



Environmental and Social Management System

Responsible Investment Policy and
Implementation Guidelines



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I. INTRODUCTION

Created in 2013, RGREEN INVEST is a Management Company (société de gestion de portefeuille), established in France and governed by articles L. 214-159 et seq. of the French Monetary and Financial Code. RGREEN INVEST is the first green infrastructure financing platform and provides a channel for institutional investors to direct their capital towards financing projects related to energy transition.

RGREEN INVEST finances energy transition infrastructure projects mainly located in the EEA (wind, solar, biogas, etc.), both greenfield and brownfield.

RGREEN INVEST is attentive to ESG matters at all stages of the investment process, its related policy has been described in its ESG charter (Appendix 3).

II. RGREEN INVEST'S RESPONSIBLE INVESTMENT POLICY

Purpose

As a responsible investor, RGREEN INVEST applies its principles towards its investments but also towards its investors and employees. Through its investments in renewable energy, RGREEN INVEST favours clean and local energy generation as well as a significant CO2 emissions savings, thus contributing to the transition towards a low carbon economy.

With the award of the Label TEEC to their last generations of INFRAGREEN' solutions (French Label for the Energy and Ecological Transition for Climate), which certifies the orientation of investments towards the energy and ecological transition, RGREEN INVEST is recognized as a committed actor addressing climate change issues. Positioned as a long-term partner towards investees, RGREEN INVEST encourages dialogue on social and environmental issues to encourage improvements and build trust between its stakeholders (investors, investees, and their local communities).

RGREEN INVEST's investees

Investee assets such as photovoltaic and wind parks projects in which the funds managed by RGREEN INVEST invest do not require significant manpower for their operations. Nevertheless, RGREEN INVEST is committed to fostering local growth and local employment through the direct & indirect impacts of the infrastructure projects financed.

RGREEN INVEST wishes to ensure that health and safety rules and proper labour conditions, particularly on the infrastructure building site, are respected by its investees and their contractors.

RGREEN INVEST is also sensitive to the acceptability of each project by local communities, and is strongly committed to respecting international and local standards regarding business ethics, particularly in the fight against any form of corruption.



RGREEN INVEST's operations as a Management company

Internally, at the company level, RGREEN INVEST implements environmental best practices: reduction of electricity and paper consumption, recycling, and promotion for displacement of public transportation or hybrid cars. RGREEN INVEST also encourages its partners to implement similar measures (if not already the case).

RGREEN INVEST's Management acts to foster a good social climate, based on an open and transparent dialogue in order to meet the team's expectations.

III. RGREEN INVEST'S ESMS

This document:

- Outlines RGREEN INVEST's Responsible Investment Policy;
- Describes the procedures implemented by RGREEN INVEST in order to perform its responsibilities as a Management company in line with its Responsible Investment Policy and to ensure they are correctly implemented;
- Establishes the procedures to assess and control investment-related ESG issues and establish actions plans.

1. ESMS SCOPE

The purpose of this ESMS is to provide guidance on the operational implementation of RGREEN INVEST's Responsible Investment Commitments and to set out the relevant actions to be taken at each stage of all investments made by the funds managed by RGREEN INVEST.

Through this ESMS, RGREEN INVEST will implement the following:

- Assess ESG issues of targeted companies, in line with RGREEN INVEST's and its investors' standards, and implement appropriate actions at the time of investment;
- Ensure the investees' compliance with the ESG policies over the holding period, notably:
 - Promote compliance with applicable local regulations and, where appropriate, relevant international standards and industry best practices;
 - Discuss and encourage ESG best practices at portfolio companies' Board of Directors-level;
 - Promote and maintain the highest standards of integrity and good corporate governance;
 - Monitor portfolio companies' mitigation of their environmental and social impact in compliance with the legal and administrative frameworks to which they are subjected;
 - Encourage portfolio companies to enhance their positive effects on the environment, employees, and wider society.



2. ESMS REFERENCE STANDARDS AND GUIDELINES

RGREEN INVEST is committed to apply best-in-class standards in environmental, social and procurement engagement across its portfolio. RGREEN INVEST adheres to the applicable ESG laws and regulations of the jurisdictions in which it invests. This ESMS is notably inspired by the UN Principles for Responsible Investment, the UN Sustainable Development Goals and the European Investment Bank's (EIB) Environmental and Social Standards.

3. RESPONSIBILITIES AND ESMS UPDATE

a. Responsibilities

RGREEN INVEST is in charge to maintain and implement the Responsible Investment Policy. To this end, RGREEN INVEST has set up an ESG governance. A Board of Directors supervises and carries out an operational follow-up.

RGREEN INVEST's ESMS implementation is under the responsibility of the Investment Managers at any stage of the acquisition process.

These Managers will be assisted by the Managing Director which has also the role of Environmental and Social Manager (E&S Manager¹). The E&S Manager verifies that the ESG procedure is effectively applied for all investments. Investment Managers may also be assisted by external independent advisors if required.

The responsibilities of all concerned parties are clearly set out under Appendix 1.

Investment Team will perform the monitoring of investee's detailed follow-up by requiring a regular report that is both operational (electricity production, important maintenance operations, etc.) and financial.

A yearly ESMS review will be performed by the E&S Manager as part of RGREEN INVEST's internal control.

b. Competency Requirements

The Investment Managers and Teams will be adequately trained in order to ensure their comprehensive understanding of ESG and procurement standards and procedures. The Managing Director and E&S Manager will follow French and European regulatory trends on social and environmental topics.

¹ In line with EIB Environmental and Social Standards



4. ESMS IMPLEMENTATION

In line with RGREEN INVEST's commitment to ESG performance, the company chose to include ESG criteria as part of its screening investment procedures and daily analysis. The ESG criteria are addressed and documented in the initial due diligence process.

All investments made by RGREEN INVEST shall comply with the following requirements:

- Applicable regulation;
- Applicable Directives or principles on public procurement;
- Private procurement procedure which satisfies the criteria of economy and efficiency;
- Investors Transparency policies and Investors Requirements through a contractual obligation;
- Excluded and Restricted Activities.

When investing in greenfield and brownfield projects, RGREEN INVEST's ESMS will be implemented through a systematic ESG Due Diligence addressing risks and opportunities associated with portfolio companies' activities, taking into account the inherent materiality of these issues in specific sectoral contexts.

As part of the Due Diligence process, these analyses will rely on project documentation and in-depth dialogue with the project stakeholders and will serve as a basis for designing and monitoring E&S and ESG action plans, which will then be implemented by portfolio companies.

RGREEN INVEST's ESMS will be implemented throughout the investment cycle in a consistent approach with the six UN PRI Principles.

a. Investment Phase

At the time of the investment, an appropriate ESG Due Diligence in examining project ESG characteristics in more detail and identify improvements.

This Due Diligence process, conducted by RGREEN INVEST with an independent external expertise if needed, will mainly be based on:

- A sector-based analysis of the materiality of issues regarding five key ESG themes:
 - ESG Management
 - Environment
 - Labour and H&S
 - Social / Community
 - Procurement/contracting
- Interviews (or, at least, a Q&A session) with representatives of the Management of the target company (or of its main sponsor, when applicable), covering above themes;



- A documentary review, when applicable, of the target's company main ESG and procurement policies, procedures, initiatives, KPIs, etc.;
- A review, when applicable, of the target company's compliance with applicable environmental, social and procurement standards;
- An assessment, when applicable, of the target's maturity level on each material ESG theme, given sectoral best practices.

The due diligence assessment will result in the formulation of an E&S and ESG action plan to be implemented by the acquired company.

When required, the ESG action plan based on due diligence analysis will be presented to RGREEN INVEST's Investment Committee (through an Investment Committee note) and will form part of the contractual transaction agreement.

b. Portfolio Holding Phase

During the holding period of an investee company's equity or debt, and under the supervision of the Investment Manager, RGREEN INVEST will assume the following measures for each investment:

- Formalise an action plan based on ESG Due Diligence report and define clear ESG objectives to be achieved by the acquired company during the holding period;
- Define monitoring KPIs to measure the achievement of those ESG objectives;
- Implement a regular monitoring and reporting system to follow the portfolio company's ESG performance;
- Based on information provided by portfolio companies, monitor major environmental and social incidents. For this purpose, major incidents are defined as incidents with potential significant consequences on the company's operations, revenue, or reputation.

The E&S Manager will provide guidance and monitor the progress on the aforementioned action plan. Whenever necessary, this action plan can be amended or new work streams can be established.

c. Exit Phase (for equity investments only)

Upon the sale of equity interests in portfolio companies, RGREEN INVEST will produce a final assessment outlining ESG progress made during the holding period and pending actions. The assessment will be based on the portfolio company's progress on the ESG action plan.

5. TRANSPARENCY

RGREEN INVEST applies the AMF directive regarding the alternative investments funds management. It ensures a high level of transparency to the investors of the funds managed by the company regarding conflicts of interest, risks and funds' governance.



RGREEN INVEST is also committed to apply the Transparency Policies of its investors. For this purpose, the ESMS and the results of its implementation may be communicated to investors, upon request. This includes Due Diligence reports, action plans, and regular monitoring results. In addition, the E&S Manager will communicate on the Company's website about RGREEN INVEST's Responsible Investment Policy and ESG performance, as well as an overview of ESG practices of RGREEN INVEST's Investees.

IV. ESMS OPERATIONAL DESCRIPTION

1. INVESTMENT PHASE: DUE DILIGENCE

a. Purpose of the ESG Due Diligence

Consistent with RGREEN INVEST's Responsible Investment Policy, the Environmental and Social Standards of EIB and the associated Procurement Requirements, the ESG Due Diligence process focus will be placed on:

- Environmental issues and impacts linked to the target company's specific activities or future activities (e.g. supply chain, production, distribution, end of life, climate, biodiversity, etc.)
- Social issues, including regulated topics such as human resources performance, well-being at work, health & safety, and social dialogue, as well as other potentially material key issues such as diversity, talent attraction and retention, and training.
- Governance issues including corporate governance, crisis management, and ethics:
 - Behavioural ethics (e.g. prevention of harassment or discrimination)
 - Business ethics (e.g. relationships with stakeholders and business partners)
 - Community engagement (e.g. corporate citizenship, stewardship of cultural and societal heritage)
- Procurement compliance with applicable Directives and principles on public procurement or procedures on private procurement;
- The materiality of climate change issues for the Target.

The ESG Due Diligence process will be conducted by RGREEN INVEST's Investment Manager, with the assistance of independent external experts if required.

b. Due Diligence Scope & Timing

The main objective of the ESG Due Diligence is to provide an objective, and informed view of the investment's exposure to ESG issues, management of ESG matters, performance against best practices, and related opportunities to add value by improving ESG practices / performance.

As such, the ESG Due Diligence scope will cover:

- The materiality of ESG issues and impacts to the business, identifying gaps/improvement areas and addressing them (i.e. action plan);



- The company's compliance status with applicable laws, regulations and standards, notably regarding authorizations and impact assessment processes;
- The company's commitments, initiatives and monitoring regarding ESG matters;

Whenever transaction timing allows and when required, due diligence findings will be communicated to Investment Committee to ensure a fully informed investment decision. The timing of the due diligence will depend on the complexity of the Target Company and related work expected.

c. Due diligence Process

The due diligence process comprises the following four macro-steps:

- **Step 1. ESG themes materiality analysis:**
The ESG Due Diligence presents a materiality or risk-level assessment of a range of ESG themes in a specific sectorial context.
- **Step 2. Information analysis on the target company's practices, including where appropriate interview with representatives of the Management:**
 - Collection and review of ESG documentation, including publicly available information and documents requested from the company (e.g. info memo, environmental or social assessments, company website and external communications, policies, internal communications, KPIs, etc.);
 - Formalization of questions intended the target company's (or in some cases, its main sponsor's) Management and covering material ESG themes previously identified;
 - On-site or remote interviews with the Management and plants visits, when relevant and possible.
- **Step 3. Due diligence results**
All due diligence results will be summarized in a table showing material issues and the target company's compliance and appropriate best practices.
- **Step 4. ESG Action plan definition** to address identified gaps / improvement areas.

d. Outcome

RGREEN INVEST will produce a final Due Diligence report presenting main findings and a detailed performance assessment for each ESG theme under investigation, as well as an ESG action plan.

The proposed ESG action plan will be specific, measurable, achievable, and time-delimited to be used as a basis of the future target's formalized action plan. It will be composed of:

- Concise and clear descriptions of the actions to be implemented, designed to address specific ESG gaps/opportunities;
- Realistic and clear timelines for completion of required actions and actions prioritization;
- Clear indicators of completion and allocation of responsibility for each action/task.



2. PORTFOLIO MANAGEMENT: ACTION PLAN IMPLEMENTATION AND MONITORING

For each investment, RGREEN INVEST's Investment Managers shall monitor ESG performance on an ongoing basis throughout the holding period. Accordingly, Investment Managers guide and assist the investee company in complying with applicable standards, implementing the ESG action plan defined during the due diligence process, and continuously improving its ESG performance.

During the holding period, Investment Managers will have the responsibility to implement the following initiatives:

- Action plan approval

The ESG action plan proposed during the due diligence process will be discussed and approved by the Management of the investee company, RGREEN INVEST's Investment Manager, and E&S Manager.

Depending on the discussions held with the Management of the portfolio company, the pace of implementation of the measures and the definition of associated KPIs will be reviewed in order to formalize a final and realistic action plan.

- Monitoring the investee's achievement of ESG objectives

ESG performance should be monitored annually at the portfolio company's Board level. Monitoring should be planned, structured, and recorded in standard reports. The monitoring will be based on:

- Information provided by investee companies to Investment Managers:
 - Annual reporting on environmental and social KPIs
 - Major environmental and social incidents
 - Evolution of ESG commitments and their implementation
- Ad-hoc meetings between portfolio companies' Management and Investment Managers to discuss ESG matters;
- Periodic assessment by Investment Managers of portfolio companies' ESG performance and ESG action plan implementation;

3. EXIT: FINAL ASSESSMENT (ONLY FOR EQUITY INVESTMENTS)

a. Purpose

RGREEN INVEST understands that ESG factors may be important at the exit phase, in order to potentially attract buyers for whom a certain level of ESG performance would be an investment criteria;

RGREEN INVEST is thus committed to provide an ESG positioning of equity investments at the time of their sale.



b. Process

Upon the sale of an equity interest in a portfolio company, the Investment Manager of the portfolio company should request the production of a report on the company's ESG performance and level of maturity. The original ESG Due Diligence report can serve as a baseline against which improvements (or otherwise) can be effectively assessed.

The report would include the following documents established over the portfolio company's holding period:

- Monitoring reports that track the ESG performance of the portfolio company;
- Key issues and progress made;
- Reports on serious accidents or incidents together with the remedial actions implemented;
- All relevant certifications to ESG standards, authorization, and impact assessment studies.



APPENDIX 1: ESG RESPONSIBILITIES CHECKLIST

The following table presents the tasks to be undertaken at each phase of the investment cycle by the Investment Manager in charge of the target/portfolio company, the E&S Manager, the external Advisor (as required), and the Portfolio Company.

1. INVESTMENT PHASE

	INVESTMENT MANAGER	E&S MANAGER	ADVISOR	INVESTEES
1	Selects an external advisor (if needed)	Participate in the selection process	--	--
2	Provides advisor & E&S Manager with available information on the target company, performs preliminary research	--	Performs a materiality and sectorial analysis, review available documentation on the target company	--
3	Validates Q&A for the portfolio company's Management	--	As required, prepares Q&A for the target company's Management	--
4	Reviews advisor work (ESG due diligence report and action plan)	--	Updates ESG due diligence report & action plan with KPIs to be monitored	--
5	Validates ESG due diligence report and action plan	Validates ESG due diligence report and action plan	Presents the due diligence report & action plan to Investment Manager, E&S Manager, and to the Portfolio Company and when required, to the Investment Committee	Validates ESG due diligence report and action plan

2. HOLDING PERIOD

	INVESTMENT MANAGER	E&S MANAGER	ADVISOR	INVESTEES
1	Registers action plan in the existing business review systems	Provides methodological support for discussions with the portfolio company's Management and analysis of company reporting	--	Implements action plan
2	Reports progresses, KPIs and key documents to E&S Manager	Supervises progress towards the achievement of targets listed in the action plan	--	Reports relevant information to IM in order to monitor action plan advancement and KPIs performance
3	Informs E&S Manager of incidents with potential significant consequences on the company's operations, revenue, or reputation.	Monitors ESG regulatory and market development	--	Informs Investment Manager of incidents with potential significant consequences on the company's operations, revenue, or reputation.



3. EXIT PHASE (EQUITY INVESTMENTS ONLY)

	INVESTMENT MANAGER	E&S MANAGER	ADVISOR	INVESTEES
1	Prepares a progress report showing the portfolio company's advancement in implementing action plans and evolution of ESG performance	Provides methodological support to Investment Manager regarding analysis of performance evolution	--	--



APPENDIX 2: RGREEN INVEST – TEMPLATE OF THE ESG DUE DILIGENCE REPORT

ESG DUE DILIGENCE QUESTIONNAIRE
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RGREEN INVEST'S ESG DASHBOARD				ESG PROJECT NOTATION		FOLLOW-UP	
VALIDATION PROCESS FIRST DD			ESG PROJECT NOTATION		FOLLOW-UP		
Done	Name	Date	Status	ESG management at project level	Statut	Note (1 to 3)	Done Note (1 to 3)
Validated	Benoit Forgues	27/11/2017	Validated	Environmental Impacts & Risks and Climate Standards	4- Starting Up	2018	Validated
ES&S mana	Cédric Lacaze	27/11/2017	Validated	Social standards (Labour, H&S, and Community)	2- Operational - Formalised	2019	2023
				Procurement and Contracting	3- Operational - Partially Formalised	2020	2024
					3- Operational - Partially Formalised	2021	2025
						2022	2026
							2027

INVESTMENT INFORMATION	
Name of the investment (Rgreen Invest internal Name)	
Number of operations	
Project Name	
Counterparty (Name of the SPV)	
Partner	
Fund	
Country	
Asset Technology	
Share	
Investment instrument	
Contract n.1 - Rgreen Invest	
Contract n.2 - Counterparty	

PROJECT	
Overall description	
Technical description	
CAPEX Details	
Number of years of operation (COD) used to value the project	
Start of construction date	
COD	
Required permits/authorization to build and operate the project: Name of the entities providing the permits / authorization for construction and operation	
Numbers of employment generated by the project (including sub contractors) DURING construction	
Numbers of employment generated by the project (including sub contractors) AFTER construction (O&M, asset management, ...)	
Annual electricity production	
Annual CO2 savings in tons compared to country mix (see Toolbox-CO2)	
O&M Contractor	
Cost of O&M	
Price of electricity (€/MWh)	

ENVIRONMENTAL & SOCIAL STANDARDS (E&S) REVIEW		RGREEN INVEST NOTATION	
ESG management & Business ethics		4- Starting Up	
Does the project company Management understand and appreciate the importance of environmental and social standards?		Supp. ESMS	Indicate whether the issue of ESG management has been raised with the project leaders, and the outcome of discussion
Has the project company's Management identified specific business ethics requirements applying to its activity?		Supp. ESMS	
Does the project company Management commit to identify and mitigate corruption and bribery risks (facilitation payments, contract negotiations...) during the project development, construction and operation?		Supp. ESMS	Potential business ethics risk areas: - relationship with authorities and/or private persons in obtaining permits or acquiring/leasing land; - relationship with contractors and suppliers;



If applicable, specify the action plan regarding ESG and business ethics Management		Supp. ESMS	Additional Information
Environmental Impacts & Risks and Climate Standards			
Environmental and social category (A, B, C, D) <i>Note: Given RGREEN INVEST's investment universe, no projects are expected to fall under Category A</i>	B	Annex 9	
For category B projects, what environmental and social due diligence has been undertaken, and by whom? Were any environmental studies commissioned during due diligence (e.g. audits/EDAs etc.)? If so, please briefly describe: - Industrial installations for the production of electricity, steam and hot water; - Installations for the harnessing of wind power for energy production (wind farms); - Installations for hydroelectric energy generation		Annex 9	
For other projects (Categories C/D) or the ILO guidelines), have limited environmental assessments been performed or planned, and by whom? If so, please briefly describe. <i>Unless specific local regulations apply, wind and solar parks should be classified...</i>		Annex 9	
What were the main environmental and social issues associated with this project and how they were dealt with (i.e. outcome of due diligence)? Are there any material non-compliances with the ESMS requirements detected?		Annex 9	Please refer to project-specific environmental assessments. In general, the principal potential environmental adverse impacts associated with renewable energy assets are: - Habitat fragmentation and biodiversity impact - Landscape impacts - (For biomass-powered cogeneration plants) air emissions
Which measures has the Fund taken to ensure that the investee company continues to meet the applicable environmental, social, health and safety laws and regulations?		Annex 9	The following can be mentioned: - monitoring of EHS developments and incidents; - The regular engagement with investee's Management on EHS, business ethics, and procurement issues; - They typically form part of the action plan.
Has the investee company been subject to any fines, penalties for non-compliance with environmental, health and safety regulations?	No	Annex 9	
Was an E&S Corrective Action Plan developed for this investment? If yes, was it included in the legal agreement with the investee company?	Yes	Annex 9	The action plan is detailed at the end of each section of this due diligence questionnaire
A copy of approval of the Environmental Impact Assessment issued by the Competent Environmental Authority is available to the Subscriber upon request	Yes	Annex 9	
Does the project impact on any classified nature conservation site or site of high biodiversity value, including fauna and/or flora?	No	Annex 9	If Yes, does the environmental impacts study include a detailed nature assessment or there was a specific and separate nature/biodiversity assessment carried out, with a copy of the specific and detailed studies available to the Subscriber upon request? If the project impacts on internationally classified nature conservation site or a site of high biodiversity value, ensure an appropriate assessment is available and a copy of the relevant environmental approval document, from the competent authority, is available to the Subscriber upon request
Are there any critical issues regarding natural habitat and species or legal claims by NGOs or other stakeholders?	Yes	Annex 9	If yes, please provide details including an assessment of potential risks for the project
Is the investment for an environmentally and/or socially beneficial project (for example, a manufacturer that produces solar panels, or an agrifood business that produces organic produce), or does the investment add value to the project with respect to environmental and social risks and opportunities? If so, please briefly describe.	Yes	Annex 9	As indicated in RGREEN INVEST's ESMS, through its investments in renewable energy, RGREEN INVEST favours clean and local energy generation as well as significant CO2 emissions savings, thus contributing to the transition towards a low carbon economy. (Describe additional project-specific benefits)
Have climate issues associated with the project activity & value chain been evaluated, e.g.: - Sensitivity of operations to weather conditions - Climate-related issues in the supply chain (e.g. components/equipment produced)		Supp. ESMS	



Has a carbon footprint or lifecycle assessment of the project been carried out? If yes, provide details					Supp. ESMS	This could be a focus of interest in the environmental action plan
If applicable, specify the action plan regarding environmental issues:					Supp. ESMS	
Social standards, including Labour, Health and Safety, H&S, and Community						3- Operational - Partially Formalised
Does the project have social adverse effects, thus requiring involuntary resettlement and/or loss of livelihood of project affected people, impact negatively on the rights and interests of vulnerable groups including on indigenous peoples, involve issues related to the Core Labour Standards as well as impact negatively on community and occupational health and safety?	No	If yes, was the necessary social impact assessment, including health and safety at work, carried out? Is a copy of the necessary social impact assessment, mitigation measures and management plan available to the Stakeholders?	NA		Annex 9	
		If yes, please provide details on the consultation process	Start date and duration	End date		
		List of stakeholders consulted				
Even if the project does not incur adverse social impacts, does project Management identify key labour and occupational health and safety risks and opportunities of the project activity? • Construction • Operation & maintenance (directly controlled) • Operation & Maintenance (contracted)	Yes	If yes, please describe key risks & opportunities - e.g. risks: construction-related risks, availability of sufficiently trained O&M personnel, opportunities: development of locally-based job positions			Supp. ESMS	
		If no, the identification of social risks and opportunities should be included in the action plan				
For risks identified, does the project Management plan to implement appropriate policies and controls?	No	If yes, please describe the main elements of these policies & controls. Otherwise, they should be included in the action plan			Supp. ESMS	
Does the project involve expropriation and acquisition of land and properties?	Yes	Confirm that acceptability of the land acquisition and compensation policies, regulations and procedures have been legally verified			Annex 9	
Does the project involve the involuntary resettlement of people?	No	Confirm that satisfactory documentation from competent authorities or from the promoter (if it is not a government led resettlement plan) detailing the resettlement action plan including applicable laws on resettlement (if any) is available to the Subscriber			Annex 9	
Are there any critical issues regarding social adverse effect or legal claims by NGOs or other stakeholders?	No	Please provide details including an assessment of potential risks for the project			Annex 9	
What coordination actions have been undertaken with local communities concerned with the project? Have community impact assessments been performed (e.g. revitalization of economic activity)?	Please describe actions undertaken				Supp. ESMS	
If applicable, specify below the action plan regarding labour and H&S issues					Supp. ESMS	
Procurement and Contracting						3- Operational - Partially Formalised
Does the procurement of the project works, goods and services by the investment company follow fair, non-discriminatory and transparent procedures which satisfy the criteria of economy and efficiency and can be reviewed?	Yes	(Optional) If yes, describe the procedures implemented		If no, provide information on the deviations from the mentioned principles	Annex 9	
Have the contracts awarded by the investment company been negotiated impartially and are they in the project's best interests?	Yes	(Optional) If yes, describe the awarded contracts		If no, provide information on the deviations from the mentioned principles	Annex 9	



<p>What environmental and social standards are/will be applied when selecting, as appropriate, O&M contractors and other contractors?</p>		<p>Supp. ESMS</p>	<p>Guidance on standards that qualify: • selection of contractors on the basis of demonstrated H&S or environmental commitments; • discussion by Management during negotiations and supplier selections on contractors' or suppliers' environmental and social commitments.</p>
<p>Regarding project equipment/components (photoelectric panels, wind turbines, etc.), what ESG criteria - if any - have been used by Management to select suppliers?</p>		<p>Supp. ESMS</p>	<p>Examples of ESG criteria that can be considered: • labour standards • sourcing of raw materials • recycling capability etc.</p>
<p>If applicable, specify below the action plan regarding procurement & contracting issues</p>		<p>Supp. ESMS</p>	

ANNUAL FOLLOW UP 2018

<p>Was the project involved in any environmental litigation? Regarding the action plan defined in section 2 above, what actions were taken? 1. ESG Management 2. Environment 3. Labour and H&S 4. Social / Community 5. Procurement/contracting</p>	
<p>Was there any litigation related to the governance of the SPV?</p>	
<p>Has a CO2 assessment been performed? If yes, what emissions does it cover? - Avoided emissions (fCO2) - Carbon footprint (Scope III)</p>	
<p>Has the project been subject to strikes or workplace accident?</p>	

- ANNUAL FOLLOW UP 2019
- ANNUAL FOLLOW UP 2020
- ANNUAL FOLLOW UP 2021
- ANNUAL FOLLOW UP 2022
- ANNUAL FOLLOW UP 2023
- ANNUAL FOLLOW UP 2024
- ANNUAL FOLLOW UP 2025
- ANNUAL FOLLOW UP 2026
- ANNUAL FOLLOW UP 2027