaction arising out of our relations with neighboring / host communities and or CSI project/programme implementation are communicated, tracked and are resolved in the most efficient manner.

An external Grievance Mechanism is implemented around facilities and demonstrates commitment towards Societal dialogue and implementing our business Ethics commitments. Eneo also engages with the community. This is a two-way interaction between local neighboring and/or host communities and Eneo via its CSR programme which give communities a stake in decision-making with the objective to improve intermediate and final community relations and projects outcomes.

A call center that interfaces with the work management center operates 24/7 and takes calls via 8010 and on WhatsApp. Members of the public are required to call in as soon as they identify dangerous situations in the network that are life threatening. Eneo has a 30 min Network Emergency response Time as target to secure an incident location with potential hazards.

Eneo provides medical coverage for victims of public accidents due to network conditions as well as to innocent people who are injured by fraudulent networks, especially children.

Eneo has developed and implemented an internal Grievance Mechanism for workers, contractors. The Human Resource Director is responsible for the smooth functioning of the internal Grievance Mechanism.

The internal Grievance Redress mechanism is accessible to all personnel and also takes into account issues raised by contractor workers. Issues raised are categorized and assigned to different action owners for resolution. Status is presented on a monthly basis during internal Human Resource Steering Committee.

## 11. DOCUMENTATION

Eneo has a minimum, the following specific documentation relating to its Environmental and Social Management System (ESMS):

- An updated manual of the Environmental and Social Management System (ESMS) which describes the business management processes to implement the elements of the Framework Document of the Eneo Environmental Management System (EMS).
- The Environmental & Social Policy adopted today.
- An updated assessment of the environmental aspects and significant impacts.
- An updated version of the environmental and social objectives of the business, and associated action plans.
- Identified needs of Environmental and Social Safeguards Training and associated support documentation.
- Operation and maintenance procedures associated with Environmental and Social and other aspects of Eneo Environmental and Social Management System (EMS).
- Information on specific business environmental performance, current and relevant past events.
- Audits of the Environmental and Social Management System (ESMS) reports and responses to audit findings.
- Reports of the ESMS management review.
- Inventories and records of operation equipment both in and out of service with PCBs content.
- Records of SF6 emissions.

The QHSE Directorate has the responsibility for maintaining these documents and make them available when needed.

## 12. DOCUMENT CONTROL

Eneo has established a process that regulates the control of environmental documents identified in section 8, as described within the procedure **EGP 4.4.5 Document Control** of the Environmental and Social Management System.

The QHSE Directorate is responsible for implementing the procedure of the Environmental Document Control identified in this document.

### 13. OPERATIONAL CONTROL

Operational Controls are key points of intervention by the administration. They have like a main objective to prevent and / or mitigate potential impacts associated with most of the environmental and social aspects of our business activities, operations and services. Many of these controls, although not all, are developed according to the requirements and / or legal regulations and Standards.

Eneo has implemented effective controls to address operational aspects and environmental and social impacts identified, to achieve their environmental and social goals and objectives set out and ensure full compliance of all legal and other environmental and social requirements. All control procedures associated with the environmental and social aspects are fully documented, and as appropriate, provide specific operational criteria and which are detailed below:

- EGP 4.4.6 / 1 Spill Control.
- EGP 4.4.7 Emergency Response Plan.
- EGP 4.4.6 / 2 PCB Environmental Management.
- EGP 4.4.6 / 3 Environmental Waste Management.
- EGP 4.4.6 / 4 Asbestos-containing materials Handling.
- EGP 4.4.6 / 5 Chemical Handling.
- EGP 4.4.6 / 6 Bioremediation Process.
- EGP 4.4.6 / 7 Measuring Gas Emissions.
- PGMA 4.4.6/8 Field Inspections
- Grievance Redress Process – internal and external
  - EGP 4.5.1 / 1 Identification and Compliance of Significant Environmental and Social Aspects.
  - EGP 4.5.1 / 2 Monitoring and Measurement of Significant Environmental and Social Aspects.
- **EGP 4.5.4 Internal Audits**
- **EGP 4.4.6 Field Inspections**
- **GP 4.5.2 Non-conformity and Corrective and Preventive Actions**
- **EGP 4.5.3 Records Control.**



The responsibility for implementing the environmental and social operational controls is of the Different Operational Team Leaders at each facility and operational staff, depending on the nature of the specific control. In all cases, the written procedures identify the position of each responsible person.

## 14. EMERGENCY PREPAREDNESS AND RESPONSE

Eneo has developed and documented a plan for emergency preparedness and response that identifies potential emergency situations specific to each facility that could have adverse impacts on the environment, and appropriate measures to prevent and / or mitigate those impacts seen within the Procedure **EGP 4.4.7 Emergency Response Plan**.

Identification of potential emergency scenarios is based on the results of the evaluation of environmental and social aspects and impacts of the facility, extending this analysis as required recognizing all environmental emergency reasonably foreseeable.

The responsibility for identifying potential emergency scenarios and develop preparedness and response plan required is for the QHSE Directorate . The QHSE Directorate also has the responsibility for developing and implementing the Emergency Spill Response Plan that include the following items:

- Identification and Inventory of facilities, equipment and operations into the place, besides the type and volume of material stored in it.
- Environmental and social aspects identified as potentially significant at the site.
- Credible risk scenarios and their relative likelihood of occurrence.
- Response Plan (s) appropriate for each scenario that include:
  - Instant Action.
  - Spills.
  - Spills on poles or during transformer transportation.
  - Spill on substations or temporary storage.
  - Procedure in case of fire.
  - Report the incident.
- Process to start the Response Plan.
- Plan for facility evacuation.
- Composition, organization, roles and responsibilities of the response team.



- Resources for response and logistical support available locally.
- Training for response team members and other field staff.
- Testing and response drills.
- Post-response evaluation.

Eneo Personnel and Contractors are aware of the contents of the preparedness plan and emergency response available, and have received training in Management and Spill Control, Hazardous Substances Management, PCB Management, Asbestos Management, Chemicals Management, as required under the Environmental and Social Management System (ESMS) of Eneo. The business also has put the plan available to the relevant local response organizations, community officials and regulatory authorities as appropriate.

The QHSE Directorate is responsible for periodic testing of the plan for preparedness and response to emergencies and is also responsible for reviewing and updating the plan as necessary based on significant changes that have been made in the installation as well as those arising from any lessons learned from actual emergencies or the results of periodic tests.

## 15. MONITORING AND MEASUREMENT

Eneo takes environmental measurements and performance in order to:

- Meet regulatory requirements and / or corporate standards of monitoring and measurement.
- Identify and evaluate potentially significant environmental and social impacts of their operations and services.
- Ensure compliance with the environmental and social safeguards goals and objectives.

Eneo has formally documented procedures to register the parameter related to the aspects of their operations and services that can generate significant environmental and social risks and impacts detailed in the Matrix of Significant Environmental and Social Aspects of the Environmental and Social Management System (ESMS) as detailed below :

- **EGP 4.5.1 / 1 Identification and Compliance of Significant Environmental and Social Aspects.**
- **EGP 4.5.1 / 2 Monitoring and Measurement of Significant Environmental and Social Aspects.**

Team Leaders are responsible for measurement and monitoring the progress in compliance of the environmental and social safeguards goals and objectives assigned to each of them using appropriate measures set out in the associated Action Plan. The Progress Report are submitted to the QHSE Directorate, who at the same time shall present the summary to the Managing Director and each Director of Eneo.

For that reason, the QHSE Director shall prepare a Monthly Environmental and Social Report containing the progress of each of the targets set for achieving our environmental and social indicators for Eneo; both reactive



and proactive measures. This report must be submitted to the Eneo Managing Director and all Directors registered in the files of the QHSE Directorate.

## 16. COMPLIANCE ASSESSMENT

Eneo periodically reviews and confirms its own status of compliance with legal requirements and the company.

This should follow the guidelines established in the procedure **EGP 4.5.4 Internal Audits and EGP 4.4.6 Field Inspections** of the Environmental and Social Management System.

Eneo also used this activity in compliance with local assessment to identify hazards and risks that could require additional environmental mitigation measures, as well as to determine where to have opportunity for continuous improvement to the environmental performance of the installation.

These self-assessments of environmental and social compliance are documented and any issues that required corrective actions are communicated to the appropriate level within the organization, as described in Procedure **EGP 4.5.2 Non-conformity and Corrective and Preventive Actions** of the Environmental and Social Management System.

## 17. NON-CONFORMITIES, CORRECTIVE AND PREVENTIVE ACTIONS

The following are considered non-compliance according to the Environmental and Social Management System (ESMS):

- Non-conformity Events defined by the National Regulations.
- Findings of Internal Eneo Environmental Audits.
- Findings of Inspections and audits performed by the facility.
- Findings of Internal and External Audits of the ESMS.

Findings of Internal Environmental and Social Compliance audits include all events identified during the Eneo Formal Internal Audits and documented.

The findings of inspections and audits performed by the same facility that are locally identified like environmental and social non-conformities, have to be reported to owners for corrective measures.

Findings of the Environmental and Social Management System (ESMS) Internal and External Audits are those nonconformities identified either by internal audits of the ESMS according to internal or external formal audits according to ISO 14001 :2015.

Eneo covers all non-conformities as defined above and takes preventive and corrective actions as appropriate.

For those non-conformities that cannot be resolved immediately, the QHSE Directorate will ensure that non-compliance is assigned to a person or group responsible that:

- Determine the cause of non-compliance identified.
- Consider the available options for preventive and corrective actions.
- Select the appropriate action to prevent or reduce the probability of recurrence of nonconformities, considering the magnitude of the environmental and social impacts and risks identified.
- Implement the selected corrective action within a specified period.

Significant Non-conformities require that the determined preventive and corrective actions are documented and that the assignment of the person responsible for implementation and due dates must be incorporated into a written Corrective and Preventive Action Plan.

Significant Non-conformities that require written Action Plans include, but are not limited to:

- Notice of regulation violation or existing penalties or expected.
- “Critical” or “High” Internal Audits Findings.

In case of occurrence of these significant non-compliance findings, the QHSE Directorate is also responsible to follow up and record the results achieved and evaluate the effectiveness of the preventive or corrective actions taken.

When taking preventive or corrective actions involving changes in the existing environmental and social procedures and other requirements associated with the Environmental and Social Management System (ESMS).

The ESMS is also responsible for ensuring that the relevant documents are modified according to the changes implemented.





## 18. RECORDS CONTROL

An Environmental Register is a special environmental document that declares the results achieved or otherwise provides evidence of the activities implemented.

Eneo has established a process that controls the identification, maintenance, removal time, retention and disposition of environmental and social records to demonstrate compliance with the requirements of its Environmental Management System, and to document environmental performance, as detailed within the Procedure **EGP 4.5.3 Records Control**.

The QHSE Directorate is responsible for implementation and control of the environmental record. This responsibility includes the guarantee that all records remain legible, easy identification and tracking.

## 19. INTERNAL AUDITS

Eneo has implemented an internal audit plan to provide environmental audits, systematic, documented, periodic and objective to all facilities of generation and distribution business operations around the country.

The audits are conducted every three years or less if recommended by the audit team, based on the results of the latest audit. An internal audit of a generation & distribution facility evaluates:

- Status of compliance with all applicable environmental laws and regulations, environmental guidelines as well as the identification of environmental risks, whether or not regulated (Environmental and Social Compliance Audit).
- Conformity of the Environmental and Social Management System (EMS) with the requirements of local framework

The audits are planned, scheduled and coordinated by Internal Audit and Compliance Directorate in addition to the audit plan driven by the QHSE Directorate.

Internal audits usually are conducted by a team consisting of a leader and two or three additional members. Each person in an audit team is organizationally independent of the facility or business under audit, and has previously received and approval training in environmental audits. Auditors use formally documented audit protocols that are available in electronic format on the Eneo Portal, supplemented as required by protocols on paper incorporating the regulations and permit conditions applicable to the Eneo individual businesses or facilities.

The auditors develop and prioritize local findings related to:

- Non-compliance with legal, regulatory, company, and other types of requirements.
- Aspects of environmental and social risk and impacts that require mitigation.
- Non-compliance with the requirements of the Environmental and Social Management System (ESMS) as compared with the ESMS Framework of the ISO 14001 :2015 standard

The audit team prepares legally privileged and confidential reports summarizing their findings, they deliver to the administration of the audited facility for review and comment prior to issuing the final report. The Managing Director and the QHSE Director receive immediate notification via email of any findings of the audit priority "critical" or "high". It is the responsibility of the audited facility or business to develop and implement appropriate preventive or corrective actions to resolve all audit findings in a timely manner.

## 20. MANAGEMENT REVIEW

Every three years, the Management Committee is responsible for conducting a review of the EMS. A Management Review, is a systematic and documented assessment of the continuity of proper design and effectiveness of the Eneo Policy Framework, national regulations and international best practice including DFI E&S safeguards requirements (e.g. AfDB ISS and IFC PS) and GIIP, according to current design and implementation throughout the company.

The Management Review takes into account various sources of information, including but not limited to:

- The status of recommended actions from previous management reviews.
- Results of internal audits of individual businesses of Eneo, conducted by environmental auditors of the regional groups, plus the status of any preventive or corrective action taken.
- Environmental and social safeguards performance measured in each of Eneo's Regions and Units, including its compliance with the established environmental and social objectives and targets.
- Changes in the business strategy of the Eneo, its assets, technologies, operations and environmental and social aspects and impacts.
- New and emerging aspects affecting Eneo and any third party in terms of the Environment.

The review focuses on answering the following key questions for assessment:

- If the Environmental and Social Policy of the Eneo and the Framework of Environmental and Social Management System (EMS), as currently designed, are still relevant and appropriate to the needs of the company's environmental management.



- If there is overall compliance with the requirements of national regulations and international best practice including lender E&S safeguards requirements (e.g. AfDB ISS and IFC PS) and GIPP at corporate, regional and subproject level.

If the requirements of the Environmental and Social Management System (ESMS) in relation to the identification and management of E&S risks and impacts are being effectively implemented in each region/unit in a cost effective manner, monitored and reported upon regularly.

If the requirements of the Eneo Environmental and Social Management System (ESMS) are applied across each region/unit in a consistent manner and its use are well understood and widely disseminated through their organizations.

- If the use of Environmental and Social Management System (ESMS) is allowing regions/units have a strong environmental and social performance and proper ongoing management, including reporting to corporate.

These reviews are conducted according to formal protocols of the Environmental and Social Management System.

## 21 CONTINUOUS IMPROVEMENT

Eneo is committed to continuously reviewing the ESMS to ensure that its relevant in addressing the E&S risks and impacts associated with the portfolio projects and subproject. The ESMS review process is undertaken as appropriate and based on the need to ensure that the ESMS remain relevant (including integrating emerging E&S safeguards challenges such as GBV, SEAH, forced & child labour in the supply chain, etc) and in compliance with national regulations and international best practice such as AfDB ISS and IFC PS requirements and GIPP.

## 21. ANNEX

### Annex 1: Eneo Environmental and Social Policy

# Environment & Social Policy

EP Rev.3 12/20

**Eneo Cameroon S.A.** is the leading electricity company in Cameroon carrying out its business in the field of generation, distribution and sales of electricity.


**Eneo Cameroon S.A.** is committed to protecting the environment and society by reducing impacts resulting from our operations and promoting sound environmental conditions where we operate.

We strive to improve our performance over time and be proactive in enhancing environmental conditions.

We acknowledge our obligation to implement best industry environmental standards.

Our environmental commitment extends to our workforce, contractors, the core supply chain, affected communities, and other stakeholders.

- Establish and maintain an effective environmental & social management;
- Providing our workforce with all the necessary means (i.e. awareness, training, information, resources, etc.) to operate and contribute to implement this Policy;
- Promoting innovative thinking and incorporating a continual improved approach to reduce our impacts by implementing performance monitoring /auditing procedures and setting setting targets aiming to reduce overall impacts;
- Share information and experience with regulatory bodies, industry associations, other companies, employees and members of the public as appropriate;
- Disclosing relevant project information to ensure transparency and allow dialogue, independent monitoring and public oversight.



**Our Commitments**

Eneo Cameroon S.A. is committed to:

- Complying with all applicable national environmental regulations/standards;
- Implementing the Lender and Investor Performance Standards Requirements;
- Integrating environmental aspects into decision-making;
- Applying a precautionary approach on environmental risk management;

**Our Principles**



The following principles will be strictly observed during Project Life Cycle in carrying out engineering, procurement construction and decommissioning:


- In our project work design, we shall strive to minimise adverse impacts on the environment through measures that include limiting the consumption of resources and energy, and working working to prevent air, water and soil pollution.
- In procurement, we shall encourage vendors that show a positive attitude towards the use of environmentally friendly manufacturing practices.
- In construction, we shall minimise the use of resources and production of waste, promote recycling, and strive to protect the environment through preventing air, water and soil pollution.
- During decommissioning, we shall shall take measures to ensure operations do not impact on the environment and the public.

This policy is approved by the Eneo Managing Director communicated to employees, contractors and made public when necessary.

It will be reviewed in three years.

**Eric Mansuy**  
Managing Director, Eneo Cameroon S.A.

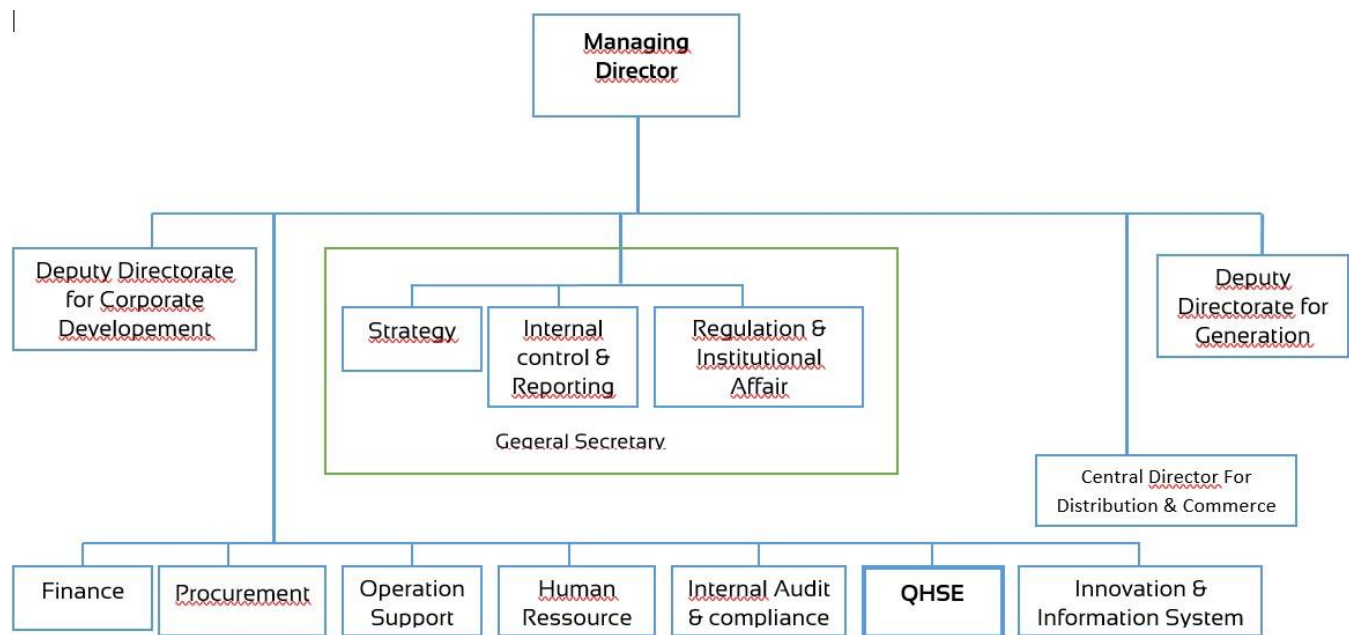





The energy of Cameroon



Annex 2: Eneo Organizational Chart



Annex 3: Quality, Health & Safety and Environment Organisational Chart

