

Annex 1. Environmental and Social Action Plan

No.	Action	Deliverables	Timeline
PS 1 Assessment and Management of Environmental and Social Risks and Impacts			
1	Update the Project's Environmental and Social Management System and associated plans and procedures for each Project Company in line with the requirements of the MIGA PSs to be appropriate to the nature and scale of the Project, specify compliance with applicable E&S laws and standards and incorporate the following elements: (i) policy; (ii) identification of risks and impacts; (iii) management programs; (iv) organizational capacity and competency; (v) emergency preparedness and response; (vi) stakeholder engagement; and (vii) monitoring and review.	ESMS documentation	Within 120 days of the Effective Date
2.	Develop E&S Policy documents defining the environmental and social objectives and principles that guide the Project, provide a framework for the environmental and social assessment and management process, and specify that the Project will comply with the applicable Rwandan and Kenyan laws and regulations	E&S Policy document	Within 90 days of the Effective Date
3	<ul style="list-style-type: none"> i. Develop Environmental and Social Management Plans (ESMPs) for each Project Company based on the risks identified in the HEMP specifying time period, resources, responsibilities, change management, provisions for monitoring and review and management of contractors ii. Conduct periodic review of Hazards and Effects Management Process (HEMP) documentation. iii. Update HEMP to include risks related to warehouse safety and ergonomic hazards; 	<ul style="list-style-type: none"> i. ESMP ii. Summary of HEMP review; iii. Updated HEMP 	<ul style="list-style-type: none"> i. Within 90 days of the Effective Date ii. Annually iii. Within 90 days of the Effective Date
4	Develop an E&S Monitoring Plan that would describe responsibilities, KPIs, and concrete actions to monitor and improve performance	E&S Monitoring Plan	Within 90 days of the Effective Date
5	Update stakeholder engagement document for KOKO Kenya and develop one for KOKO Rwanda in line with MIGA PS 1, to include stakeholder mapping and	Stakeholder Engagement documents for KOKO Kenya and KOKO Rwanda	Within 120 days of the Effective Date

	analysis, reference to local regulations and international standards), description of risks and impacts, summary of ongoing and previous engagement, participation of the vulnerable groups, description of Grievance Redress Mechanisms (GRM), list of time-bound activities and resources and responsibilities.		
PS 2 Labor and Working Conditions			
6	Adopt for each Project Company and update Employee Handbook and relevant HR policies and procedures in line with PS2 to cover retrenchment, worker organizations and prohibition of child and forced labor	Updated Employee Handbook for each Project Company, HR policies and procedures	Within 90 days of the Effective Date
7	Update the set of OHS SOPs to include procedures covering warehouse safety and ergonomic hazards	Updated OHS SOPs	Within 90 days of the Effective Date
8	Equip testing labs and bioethanol storage areas with secondary containment, drip trays, eyewash stations, appropriate first aid kits and spill kits and ensure compliance with the requirements of the WBG EHS General Guidelines on Hazardous Materials Management and Bioethanol MSDS	Audit/ inspection report and action plan, including completion status	Within 90 days of the Effective Date
9	Include OHS topics into Agents Training and Onboarding presentation including access to grievance mechanisms.	Updated presentation	Within 90 days of the Effective Date
10	Update KOKO Kenya Supplier Code of Conduct to include matters related to Gender Based Violence (GBV) and Sexual Harassment (SH). Develop KOKO Rwanda Code of Conduct in line with the requirements of the PS 2	Project Companies' Supplier Code of Conduct in line with PS2	Within 60 days of the Effective Date
PS 3 Resource Efficiency and Pollution Prevention			
11	Track and record the utility use in the HSE dashboard	Updated HSE dashboard including utility use.	Within 90 days of the Effective Date
12	As a part of the ESMP, each project company will develop waste management plans to specify wastes generated by each company and concrete actions/measures to implement the mitigation hierarchy to properly collect, store and dispose and record these wastes		Within 90 days of the Effective Date
PS 4 Community Health, Safety and Security			
13	Develop a GBV Action Plan aimed at raising awareness on GBV issues and providing information about preventive and response measures in the communities	GBV Action Plan	Within 90 days of the Effective Date
14	Develop a Security Management Plan to include: i) screening of security	Security Management Plan	Within 90 days of the Effective Date

<p>contractors for past involvement in crimes/abuses related to sexual harassment and GBV; ii) training of security personnel on the Code of Conduct requirements; iii) the roles and responsibilities of security staff in grievance redress; iv) training of security personnel in human rights (including combatting GBV; v) rules of engagement and use of force, and; vi) responsibilities of Project Companies staff and resources, such as dedicated personnel to oversee the management of security at KOKO sites.</p>			
<p>PS 6 Biodiversity Conservation and Sustainable Management of Living Natural Resources</p>			
<p>15</p>	<p>Develop/update its Supply Chain Policy and associated procedures to include PS 6 requirements on supply chains to (i) commit to purchasing from suppliers that are not associated with significant conversion of natural or critical habitats; (ii) periodically review supply chains with respect to risks of significant habitat conversion; (iii) limit procurement to those suppliers that can demonstrate that they are not contributing to significant conversion of natural or critical habitats (e.g. certified or verified products and/or outside areas assessed by Project Companies as high risk)</p>	<p>i.Updated Supplier Code of Conduct ii.Supply Chain Procedure</p>	<p>Within 120 days of the Effective Date</p>