



ANNUAL ENVIRONMENTAL AND SOCIAL
MONITORING REPORT
for Coria (PKF) Investments 28 (Pty) Ltd

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1 TERMS OF REFERENCE SUMMARY

Terramanzi Group (Pty) Ltd (TMG), as the independent reviewer was requested by Coria (PKF) Investments 28 (Pty) Ltd (hereinafter referred to as the “Client” or “Coria”) to undertake an environmental and social compliance audit of Noblesfontein Wind Farm (“the Project”) located in the Beaufort West and Ubuntu Local Municipalities of the Northern and Western Cape Provinces of South Africa.

This Annual Environmental and Social Compliance Report details Coria’s compliance with the applicable environmental and social standards during the construction and operation stages of the project and provides basic guidance with respect to maintaining environmental and social compliance.

The Scope of Works of the Annual Environmental and Social Monitoring Report includes:

- a) An update on environmental and social progress in the respective reporting period;
- b) Progress in relation to, and compliance with the Environmental Management Plan and applicable authorisations and permits;
- c) An assessment of compliance with the relevant national (Environmental and Social Laws applicable to the Project) and international (i.e. Equator Principles, IFC Performance Standards including IFC PS5, World Bank EHS and industry sector guidelines) standards;
- d) An assessment of compliance and progress in relation to the Environmental and Social Action Plan (ESAP) and review of any ESAP items developed/actions addressed after finalization of the Environmental Due Diligence in the relevant reporting period;
- e) Any rectification actions associated with non- or partial non-compliances with the EMP, permits, authorisations, international standards or ESAP.

The manner in which the above Scope of Works has been reported on is in line with international best practice. Furthermore, it takes cognisance of the *Equator Principles: Guidance for Consultants on the Contents of a Report for an Independent Environmental and Social Due Diligence Review* (October 2020).

2 INDEPENDENT ENVIRONMENTAL PRACTITIONER DETAILS

Terramanzi Group (Pty) Ltd (“TMG”) (www.terramanzi.co.za) has been appointed as the independent reviewer to undertake this Annual Environmental and Social Monitoring Report for Coria.

Fabio Venturi is responsible for the co-authoring and review of this Report. Fabio has a wealth of strategic environmental assessment and environmental management expertise in both government and the private sectors, stretching over 18 years within the industry.

Fabio Venturi is a certified Environmental Scientist registered with the Southern African Institute of Ecologists and Environmental Scientists (SAIEES), is a founding member of the Environmental Assessment Practitioners Association of South Africa (EAPASA), served on the Western Cape Committee Branch and National Executive of the South African Affiliate of the International Association for Impact Assessment (IAIASa), is a Certified Carbon Footprint Analyst and Energy Efficiency Auditor and is qualified as an accredited professional (AP) with the Green Building Council of South Africa (GBCSA).

Johann Kilian who is responsible for the co-authoring of this report, is registered with SACNASP as a Professional Natural Scientist and senior environmental consultant with over seven years’ experience consulting as and EAP and a Freshwater Specialist, Water Use Registration Consultant, and as an Environmental Control Officer. Johann is a senior member and Team Leader of the Environmental Services Team at Terramanzi Group (Pty) Ltd.

Evan Milborrow assisted with key technical review and data gathering work on the report. Evan has a MSc (Botany) and plays a key role in the Environmental Team and is responsible for Environmental Compliance work, Environmental Permitting, NEMA audits and Compliance Reporting and also has a strong focus on rehabilitation innovation for renewable energy sites, bringing a sound scientific background and a proactive approach to Projects.

Gordon Harding has a BSc (Hons) Geology and assists with technical reviews and data collection. Gordon plays a key role in the Environmental Team and is responsible for Environmental Compliance work, Environmental Permitting, NEMA audits and Compliance Reporting. Gordon has strong field assessment skills, an investigative mindset and a keen interest in geotechnical/environmental site investigations, civil design, and groundwater/surface water contamination. Bringing a solid scientific background, a proactive and pragmatic approach, and an eagerness to deliver on Projects.

Terramanzi Group (Pty) Ltd (“TMG”) hereby declares that they have no conflicts of interest related to the work of this Report. Specifically, TMG declares that they have no personal financial interests in the property and/or activity being assessed in this report, and that they have no personal or financial connections to the relevant property owners, developers, planners, financiers or consultants of the property or activity, other than fair remuneration for professional services rendered for this Report to the Competent Authority. TMG declares that the opinions expressed in this Report are independent and a true reflection of their professional expertise.

Terramanzi Group (Pty) Ltd is a **Level 4 Broad Based Black Economic Empowerment Company** and is **professionally accredited** with a number of relevant industry bodies as well as being an approved supplier on the **Western Cape Supplier Database**.

3 EXECUTIVE SUMMARY

This section serves as a lender required **executive summary** for the Annual Environmental and Social Compliance Audit for Noblesfontein Wind Facility and the pertinent aspects noted.

Environmental Audit

In June 2020, an **annual External Environmental Audit** was undertaken in accordance with Regulation 34 and Appendix 7 of the National Environmental Management Act, Act 107 of 1998 (NEMA) Environmental Impact Assessment (EIA) Regulations (2014, as amended) by Environmental Impact Management Services (EIMS) (Pty) Ltd. A **recommendation** was made by the auditor to **update the Environmental Management Programme (EMPr)** to improve site management. This included the management and storage of general and hazardous waste, roadside erosion control and stormwater management at the substation. Coria **have taken this recommendation on board and have commenced with the application process** to amend the EMPr. The EMPr was out for public participation from 29 October 2021 to 29 November 2021 and is thus still in process.

Section 24G Rectification Application

The holder of the Environmental Authorisation (2012), Coria commenced with the construction of an unauthorised access road. The holder therefore submitted an Environmental Authorisation amendment application to the DEA regarding changes to the access road layout and turbine laydown area. It was refused based on the fact that the changes had already occurred. On the 15th March 2019, the DEFF issued a decision on the resultant Section 24G Application. It was stated that the application no longer met the requirements of a Section 24G application as the unlawful deviations from the approved site layout plan, approved by the Department no longer triggered a similar listing in terms of the EIA Regulations, 2014. The application has been referred to the Compliance and Enforcement Unit for further investigation. The following was quoted verbatim from the Public Participation Document for the Amendment Process conducted by EIMS:

“With reference to the Section 24G process undertaken for the above facility relating to the changes associated with the internal road layout (Ref: 14/12/16/3/2/75), the current layout of the facility has been identified as a compliance matter and included in the latest Environmental Audit Report undertaken for this wind farm. The Department’s Compliance and Enforcement Section has since responded to the Applicant with a Warning Letter. It is thus understood that the matter has been closed by Compliance and Enforcement. The layout of the above development has been updated to reflect the current layout of the wind farm and now requires an amendment of the EMPr to formalise this.”

The auditor is satisfied that this issue has been resolved.

Bird and Bat Monitoring

Coria has conducted bird and bat carcass-search monitoring surveys at the facility since the operational monitoring programme started in November 2014. The purpose of the monitoring programme is to determine the real impacts caused by the project, including bat monitoring, bird monitoring and fatality monitoring in the first three years following the wind farms’ operational

commencement (December 2014 – December 2017). Bird and bat monitoring have since then been continued to be conducted on site whilst only being interrupted during a 1-year period in 2018.

Bat Monitoring

No bat fatalities were observed during the period of the previous audit (2020). In line with the South African Guidelines for Surveying Bats at Wind Energy Facility Developments (Sowler et al. 2016) no further bat monitoring in subsequent years is required, apart from fatality estimations in the tenth year of the projects' operational phase. This means that estimations of bat fatalities will need to be made in 2025 and every ten years after that. No further bat monitoring has taken place during the period covered by this audit report (2021).

Bird Monitoring

This mitigation plan was provided to Birdlife South Africa in July 2020 who indicated their approval of the plan and specified the need for the EMPr to be checked against these recommendations, and where necessary, be updated.

Seven bird fatalities were observed during the 2019 campaign including two Verreaux's Eagles which are considered regionally vulnerable in South Africa and therefore a sensitive species. It should be noted, however, that the facility's fatality findings to date show that the average bird fatalities for Noblesfontein Wind Energy Facility are within the average bird fatalities for South Africa. Nonetheless, Coria appointed Bioinsight (Pty) Ltd (Bird Specialist) in June 2020 to design an effective mitigation strategy for Coria. The mitigation measures centre around a "shut-down on demand" (SDOD) protocol, aiming for zero fatalities of Verreaux's Eagles to avoid a net loss from the moment of implementation, onwards.

In addition to nest monitoring, the mitigation plan requires monitoring by the local bird observation team from two unique vantage points (VP's) located within the wind farm, who will indicate when a turbine needs to be shut down. These VP's will be located in the vicinity where the previous fatalities were found. The specialist recommended monitoring to take place between the months of March and August (inclusive) – the period when past fatalities have been documented at the wind farm. This shut-down period was to be revised based on the results of the annual carcass searches, forming part of an adaptive management approach, and the decision was made for the mitigation plan to be implemented by the local team starting from March 2021 onwards in line with the specialist's recommended timeline.

While the next Operational phase Bird Monitoring Report will be compiled by Bioinsight in year 10 of operation (2025), carcass monitoring continued to be conducted internally by the local team on site, with input from Bioinsight. Records from March 2021, when the mitigation plan was implemented, to October 2021 have been assessed for this Audit report. In this time only a single bird fatality was observed on site; a Karoo korhaan (*Eupodotis vigorsii*) under WTG41. Zero fatalities of Verreaux's Eagles were observed. These findings suggests that the implemented mitigation plan has achieved it's desired outcome.

Socio-Economic Development and Enterprise Development

Coria invests in Socio Economic Development (SED) and Enterprise Development (ED) of the local community residing within 50km radius from the project site where engagement with the community on a regular basis is undertaken. SED and ED projects are administered by Knowledge Pele and Coria's Community Liaison Officers and from this, a monthly report is generated. A local community forum is held on a regular basis to engage with the community with regard to the SED and ED projects. The annual monitoring and evaluation report is then compiled by an independent research team contracted through Knowledge Pele Research. This report aims to measure the developmental impact and effectiveness of their SED and ED programmes (eight programmes in total), incorporating a baseline measurement and assessing their success of meeting their intended objectives (theory of change). The findings of previous year's reports, the August and September Client Reports, as well as the 2021 SED-ED Baseline and Community Study were assessed for the purposes of this audit.

Overall, Coria is investing in programmes that enjoy positive community perceptions. Participants within the Work Experience Programme and Community Liaison expressed a desire for the programme to run for more than one year and the number of personnel with identification documents (ID Intervention Programme) continues to rise. The KP Starter Pack Programme is undoubtedly addressing the challenge of high unemployment in the community as the businesses created have employed community members. The Infundo Teacher Training Programme has also included more workshops to help teachers improve their technical skills. With regards to the Social Infrastructure Programme, the installed solar panels continue to function well, and schools have realised the cost - saving benefits of using solar panels. The Bursary Programmes (KP and MAD) are functioning effectively, with very positive feedback from participants and requests to extend the Programme to other communities/areas and fund individuals in private universities/institutions.

To absorb the detrimental impact of COVID-19, Coria, together with Knowledge Pele, formulated a strategy geared towards assisting vulnerable members of the community of Victoria West through a variety of interventions. These relief interventions ranged from food parcel contributions, providing the local clinic with personal protective equipment (PPE), community wide masks sponsorships and COVID-19 Information Packs for the community. The food parcel contributions were targeted at undocumented community members, who do not have the required Identity Document (ID) verification to claim assistance from the government's Social Relief of Distress grant or broader state interventions. At the end of August 2021, Coria had spent a total of R454 641 SED funds on these interventions. Regardless of the nationwide lockdown and COVID related challenges, Coria was able to satisfy their SED and ED obligations.

Pertinent compliances, partial compliances and non-compliances

Compliances identified included:

- a) Improved rehabilitation of the site and vegetation.
- b) Improved erosion control

Non-compliances identified included:

- c) Poor management of hazardous materials.
 - o The hazardous waste skip for storing oil is leaking
- d) The lack of use of benchmarking data to establish the relative level of resource efficiency.

Following on from the above, the Environmental and Social Action Plan (ESAP) 2021 has been revised and Coria (PKF) Investments 208 (Pty) Ltd have signed the revised ESAP Acceptance Letter (Appendix B) and will thus achieve **full compliance by following the remedial actions instructed in the ESAP.**

We would like to commend Coria (PKF) Investments (Pty) Ltd for their ongoing commitment to achieving excellence with the ESAP.

Yours faithfully,



FABIO VENTURI

4 INTRODUCTION

4.1 PURPOSE OF THIS REPORT

The purpose of the Annual Environmental and Social Compliance Report is to detail the findings of the independent environmental and social due diligence conducted by TMG of the Noblesfontein Wind Farm and to provide subsequent basic guidance with respect to achieving and maintaining full environmental and social compliance. The independent environmental and social due diligence assesses the construction and operational phases of the Noblesfontein Wind Farm against the relevant national and international standards. Furthermore, the report includes an updated ESAP, which details all necessary rectification actions associated with non- or partial compliances with the EMP, permits, authorisations, international standards or existing ESAP.

4.2 SCOPE OF REPORT

This report examines the environmental and social compliance of the Noblesfontein Wind Farm and its associated activities with the requisite national and international standards. It does not consider any of the other projects associated with the Karoo Renewable Energy Facility, namely the Modderfontein Wind Farm and the Noblesfontein Photovoltaic Facility.

The overarching standards used to assess the Noblesfontein Wind Farm environmental and social compliance are the Equator Principles, which include assessment criteria for country-specific environmental legislation, the International Finance Corporation (IFC) Performance Standards on Social and Environmental Sustainability, the World Bank Group General Environmental, Health and Safety (EHS) Guidelines and the World Bank Group Industry Sector Guidelines for Wind Power.

The report provides a description of the project, including its location, scale and authorised activities, and describes the methodology used to assess its compliance. The report then provides a detailed assessment and description of the project's compliance with each of the ten Equator Principles and provides mitigation measures in an attached ESAP (*Appendix A*) to bring the project into complete compliance with the Equator Principles.

4.3 THE EQUATOR PRINCIPLES

The Equator Principles form a risk management framework, adopted by 126 financial institutions across 38 countries, for determining, assessing and managing environmental and social risk in projects and is primarily intended to provide a minimum standard for due diligence to support responsible risk decision-making. The Equator Principles Financial Institutions (EPFI's) are those financial institutions that have formally adopted the principles to ensure that the projects they finance are developed in a manner that is socially responsible and reflect sound environmental management practices.

EPFI's will only provide loans to projects that conform to the following principles:

- Principle 1: Review and Categorisation;
- Principle 2: Social and Environmental Assessment;
- Principle 3: Applicable Social and Environmental Standards;
- Principle 4: Environmental and Social Management System and Equator Principles Action Plan;
- Principle 5: Stakeholder Engagement ;

- Principle 6: Grievance Mechanism;
- Principle 7: Independent review;
- Principle 8: Covenants;
- Principle 9: Independent Monitoring and Reporting; and
- Principle 10: Reporting and Transparency.

The Equator Principles were originally developed in 2003 based on the IFC Performance Standards and on the World Bank Group's EHS Guidelines and are regularly updated. The most recent version, *Equator Principles IV*, was published on 18 November 2019 and we hereby confirm that these revised principles are only mandatory for all new transactions from 1 July 2020. Correspondence with the EP Secretariat on 24th November 2020 inferred that the EP IV requirements are only effective for Projects where the mandate was signed on or after the 1st October 2020. The Equator Principles include Bridge Loans and Project-Related Corporate Loans and provides further guidance on how projects should consider social and environmental issues and risks. It also includes the World Bank Group's Sector Guidelines for specific industries such as wind or solar power.

The Equator Principles have greatly increased the attention and focus on social and community standards and responsibility. This includes robust standards for indigenous peoples, labour standards, and consultation with locally affected communities within the Project Finance market. They have also been lauded for promoting convergence around common environmental and social standards and for supporting the principle of sustainable development.

The benefits of applying the Equator Principles to project financing include improved relationships with stakeholders, a more structured risk management process, improved long-term investment performance through better environmental and social risk management and increased business opportunities in the international project finance arena. The reputational benefits associated with applying the Equator Principles are considered the greatest advantage and include improved accountability and transparency in a sector that is often criticised for its lack thereof.

However, the Equator Principles have also come under fire for their lack of enforcement mechanism. As a voluntary guideline, only a few organizations disclose all information required by the Equator Principles. Instead of being proactive, they are rather reactive to stakeholder pressure and only report on what is requested. It is therefore advised that both the client and EPFI make all project documentation available to stakeholders to enjoy the full extent of the benefits of the Equator Principles.

5 DESCRIPTION OF THE PROJECT

5.1 ACTIVITY DESCRIPTION

The Noblesfontein Wind Farm originally formed part of the composite Karoo Renewable Energy Facility. The original authorisation for the Karoo Renewable Energy Facility was amended to split the authorised project development area into three project development phases, and an amended authorisation for each phase was issued on 22 February 2012.

The details of the project are as follows:

Project Name	DEA Reference Number
Noblesfontein Wind Energy Facility (132 MW)	12/12/20/1993/1
Noblesfontein Solar Energy Facility (50 MW)	12/12/20/1993/2
Modderfontein Wind Energy Facility (198 MW)	12/12/20/1993/3

The first phase of the project is now known as the Noblesfontein Wind Farm and was awarded preferred bidder status by the Department of Energy in 2011. The Noblesfontein Wind Farm is currently owned and operated by Coria and is the subject of this Annual Environmental and Social Compliance Report.

The authorisation for the Noblesfontein Wind Farm included the construction of a substation and a power line in order to connect the wind farm to the Eskom grid. However, through the final micrositing of the facility, it was raised that the authorised location of the substation and power line was too far relative to the location of the bulk of the turbines. This would mean that additional lengths of power cable would be required to connect the turbines to the on-site substation. Therefore, a Basic Assessment process was undertaken to authorise the relocation of the substation to a more central location.

Noblesfontein Wind Farm has an installed capacity of 73,8MW with 41 Vestas V100 turbines, each generating 1,8MW. This amounts to an expected generation of 221,400 MW annually. Coria has signed a 20-year lease with Eskom to provide electricity directly into the grid.

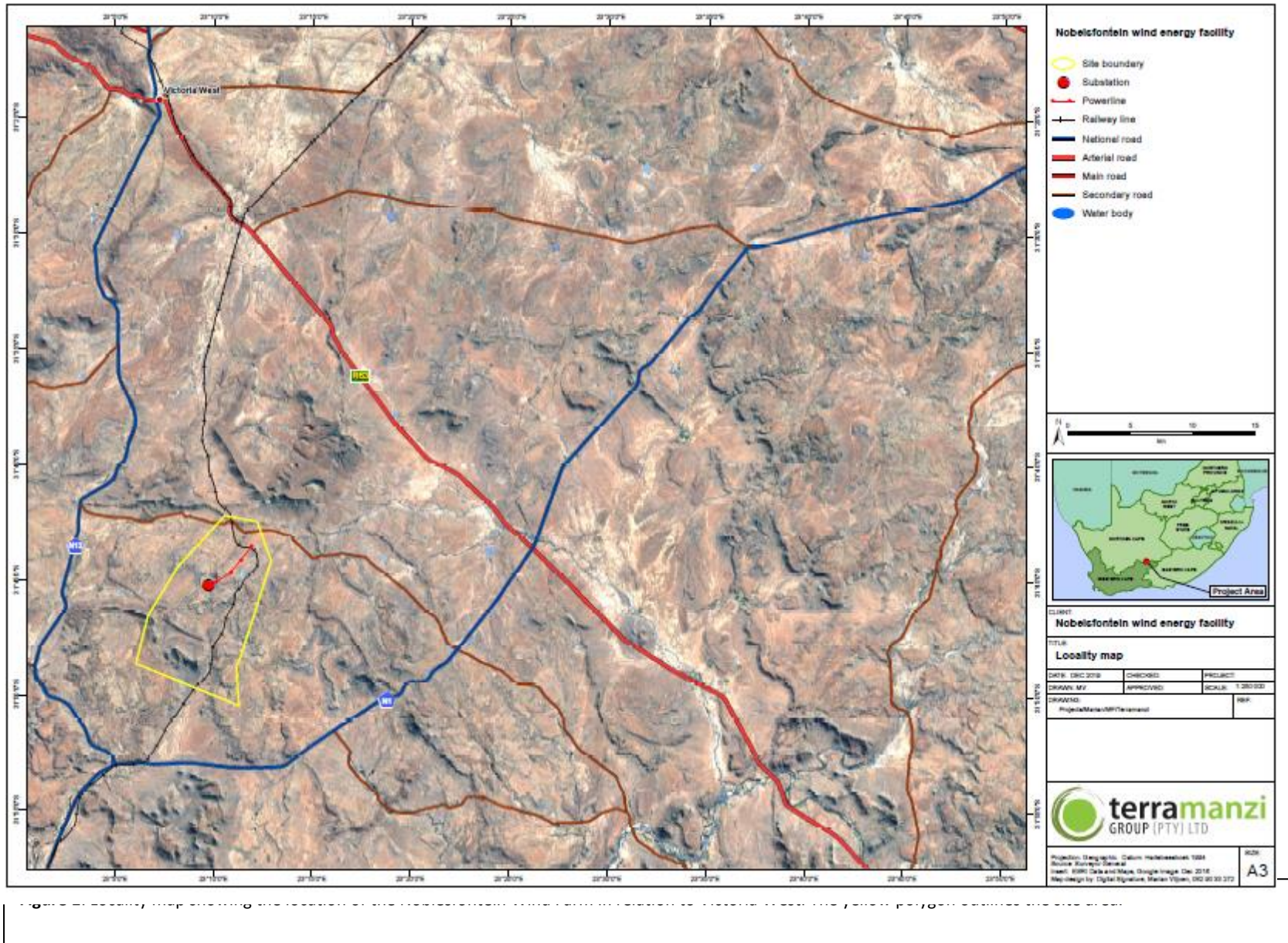
5.2 LOCATION OF ACTIVITY

The Noblesfontein Wind Farm is located in the Northern and Western Cape provinces of South Africa within the Ubuntu and Beaufort West local municipalities, approximately 25km from Victoria West, 25 km South of Hutchinson and 7.5 km North of Three Sisters. The wind energy facility is on the Noblesfontein farm, which consists of 11 000 hectares of Karoo veld and comprises the following farm portions:

- Remainder of Farm Noblesfontein 227;
- Portion 3 of the Farm Noblesfontein 227;
- Portion 2 of the Farm Ezelsfontein 235;
- Portion 3 of the Farm Ezelsfontein 235;
- Portion 4 of the Farm Ezelsfontein 235;
- Remaining extent of the Farm Annex Noblesfontein 234;
- Portion 1 of the Farm Annex Noblesfontein 234; and
- Portion 1 of the Farm Rietkloofplaaten 239.

The table below provides the co-ordinates of the wind farm and the associated key infrastructure, namely the substation and powerline:

Infrastructure	Latitude	Longitude
Wind Energy Facility	31° 45' 46.04" S	23° 09' 42.29" E
Substation	31° 45' 17.61" S	23° 09' 44.08" E
Powerline (start point)	31° 45' 17.61" S	23° 09' 44.08" E
Powerline (middle point)	31° 44' 43.84" S	23° 10' 49.99" E
Powerline (end point)	31° 43' 33.01" S	23° 11' 55.97" E



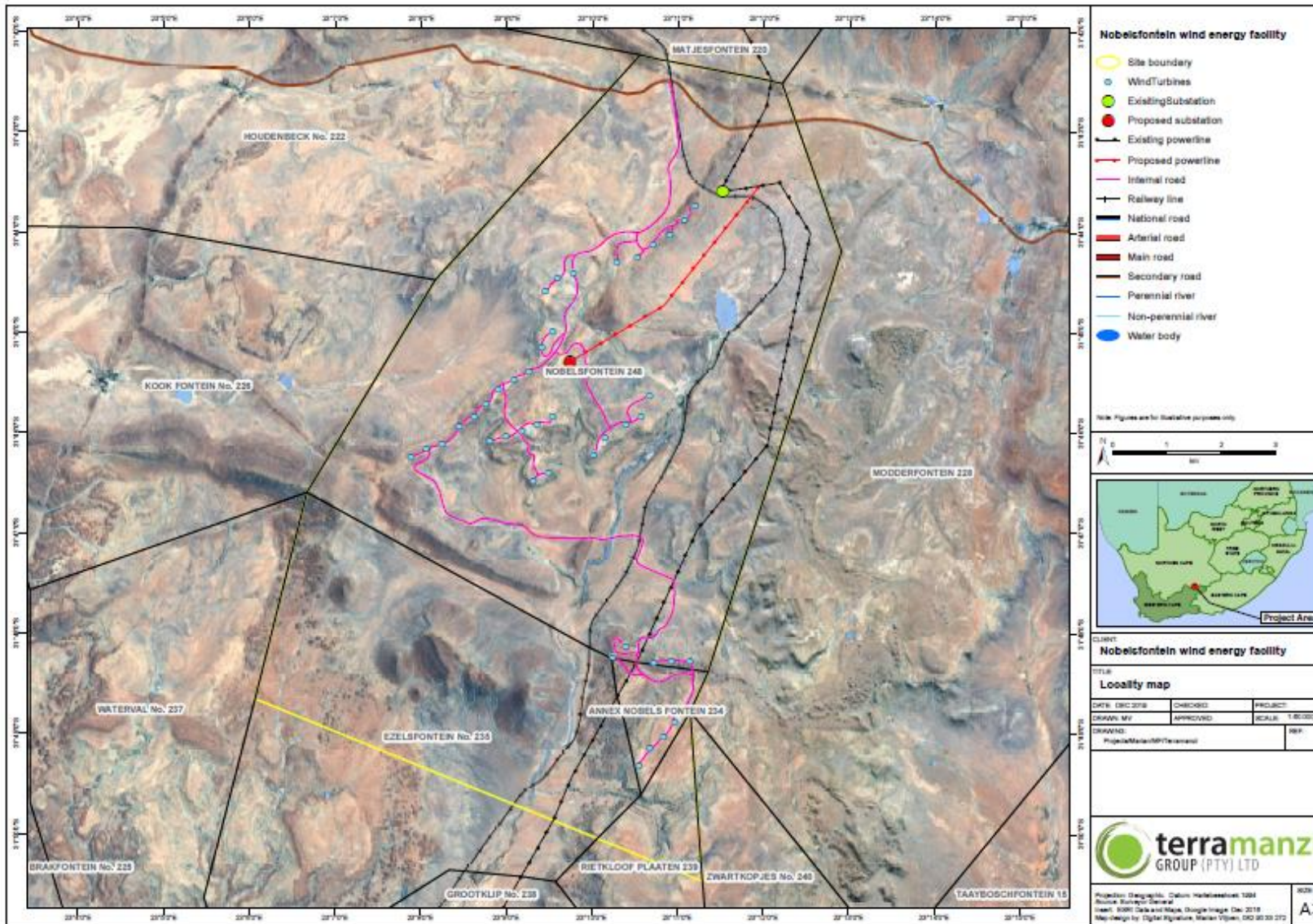


Figure 2: Locality map showing the infrastructure layout of the Noblesfontein Wind Farm. The yellow polygon outlines the site area.

5.3 SCALE OF ACTIVITY

The scale of the project and its respective activities needs to be considered when assessing environmental and social compliance as its influence is not necessarily limited to its geographic boundary. The scale of the activity therefore includes all the components and associated facilities that form part of the project and their entire area of influence. Consequently, the IFC stipulates that the following aspects of the project must be considered and included in a compliance assessment:

- The primary project site and related facilities that the client develops or controls;
- Associated facilities that are not funded as part of the project, but whose viability and existence depend exclusively on the project and whose goods or services are essential for the successful operation of the project;
- Areas potentially impacted by cumulative impacts from further planned development of the project; and
- Areas potentially affected by impacts from unplanned but predictable developments caused by the project that may occur later or at a different location.

As such, the scale of the activity includes the following infrastructure and activities associated with the Noblesfontein Wind Farm and their respective locations (see *Section 5.2*):

- 41 wind turbines with a total generating capacity of 73,8MW, using turbines with a generating capacity of 1,8 MW;
- 22.07 hectares of permanently transformed land for the installation of the turbines and related infrastructure;
- Each turbine consists of a steel tower (between 80 metres and 125 metres in height), nacelle (gear box) and three rotor blades with a rotor diameter of between 90 metres and 110 metres (ie. Each blade up to 55 metres in length);
- 44 temporary turbine laydown areas of 50 metres X 25 metres (55 000 m²);
- 44 concrete foundations to support the turbine towers (15m X 15 m X 2.5 m in depth);
- A temporary lay down area with a footprint of 0.66 km² (66ha);
- A 132 kV substation with high voltage yard footprint of approximately 100m X 100m (10 000 m²);
- Underground cabling between the project components;
- One new overhead 132 kV powerline of 1 km in length, turning into the existing Hutchison/Biesiespoort-1 132 kV line;
- Internal access roads (5m wide and 40 km long) linking the wind turbines and the infrastructure on the site; and
- Operations and maintenance building including a storage facility with a footprint of 40m X 20m (800 m²) for maintenance and storage purposes.

5.4 ENVIRONMENTAL AUTHORISATION ACTIVITIES

The Environmental Authorisation for the Noblesfontein Wind Farm (2012) authorised the following Listed Activities in terms of Environmental Impact Assessment (EIA) Regulations (2006) with Government Notice No. R. 385, 386 and 387:

GNR 386	
Activity 1(m)	The construction of facilities or infrastructure, including associated structures or infrastructure, for any purpose in the one in ten-year flood line of a river or stream, or within 32 metres from the bank of a river or stream where the flood line is unknown, excluding purposes associated with existing residential use, but including – <ol style="list-style-type: none"> i. canals; ii. channels; iii. bridges; iv. dams; and v. Weirs.
Activity 7	The above ground storage of a dangerous good, including petrol, diesel, liquid petroleum gas or paraffin, in containers with a combined capacity of more than 30 cubic metres but less than 1 000 cubic metres at any one location or site
Activity 12	The transformation or removal of indigenous vegetation of 3 hectares or more or of any size where the transformation or removal would occur within a critically endangered or an endangered ecosystem listed in terms of section 52 of the National Environmental Management: Biodiversity Act, 2004 (Act No. 10 of 2004).
Activity 16 (b)	The transformation of undeveloped, vacant or derelict land to residential, mixed, retail, commercial, industrial or institutional use where such development does not constitute infill and where the total area to be transformed is bigger than 1 hectare.
Activity 17	Phased activities where any one phase of the activity may be below a threshold specified in this Schedule but where a combination of the phases, including expansions or extensions, will exceed a specified threshold.
GNR 387	
Activity 1 (a)	The construction of facilities or infrastructure, including associated structures or infrastructure, for the generation of electricity where – <ol style="list-style-type: none"> i. the electricity output is 20 megawatts or more; or ii. the elements of the facility cover a combined area in excess of 1 hectare.
Activity 1 (l)	The construction of facilities or infrastructure, including associated structures or infrastructure, for the transmission and distribution of above ground electricity with a capacity of 120 kilovolts or more.
Activity 2	Any development activity, including associated structures and infrastructure, where the total area of the developed area is, or is intended to be, 20 hectares or more.

5.5 TIMELINES AND DEVELOPMENT PHASES

An amended authorisation for each phase of the Karoo Renewable Energy Facility was issued on 22 February 2012. Nobelsfontein Wind Farm began construction in September 2013 and all construction related activities were concluded during August 2014. The wind farm is currently fully operational (since November 2014) and rehabilitation, in accordance with the EMPr, was completed at the end of 2019. Independent environmental compliance monitoring of bats and birds has been conducted on an annual basis since the start of the operational phase (2015).

5.6 ADDITIONAL CURRENT INFORMATION

Employee Data

Operation of the Nobelsfontein Wind Energy Facility during the reporting period was headed by Coria (PKF) Investments 28 (Pty) Ltd. The Coria (PKF) Investments 28 team comprise 14 employees – four based off-site, and 10 based on-site. Three of the 14 employees are employed on a temporary basis (internships) whilst the remaining employees are permanent staff. Eight of the employees are male (57.14%) and six employees are female (42.86%).

CO₂ Emission Reductions

CO₂ emissions are monitored based on actual production and converted to CO₂ using a grid emissions factor of 0.975 which is based on a validation done by the Japan Consulting Institute (JCI) on the basis of the United Nations Framework Convention on Climate Change (UNFCCC) criteria for the Clean Development Mechanism (CDM).

Total emission reductions for the reporting period (January 2020 – October 2020) was recorded as 186 671tCO₂. Total emission reductions since the commencement of operation of the wind farm (July 2014 – October 2020) is recorded as 1 379 195tCO₂, with a reduced projection of 1 1060 108 tCO₂ for the period of January 2020 to December 2024.

Accident Statistics and Complaints

One low-medium risk Incident occurred on the 25th of October 2021. The following was quoted verbatim from the Incident Report: *“Employee admitted to negligence while operating his machine on the 25th of October, he was removing rubble and without noticing, the branch pressed against the mirror and caused the mirror to break the side window of the machine. Incident caused by human error and could have been avoided if employee paid more attention Employee described the incident as an accident, and that he was busy focusing on his work while the accident with the branch happened.”*

No complaints were received during the reporting period.

6 METHODOLOGY

6.1 ASSESSMENT PROCESS

The assessment process is based on the guidelines provided in *Equator Principles IV* of 2020, which stipulate that the following should be included in the evaluation:

- *The Review must include the evaluation of the Environmental and Social Impact Assessment (ESIA), Environmental and Social Management Plan (ESMP), Environmental and Social Management System (ESMS), Stakeholder Engagement Plan (SEP) and documentation, and grievance mechanism against the Applicable Standards;*
- *The Review must include an evaluation of assessments of potential adverse Human Rights impacts and climate change risks as part of the ESIA or other Assessment (as required by EP4 and other Applicable Standards);*
- *Adequacy of the management, mitigation, monitoring and compensation measures, including the ESMS, the ESMP, the SEP and the thematic action or management plans (e.g. corrective action plan, Resettlement Action Plan (RAP), Indigenous Peoples Plan (IPP));*
- *Adequacy of the cumulative impact assessment (as required by the Applicable Standards) and transboundary impacts assessment, if applicable;*
- *Applicability and adequacy of the assessment of associated facilities;*
- *In the case of existing facilities, assessment of the Project's environmental and social performance based on site visit observations (if required) and records/documentation review;*
- *The Project's capacity and resources to successfully manage the environmental and social risks and impacts, and to address the identified gaps in accordance with the Applicable Standards, or if additional capacity and resources are required;*
- *The Review should aim to demonstrate in a comprehensive, clear and transparent manner how the Project does or does not meet the requirements of the Applicable Standards. There are many ways of presenting this, for example in the form of tables, lists, or a narrative. The format chosen should clearly demonstrate compliance with, or identify gaps against, the Applicable Standards, and be organised by main topic (e.g. E & S Assessment, Stakeholder Engagement, monitoring);*
- *Where gaps against the Applicable Standards are identified, the Review should provide clear recommendations to address the gaps and identify whether the gaps represent a significant issue and can (or cannot) be closed to achieve compliance.*

To this end, a desktop study was conducted where all documentation associated with the project (see *Section 6.2* below) was assessed against the applicable standards of the Equator Principles. Compliance was measured using detailed checklists based on the requisite national legislation and international guidelines (see *Section 6.2* below). Each checklist requirement was categorised as one of the following:

- **Compliant:** The client has met the criteria to the satisfaction of the independent reviewer.
- **Partially compliant:** The client has addressed certain aspects of this issue and complied to a certain extent. However, remedial action needs to be taken in order to achieve full compliance.
- **Non-compliant:** The client has not met the criteria and is required to take remedial action in order to achieve full compliance.
- **N/A:** Not applicable (the criteria are not relevant to this particular project).

A site visit was also conducted on 16 November 2021 to corroborate the findings from the desktop study and to collect additional data pertinent to the assessment.

6.2 DOCUMENTATION

This Annual Environmental and Social Compliance Report and associated Equator Principles Review is based primarily on an analysis of the relevant project documentation provided to TMG electronically by the Client. The applicable international and national standards, guidelines and frameworks were also consulted. The table below provides a full list of all documentation consulted in the auditing process and in writing this report. New and updated documentation for the 2021 period is highlighted in bold.

Standards & Guidelines			
	Document name	Author	Date
1	IFC Performance Standards on Social and Environmental Sustainability	IFC	30-04-12
2	IFC Policy on Social and Environmental Sustainability	IFC	30-04-12
3	IFC Environmental, Health and Safety (EHS) General Guidelines	IFC	30-04-07
4	IFC Guidance Notes: Performance Standards on Social and Environmental Sustainability	IFC	01-01-12
5	The Equator Principles	Equator Principles Association	01-07-20
6	The Equator Principles: Implementation Note	Equator Principles Association	01-09-20
7	The Equator Principles: Guidance for Consultants on the Contents of a Report for an Independent Environmental and Social Due Diligence Review	Equator Principles Association	01-10-20
9	World Bank Group Industry Sector Guidelines: Power	World Bank Group	Aug-15
10	Broad-Based Black Economic Empowerment GENERIC Verification Certificate	Izwelisha BEE Verification Agency	24- 07-20
Project Documents			
	Document name	Author	Date
11	Environmental and Social Standards Compliance – Construction Monitoring Report (issue 1)	Arup (Pty) Ltd	13-05-14
12	Environmental and Social Standards Compliance – Construction Monitoring Report (Final)	Arup (Pty) Ltd	31-07-14
13	ESAP Operations Monitoring Report	Arup (Pty) Ltd	12-11-15
14	Annual Environmental and Social Operation Report (Equator Principles Review)	Arup (Pty) Ltd	26-09-16
15	Quarterly Rehabilitation Environmental Compliance Report No 9	Environmental Impact Management Services	31-01-18
16	Environmental Authorisation Audit Checklist	Environmental Impact Management Services	8-12-17
17	Environmental Management Plan Audit Checklist	Environmental Impact Management Services	08-12-17
18	Noblesfontein Wind Energy Facility Photographic Record	Environmental Impact Management Services	08-12-17
19	Noblesfontein Wind Energy Facility Non-compliance/Incident Register	Environmental Impact Management Services	08-12-17

20	Rehabilitation Environmental Compliance Report No 16	Environmental Impact Management Services	31-05-19
21	Environmental Authorisation Audit Checklist	Environmental Impact Management Services	31-05-19
22	Environmental Management Plan Audit Checklist	Environmental Impact Management Services	31-05-19
23	Noblesfontein Wind Energy Facility Non-compliance/Incident Register	Environmental Impact Management Services	25-10-21
24	Noblesfontein Wind Energy Facility Concerns Register	Environmental Impact Management Services	31-05-19
25	Noblesfontein Wind Energy Facility Complaints Register	Environmental Impact Management Services	31-05-19
26	Rehabilitation Environmental Close Out Report	Environmental Impact Management Services	20-11-19
27	Environmental Authorisation Audit Checklist	Environmental Impact Management Services	20-11-19
28	Environmental Management Plan Audit Checklist	Environmental Impact Management Services	20-11-19
29	Noblesfontein Wind Energy Facility Photographic Record	Environmental Impact Management Services	31-05-19
30	Noblesfontein Wind Energy Facility Photographic Record	Terramanzi Group	16-11-21
31	Noblesfontein Wind Energy Facility Non-compliance/Incident Register	Environmental Impact Management Services	20-11-19
32	Noblesfontein Wind Energy Facility Concerns Register	Environmental Impact Management Services	08-12-17
33	Noblesfontein Wind Energy Facility Complaints Register	Environmental Impact Management Services	08-12-17
34	Noblesfontein Wind Farm Operational Phase Final Bird Monitoring Report	Bioinsight	17-01-20
35	Noblesfontein Wind Farm Operational Phase Final Bat Monitoring Report	Bioinsight	18-01-20
36	Noblesfontein Wind Farm Facility Bird and Bat Carcass Searches/Monitoring – Progress Report (Summer)	Bioinsight	19-06-20
37	Noblesfontein Wind Farm Facility Bird and Bat Carcass Searches/Monitoring – Progress Report (Autumn)	Bioinsight	19-07-20
38	Noblesfontein Wind Farm Facility Bird and Bat Carcass Searches/Monitoring – Progress Report (Winter)	Bioinsight	19-10-20
39	Noblesfontein Wind Farm Vegetation Monitoring Report	NCC Environmental Services (Pty) Ltd	19-10-20
40	NEMA Environmental Audit Report – 2020: Noblesfontein Wind Energy Facility	Environmental Impact Management Services	26-06-20
41	Noblesfontein Wind Farm: Operational phase Bat Monitoring	BioInsight	Feb 2020
42	Noblesfontein Wind Farm: Operational phase Bird Monitoring	BioInsight	Feb 2020
43	Mitigation Plan for Noblesfontein WEF (Sensitive Bird Species)	BioInsight	12-06-2020
44	Noblesfontein Wind Farm Facility Bird and Bat Carcass Searches/Monitoring – Monthly Summary Report (March - October)	Neverest	Oct 2021
45	Noblesfontein Wind Farm Report (August, September and October 2020)	Knowledge Pele	Oct 2020
47	Noblesfontein Wind Farm Research Report: Annual SED & ED Monitoring - 2020	Knowledge Pele	Nov 2020

47	Noblesfontein Wind Farm Research Report: SED-ED Baseline & Community Study 2021	Knowledge Pele	Nov 2021
48	Noblesfontein Wind Farm Report (August and September 2021)	Knowledge Pele	Sept 2021
49	Coria Employee List Current	Coria	Nov 2021
Documents from the Original Karoo Renewable Energy Facility EIA			
50	Final Environmental Impact Report for a Proposed Karoo Renewable Energy Facility	Savannah Environmental (Pty) Ltd	May-11
51	Environmental Management Programme for a Proposed Karoo Renewable Energy Facility	Savannah Environmental (Pty) Ltd	May-11
52	Specialist Study on the Potential Impact of the Proposed Karoo Renewable Energy Facility - "Ecology Study"	David Hoare Consulting CC	May-11
53	Specialist Study on the Potential Impact of the Proposed Karoo Renewable Energy Facility - "Avifaunal Study"	Avisense Consulting	May-11
54	Specialist Study on the Potential Impact of the Proposed Karoo Renewable Energy Facility - "Geological Study"	Outeniqua Geotechnical Services	May-11
55	Specialist Study on the Potential Impact of the Proposed Karoo Renewable Energy Facility - "Heritage Study"	Department of Archaeology, Albany Museum, Grahamstown	May-11
56	Specialist Study on the Potential Impact of the Proposed Karoo Renewable Energy Facility - "Visual Study"	MetroGIS (Pty) Ltd	May-11
57	Specialist Study on the Potential Impact of the Proposed Karoo Renewable Energy Facility - "Noise Study"	M2 Environmental Connections	May-11
58	Specialist Study on the Potential Impact of the Proposed Karoo Renewable Energy Facility - "Social Specialist Study"	Batho Earth Social and Environmental Consultants	May-11
59	Specialist Study on the Potential Impact of the Proposed Karoo Renewable Energy Facility - "Palaeontology Study"	L. Rossouw	May-11
60	Authority Consultations, I & AP database and the Public Participation comments and response report	Compiled by Savannah Environmental (Pty) Ltd	May-11
61	Ngwao Boswa Kapa Bokone comment on Heritage resources on the site (Copied to SAHRA)	Ngwao Boswa Kapa Bokone Permits Committee	2011
62	SAHRA review comment on Archaeological and Palaeontological Impact Assessments	Heritage Resources Agency	May-11
63	Environmental Authorisation - "Karoo EA 13 Oct 2011"	DEA	13-10-11
64	Construction & Operational Environmental Management Plan	Savannah Environmental (Pty) Ltd	Jan-12
65	Water Use License	DWA	07-05-13
66	Noblesfontein Walk-Through Report	Simon Todd Consulting	24-10-12
67	Communications and Approvals from DEA	DEA	07-05-13
68	Noblesfontein Wind Farm Final Turbine Layout	Savannah Environmental (Pty) Ltd	10-07-12
69	Quality, Environment and Risk Prevention Policy	Gestamp Wind	21-09-11

70	Safety and Environmental Regulations for Subcontracted Personnel	Gestamp Wind	April-16
71	Noblesfontein Wind Farm Emergency Plan	Gestamp Wind	Aug-15
72	Identification of Inherent Risks and Preventative Measures	Gestamp Wind	Jan-17
73	Access Control Procedure to Wind Farms in Operation	Gestamp Wind	Aug-15
74	Technical Work Instruction	Gestamp Wind	Nov-16

6.3 LIMITATIONS

Although a thorough assessment was undertaken of all project documentation provided, certain limitations exist in assessing compliance with the Equator Principles. Importantly, the Equator Principles do not provide a definitive minimum standard or benchmark for every requirement. In such cases, the appropriate standard is left to the independent reviewer's discretion and, as a result, some of the findings may be slightly biased or subjective.

The Equator Principles place a lot of emphasis on effective and meaningful stakeholder engagement. Although the Client provided detailed documentation and proof of stakeholder engagement during the environmental and social impact assessment phase, no stakeholders were consulted or interviewed during the Equator Principles assessment process so it cannot be determined if they were satisfied with their level of engagement or that their concerns were adequately addressed.

Only a high-level audit was conducted to assess the project's compliance with the World Bank Group's General EHS Guidelines. It should be noted, however, that this is commensurate with the level of assessment required by the Equator Principles and that the relevant industry sector guidelines were audited in detail.

Audit opinion is expressed on historic documentation. The EIA, for example, was produced in 2012 and some of the information contained therein may no longer be relevant or true. The Client has, however, provided results of an environmental compliance report, which details the most recent information pertaining to the project.

7 EP 1: PROJECT REVIEW AND CATEGORISATION

EP 1	Review and Categorisation	COMPLIANCE	COMMENTS
	The Project has been correctly categorised based on the magnitude of its potential environmental and social risks and impacts.	Compliant	Rated as a Category B project, as there are limited adverse impacts and no fatal flaws that were identified during the Scoping and EIA phase of the environmental permitting process.
	The EPFI's environmental and social due diligence is commensurate with the nature, scale and stage of the Project, and with the level of environmental and social risks and impacts.	Compliant	

Projects are required to be categorised according to the magnitude of their potential environmental and social risks and impacts to ensure that the environmental and social due diligence is commensurate with the nature, impact, scale and stage of the Project. Categorisation is based on the environmental and social categorisation process of the IFC. The categories are as follows:

Category A	<i>Projects with potential significant adverse environmental and social risks and/or impacts that are diverse, irreversible or unprecedented.</i>
Category B	<i>Projects with potential limited adverse environmental and social risks and/or impacts that are few in number, generally site-specific, largely reversible and readily addressed through mitigation measures.</i>
Category C	<i>Projects with minimal or no adverse environmental and social risks and/or impacts.</i>

The Noblesfontein Wind Farm has been correctly classified as a *Category B* project as limited adverse impacts and no fatal flaws were identified during the scoping and EIA phase of the environmental permitting process. Furthermore, the *Karoo Renewable Energy Facility Environmental Impact Report* (May 2011) states that “the significance levels of the majority of the identified negative impacts can be reduced by implementing the recommended mitigation measures.”

8 EP 2: SOCIAL AND ENVIRONMENTAL ASSESSMENT

EP 2	Social and Environmental Assessment	COMPLIANCE	COMMENTS
	The client has conducted an Assessment process to address the relevant environmental and social risks and impacts of the proposed Project.	Compliant	
	The Assessment Documentation proposes measures to minimise, mitigate, and offset adverse impacts in a manner relevant and appropriate to the nature and scale of the proposed Project.	Compliant	The assessment documentation includes an EMPr which details the measures to minimise, mitigate and offset adverse impacts of the project.
	The Assessment Documentation is an adequate, accurate and objective evaluation and presentation of the environmental and social risks and impacts, whether prepared by the client, consultants or external experts.	Compliant	The assessment documentation abides by the regulations stated in NEMA, 2014 EIA Regulations (as amended) and therefore ensures adequate, accurate and objective evaluation and presentation of the environmental and social risks.
	The Assessment Documentation includes an Environmental and Social Impact Assessment (ESIA) with relevant specialist studies.	Compliant	The Scoping and EIA documentation is compliant.

The Equator Principles require that an appropriate assessment process is undertaken in order to address the relevant social and environmental impacts and risks presented by the project. This assessment process must produce an Environmental and Social Impact Assessment and related mitigation strategy. The Client has hired independent environmental specialists to conduct this assessment process, which produced the Project Documents listed in *Section 6.2* above. All Project Documents were written in accordance with the Environmental Application and Review (specifically Scoping and EIA) Process in South Africa, which is commensurate with the standards of the Equator Principles.

The Scoping and EIA Process can be broadly broken down into the following key phases:



The process illustrated above is in keeping with the requirements stipulated in the NEMA EIA Regulations (2014 as amended). The application requirements are set out in Government Notice No.'s R. 326, R.327, R.325 and R.324, promulgated in terms of Section 5 of the National Environmental Management Act (Act 107 of 1998) (as amended).

9 EP 3: APPLICABLE SOCIAL AND ENVIRONMENTAL STANDARDS

EP 3	Applicable Social and Environmental Standards	COMPLIANCE	COMMENTS
	The project and its Assessment Documentation are in compliance with South African Legislation, Regulations and Policies:	Compliant	<i>See Section 9.1 for detailed checklist.</i>
	The project and its Assessment Documentation are in compliance with IFC Performance Standards on Social and Environmental Sustainability:	Partially Compliant	<i>See Section 9.2 for detailed checklist.</i>
	<ul style="list-style-type: none"> Performance Standard 1: Assessment and Management of Environmental and Social Risks and Impacts 	Compliant	<i>See Section 9.2 for detailed checklist.</i>
	<ul style="list-style-type: none"> Performance Standard 2: Labour and Working Conditions 	Compliant	<i>See Section 9.2 for detailed checklist.</i>
	<ul style="list-style-type: none"> Performance Standard 3: Resource Efficiency and Pollution Prevention 	Non-compliant	<i>See Section 9.2 for detailed checklist.</i>
	<ul style="list-style-type: none"> Performance Standard 4: Community Health, Safety and Security 	Compliant	<i>See Section 9.2 for detailed checklist.</i>
	<ul style="list-style-type: none"> Performance Standard 5: Land Acquisition and Involuntary Resettlement 	Compliant	<i>See Section 9.2 for detailed checklist.</i>
	<ul style="list-style-type: none"> Performance Standard 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources 	Compliant	<i>See Section 9.2 for detailed checklist.</i>
	<ul style="list-style-type: none"> Performance Standard 7: Indigenous Peoples 	Compliant	<i>See Section 9.2 for detailed checklist.</i>
	<ul style="list-style-type: none"> Performance Standard 8: Cultural Heritage 	Compliant	<i>See Section 9.2 for detailed checklist.</i>
	The project and its Assessment Documentation are in compliance with the World Bank Group General Environmental Health and Safety Guidelines.	Partially Compliant	<i>See Section 9.3 for detailed checklist.</i>
	<ul style="list-style-type: none"> Theme 1: Environment 	Partially Compliant	<i>See Section 9.3 for detailed checklist.</i>
	<ul style="list-style-type: none"> Theme 2: Occupational Health and Safety 	Compliant	<i>See Section 9.3 for detailed checklist.</i>
	<ul style="list-style-type: none"> Theme 3: Community Health and Safety 	Compliant	<i>See Section 9.3 for detailed checklist.</i>
	<ul style="list-style-type: none"> Theme 4: Construction and Decommissioning 	Compliant	<i>See Section 9.3 for detailed checklist.</i>
	The project and its Assessment Documentation are in compliance with the World Bank Group Industry Sector Guidelines for Wind Power:	Compliant	<i>See Section 9.4 for detailed checklist.</i>
	<ul style="list-style-type: none"> Theme 1: Environment 	Compliant	<i>See Section 9.4 for detailed checklist.</i>
	<ul style="list-style-type: none"> Theme 2: Occupational Health and Safety 	Compliant	<i>See Section 9.4 for detailed checklist.</i>
	<ul style="list-style-type: none"> Theme 3: Community Health and Safety 	Compliant	<i>See Section 9.4 for detailed checklist.</i>

The Equator Principles review process should, in the first instance, address project compliance with relevant host country laws, regulations and permits that pertain to environmental and social issues. South Africa is not classified as a Designated Country, which means that it is seen to have “evolving technical and institutional capacity to manage environmental and social issues.” As a result, the Equator Principles review process must also evaluate compliance with the applicable IFC Performance Standards on Environmental and Social Sustainability and the World Bank Group’s Environmental, Health and Safety Guidelines. These guidelines represent the minimum standards subscribed to by EPFI’s.

The project was consequently assessed against the following applicable standards and guidelines:

- South African Legislation;
- IFC Performance Standards on Social and Environmental Sustainability (2012);
- World Bank Group General Environmental, Health and Safety (EHS) Guidelines (2007);
- World Bank Group Industry Sector Guidelines for Wind Power (2015).

9.1 COMPLIANCE WITH SOUTH AFRICAN LEGISLATION

South African Legislation	COMPLIANCE	COMMENTS
National Environmental Management Act (107 of 1998)	Compliant	The annual NEMA Audit took place in June 2020, resulting in a recommendation to update the Environmental Management Programme (EMPr) to improve management on site. Considering this, Coria has commenced with the Application process to amend the EMPr accordingly.
National Water Act (36 of 1998)	Compliant	
National Heritage Resources Act (25 of 1999)	Compliant	
Civil Aviation Act (13 of 2009)	Compliant	
Electricity Regulation Act (4 of 2006)	Compliant	
National Energy Act (34 of 2008)	Compliant	

The following laws and policies apply to wind energy facilities in South Africa:

- **National Environmental Management Act (Act No. 107 of 1998)**

In terms of the National Environmental Management Act, 1998 (Act No. 107 of 1998) (NEMA), as amended and the NEMA EIA Regulations, 2014 (as amended), an Application for Environmental Authorisation for certain listed activities is required to be submitted to either the Provincial Environmental Competent Authority, or the National Competent Authority (Department of Environmental Affairs, DEA).

- **National Water Act (Act No. 36 of 1998)**

The National Water Act, 1998 (Act No. 36 of 1998) (NWA) is the primary legislation regulating both the use of water and the pollution of water resources. It is applied and enforced by the Department of Water Affairs (DWA). Section 19 of the National Water Act regulates pollution, which is defined as

The direct or indirect alteration of the physical, chemical or biological properties of a water resource so as to make it:

less fit for any beneficial purpose for which it may reasonably be expected to be used; or harmful or potentially harmful to -

- *the welfare, health or safety of human beings;*
- *any aquatic or non-aquatic organisms;*
- *the resource quality; or*
- *property.*

The persons held responsible for taking measures to prevent pollution from occurring, recurring or continuing include persons who own, control, occupy or use the land. This obligation or duty of care is initiated where there is any activity or process performed on the land (either presently or in the past) or any other situation which could lead or has led to the pollution of water.

The following measures are prescribed in the section 19(2) of the NWA to prevent pollution:

- *cease, modify or control any act or process causing the pollution;*
- *comply with any prescribed standard or management practice;*
- *contain or prevent the movement of pollutants;*
- *eliminate any source of the pollution;*
- *remedy the effects of pollution; and*
- *remedy the effects of any disturbance to the bed or banks of a watercourse.*

Section 21 of the NWA lists the water uses for which a water use licence (WUL) is required. In terms of the NWA, water uses include the following activities:

- *Taking water from a water resource;*
- *Storing water;*
- *Impeding or diverting the flow of water in a watercourse;*
- *Engaging in a stream flow reduction activity contemplated in section 36;*
- *Engaging in a controlled activity identified as such in section 37(1) or declared under section 38(1);*
- *Discharging waste or water containing waste into a water resource through a pipe, canal, sewer, sea*
- *outfall or other conduit;*

- *Disposing of waste in a manner which may detrimentally impact on a water resource;*
- *Disposing in any manner of water which contains waste from or which has been heated in, any industrial or power generation process;*
- *Altering the bed, banks, course or characteristics of a watercourse:*
- *Removing, discharging or disposing of water found underground if it is necessary for the efficient*
- *continuation of an activity or for the safety of people; and*
- *Using water for recreational purposes.*

Coria is the holder of a Water Use License (dated November 2012), which allows for the abstraction of water from a water resource. Furthermore, the EMPr for the project prohibits the pollution of any water source in the project's area of influence.

- **National Heritage Resource Act (Act No. 25 of 1999)**

The National Heritage Resources Act governs the management of heritage resources which are of cultural significance. The South African Heritage Resources Agency is the national body responsible for the protection of South Africa's cultural heritage resources.

The Heritage Impact Assessment undertaken for the project determined that the project activities were acceptable and that heritage resources would not be adversely affected.

- **Civil Aviation Act (Act No. 13 Of 2009)**

The purpose of this act is to repeal, consolidate and amend the aviation laws giving effect to certain International Aviation Conventions; to provide for the control and regulation of aviation within the Republic; to provide for the establishment of a South African Civil Aviation Authority with safety and security oversight functions, to provide for the establishment of an independent Aviation Safety Investigation Board in compliance with Annexure 13 of the Chicago Convention, to give effect to certain provisions of the Convention on Offences and Certain other Acts Committed on Board Aircraft; to give effect to the Convention for the Suppression of Unlawful Seizure of Aircraft and the Convention for the Suppression of Unlawful Acts against the Safety of Civil Aviation; to provide for the National Aviation Security Program; to provide for additional measures directed at more effective control of the safety and security of aircraft, airports and the like; and to provide for matters connected thereto.

The South African Civil Aviation Authority confirmed in writing (October 2011) they did not object to the project and its corresponding turbine layout. However, the Civil Aviation permit was subject to the marking of specific turbines, which was subsequently completed.

- **Electricity Regulation Act 4 of 2006 as amended by the Electricity Regulation Amendment Act 28 of 2007**

The Electrical Regulation Act, 2006, governs the use and generation of electricity. The Electricity Regulation Act aims to establish a national regulatory framework for the electricity supply industry; to make the National Energy Regulator the custodian and enforcer of the national electricity regulatory framework; to provide for licences and registration as the manner in which generation, transmission, distribution, reticulation, trading and the import and export of electricity are regulated; to regulate the reticulation of electricity by municipalities; and to provide for matters connected therewith.

- **National Energy Act (Act No 34 of 2008)**

The National Energy Act was promulgated in 2008 (Act No 34 of 2008). One of the objectives of the Act was to promote diversity of supply of energy and its sources. In this regard, the preamble makes direct reference to renewable resources, including wind:

“To ensure that diverse energy resources are available, in sustainable quantities, and at affordable prices, to the South African economy, in support of economic growth and poverty alleviation, taking into account environmental management requirements (...); to provide for (...) increased generation and consumption of renewable energies...”

9.2 COMPLIANCE WITH IFC PERFORMANCE STANDARDS ON SOCIAL AND ENVIRONMENTAL SUSTAINABILITY

IFC's Environmental and Social Performance Standards outline the client's responsibilities for managing their environmental and social risks. They encourage sustainable business practices by promoting sound environmental and social practices, encouraging transparency and accountability, and contributing to positive development impacts. The Performance Standards are globally recognized as a benchmark for environmental and social risk management in the private sector.

The latest standards¹ were published in 2012 and reflect the recent evolution in good practice for sustainability and risk mitigation. They incorporate modifications on challenging issues that are increasingly important to sustainable businesses, including supply-chain management, resource efficiency, climate change, and business and human rights.

The IFC Performance Standards are assessed in detail under the following 8 themes:

- Assessment and Management of Environmental and Social Risks and Impacts;
- Labour and Working Conditions;
- Resource Efficiency and Pollution Prevention;
- Community Health, Safety and Security;
- Land Acquisition and Involuntary Resettlement;
- Biodiversity Conservation and Sustainable Management of Living Natural Resources;
- Indigenous Peoples;
- Cultural Heritage.

¹ IFC Performance Standards on Social and Environmental Sustainability, January 2012

9.2.1 Performance Standard 1: Assessment and Management of Environmental and Social Risks and Impacts

PS 1	Assessment and Management of Environmental and Social Risks and Impacts	COMPLIANCE	COMMENTS
	Environmental and Social Assessment and Management System		
	The client, in coordination with other responsible government agencies and third parties as appropriate, conducted a process of environmental and social assessment, and established and maintained an ESMS appropriate to the nature and scale of the project and commensurate with the level of its environmental and social risks and impacts. The ESMS incorporates the following elements:	Compliant	A Scoping and Environmental Impact Assessment process, in accordance with NEMA, 2014 EIA Regulations (as amended) has been undertaken and the relevant documentation produced is compliant.
	(i) policy	Compliant	
	(ii) identification of risks and impacts	Compliant	
	(iii) management programs	Compliant	
	(iv) organisational capacity and competency	Compliant	
	(v) emergency preparedness and response	Compliant	Although the EMPr ² does not include an emergency preparedness and response plan as an appendix, the organisation has developed and implemented 'Nobelsfontein Wind Farm Emergency Plan' ³ .
	(vi) stakeholder engagement	Compliant	
	(vii) monitoring and review	Compliant	
	Policy		
	The client established an overarching policy defining the environmental and social objectives and principles that guide the project to achieve sound environmental and social performance.	Compliant	The organisation's policy document is compliant with the requirements.
	The policy provides a framework for the environmental and social assessment and management process, and specifies that the project (or business activities, as appropriate) will comply with the applicable laws and regulations of the jurisdictions in which it is being undertaken, including those laws implementing host country obligations under international law.	Compliant	
	Other internationally recognized standards, certification schemes, or codes of practice that the client subscribes to have been included in the policy.	Compliant	
	The policy indicates who, within the client's organization, ensures conformance with the policy and is responsible for its execution (with reference to an appropriate responsible government agency or third party, as necessary).	Compliant	

² Savannah Environmental (2011) Final Environmental Impact Assessment Report: Proposed Karoo Renewable Energy Facility on a Site South of Victoria West, Northern and Western Cape Province, for SARGE (Pty) Ltd.

³ Gestamp Wind (2019) Nobelsfontein Wind Farm Emergency Plan.

	The client has communicated the policy to all levels of its organization.	Compliant	
	Identification of Risks and Impacts		
	The client has established and maintained a process for identifying the environmental and social risks and impacts of the project. The scope of the risks and impacts identification process is consistent with good international industry practice and determines the appropriate and relevant methods and assessment tools.	Compliant	ECO reporting was undertaken during construction, ECO reports ⁴ were compiled during rehabilitation activities and annual compliance audits ⁵ are undertaken which satisfies this requirement.
	The risks and impacts identification process considers the emissions of greenhouse gases, the relevant risks associated with a changing climate and the adaptation opportunities, and potential transboundary effects, such as pollution of air, or use or pollution of international waterways.	N/A	N/A
	In the event of risks and impacts in the project's area of influence resulting from a third party's actions, the client has addressed those risks and impacts in a manner commensurate with the client's control and influence over the third parties, and with due regard to conflict of interest.	N/A	N/A
	Where the project involves specifically identified physical elements, aspects and facilities that are likely to generate environmental and social impacts, the identification of risks and impacts take into account the findings and conclusions of related and applicable plans, studies, or assessments prepared by relevant government authorities or other parties that are directly related to the project and its area of influence.	Compliant	N/A
	Where individuals or groups are identified as disadvantaged or vulnerable, the client has proposed and implemented differentiated measures so that adverse impacts do not fall disproportionately on them and they are not disadvantaged in sharing development benefits and opportunities.	Compliant	N/A
	Where the project involves specifically identified physical elements, aspects, and facilities that are likely to generate impacts, environmental and social risks and impacts have been identified in the context of the project's area of influence	Compliant	All aspects pertaining environmental and social risks have been identified within the Scoping and Environmental Impact Assessment Reports.
	Management Programs		
	The management program describes mitigation and performance improvement measures and actions that address the identified environmental and social risks and impacts of the project	Compliant	The organisation's EMPr details the measures to mitigate identified environmental and social risks and impacts of the project.
	The mitigation hierarchy to address identified risks and impacts will favour the avoidance of impacts over minimisation	Compliant	N/A

⁴ Environmental Impact Management Services (2019) Nobelsfontein Wind Energy Facility – Rehabilitation Environmental Close Out Report.

⁵ EIMS (2020). Nobelsfontein Wind Farm Facility NEMA Environmental Audit Report

	Where the identified risks and impacts cannot be avoided, the client has identified mitigation and performance measures and has established corresponding actions to ensure the project will operate in compliance with applicable laws and regulations, and meet the requirements of Performance Standards 1 through 8	Compliant	N/A
	The management programs establish environmental and social Action Plans, which define desired outcomes and actions to address the issues raised in the risks and impacts identification process, with elements such as performance indicators, targets, or acceptance criteria that can be tracked over defined time periods, and with estimates of the resources and responsibilities for implementation.	Compliant	N/A
	Recognizing the dynamic nature of the project, the management program is responsive to changes in circumstances, unforeseen events, and the results of monitoring and review.	Compliant	The EMPr is able to be reviewed and amended through the regulated procedures stipulated in the NEMA, 2014 (as amended). The EMPr is currently undergoing an amendment as a result of the NEMA Annual Audit (2020) to improve management and make the programme more robust to potential risks.
	Organisational Capacity and Competency		
	The client, in collaboration with appropriate and relevant third parties, has established, maintained, and strengthened as necessary an organizational structure that defines roles, responsibilities, and authority to implement the ESMS. Sufficient management sponsorship and human and financial resources are provided on an ongoing basis to achieve effective and continuous environmental and social performance.	Compliant	Appropriate and relevant third parties have been appointed to implement the ESMS, through site visits and compliance reports.
	Personnel within the client's organization with direct responsibility for the project's environmental and social performance have the knowledge, skills, and experience necessary to perform their work, including current knowledge of the host country's regulatory requirements and the applicable requirements of Performance Standards 1 through 8. Personnel also possess the knowledge, skills, and experience to implement the specific measures and actions required under the ESMS and the methods required to perform the actions in a competent and efficient manner.	Compliant	Appropriate and relevant third parties have been appointed for this responsibility.
	The process of identification of risks and impacts consists of an adequate, accurate, and objective evaluation and presentation, prepared by competent professionals.	Compliant	N/A
	Emergency Preparedness and Response		
	Where the project involves specifically identified physical elements, aspects and facilities that are likely to generate impacts, the ESMS has established and maintained an emergency preparedness and response system appropriate to prevent and mitigate any harm to people and/or the environment.	Compliant	There is an established incident and accident reporting protocol as well as fire prevention measures implemented on site. An emergency plan (October 2019) is in place on site.

	The emergency response plan includes the identification of areas where accidents and emergency situations may occur, communities and individuals that may be impacted, response procedures, provision of equipment and resources, designation of responsibilities, communication, including that with potentially Affected Communities and periodic training to ensure effective response.	Compliant	Noblesfontein Emergency Plan is compliant with the requirements.
	The emergency preparedness and response activities are periodically reviewed and revised, as necessary, to reflect changing conditions.	Compliant	The Noblesfontein Emergency Plan is to be reviewed every four years, as stated in section 11 of the plan. Thus, a reviewed edition was produced in October 2019.
	Where applicable, the client assists and collaborates with the potentially Affected Communities and the local government agencies in their preparations to respond effectively to emergency situations. If local government agencies have little or no capacity to respond effectively, the client plays an active role in preparing for and responding to emergencies associated with the project.	N/A	The Noblesfontein Emergency Plan is site specific and does not include any processes or procedures in this regard.
	The client documents its emergency preparedness and response activities, resources, and responsibilities, and provides appropriate information to potentially Affected Community and relevant government agencies.	Compliant	The Client has documented its emergency preparedness and response activities and resources. A contact person, whom maintains the emergency register, is available on the Nobelsfontein website (http://www.noblesfonteinprojects.co.za/equator-principals.html)
Monitoring and Review			
	The client has established procedures to monitor and measure the effectiveness of the management program, as well as compliance with any related legal and/or contractual obligations and regulatory requirements. The extent of monitoring is commensurate with the project's environmental and social risks and impacts and with compliance requirements.	Compliant	Compliance of the management programme(s) are reviewed annually during the annual audit. As a result of this year's audit, the Client is undertaken an amendment to the Environmental Management Programme to remain compliant with the NEMA, 2014 EIA Regulations (as amended).
	In addition to recording information to track performance and establishing relevant operational controls, the client uses dynamic mechanisms, such as internal inspections and audits, where relevant, to verify compliance and progress toward the desired outcomes.	Compliant	Annual site audits by an external consultant are conducted.

	Senior management in the client organization receives periodic performance reviews of the effectiveness of the ESMS, based on systematic data collection and analysis. Based on results within these performance reviews, senior management takes the necessary and appropriate steps to ensure the intent of the client's policy is met, that procedures, practices, and plans are being implemented, and are seen to be effective.	Compliant	The Client implemented a bird ⁶ and bat ⁷ monitoring plan which occurred over a period of 5 years. Furthermore, ECO site visits conducted over various phases of the project ensure EMPr compliance. Additionally, there are annual audits ⁸ conducted.
	Stakeholder Engagement		
	Stakeholder Analysis and Engagement Planning		
	The range of stakeholders that may be interested in the actions associated with the project have been identified	Compliant	N/A
	The client has developed and implemented a Stakeholder Engagement Plan that is scaled to the project risks and impacts and development stages. Where applicable, the Stakeholder Engagement Plan will include differentiated measures to allow the effective participation of those identified as disadvantaged or vulnerable.	Compliant	N/A
	When the stakeholder engagement process depends substantially on community representatives, the client has made every reasonable effort to verify that such persons do in fact represent the views of Affected Communities and that they can be relied upon to faithfully communicate the results of consultations to their constituents.	Compliant	Numerous public meetings were held to engage with the community during the permitting process.
	In cases where the exact location of the project is not known, but it is reasonably expected to have significant impacts on local communities, the client has prepared a Stakeholder Engagement Framework, as part of its management program, outlining general principles and a strategy to identify Affected Communities and other relevant stakeholders and plan for an engagement process compatible with this Performance Standard that will be implemented once the physical location of the project is known.	N/A	N/A
	Disclosure of Information		
	Disclosure of relevant project information helps Affected Communities and other stakeholders understand the risks, impacts and opportunities of the project.	Compliant	N/A
	The client has provided Affected Communities with access to relevant information on: (i) the purpose, nature, and scale of the project; (ii) the duration of proposed project activities; (iii) any risks to and potential impacts on such communities and relevant mitigation measures; (iv) the envisaged stakeholder engagement process; and (v) the grievance mechanism.	Compliant	N/A

⁶ Bioinsight (2020). Noblesfontein Wind Farm Facility Operational phase Bird Monitoring – Final Bird Monitoring Report – Fifth year of Operation.

⁷ Bioinsight (2020). Noblesfontein Wind Farm Facility Operational phase Bat Monitoring – Final Bat Monitoring Report – Fifth year of Operation.

⁸ EIMS (2020). Noblesfontein Wind Farm Facility NEMA Environmental Audit Report.

	Consultation		
	When Affected Communities are subject to identified risks and adverse impacts from a project, the client has undertaken a process of consultation in a manner that provides the Affected Communities with opportunities to express their views on project risks, impacts and mitigation measures, and allows the client to consider and respond to them.	Compliant	N/A
	The extent and degree of engagement required by the consultation process is commensurate with the project's risks and adverse impacts and with the concerns raised by the Affected Communities.	Compliant	N/A
	The client has tailored its consultation process to the language preferences of the Affected Communities, their decision-making process, and the needs of disadvantaged or vulnerable groups.	Compliant	N/A
	Informed Consultation and Participation		
	For projects with potentially significant adverse impacts on Affected Communities, the client has conducted an Informed Consultation and Participation (ICP) process. ICP involves a more in-depth exchange of views and information, and an organized and iterative consultation, leading to the client's incorporating into their decision-making process the views of the Affected Communities on matters that affect them directly, such as the proposed mitigation measures, the sharing of development benefits and opportunities, and implementation issues.	N/A	N/A
	The consultation process (i) captures both men's and women's views, if necessary, through separate forums or engagements, and (ii) reflects men's and women's different concerns and priorities about impacts, mitigation mechanisms, and benefits, where appropriate.	N/A	N/A
	The client has documented the process, in particular the measures taken to avoid or minimize risks to and adverse impacts on the Affected Communities and has informed those affected about how their concerns have been considered.	N/A	N/A
	Indigenous Peoples		
	For projects with adverse impacts to Indigenous Peoples, the client has engaged them in a process of ICP and has obtained their Free, Prior, and Informed Consent (FPIC)	N/A	N/A
	Private Sector Responsibilities Under Government-Led Stakeholder Engagement		N/A
	Where stakeholder engagement is the responsibility of the host government, the client will collaborate with the responsible government agency, to the extent permitted by the agency, to achieve outcomes that are consistent with the objectives of this Performance Standard.	N/A	N/A

	External Communications and Grievance Mechanisms		
	External Communications		
	A procedure for external communications has been implemented and maintained that includes methods to (i) receive and register external communications from the public; (ii) screen and assess the issues raised and determine how to address them; (iii) provide, track, and document responses, if any; and (iv) adjust the management program, as appropriate.	Compliant	There is a grievance mechanism in place ⁹ .
	Grievance Mechanisms for Affected Communities		
	Where there are Affected Communities, the client has established a grievance mechanism to receive and facilitate resolution of Affected Communities' concerns and grievances about the client's environmental and social performance.	Compliant	N/A
	The mechanism does not impede access to judicial or administrative remedies.	Compliant	N/A
	The client has informed the Affected Communities about the mechanism in the course of the stakeholder engagement process.	Compliant	N/A
	Ongoing Reporting to Affected Communities		
	The client provides periodic reports to the Affected Communities that describe progress with implementation of the project Action Plans on issues that involve ongoing risk to or impacts on Affected Communities and on issues that the consultation process or grievance mechanism have identified as a concern to those Communities.	Compliant	All relevant project documentation and reporting is available to affected communities, specifically where risks or adverse impacts are observed.
	If the management program results in material changes in or additions to the mitigation measures or actions described in the Action Plans on issues of concern to the Affected Communities, the updated relevant mitigation measures or actions are communicated to them.	Compliant	N/A
	The frequency of these reports is proportionate to the concerns of Affected Communities but not less than annually.	Compliant	N/A

⁹ Tony Barbour (2012) *Grievance Mechanism/Process*

9.2.2 Performance Standard 2: Labour and Working Conditions

PS 2	Labour and Working Conditions	COMPLIANCE	COMMENTS
	Working Conditions and Management of Worker Relationship		
	Human Resources Policies and Procedures		
	The client has adopted and implemented human resources policies and procedures appropriate to its size and workforce that set out its approach to managing workers consistent with the requirements of this Performance Standard and national law.	Compliant	The organisation is compliant with relevant labour relations and human resource management regulations.
	The client has provided workers with documented information that is clear and understandable, regarding their rights under national labour and employment law and any applicable collective agreements, including their rights related to hours of work, wages, overtime, compensation, and benefits upon beginning the working relationship and when any material changes occur.	Compliant	N/A
	Working Conditions and Terms of Employment		
	Where the client is a party to a collective bargaining agreement with a workers' organization, such agreement has been respected. Where such agreements do not exist, or do not address working conditions and terms of employment, the client has provided reasonable working conditions and terms of employment.	Compliant	N/A
	The client has identified migrant workers and has ensured that they are engaged on substantially equivalent terms and conditions to non-migrant workers carrying out similar work.	Compliant	N/A
	Where accommodation services are provided to workers covered by the scope of this Performance Standard, the client has put in place and implemented policies on the quality and management of the accommodation and provision of basic services.	Compliant	N/A
	The accommodation services were provided in a manner consistent with the principles of non-discrimination and equal opportunity. Workers' accommodation arrangements did not restrict workers' freedom of movement or of association.	Compliant	N/A
	Workers' Organisations		
	In countries where national law recognizes workers' rights to form and to join workers' organizations of their choosing without interference and to bargain collectively, the client has complied with national law.	Compliant	N/A
	Where national law substantially restricts workers' organizations, the client has not restricted workers from developing alternative mechanisms to express their grievances and protect their rights regarding working conditions and terms of employment. The client did not seek to influence or control these mechanisms.	Compliant	N/A
	Where applicable, the client has engaged with such workers' representatives and workers' organizations and	Compliant	N/A

	provided them with information needed for meaningful negotiation in a timely manner.		
	Non-Discrimination and Equal Opportunity		
	The client has not made employment decisions on the basis of personal characteristics unrelated to inherent job requirements. The client has based the employment relationship on the principle of equal opportunity and fair treatment, and has not discriminated with respect to any aspects of the employment relationship, such as recruitment and hiring, compensation (including wages and benefits), working conditions and terms of employment, access to training, job assignment, promotion, termination of employment or retirement, and disciplinary practices.	Compliant	N/A
	The client has taken measures to prevent and address harassment, intimidation, and/or exploitation, especially regarding women.	Compliant	N/A
	In countries where national law provides for non-discrimination in employment, the client has complied with national law. When national laws are silent on non-discrimination in employment, the client has met this Performance Standard.	Compliant	N/A
	Retrenchment		
	Prior to implementing any collective dismissals, the client has carried out an analysis of alternatives to retrenchment. If the analysis does not identify viable alternatives to retrenchment, a retrenchment plan has been developed and implemented to reduce the adverse impacts of retrenchment on workers. The client has complied with all legal and contractual requirements related to notification of public authorities, and provision of information to, and consultation with workers and their organizations.	Compliant	N/A
	The client has ensured that all workers receive notice of dismissal and severance payments mandated by law and collective agreements in a timely manner.	Compliant	N/A
	Grievance Mechanism		
	The client has provided a grievance mechanism for workers (and their organizations, where they exist) to raise workplace concerns. The client has informed the workers of the grievance mechanism at the time of recruitment and make it easily accessible to them.	Compliant	N/A
	The mechanism involves an appropriate level of management and addresses concerns promptly, using an understandable and transparent process that provides timely feedback to those concerned, without any retribution. The mechanism does not impede access to other judicial or administrative remedies that might be available under the law or through existing arbitration procedures, or substitute for grievance mechanisms provided through collective agreements.	Compliant	The grievance mechanism ¹⁰ in place is compliant with the requirements.
	Protecting the Work Force		
	Child Labour		

¹⁰ Tony Barbour (2012) *Grievance Mechanism/Process*

	The client has not employed children in any manner that is economically exploitative or is likely to be hazardous or to interfere with the child's education, or to be harmful to the child's health or physical, mental, spiritual, moral, or social development.	Compliant	N/A
	The client has identified the presence of all persons under the age of 18. Where national laws have provisions for the employment of minors, the client has followed those laws applicable to the client.	Compliant	N/A
	Forced Labour		
	The client has not employed forced labour, which consists of any work or service not voluntarily performed that is exacted from an individual under threat of force or penalty.	Compliant	N/A
	Occupational Health and Safety		
	The client has provided a safe and healthy work environment, taking into account inherent risks in its particular sector and specific classes of hazards in the client's work areas, including physical, chemical, biological, and radiological hazards, and specific threats to women.	Compliant	N/A
	The client has taken steps to prevent accidents, injury, and disease arising from, associated with, or occurring in the course of work by minimizing, as far as reasonably practicable, the causes of hazards.	Compliant	N/A
	Workers Engaged by Third Parties		
	With respect to contracted workers, the client has taken commercially reasonable efforts to ascertain that the third parties who engage these workers are reputable and legitimate enterprises and have an appropriate ESMS that will allow them to operate in a manner consistent with the requirements of this Performance Standard.	Compliant	The policies and regulations relating to subcontracted personnel are compliant.
	The client has established policies and procedures for managing and monitoring the performance of such third party employers in relation to the requirements of this Performance Standard. In addition, the client has used commercially reasonable efforts to incorporate these requirements in contractual agreements with such third party employers.	Compliant	N/A
	The client has ensured that contracted workers have access to a grievance mechanism. In cases where the third party is not able to provide a grievance mechanism the client has extended its own grievance mechanism to serve workers engaged by the third party.	Compliant	N/A
	Supply Chain		
	Where there is a high risk of child labour or forced labour in the primary supply chain, the client has identified those risks. If child labour or forced labour cases are identified, the client has taken appropriate steps to remedy them.	Compliant	N/A
	The client monitors its primary supply chain on an ongoing basis in order to identify any significant changes.	Compliant	N/A
	Additionally, where there is a high risk of significant safety issues related to supply chain workers, the client has introduced procedures and mitigation measures to ensure	Compliant	N/A

	that primary suppliers within the supply chain are taking steps to prevent or to correct life-threatening situations.		
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9.2.3 Performance Standard 3: Resource Efficiency and Pollution Prevention

PS 3	Resource Efficiency and Pollution Prevention	COMPLIANCE	COMMENTS
	During the project life-cycle, the client has considered ambient conditions and applied technically and financially feasible resource efficiency and pollution prevention principles and techniques that are best suited to avoid, or where avoidance is not possible, minimize adverse impacts on human health and the environment.	Compliant	N/A
	The client has referred to the EHS Guidelines or other internationally recognized sources, as appropriate, when evaluating and selecting resource efficiency and pollution prevention and control techniques for the project.	Compliant	N/A
	Resource Efficiency		
	The client has implemented technically and financially feasible and cost-effective measures for improving efficiency in its consumption of energy, water, as well as other resources and material inputs, with a focus on areas that are considered core business activities. Such measures integrate the principles of cleaner production into product design and production processes with the objective of conserving raw materials, energy, and water.	Compliant	Use of LED lights, water meters and rainwater tanks on site (Appendix C, Photo 1).
	Where benchmarking data are available, the client has made a comparison to establish the relative level of efficiency.	Non - Compliant	Although reference is made in the EMPr to avoiding inefficient use of resources when generating waste, neither the EIA nor EMPr has established the project's relative level of operational resource efficiency against best practice guidelines, which is a requirement here. The client must also take cognisance of the national policies and EHS guidelines (as governed by IFC Performance Standards). In January 2020 TMG suggested the use of The Energy and Water Performance Tool which is the national standard for water and energy benchmarking in South Africa. The Client reviewed this tool but did not find it applicable to their Wind Facility. The Client is currently looking for an alternative tool.

	Greenhouse Gases		
	The client has considered alternatives and implemented technically and financially feasible and cost-effective options to reduce project-related GHG emissions during the design and operation of the project.	N/A	N/A
	For projects that are expected to or currently produce more than 25,000 tonnes of CO ₂ -equivalent annually, the client has quantified direct emissions from the facilities owned or controlled within the physical project boundary, as well as indirect emissions associated with the off-site production of energy used by the project.	N/A	N/A
	Quantification of GHG emissions is conducted by the client annually in accordance with internationally recognized methodologies and good practice.	N/A	N/A
	Water Consumption		
	When the project is a potentially significant consumer of water, in addition to applying the resource efficiency requirements of this Performance Standard, the client has adopted measures that avoid or reduce water usage so that the project's water consumption does not have significant adverse impacts on others.	Compliant	Although the project is not deemed to be a significant water consumer, the EMPr addresses water conservation measures and water meters and rainwater tanks have been installed.
	Pollution Prevention		
	The client has avoided the release of pollutants or, when avoidance is not feasible, minimized and/or controlled the intensity and mass flow of their release. This applies to the release of pollutants to air, water, and land due to routine, non-routine, and accidental circumstances with the potential for local, regional, and transboundary impacts.	Compliant	N/A
	Where historical pollution such as land or ground water contamination exists, the client has to determined whether it is responsible for mitigation measures. If it is determined that the client is legally responsible, then these liabilities have been resolved in accordance with national law, or where this is silent, with GIIP.	N/A	N/A
	To address potential adverse project impacts on existing ambient conditions, the client has considered relevant factors, including (i) existing ambient conditions; (ii) the finite assimilative capacity of the environment; (iii) existing and future land use; (iv) the project's proximity to areas of importance to biodiversity; and (v) the potential for cumulative impacts with uncertain and/or irreversible consequences.	Compliant	N/A
	When the project has the potential to constitute a significant source of emissions in an already degraded area, the client has considered additional strategies and adopted measures that avoid or reduce negative effects.	N/A	N/A
	Wastes		

	The client has avoided the generation of hazardous and non-hazardous waste materials. Where waste generation cannot be avoided, the client has reduced the generation of waste, and recovered and reused waste in a manner that is safe for human health and the environment. Where waste cannot be recovered or reused, the client has treated, destroyed, or disposed of it in an environmentally sound manner that includes the appropriate control of emissions and residues resulting from the handling and processing of the waste material.	Compliant	Collection and disposal of waste is managed by EnviroServ.
	If the generated waste is considered hazardous, the client has adopted GIIP alternatives for its environmentally sound disposal while adhering to the limitations applicable to its transboundary movement. When hazardous waste disposal is conducted by third parties, the client has used contractors that are reputable and legitimate enterprises licensed by the relevant government regulatory agencies and obtained chain of custody documentation to the final destination.	Compliant	Collection and disposal of waste is managed by EnviroServ.
	The client has ascertained whether licensed disposal sites are being operated to acceptable standards and where they are, the client has used these sites. Where this is not the case, clients have reduced waste sent to such sites and considered alternative disposal options, including the possibility of developing their own recovery or disposal facilities at the project site.	Compliant	N/A
	<i>Hazardous Materials Management</i>		
	The client has avoided or, when avoidance is not possible, minimized and controlled the release of hazardous materials. The client has considered less hazardous substitutes where hazardous materials are intended to be used in manufacturing processes or other operations. The client has avoided the manufacture, trade, and use of chemicals and hazardous materials subject to international bans or phase-outs due to their high toxicity to living organisms, environmental persistence, potential for bioaccumulation, or potential for depletion of the ozone layer.	Non-compliant	During the site visit on the 16 th of November 2021, a small hole was noted in the waste skip that may lead to leakage (Appendix C, Photo 2). Unsealed bins were observed in the waste skip (Appendix C, Photo 3).
	<i>Pesticide Use and Management</i>		
	The client has, where appropriate, formulated and implemented an integrated pest management (IPM) and/or integrated vector management (IVM) approach targeting economically significant pest infestations and disease vectors of public health significance. The client's IPM and IVM program integrate coordinated use of pest and environmental information along with available pest control methods, including cultural practices, biological, genetic, and, as a last resort, chemical means to prevent economically significant pest damage and/or disease transmission to humans and animals.	N/A	N/A

	When pest management activities include the use of chemical pesticides, the client has selected chemical pesticides that are low in human toxicity, that are known to be effective against the target species, and that have minimal effects on non-target species and the environment. When the client selected chemical pesticides, the selection was based upon requirements that the pesticides be packaged in safe containers, be clearly labeled for safe and proper use, and that the pesticides have been manufactured by an entity currently licensed by relevant regulatory agencies.	N/A	N/A
	The client has designed its pesticide application regime to (i) avoid damage to natural enemies of the target pest (ii) avoid the risks associated with the development of resistance in pests and vectors.	N/A	N/A
	Pesticides have been handled, stored, applied, and disposed of in accordance with the Food and Agriculture Organization's International Code of Conduct on the Distribution and Use of Pesticides or other GIIP.	N/A	N/A
	The client has not purchased, stored, used, manufactured, or traded in products that fall in WHO Recommended Classification of Pesticides by Hazard Class Ia (extremely hazardous); or Ib (highly hazardous).	N/A	N/A
	The client has not purchased, stored, used, manufactured or traded in Class II (moderately hazardous) pesticides, unless the project has appropriate controls on manufacture, procurement, or distribution and/or use of these chemicals. These chemicals are not accessible to personnel without proper training, equipment, and facilities to handle, store, apply, and dispose of these products properly.	N/A	N/A

9.2.4 Performance Standard 4: Community Health, Safety and Security

PS 4	Community Health, Safety and Security	COMPLIANCE	COMMENTS
	Community Health and Safety		
	The client has evaluated the risks and impacts to the health and safety of the Affected Communities during the project life cycle and has established preventive and control measures consistent with good international industry practice (GIIP). The client has identified risks and impacts and proposed mitigation measures that are commensurate with their nature and magnitude. These measures favour the avoidance of risks and impacts over minimization.	Compliant	N/A
	Infrastructure and Equipment Design and Safety		
	The client has designed, constructed, operated, and decommissioned the structural elements or components of the project in accordance with GIIP, taking into consideration safety risks to third parties or Affected Communities.	Compliant	N/A

	When new buildings and structures will be accessed by members of the public, the client has considered incremental risks of the public's potential exposure to operational accidents and/or natural hazards and is consistent with the principles of universal access.	Compliant	N/A
	Structural elements have been designed and constructed by competent professionals and certified or approved by competent authorities or professionals.	Compliant	N/A
	When structural elements or components, such as dams, tailings dams, or ash ponds are situated in high-risk locations, and their failure or malfunction may threaten the safety of communities, the client has engaged one or more external experts with relevant and recognized experience in similar projects, separate from those responsible for the design and construction, to conduct a review as early as possible in project development and throughout the stages of project design, construction, operation, and decommissioning.	N/A	N/A
	For projects that operate moving equipment on public roads and other forms of infrastructure, the client has avoided the occurrence of incidents and injuries to members of the public associated with the operation of such equipment.	Compliant	N/A
	<i>Hazardous Materials Management and Safety</i>		
	The client has avoided or minimized the potential for community exposure to hazardous materials and substances that may be released by the project. Where there is a potential for the public (including workers and their families) to be exposed to hazards, particularly those that may be life-threatening, the client has exercised special care to avoid or minimize their exposure by modifying, substituting, or eliminating the condition or material causing the potential hazards.	Compliant	N/A
	<i>Ecosystem Services</i>		
	The client has identified the risks and potential impacts on priority ecosystem services. Adverse impacts have been avoided, and if these impacts are unavoidable, the client has implemented mitigation measures.	Compliant	N/A
	<i>Community Exposure to Disease</i>		
	The client has avoided or minimized the potential for community exposure to water-borne, water-based, water-related, and vector-borne diseases, and communicable diseases that could result from project activities, taking into consideration differentiated exposure to and higher sensitivity of vulnerable groups.	Compliant	N/A
	The client has avoided or minimized transmission of communicable diseases that may be associated with the influx of temporary or permanent project labour.	Compliant	N/A
	<i>Emergency Preparedness and Response</i>		

	In addition to the emergency preparedness and response requirements described in Performance Standard 1, the client has also assisted and collaborated with the Affected Communities, local government agencies, and other relevant parties, in their preparations to respond effectively to emergency situations, especially when their participation and collaboration are necessary to respond to such emergency situations.	N/A	The local government agencies have capacity to respond effectively to emergency situations.
	If local government agencies have little or no capacity to respond effectively, the client has played an active role in preparing for and responding to emergencies associated with the project. The client has documented its emergency preparedness and response activities, resources, and responsibilities, and disclosed appropriate information to Affected Communities, relevant government agencies, or other relevant parties.	N/A	The local government agencies have capacity to respond effectively to emergency situations.
	Security Personnel		
	When the client retains direct or contracted workers to provide security to safeguard its personnel and property, it has assessed risks posed by its security arrangements to those within and outside the project site. In making such arrangements, the client is guided by the principles of proportionality and good international practice in relation to hiring, rules of conduct, training, equipping, and monitoring of such workers, and by applicable law.	Compliant	N/A
	The client has made reasonable inquiries to ensure that those providing security are not implicated in past abuses; has trained them adequately in the use of force (and where applicable, firearms), and appropriate conduct toward workers and Affected Communities; and required them to act within the applicable law.	Compliant	N/A
	The client has provided a grievance mechanism for Affected Communities to express concerns about the security arrangements and acts of security personnel.	Compliant	N/A
	The client has assessed and documented risks arising from the project's use of government security personnel deployed to provide security services.	Compliant	N/A
	The client has considered and investigated all allegations of unlawful or abusive acts of security personnel, taken action (or urged appropriate parties to take action) to prevent recurrence, and reported unlawful and abusive acts to public authorities.	N/A	N/A

9.2.5 Performance Standard 5: Land Acquisition and Involuntary Resettlement

PS 5	Land Acquisition and Involuntary Resettlement	COMPLIANCE	COMMENTS
	General		
	<i>Project Design</i>		
	The client has considered feasible alternative project designs to avoid or minimize physical and/or economic displacement, while balancing environmental, social, and financial costs and benefits, paying particular attention to impacts on the poor and vulnerable.	Compliant	N/A
	<i>Compensation and Benefits for Displaced Persons</i>		
	When displacement cannot be avoided, the client has offered displaced communities and persons compensation for loss of assets at full replacement cost and other assistance to help them improve or restore their standards of living or livelihoods, as provided in this Performance Standard. Compensation standards are transparent and applied consistently to all communities and persons affected by the displacement.	N/A	N/A
	The client has taken possession of acquired land and related assets only after compensation has been made available and, where applicable, resettlement sites and moving allowances have been provided to the displaced persons in addition to compensation.	N/A	N/A
	The client has also provided opportunities to displaced communities and persons to derive appropriate development benefits from the project.	N/A	N/A
	<i>Community Engagement</i>		
	The client has engaged with Affected Communities, including host communities, through the process of stakeholder engagement.	Compliant	N/A
	Decision-making processes related to resettlement and livelihood restoration have included options and alternatives, where applicable. Disclosure of relevant information and participation of Affected Communities and persons has continued during the planning, implementation, monitoring, and evaluation of compensation payments, livelihood restoration activities, and resettlement to achieve outcomes that are consistent with the objectives of this Performance Standard.	Compliant	N/A
	<i>Grievance Mechanism</i>		
	The client has established a grievance mechanism consistent with Performance Standard 1 as early as possible in the project development phase.	Compliant	N/A
	<i>Resettlement and Livelihood Restoration Planning and Implementation</i>		

	Where involuntary resettlement is unavoidable, either as a result of a negotiated settlement or expropriation, a census has been carried out to collect appropriate socio-economic baseline data to identify the persons who will be displaced by the project, determine who will be eligible for compensation and assistance, and discourage ineligible persons, such as opportunistic settlers, from claiming benefits. In the absence of host government procedures, the client has established a cut-off date for eligibility. Information regarding the cut-off date has been well documented and disseminated throughout the project area.	N/A	N/A
	In cases where affected persons reject compensation offers that meet the requirements of this Performance Standard and, as a result, expropriation or other legal procedures are initiated, the client has explored opportunities to collaborate with the responsible government agency, and, if permitted by the agency, played an active role in resettlement planning, implementation, and monitoring.	N/A	N/A
	The client has established procedures to monitor and evaluate the implementation of a Resettlement Action Plan or Livelihood Restoration Plan and has taken corrective action as necessary. The extent of monitoring activities is commensurate with the project's risks and impacts.	N/A	N/A
	For projects with significant involuntary resettlement risks, the client has retained competent resettlement professionals to provide advice on compliance with this Performance Standard and to verify the client's monitoring information.	N/A	N/A
	Affected persons have been consulted during the monitoring process.	Compliant	N/A
	A completion audit of the Resettlement Action Plan or Livelihood Restoration Plan has been undertaken once all mitigation measures have been substantially completed and once displaced persons have been deemed to have been provided adequate opportunity and assistance to sustainably restore their livelihoods.	N/A	N/A
	The completion audit has been undertaken by competent resettlement professionals once the agreed monitoring period concluded. The completion audit includes, at a minimum, a review of the totality of mitigation measures implemented by the Client, a comparison of implementation outcomes against agreed objectives, and a conclusion as to whether the monitoring process can be ended.	N/A	N/A
	Where the exact nature or magnitude of the land acquisition or restrictions on land use related to a project with potential to cause physical and/or economic displacement is unknown due to the stage of project development, the client has developed a Resettlement and/or Livelihood Restoration Framework. Once the individual project components are defined and the necessary information becomes available, such a framework has been expanded into a specific Resettlement Action Plan or Livelihood Restoration Plan and procedures.	N/A	N/A
	Displacement		

	A census has established the status of any displaced persons affected by the project.	N/A	N/A
	Physical Displacement		
	In the case of physical displacement, the client has developed a Resettlement Action Plan that covers, at a minimum, the applicable requirements of this Performance Standard regardless of the number of people affected. This includes compensation at full replacement cost for land and other assets lost. The Plan has been designed to mitigate the negative impacts of displacement; identify development opportunities; develop a resettlement budget and schedule; and establish the entitlements of all categories of affected persons (including host communities).	N/A	N/A
	If people living in the project area are required to move to another location, the client has (i) offered displaced persons choices among feasible resettlement options, including adequate replacement housing or cash compensation where appropriate; and (ii) provided relocation assistance suited to the needs of each group of displaced persons.	N/A	N/A
	In the case of physically displaced persons, the client has offered the choice of replacement property of equal or higher value, security of tenure, equivalent or better characteristics, and advantages of location or cash compensation where appropriate. Compensation in kind should be considered in lieu of cash. Cash compensation levels should be sufficient to replace the lost land and other assets at full replacement cost in local markets	N/A	N/A
	Forced evictions have not been carried out, except in accordance with law and the requirements of this Performance Standard.	N/A	N/A
	Economic Displacement		
	In the case of projects involving economic displacement only, the client has developed a Livelihood Restoration Plan to compensate affected persons and/or communities and offer other assistance that meet the objectives of this Performance Standard. The Livelihood Restoration Plan establishes the entitlements of affected persons and/or communities and ensures that these are provided in a transparent, consistent, and equitable manner.	N/A	N/A
	Economically displaced persons who face loss of assets or access to assets have been compensated for such loss at full replacement cost.	N/A	N/A
	For persons whose livelihoods are land-based, replacement land that has a combination of productive potential, locational advantages, and other factors at least equivalent to that being lost has been offered as a matter of priority.	N/A	N/A

	For persons whose livelihoods are natural resource-based and where project-related restrictions on access apply, implementation of measures have been made to either allow continued access to affected resources or provide access to alternative resources with equivalent livelihood-earning potential and accessibility.	N/A	N/A
	If circumstances prevent the client from providing land or similar resources as described above, alternative income earning opportunities have been considered, such as credit facilities, training, cash, or employment opportunities.	N/A	N/A
	Transitional support has been provided as necessary to all economically displaced persons, based on a reasonable estimate of the time required to restore their income-earning capacity, production levels, and standards of living.	N/A	N/A
	Private Sector Responsibilities Under Government-Managed Resettlement		
	Where land acquisition and resettlement are the responsibility of the government, the client has collaborated with the responsible government agency, to the extent permitted by the agency, to achieve outcomes that are consistent with this Performance Standard. In addition, where government capacity is limited, the client has played an active role during resettlement planning, implementation, and monitoring, as described below.	N/A	N/A
	In the case of acquisition of land rights or access to land through compulsory means or negotiated settlements involving physical displacement, the client has identified and described government resettlement measures. If these measures do not meet the relevant requirements of this Performance Standard, the client has prepared a Supplemental Resettlement Plan that, together with the documents prepared by the responsible government agency, have addressed the relevant requirements of this Performance Standard.	N/A	N/A
	The client has included in its Supplemental Resettlement Plan, at a minimum (i) identification of affected people and impacts; (ii) a description of regulated activities, including the entitlements of displaced persons provided under applicable national laws and regulations; (iii) the supplemental measures to achieve the requirements of this Performance Standard in a way that is permitted by the responsible agency and implementation time schedule; and (iv) the financial and implementation responsibilities of the client in the execution of its Supplemental Resettlement Plan.	N/A	N/A
	In the case of projects involving economic displacement only, the client has identified and described the measures that the responsible government agency plans to use to compensate Affected Communities and persons. If these measures do not meet the relevant requirements of this Performance Standard, the client has developed an Environmental and Social Action Plan to complement government action.	N/A	N/A

9.2.6 Performance Standard 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources

PS 6	Biodiversity Conservation and Sustainable Management of Living Natural Resources	COMPLIANCE	COMMENTS
	General		
	The risks and impacts identification process as set out in Performance Standard 1 have considered direct and indirect project-related impacts on biodiversity and ecosystem services and have identified any significant residual impacts. This process has considered relevant threats to biodiversity and ecosystem services, especially focusing on habitat loss, degradation and fragmentation, invasive alien species, overexploitation, hydrological changes, nutrient loading, and pollution. It has also taken into account the differing values attached to biodiversity and ecosystem services by Affected Communities and, where appropriate, other stakeholders.	Compliant	The Scoping and EIA process encompass this identification and assessment of risks and impacts.
	As a matter of priority, the client has avoided impacts on biodiversity and ecosystem services. When avoidance of impacts is not possible, measures to minimize impacts and restore biodiversity and ecosystem services have been implemented.	Compliant	N/A
	Given the complexity in predicting project impacts on biodiversity and ecosystem services over the long term, the client has adopted a practice of adaptive management in which the implementation of mitigation and management measures are responsive to changing conditions and the results of monitoring throughout the project's lifecycle.	Compliant	N/A
	The client has retained competent professionals to assist in conducting the risks and impacts identification process and to assist in the development of a mitigation hierarchy.	Compliant	N/A
	Protection and Conservation of Biodiversity		
	Modified Habitat		N/A
	The client has minimized impacts on modified habitat that include significant biodiversity and has implemented mitigation measures as appropriate.	Compliant	N/A
	Natural Habitat		N/A
	The client has not significantly converted or degraded natural habitats, unless all of the following are demonstrated: - No other viable alternatives within the region exist for development of the project on modified habitat; - Consultation has established the views of stakeholders, including Affected Communities, with respect to the extent of conversion and degradation; and - Any conversion or degradation is mitigated according to the mitigation hierarchy.	Compliant	N/A
	In areas of natural habitat, mitigation measures have been designed to achieve no net loss of biodiversity where feasible (such as biodiversity offsets, Restoring habitats during operations and/or after operations).	Compliant	N/A

	Critical Habitat		
	In areas of critical habitat, a robust, appropriately designed, and long-term biodiversity monitoring and evaluation program has been integrated into the client's management program.	N/A	N/A
	The project does not lead to measurable adverse impacts on those biodiversity values for which the critical habitat was designated, and on the ecological processes supporting those biodiversity values.	N/A	N/A
	The project's mitigation strategy is described in a Biodiversity Action Plan and has been designed to achieve net gains of those biodiversity values for which the critical habitat was designated.	N/A	N/A
	Legally Protected and Internationally Recognised Areas		
	The client has acted in a manner consistent with any government recognized management plans for such areas.	N/A	N/A
	The client has Implemented additional programs, as appropriate, to promote and enhance the conservation aims and effective management of the area.	N/A	N/A
	The client has demonstrated that the proposed development in such areas is legally permitted.	N/A	N/A
	Invasive Alien Species		
	The client has not intentionally introduced any new alien species (not currently established in the country or region of the project) unless this is carried out in accordance with the existing regulatory framework for such introduction.	Compliant	N/A
	The client has not deliberately introduced any alien species with a high risk of invasive behaviour regardless of whether such introductions are permitted under the existing regulatory framework.	Compliant	N/A
	All introductions of alien species have been subject to a risk assessment (as part of the client's environmental and social risks and impacts identification process) to determine the potential for invasive behaviour. The client has implemented measures to avoid the potential for accidental or unintended introductions including the transportation of substrates and vectors (such as soil, ballast, and plant materials) that may harbour alien species.	Compliant	Measures to avoid unintended or accidental introduction of alien species were implemented for the construction phase of the project, in accordance with the EMPr
	Where alien species are already established in the country or region of the proposed project, the client has exercised diligence in not spreading them into areas in which they have not already been established. As practicable, the client has taken measures to eradicate such species from the natural habitats over which they have management control.	Compliant	An Alien Invasive Management Plan is currently implemented on site and rehabilitation zones for propagation of indigenous plants have been established on site. Rehabilitation has progressed well, with much of the areas covered with a healthy layer of indigenous vegetation (Appendix C, Photo 4).
	Management of Ecosystem Services		
	Where a project is likely to adversely impact ecosystem services, as determined by the risks and impacts	Compliant	N/A

	identification process, the client has conducted a systematic review to identify priority ecosystem services.		
	When Affected Communities are likely to be impacted, they have participated in the determination of priority ecosystem services in accordance with the stakeholder engagement process as defined in Performance Standard 1.	N/A	N/A
	With respect to impacts on priority ecosystem services of relevance to Affected Communities and where the client has direct management control or significant influence over such ecosystem services, adverse impacts have been avoided. If these impacts are unavoidable, the client has minimized them and implemented mitigation measures that aim to maintain the value and functionality of priority services.	N/A	N/A
	With respect to impacts on priority ecosystem services on which the project depends, clients have minimized impacts on ecosystem services and implemented measures that increase resource efficiency of their operations, as described in Performance Standard 3.	Compliant	N/A
	Sustainable Management of Living Natural Resources		
	Where feasible, the client has located land-based agribusiness and forestry projects on unforested land or land already converted.	N/A	N/A
	Clients who are engaged in such industries manage living natural resources in a sustainable manner, through the application of industry-specific good management practices and available technologies. Where such primary production practices are codified in globally, regionally, or nationally recognized standards, the client has implemented sustainable management practices to one or more relevant and credible standards as demonstrated by independent verification or certification.	N/A	N/A
	Where relevant and credible standard(s) exist, but the client has not yet obtained independent verification or certification to such standard(s), the client has conducted a pre-assessment of its conformity to the applicable standard(s) and taken actions to achieve such verification or certification over an appropriate period of time.	N/A	N/A
	In the absence of a relevant and credible global, regional, or national standard for the particular living natural resource in the country concerned, the client has: <ul style="list-style-type: none"> - Committed to applying good international industry operating principles, management practices, and technologies; and - Actively engaged and supported the development of a national standard, where relevant, including studies that contribute to the definition and demonstration of sustainable practices. 	N/A	N/A
	Supply Chain		

	Where a client is purchasing primary production (especially but not exclusively food and fibre commodities) that is known to be produced in regions where there is a risk of significant conversion of natural and/or critical habitats, systems and verification practices have been adopted as part of the client's ESMS to evaluate its primary suppliers.	N/A	N/A
	The systems and verification practices (i) identify where the supply is coming from and the habitat type of this area; (ii) provide for an ongoing review of the client's primary supply chains; (iii) limit procurement to those suppliers that can demonstrate that they are not contributing to significant conversion of natural and/or critical habitats (this may be demonstrated by delivery of certified product, or progress towards verification or certification under a credible scheme in certain commodities and/or locations); and (iv) where possible, require actions to shift the client's primary supply chain over time to suppliers that can demonstrate that they are not significantly adversely impacting these areas. The ability of the client to fully address these risks will depend upon the client's level of management control or influence over its primary suppliers.	N/A	N/A

9.2.7 Performance Standard 7: Indigenous Peoples

PS 7	Indigenous Peoples	COMPLIANCE	COMMENTS
	General		
	<i>Avoidance of Adverse Impacts</i>		
	The client has identified, through an environmental and social risks and impacts assessment process, all communities of Indigenous Peoples within the project area of influence who may be affected by the project, as well as the nature and degree of the expected direct and indirect economic, social, cultural (including cultural heritage), and environmental impacts on them.	Compliant	N/A
	Adverse impacts on Affected Communities of Indigenous Peoples have been avoided where possible. Where alternatives have been explored and adverse impacts are unavoidable, the client has minimized, restored, and/or compensated for these impacts in a culturally appropriate manner commensurate with the nature and scale of such impacts and the vulnerability of the Affected Communities of Indigenous Peoples.	N/A	N/A
	The client's proposed actions have been developed with the ICP of the Affected Communities of Indigenous Peoples and contained in a time-bound plan, such as an Indigenous Peoples Plan, or a broader community development plan with separate components for Indigenous Peoples.	N/A	N/A
	<i>Participation and Consent</i>		

	The client has undertaken an engagement process with the Affected Communities of Indigenous Peoples as required in Performance Standard 1. This engagement process includes stakeholder analysis and engagement planning, disclosure of information, consultation, and participation, in a culturally appropriate manner. In addition, this process: - Involved Indigenous Peoples' representative bodies and organizations (e.g., councils of elders or village councils), as well as members of the Affected Communities of Indigenous Peoples; and - Provided sufficient time for Indigenous Peoples' decision-making processes.	N/A	N/A
	The client has documented: (i) the mutually accepted process between the client and Affected Communities of Indigenous Peoples, and (ii) evidence of agreement between the parties as the outcome of the negotiations	N/A	N/A
	Circumstances Requiring Free, Prior, and Informed Consent		
	Impacts on Lands and Natural Resources Subject to Traditional Ownership or Under Customary Use		N/A
	The client has identified and reviewed all property interests and traditional resource uses prior to purchasing or leasing land, including: - Assess and document the Affected Communities of Indigenous Peoples' resource use without prejudicing any Indigenous Peoples' land claim. The assessment of land and natural resource use should be gender inclusive and specifically consider women's role in the management and use of these resources; - Ensure that Affected Communities of Indigenous Peoples are informed of their land rights under national law, including any national law recognizing customary use rights; and - Offer Affected Communities of Indigenous Peoples compensation and due process in the case of commercial development of their land and natural resources, together with culturally appropriate sustainable development opportunities,	N/A	N/A
	Relocation of Indigenous Peoples from Lands and Natural Resources Subject to Traditional Ownership or Under Customary Use		
	The client has considered feasible alternative project designs to avoid the relocation of Indigenous Peoples from communally held lands and natural resources subject to traditional ownership or under customary use.	N/A	N/A
	Any relocation of Indigenous Peoples is consistent with the requirements of Performance Standard 5. Where feasible, the relocated Indigenous Peoples should be able to return to their traditional or customary lands, should the cause of their relocation cease to exist.	N/A	N/A
	Critical Cultural Heritage		
	Where a project may significantly impact on critical cultural heritage that is essential to the identity and/or cultural,	N/A	N/A

	ceremonial, or spiritual aspects of Indigenous Peoples lives, priority has been given to the avoidance of such impacts.		
	Where significant project impacts on critical cultural heritage are unavoidable, the client has obtained the FPIC of the Affected Communities of Indigenous Peoples.	N/A	N/A
	Mitigation and Development Benefits		
	The client and the Affected Communities of Indigenous Peoples have identified mitigation measures in alignment with the mitigation hierarchy described in Performance Standard 1 as well as opportunities for culturally appropriate and sustainable development benefits. The client has ensured the timely and equitable delivery of agreed measures to the Affected Communities of Indigenous Peoples.	N/A	N/A
	The determination, delivery, and distribution of compensation and other benefit sharing measures to the Affected Communities of Indigenous Peoples takes account of the laws, institutions, and customs of these communities as well as their level of interaction with mainstream society.	N/A	N/A
	Identified opportunities aim to address the goals and preferences of the Indigenous Peoples including improving their standard of living and livelihoods in a culturally appropriate manner, and to foster the long-term sustainability of the natural resources on which they depend.	N/A	N/A
	Private Sector Responsibilities Where Government is Responsible for Managing Indigenous Peoples Issues		
	Where the government has a defined role in the management of Indigenous Peoples issues in relation to the project, the client has collaborated with the responsible government agency, to the extent feasible and permitted by the agency, to achieve outcomes that are consistent with the objectives of this Performance Standard. Where government capacity is limited, the client played an active role during planning, implementation, and monitoring of activities to the extent permitted by the agency.	N/A	N/A
	The client has prepared a plan that, together with the documents prepared by the responsible government agency, address the relevant requirements of this Performance Standard. The client may need to include (i) the plan, implementation, and documentation of the process of ICP and engagement and FPIC where relevant; (ii) a description of the government-provided entitlements of affected Indigenous Peoples; (iii) the measures proposed to bridge any gaps between such entitlements, and the requirements of this Performance Standard; (iv) the financial and implementation responsibilities of the government agency and/or the client.	N/A	N/A

9.2.8 Performance Standard 8: Cultural Heritage

PS 8	Cultural Heritage	COMPLIANCE	COMMENTS
	Protection of Cultural Heritage in Project Design and Execution		
	In addition to complying with applicable law on the protection of cultural heritage, including national law implementing the host country's obligations under the Convention Concerning the Protection of the World Cultural and Natural Heritage, the client has identified and protected cultural heritage by ensuring that internationally recognized practices for the protection, field-based study, and documentation of cultural heritage have been implemented.	Compliant	N/A
	Where the risk and identification process determines that there is a chance of impacts to cultural heritage, the client has retained competent professionals to assist in the identification and protection of cultural heritage.	Compliant	N/A
	Chance Find Procedures		
	The environmental and social risks and impacts identification process has determined whether the proposed location of a project is in areas where cultural heritage is expected to be found, either during construction or operations.	Compliant	N/A
	The client has developed provisions for managing chance finds through a chance find procedure, as part of the ESMS, which has been applied in the event that cultural heritage is subsequently discovered.	Compliant	N/A
	The client did not disturb any chance find further until an assessment by competent professionals was made and actions consistent with the requirements of this Performance Standard were identified.	Compliant	N/A
	Consultation		
	Where a project may affect cultural heritage, the client has consulted with Affected Communities within the host country who use, or have used within living memory, the cultural heritage for long-standing cultural purposes.	Compliant	N/A
	The client has consulted with the Affected Communities to identify cultural heritage of importance, and to incorporate into the client's decision-making process the views of the Affected Communities on such cultural heritage. Consultation has also involved the relevant national or local regulatory agencies that are entrusted with the protection of cultural heritage.	Compliant	N/A
	Community Access		
	Where the client's project site contains cultural heritage or prevents access to previously accessible cultural heritage sites being used by, or that have been used by, Affected Communities within living memory for long-standing cultural purposes, the client has allowed continued access to the cultural site or has provided an alternative access route, subject to overriding health, safety, and security considerations.	Compliant	N/A

	Removal of Replicable Cultural Heritage		
	<p>Where the client has encountered tangible cultural heritage that is replicable and not critical, the client has applied mitigation measures that favour avoidance. Where avoidance is not feasible, the client has applied a mitigation hierarchy as follows:</p> <ul style="list-style-type: none"> - Minimize adverse impacts and implement restoration measures, in situ, that ensure maintenance of the value and functionality of the cultural heritage, including maintaining or restoring any ecosystem processes⁴ needed to support it; - Where restoration in situ is not possible, restore the functionality of the cultural heritage, in a different location, including the ecosystem processes needed to support it; - Only where minimization of adverse impacts and restoration to ensure maintenance of the value and functionality of the cultural heritage are demonstrably not feasible, and where the Affected Communities are using the tangible cultural heritage for long-standing cultural purposes, compensate for loss of that tangible cultural heritage. 	Compliant	N/A
	Removal of Non-Replicable Cultural Heritage		
	<p>The client has not removed any nonreplicable cultural heritage, unless all of the following conditions have been met:</p> <ul style="list-style-type: none"> - There are no technically or financially feasible alternatives to removal; - The overall benefits of the project conclusively outweigh the anticipated cultural heritage loss from removal; and - Any removal of cultural heritage is conducted using the best available technique. 	Compliant	N/A
	Critical Cultural Heritage		
	The client has not removed, significantly altered, or damaged critical cultural heritage.	Compliant	N/A
	In exceptional circumstances when impacts on critical cultural heritage are unavoidable, the client has used a process of Informed Consultation and Participation (ICP) of the Affected Communities as described in Performance Standard 1 and which uses a good faith negotiation process that results in a documented outcome. The client has retained external experts to assist in the assessment and protection of critical cultural heritage.	N/A	N/A
	<p>In circumstances where a proposed project is located within a legally protected area or a legally defined buffer zone, the client has met the following requirements:</p> <ul style="list-style-type: none"> - Complied with defined national or local cultural heritage regulations or the protected area management plans; - Consulted the protected area sponsors and managers, local communities and other key stakeholders on the proposed project; and - Implemented additional programs, as appropriate, to promote and enhance the conservation aims of the protected area. 	N/A	N/A
	Project's Use of Cultural Heritage		

	Where a project proposes to use the cultural heritage, including knowledge, innovations, or practices of local communities for commercial purposes, the client has informed these communities of (i) their rights under national law; (ii) the scope and nature of the proposed commercial development; (iii) the potential consequences of such development.	N/A	N/A
	Where a project proposes to use the cultural heritage, including knowledge, innovations, or practices of local communities for commercial purposes, the client has (i) entered into a process of ICP as described in Performance Standard 1 and which uses a good faith negotiation process that results in a documented outcome and (ii) provided for fair and equitable sharing of benefits from commercialization of such knowledge, innovation, or practice, consistent with their customs and traditions.	N/A	N/A

9.3 COMPLIANCE WITH THE WORLD BANK GROUP GENERAL ENVIRONMENTAL HEALTH AND SAFETY GUIDELINES

The EHS Guidelines (World Bank Group, 2007) are technical reference documents with general and industry specific (i.e. mining) examples of Good International Industry Practice (GIIP). Reference to the EHS guidelines is required under IFC PS 3.

The EHS Guidelines contain the performance levels and measures normally acceptable to the IFC and are generally considered to be achievable in new facilities at reasonable cost. When host country regulations differ from the levels and measures presented in the EHS Guidelines, Projects are expected to achieve whichever standard is more stringent.

9.3.1 Theme 1: Environment

Theme 1	Environment	COMPLIANCE	COMMENTS
	Air Emissions and Ambient Air Quality	Compliant	N/A
	Energy Conservation	Compliant	N/A
	Wastewater and Ambient Water Quality	Compliant	N/A
	Water Conservation	Compliant	N/A
	Hazardous Materials Management	Compliant	N/A
	Waste Management	Compliant	N/A
	Noise	Compliant	N/A
	Contaminated Land	Compliant	N/A

9.3.2 Theme 2: Occupational Health and Safety

Theme 2	Occupational Health and Safety	COMPLIANCE	COMMENTS
	General Facility Design and Operation	Compliant	N/A
	Communication and Training	Compliant	N/A
	Physical Hazards	Compliant	N/A
	Chemical Hazards	Compliant	N/A
	Radiological Hazards	N/A	N/A
	Personal Protective Equipment	Compliant	N/A
	Special Hazard Environments	Compliant	N/A
	Monitoring	Compliant	N/A

9.3.3 Theme 3: Community Health and Safety

Theme 3	Community Health and Safety	COMPLIANCE	COMMENTS
	Water Quality and Availability	Compliant	N/A
	Structural Safety of Project Infrastructure	Compliant	N/A
	Life and Fire Safety	Compliant	N/A
	Traffic Safety	Compliant	N/A
	Transport of Hazardous Material	Compliant	N/A
	Disease Prevention	Compliant	N/A

	Emergency Preparedness and Response	Compliant	There is an established incident and accident reporting protocol as well as fire prevention measures implemented on site. Additionally, there is the Nobelsfontein Emergency Plan (available on-site). These plans and procedures are compliant with the guidelines insofar as these guidelines are appropriate/applicable to the scale and type of this project.
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9.3.4 Theme 4: Construction and Decommissioning

Theme 4	Construction and Decommissioning	COMPLIANCE	COMMENTS
	Environment	Compliant	N/A
	Occupational Health and Safety	Compliant	N/A
	Community Health and Safety	Compliant	N/A

9.4 COMPLIANCE WITH THE WORLD BANK GROUP INDUSTRY SECTOR GUIDELINES FOR WIND POWER

These industry sector EHS guidelines are designed to be used together with the General EHS Guidelines, which provide guidance to users on common EHS issues potentially applicable to all industry sectors. For complex projects, use of multiple industry-sector guidelines may be necessary. For the Nobelsfontein Wind Farm, only the EHS Guidelines for Wind Power are pertinent.

The EHS Guidelines for Wind Power include information relevant to environmental, health, and safety aspects of onshore and offshore wind energy facilities. They should be applied to wind energy facilities from the earliest feasibility assessments, as well as the environmental impact assessment stage, and continue to be applied throughout the construction and operational phases.

9.4.1 Theme 1: Environment

Theme 1	Environment	COMPLIANCE	COMMENTS
	Landscape, Seascape and Visual Impacts		
	Consideration has been given to turbine layout, size and scale in relation to the surrounding landscape	Compliant	N/A
	Turbines are an appropriate distance from settlements, residential areas and other visual receptors	Compliant	N/A
	Community input has been incorporated into wind energy facility layout and siting	Compliant	N/A

	Erosion measures have been implemented	Partially Compliant	Although anti-erosion measures have been implemented and erosion has improved greatly since the previous audit, some erosion was observed on the roadsides during the site audit conducted on the 16 th of November 2021, however the holder remediated the erosion and evidence were provided to the Auditor (Appendix C, Photos 5-7). To remain compliant with the NEMA, 2014 EIA Regulations (as amended), the EMPr is being amended to include a method statement (procedure) to assist in adequately addressing erosion prevention and management on the access and internal roads of the Wind Facility.
	Country-specific standards have been adhered to for marking turbines	Compliant	N/A
	The presence of ancillary structures is minimal and only essential site infrastructure is present	Compliant	N/A
	Stockpiling of excavated material and construction debris has been avoided	Compliant	N/A
	Turbines are of uniform size and design	Compliant	N/A

	Cleared land has been re-vegetated	Compliant	In accordance with the EMPr conditions NCC Environmental Services is to monitor the rehabilitation every 2 years after the first sowing. The Nobelsfontein Wind Farm, Vegetation Monitoring Report (compiled by NCC Environmental Services, October 2019) found vegetation rehabilitation to have achieved the required EMPr conditions stipulated. At the time of the site visit, there was significant progress in the rehabilitation process (Appendix C, Photo 8).
Noise			
	Construction noise is limited to an acceptable and safe standard	N/A	Construction phase completed.
	Receptors have been chosen according to their environmental sensitivity (human, livestock or wildlife)	Compliant	N/A

	The cumulative noise from all wind energy facilities in the vicinity has been monitored	Compliant	N/A
	Appropriate noise barriers have been constructed if necessary	N/A	N/A
	Biodiversity		
	The wind energy facility is located within a reasonable proximity from sites of high biodiversity value	Compliant	N/A
	Relevant conservation organisations and specialists have been consulted to inform site selection	Compliant	N/A
	The environmental impact report adequately considers site-specific issues (habitats, topography, location etc.)	Compliant	N/A
	The environmental impact report adequately considers season-specific issues (breeding and migration seasons etc.)	Compliant	Each specialist only conducted one site visit and so could not adequately monitor season-specific issues. However, quarterly environmental compliance monitoring was conducted on site during the construction and rehabilitation phases of the project and a bird and bat monitoring programmes were implemented for the operational phase, which serves to address seasonal issues.
	The environmental impact report adequately considers species-specific issues (endangered species, migration corridors, special conservation status etc.)	Compliant	N/A
	The number and size of turbines and their layout have been guided by site-, species- and season-specific risks and impacts	Compliant	N/A
	Curtailement and shut-down on-demand procedures have been considered as part of the mitigation strategy if the wind energy facility is located in close proximity to a high biodiversity area	Compliant	N/A
	Cavities in walls have been fixed or capped (potential bird/bat roosting sites)	Compliant	N/A
	There are no on-site waste disposal areas or landfills	Compliant	N/A
	"Free-wheeling" has been eliminated (free spinning of rotors under low wind conditions when turbines are not generating power)	Compliant	N/A
	Artificial light sources have been avoided (only red or white blinking or pulsing lights have been used)	Compliant	N/A
	On-site transmission lines have been buried	Partially compliant	The transmission lines have not been buried. Although the transmission lines are overshadowed by the wind turbine structures, The World Bank ¹¹ best practices include

¹¹ Environmental, Health and Safety Guidelines for Wind Energy, World Bank Group, August 2015

			minimising visual impacts by burying transmission lines.
	Bird flight diverters have been installed on transmission lines where birds of high biodiversity value are at risk of collision	Compliant	N/A
	"Raptor safe" designs have been implemented for power line poles where applicable	Compliant	N/A
	Consideration has been given to collision risks to birds and bats and the site for the wind energy facility has been chosen accordingly	Compliant	N/A
Shadow Flicker			
	Shadow flicker has been appropriately measured and monitored	Compliant	N/A
	Wind turbine sites have been chosen to ensure that neighbouring receptors receive no shadow flicker effects	Compliant	N/A
	Wind turbines have been programmed to shut down at times when shadow flicker limits are exceeded	N/A	N/A
	Wind turbines have been painted with a matt, non-reflective finish to reduce blade glint	Compliant	N/A

9.4.2 Theme 2: Occupational Health and Safety

Theme 2	Occupational Health and Safety	COMPLIANCE	COMMENTS
Working at Height and Protection from Falling Objects			
	The requirement to work at height has been eliminated or reduced	Compliant	N/A
	Where working at height cannot be eliminated, appropriate work equipment and methods have been used to prevent a fall from occurring	Compliant	N/A
	Guardrails and capture netting have been used when working at height is required	Compliant	N/A
	All structures are designed and built to the appropriate standards (e.g. IEC 61400) and have the appropriate means of working-at-height systems fitted	Compliant	N/A
	Suitable exclusion zones should be established and maintained underneath any working-at-height activities, where possible, to protect workers from falling objects	Compliant	N/A
	All employees working at height have been trained and are competent in the use of all working-at-height and rescue systems in place	Compliant	N/A
	Workers have been provided with a suitable work-positioning device and connectors on positioning systems are compatible with the tower components to which they are attached	Compliant	N/A
	Hoisting equipment has been properly rated and maintained and hoist operators are properly trained	Compliant	N/A
	Where possible, all tools and equipment have been fitted with a lanyard	Compliant	N/A
	Signs and other obstructions have been removed from poles or structures prior to undertaking work	Compliant	N/A
	An approved tool bag has been used for raising or lowering tools or materials to workers on elevated structures	Compliant	N/A
	Tower installation or maintenance work is not conducted during poor weather conditions and especially where there is a risk of lightning strikes	Compliant	N/A
	An emergency rescue plan is in place detailing the methods to be used to rescue operatives should they become stranded or incapacitated while at height	Compliant	The organisation has an emergency plan available.
Working Over Water			
	A risk assessment has been completed in order to develop a safe system of work for all working-over-water tasks and appropriate resources have been allocated to mitigate the hazards	N/A	N/A
	All operatives have been trained and are competent in all tasks they are expected to undertake and in using all equipment, including Personal Protective Equipment (PPE) they are expected to operate	N/A	N/A

	In addition to standard PPE, as noted above, use approved buoyancy equipment (e.g., life jackets, vests, floating lines, ring buoys) when workers are over, or adjacent to, water where there is a drowning hazard.	N/A	N/A
	Where exposure to low water temperatures is likely to lead to the onset of hypothermia, control measures such as survival suits have been implemented	N/A	N/A
	Buoyancy equipment is compatible with working-at-height fall-arrest equipment, where appropriate	N/A	N/A
	Workers have been trained to avoid salt spray and contact with waves	N/A	N/A
	Provision has been made for appropriate rescue vessels with qualified operators and emergency personnel, if required	N/A	N/A
Working in Remote Locations			
	Suitable communication is available for the work crew	Compliant	N/A
	A local emergency plan is in place	Compliant	There is an established incident and accident reporting protocol as well as fire prevention measures implemented on site. A valid emergency plan (October 2019) is in place on site.
	There are suitably qualified first aid-trained personnel in the work crew	Compliant	N/A
	There is a means for managers to track the exact location of the working crew	Compliant	N/A
	Supervision by competent personnel empowered to make decisions based on events and conditions at the work location has been ensured	Compliant	N/A
	The training and competence of personnel working remotely has been ensured and all necessary safety equipment has been provided in the location	Compliant	N/A
Lifting Operations			
	All lifting equipment (including load attachment points) is suitable, capable of supporting the load and in good condition	Compliant	N/A
	All supervisors, equipment operators, and slingers have been trained and are competent in the lifting equipment and intended lifting techniques	Compliant	N/A
	Where possible, exclusion zones have been established and maintained in order to prevent any unauthorized access to lifting areas	Compliant	N/A
	The safe operating parameters included in the heavy lifting equipment operating manual have not been exceeded at any time	Compliant	N/A

9.4.3 Theme 3: Community Health and Safety

Theme 3	Community Health and Safety	COMPLIANCE	COMMENTS
	Blade/Ice Throw		
	Turbines have been sited at an acceptable distance ("setback") between wind turbines and adjacent sensitive receptors to maintain public safety in the event of ice throw or blade failure - The minimum setback distance is 1.5 x turbine height (tower + rotor radius)	Compliant	N/A
	Wind turbines that have been subject to independent design verification/certification (e.g., IEC 61400-1) have been selected	Compliant	N/A
	Lightning protection systems are properly installed and maintained	Compliant	N/A
	Periodic blade inspections are carried out and defects that could affect blade integrity have been repaired	Compliant	N/A
	Where appropriate, turbines have been equipped with ice detectors that shut down the turbine to an idling state when ice is present	Compliant	N/A
	Warning signs have been posted at entrance points to the Wind Energy Facility	Compliant	N/A
	Wind turbines have been equipped with vibration sensors that can react to any imbalance in the rotor blades and shut down the turbine if necessary	Compliant	N/A
	Aviation		
	The relevant aviation authorities have been consulted before installation, in accordance with air traffic safety regulations	Compliant	N/A
	Where feasible, the wind energy facility has not been sited close to airports and within known low-flying areas or flight paths	Compliant	N/A
	Anti-collision lighting and marking systems have been used on towers and/or blades (consult with the relevant aviation authorities to determine appropriate lighting and marking requirements in line with national standards or good practice guidance)	Compliant	N/A
	If located near aviation radar, the relevant aviation authorities have been consulted to determine prevention and control measures	Compliant	N/A
	Electromagnetic Interference		
	Placement of wind turbines have been modified to avoid direct physical interference of point-to-point communication systems	Compliant	N/A
	If interference is detected during operation, higher-quality or directional antenna have been installed	N/A	N/A

Public Access			
	Access roads are barred with gates	Compliant	N/A
	Where public access is not promoted to the site and/or there are no current rights of way across the site, the wind energy facility site, or individual turbines, have been fenced to prohibit public access	Compliant	N/A
	Access to turbine tower ladders has been prevented	Compliant	N/A
	Fencing of an appropriate standard has been provided around the substation with anti-climb paint and warning signs	Compliant	N/A
	Information boards have been erected/posted that detail public safety hazards and emergency contact information	Compliant	N/A
Abnormal Load Transportation			
	All activities are compliant with the <i>Toll Roads EHS Guideline</i>	Compliant	N/A
	A logistics, traffic, and transportation study has been undertaken to assess impacts on existing offsite roadways, bridges, crossings over culverts, overpasses/underpasses, turning radii, and utilities, as well as whether surface replacements, upgrades, or resettlements are required	Compliant	N/A
	Traffic management has been provided where necessary	Compliant	N/A
	Deliveries are scheduled outside of peak hours	Compliant	N/A
	Only approved access routes have been used	Compliant	N/A

10 EP 4: SOCIAL AND ENVIRONMENTAL MANAGEMENT SYSTEM AND EQUATOR PRINCIPLES ACTION PLAN

EP 4	Social and Environmental Management System and Equator Principles Action Plan	COMPLIANCE	COMMENTS
	An Environmental and Social Management Plan (ESMP) has been prepared to address issues raised in the Assessment process and incorporate actions required to comply with the applicable standards.	Compliant	N/A
	Where the applicable standards are not met to the EPFI's satisfaction, an Equator Principles Action Plan (AP) has been drawn up.	Compliant	N/A
	The Equator Principles AP adequately outlines gaps and commitments to meet EPFI requirements in line with the applicable standards.	Partially Compliant	To achieve full compliance, the ESAP (January 2022) presented in Appendix A needs to be accepted, adopted and implemented by the Client.

The project's EMPr addresses issues raised during the Assessment process and incorporates actions required to comply with the applicable national standards. The ESAP is intended to outline gaps and commitments to meet the applicable Equator Principles standards, over and above the issues highlighted in the EMPr.

The ESAP in *Appendix A* summarises the non- and partial compliances highlighted within this report and provides remedial action to achieve complete compliance. The Client needs to adopt and accept the appended ESAP and commit to implementing the mitigation measures therein.

11 EP 5: STAKEHOLDER ENGAGEMENT

EP 5	Stakeholder Engagement	COMPLIANCE	COMMENTS
	Effective Stakeholder Engagement is an ongoing process in a structured and culturally appropriate manner with Affected Communities and other stakeholders.	Compliant	Consultation with affected communities must continue in the implementation phase of the project.
	For Projects with potentially significant adverse impacts on Affected Communities, the client has conducted an Informed Consultation and Participation process that takes account of: (i) the risks and impacts of the Project; (ii) the Project's phase of development; (iii) the language preferences of the Affected Communities, their decision-making processes and the needs of disadvantaged and vulnerable groups.	Compliant	N/A
	The appropriate Assessment Documentation has been made readily available to the Affected Communities and other stakeholders in the local language and in a culturally appropriate manner.	Compliant	N/A
	The Stakeholder Engagement process has been documented, including any actions agreed to resulting from such process.	Compliant	N/A
	The Affected Communities' and other stakeholders' concerns have been adequately addressed and incorporated in all reports, management plans and the Equator Principles AP.	Compliant	N/A

During the Assessment Process, the Client is required to consult and engage with any affected communities and stakeholders. The level of engagement will vary with the nature, risks, impacts and affected communities of a project. Where potential risks and impacts to Affected Communities are identified, they should be communicated in a timely way. All communications should be in the preferred language and method of the Affected Communities.

No less than annually, the Client must report to Affected Communities regarding progress of Action Plans and mitigation measures and material changes to identified risks and impacts. All disclosed information should be disseminated in appropriate languages and formats, accessible and understandable and disclosed as per the Client's consultation process.

The interest in transparency must be balanced with protecting confidential information, including the protection of personal data and information. Publicly released data should generally not be associated with particular individuals.

12 EP 6: GRIEVANCE MECHANISM

EP 6	Grievance Mechanism	COMPLIANCE	COMMENTS
	A grievance mechanism designed to receive and facilitate resolution of concerns and grievances about the Project's environmental and social performance has been established.	Compliant	N/A
	The grievance mechanism has been scaled to the risks and impacts of the Project and has Affected Communities as its primary user.	Compliant	N/A
	The grievance mechanism seeks to resolve concerns promptly, using an understandable and transparent consultative process that is culturally appropriate, readily accessible, at no cost, and without retribution to the party that originated the issue or concern.	Compliant	N/A
	The client has informed the Affected Communities and other stakeholders about the mechanism in the course of the Stakeholder Engagement process.	Compliant	N/A

Equator Principle 6 is aimed at assessing the Grievance Mechanism incorporated in the EMPr. A grievance mechanism draws upon conflict resolution resources inside the Client's organization, as well as traditional, customary and private systems of alternative dispute resolution in Affected Communities, such as mediation, conciliation and arbitration. In developing grievance mechanisms, Clients must understand cultural customs and traditions that may influence or impede their ability to express their grievances, including differences in the roles and responsibilities of subgroups (especially women) and cultural sensitivities and taboos.

13 EP 7: INDEPENDENT REVIEW

EP 7	Independent Review	COMPLIANCE	COMMENTS
	An independent social or environmental expert, not directly associated with the Client, has reviewed the relevant project documents, the project construction and project operation to assess compliance with the Equator Principles.	Compliant	N/A

To ensure that an accurate and unbiased report is produced, the Equator Principles require that the person or organisation undertaking the social and environmental review process is completely independent from the borrower as well as from the EPFI. TMG, the independent environmental expert, is not affiliated with either the EPFI or the borrower (see *Section 4* of this report for an independence declaration).

14 EP 8: COVENANTS

EP 8	Covenants	COMPLIANCE	COMMENTS
	The client has covenanted in the financing documentation to comply with all relevant host country environmental and social laws, regulations and permits in all material respects	N/A	The client and EPFI are responsible for ensuring that all covenants are in line with the Equator Principles.
	<p>The client has covenanted in the financial documentation:</p> <p>(i) to comply with the ESMPs and Equator Principles AP (where applicable) during the construction and operation of the Project in all material respects; and</p> <p>(ii) to provide periodic reports in a format agreed with the EPFI (with the frequency of these reports proportionate to the severity of impacts, or as required by law, but not less than annually), prepared by in-house staff or third party experts, that</p> <ul style="list-style-type: none"> • document compliance with the ESMPs and Equator Principles AP (where applicable), and, • provide representation of compliance with relevant local, state and host country environmental and social laws, regulations and permits; and <p>(iii) to decommission the facilities, where applicable and appropriate, in accordance with an agreed decommissioning plan.</p>	N/A	The client and EPFI are responsible for ensuring that all covenants are in line with the Equator Principles.
	The EPFI has worked with the client on remedial actions to bring the Project into compliance to the extent feasible.	N/A	The client and EPFI are responsible for ensuring that all covenants are in line with the Equator Principles.

An important strength of the Equator Principles is the incorporation of covenants linked to compliance. Where a client is not in compliance with its environmental and social covenants, the EPFI will work with the client on remedial actions to bring the Project back into compliance to the extent feasible. If the client fails to re-establish compliance within an agreed grace period, the EPFI reserves the right to exercise remedies, as considered appropriate.

15 EP 9: INDEPENDENT MONITORING AND REPORTING

EP 9	Independent Monitoring and Reporting	COMPLIANCE	COMMENTS
	The borrower has ensured ongoing monitoring and reporting over the life of the loan.	Partially Compliant	Ideally, an Equator Principles audit should be conducted more frequently, especially where there are partial or non-compliances.
	The expertise of the independent environmental and/or social expert appointed to conduct the review are adequate for the purposes of the audit.	Compliant	N/A

To assess Project compliance with the Equator Principles and ensure ongoing monitoring and reporting after Financial Close and over the life of the loan, the EPFI will require the appointment of an Independent Environmental and Social Consultant, or require that the client retain qualified and experienced external experts to verify its monitoring information which is shared with the EPFI.

16 EP 10: REPORTING AND TRANSPARENCY

EP 10	Reporting and Transparency	COMPLIANCE	COMMENTS
	CLIENT REPORTING REQUIREMENTS		
	The client has ensured that, at a minimum, a summary of the ESIA is accessible and available online.	Compliant	N/A
	The client has publicly reported GHG emission levels (combined Scope 1 and Scope 2 Emissions) during the operational phase for Projects emitting over 100,000 tonnes of CO2 equivalent annually.	N/A	N/A
	EPFI REPORTING REQUIREMENTS		
	The EPFI reports publicly at least annually about its Equator Principles implementation processes and experience.	N/A	N/A

The Equator Principles recognise the importance of transparency in environmental and social risk management and its contribution to overall accountability. As such, in order to achieve compliance with the Equator Principles, both the client and the EPFI must follow the reporting requirements set out in the checklist above. These requirements are mandatory in addition to the disclosure requirements set out in Equator Principle 5.

17 COMPLIANCE SUMMARY

EP 1	Review and Categorisation	COMPLIANCE	COMMENTS
	The Project has been correctly categorised based on the magnitude of its potential environmental and social risks and impacts.	Compliant	Rated as a Category B project, as there are limited adverse impacts and no fatal flaws that were identified during the Scoping and EIA phase of the environmental permitting process.
	The EPFI's environmental and social due diligence is commensurate with the nature, scale and stage of the Project, and with the level of environmental and social risks and impacts.	Compliant	N/A
EP 2	Social and Environmental Assessment		
	The client has conducted an Assessment process to address, to the EPFI's satisfaction, the relevant environmental and social risks and impacts of the proposed Project.	Compliant	N/A
	The Assessment Documentation proposes measures to minimise, mitigate, and offset adverse impacts in a manner relevant and appropriate to the nature and scale of the proposed Project.	Compliant	The assessment documentation includes an EMPr which details the measures to minimise, mitigate and offset adverse impacts of the project.
	The Assessment Documentation is an adequate, accurate and objective evaluation and presentation of the environmental and social risks and impacts, whether prepared by the client, consultants or external experts.	Compliant	The assessment documentation abides by the regulations stated in NEMA, 2014 EIA Regulations (as amended) and therefore ensures adequate, accurate and objective evaluation and presentation of the environmental and social risks
	The Assessment Documentation includes an Environmental and Social Impact Assessment (ESIA) with relevant specialist studies.	Compliant	The Scoping and EIA documentation is compliant.
EP 3	Applicable Social and Environmental Standards		
	The project and its Assessment Documentation are in compliance with South African Legislation, Regulations and Policies:	Compliant	<i>See Section 9.1 for detailed checklist.</i>
	The project and its Assessment Documentation are in compliance with IFC Performance Standards on Social and Environmental Sustainability:	Compliant	<i>See Section 9.2 for detailed checklist.</i>
	<ul style="list-style-type: none"> • Performance Standard 1: Assessment and Management of Environmental and Social Risks and Impacts 	Compliant	<i>See Section 9.2 for detailed checklist.</i>
	<ul style="list-style-type: none"> • Performance Standard 2: Labour and Working Conditions 	Compliant	<i>See Section 9.2 for detailed checklist.</i>
	<ul style="list-style-type: none"> • Performance Standard 3: Resource Efficiency and Pollution Prevention 	Non - Compliant	<i>See Section 9.2 for detailed checklist.</i>
	<ul style="list-style-type: none"> • Performance Standard 4: Community Health, Safety and Security 	Compliant	<i>See Section 9.2 for detailed checklist.</i>
	<ul style="list-style-type: none"> • Performance Standard 5: Land Acquisition and Involuntary Resettlement 	Compliant	<i>See Section 9.2 for detailed checklist.</i>
	<ul style="list-style-type: none"> • Performance Standard 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources 	Compliant	<i>See Section 9.2 for detailed checklist.</i>
	<ul style="list-style-type: none"> • Performance Standard 7: Indigenous Peoples 	Compliant	<i>See Section 9.2 for detailed checklist.</i>
	<ul style="list-style-type: none"> • Performance Standard 8: Cultural Heritage 	Compliant	<i>See Section 9.2 for detailed checklist.</i>
	The project and its Assessment Documentation are in compliance with the World Bank Group General Environmental Health and Safety Guidelines.	Compliant	<i>See Section 9.3 for detailed checklist.</i>

	• Theme 1: Environment	Compliant	See Section 9.3 for detailed checklist.
	• Theme 2: Occupational Health and Safety	Compliant	See Section 9.3 for detailed checklist.
	• Theme 3: Community Health and Safety	Compliant	See Section 9.3 for detailed checklist.
	• Theme 4: Construction and Decommissioning	Compliant	See Section 9.3 for detailed checklist.
	The project and its Assessment Documentation are in compliance with the World Bank Group Industry Sector Guidelines for Wind Power:	Partially Compliant	See Section 9.4 for detailed checklist.
	• Theme 1: Environment	Partially Compliant	See Section 9.4 for detailed checklist.
	• Theme 2: Occupational Health and Safety	Compliant	See Section 9.4 for detailed checklist.
	• Theme 3: Community Health and Safety	Compliant	See Section 9.4 for detailed checklist.
EP 4	Social and Environmental Management System and Equator Principles Action Plan		
	An Environmental and Social Management Plan (ESMP) has been prepared to address issues raised in the Assessment process and incorporate actions required to comply with the applicable standards.	Compliant	N/A
	Where the applicable standards are not met to the EPFI's satisfaction, an Equator Principles Action Plan (AP) has been drawn up.	Compliant	N/A
	The Equator Principles AP adequately outlines gaps and commitments to meet EPFI requirements in line with the applicable standards.	Compliant	To achieve full compliance, the ESAP (January 2022) presented in Appendix A was accepted, adopted and implemented by the Client.
EP 5	Stakeholder Engagement		
	Effective Stakeholder Engagement as an ongoing process in a structured and culturally appropriate manner with Affected Communities and other stakeholders has been demonstrated.	Compliant	Consultation with affected communities must continue in the implementation phase of the project.
	For Projects with potentially significant adverse impacts on Affected Communities, the client has conducted an Informed Consultation and Participation process that takes account of: (i) the risks and impacts of the Project; (ii) the Project's phase of development; (iii) the language preferences of the Affected Communities, their decision-making processes and the needs of disadvantaged and vulnerable groups.	Compliant	N/A
	The appropriate Assessment Documentation has been made readily available to the Affected Communities and other stakeholders in the local language and in a culturally appropriate manner.	Compliant	N/A
	The Stakeholder Engagement process has been documented, including any actions agreed resulting from such process.	Compliant	N/A
	The Affected Communities' and other stakeholders' concerns have been adequately addressed and incorporated in all reports, management plans and the Equator Principles AP.	Compliant	N/A

EP 6	Grievance Mechanism		
	A grievance mechanism designed to receive and facilitate resolution of concerns and grievances about the Project's environmental and social performance has been established.	Compliant	N/A
	The grievance mechanism has been scaled to the risks and impacts of the Project and has Affected Communities as its primary user.	Compliant	N/A
	The grievance mechanism seeks to resolve concerns promptly, using an understandable and transparent consultative process that is culturally appropriate, readily accessible, at no cost, and without retribution to the party that originated the issue or concern.	Compliant	N/A
	The client has informed the Affected Communities and other stakeholders about the mechanism in the course of the Stakeholder Engagement process.	Compliant	N/A
EP 7	Independent Review		
	An independent social or environmental expert not directly associated with the borrower has reviewed the relevant project documents, the project construction and project operation to assess compliance with the Equator Principles.	Compliant	N/A
EP 8	Covenants		
	The client has covenanted in the financing documentation to comply with all relevant host country environmental and social laws, regulations and permits in all material respects.	N/A	The client and EPFI are responsible for ensuring that all covenants are in line with the Equator Principles.
	<p>The client has covenanted in the financial documentation:</p> <p>(i) to comply with the ESMPs and Equator Principles AP (where applicable) during the construction and operation of the Project in all material respects; and</p> <p>(ii) to provide periodic reports in a format agreed with the EPFI (with the frequency of these reports proportionate to the severity of impacts, or as required by law, but not less than annually), prepared by in-house staff or third party experts, that</p> <ul style="list-style-type: none"> • document compliance with the ESMPs and Equator Principles AP (where applicable), and, • provide representation of compliance with relevant local, state and host country environmental and social laws, regulations and permits; and <p>(iii) to decommission the facilities, where applicable and appropriate, in accordance with an agreed decommissioning plan.</p>	N/A	The client and EPFI are responsible for ensuring that all covenants are in line with the Equator Principles.
	The EPFI has worked with the client on remedial actions to bring the Project into compliance to the extent feasible.	N/A	The client and EPFI are responsible for ensuring that all covenants are in line with the Equator Principles.

EP 9	Independent Monitoring and Reporting		
	The borrower has ensured ongoing monitoring and reporting over the life of the loan.	Partially Compliant	Ideally, an Equator Principles audit should be conducted more frequently, especially where there are partial or non-compliances.
	The expertise of the independent environmental and/or social expert appointed to conduct the review are adequate for the purposes of the audit.	Compliant	N/A
EP 10	Reporting and Transparency		
	CLIENT REPORTING REQUIREMENTS		
	The client has ensured that, at a minimum, a summary of the ESIA is accessible and available online.	Compliant	N/A
	The client has publicly reported GHG emission levels (combined Scope 1 and Scope 2 Emissions) during the operational phase for Projects emitting over 100,000 tonnes of CO2 equivalent annually.	N/A	N/A
	EPFI REPORTING REQUIREMENTS		
	The EPFI reports publicly at least annually about its Equator Principles implementation processes and experience.	N/A	N/A

18 CONCLUSION

Following the detailed and in-depth audit of the documentation provided and based on the implementation of the ESAP (as signed and accepted on the 15th of December 2021 in Appendix B) it can be concluded that the project has achieved **complete compliance** with the standards and criteria of the Equator Principles overall and has achieved a compliance status of:



100%

The EPFI¹² will monitor the Client's progress and compliance with the ESAP of the Noblesfontein Wind Farm post financial close. As such, the Client will report to the EPFI with respect to Equator Principles compliance hereafter.

We thank you for this opportunity to provide you with independent environmental auditing services and remain available to assist further with any compliance queries or actions as required.

Please feel free to call me directly on 082 575 3800 should you require any clarification or wish to discuss this document.

Yours faithfully,



FABIO VENTURI

¹² Equator Principle Financial Institutions commit to implementing the EP in their internal environmental and social policies, procedures and standards for financing projects and will not provide Project Finance or Project-Related Corporate Loans to projects where the client will not, or is unable to, comply with the EP.

APPENDIX A – Updated ESAP (January 2021)

To achieve complete compliance, (in agreement with the requisite EPFI) the ESAP has been reviewed and finalised as contained in Appendix A below. The finance documents associated with the project are required to obligate the Project to adopt and implement the ESAP. Furthermore, all operation and maintenance contracts shall obligate respective contractors to conduct their work in accordance with the Equator Principles and the ESAP.

Equator Principles Environmental and Social Action Plan (ESAP)

EP 3	Applicable Social and Environmental Standards	COMPLIANCE WITH EP	COMMENTS	SPECIFIC REMEDIAL ACTIONS	DEADLINE FOR ACTION	PARTY RESPONSIBLE FOR ACTION	COMPLIANCE WITH ESAP
	The project and its Assessment Documentation are in compliance with South African Legislation						
	National Environmental Management Act (107 of 1998)	Compliant	<p><i>The Client is the holder of an Environmental Authorisation for the project and its associated infrastructure. An amendment application was submitted to the DEA regarding changes to the access road layout and turbine laydown areas. However, it was refused based on the fact that the changes had already occurred. There was a Section 24 G Application pending.</i></p> <p><i>Remedial actions involved:</i></p> <ul style="list-style-type: none"> • <i>Contacting the Department of Environmental Affairs regarding the corrective actions required.</i> • <i>Resolving the issue according to correct legislative procedure.</i> 		Resolved		<p><i>The following was quoted verbatim from the Public Participation Document for the Amendment Proses conducted by EIMS:</i></p> <p><i>“With reference to the Section 24G process undertaken for the above facility relating to the changes associated with the internal road layout (Ref: 14/12/16/3/2/75), the current layout of the facility has been identified as a compliance matter and included in the latest Environmental Audit Report undertaken for this wind farm. The Department’s Compliance and Enforcement Section has since responded to the Applicant with a Warning Letter. It is</i></p>

							<p><i>thus understood that the matter has been closed by Compliance and Enforcement. The layout of the above development has been updated to reflect the current layout of the wind farm and now requires an amendment of the EMPr to formalise this."</i></p> <p><i>The auditor is satisfied that this issue has been resolved.</i></p>
	The project and its Assessment Documentation are in compliance with IFC Performance Standards on Social and Environmental Sustainability						
	PERFORMANCE STANDARD 3: Resource Efficiency and Pollution Prevention						
	Where benchmarking data are available, the client has made a comparison to establish the relative level of efficiency.	Non-compliant	<p><i>Although reference is made in the EMPr to avoiding inefficient use of resources when generating waste, neither the EIA nor EMPr has established the project's relative level of operational resource efficiency against best practice guidelines. The client must also take cognisance of the national policies and EHS guidelines (as governed by IFC Performance Standards). In January 2020 TMG suggested the use of The Energy and Water Performance Tool which is the national standard for water and energy benchmarking. The Client reviewed this tool but did not find it applicable to their Wind Facility. The Client is currently looking for an alternative tool</i></p>	<ul style="list-style-type: none"> - National policies and best practice benchmarking data (for example in the EHS Guidelines) should be consulted and used as the applicable standard for resource efficiency. - TMG suggested the use of The Energy and Water Performance Tool which is the national standard for water and energy benchmarking. - The Client does not find the Tool applicable to their Wind Facility, however, TMG will assist with the practical interpretation and application of the Tool. Should this Tool remain to be unapplicable, the Client must find an alternative Tool. 	Four months from acceptance of ESAP	The Client	N/A

	The client has avoided or, when avoidance is not possible, minimized and controlled the release of hazardous materials. The client has considered less hazardous substitutes where hazardous materials are intended to be used in manufacturing processes or other operations. The client has avoided the manufacture, trade, and use of chemicals and hazardous materials subject to international bans or phase-outs due to their high toxicity to living organisms, environmental persistence, potential for bioaccumulation, or potential for depletion of the ozone layer.	Non-compliant	<i>During the site visit on the 16th of November 2021, a small hole was noted in the waste skip that may lead to leakage (Appendix C, Photo 2). Unsealed bins were observed in the waste skip (Appendix C, Photo 3).</i>	<ul style="list-style-type: none"> - Disposal of hazardous waste must occur within the hazardous waste skip and not the general waste skip. Clear labelling of waste skips may assist in this regard. - The leaking hazardous waste skip must be removed from site, the area in which it was placed, cleaned up and a new hazardous waste skip must be installed. 	One month from issue of the ESAP (January 2022).	The Client	
The project and its Assessment Documentation are in compliance with the World Bank Group Industry Sector Guidelines for Wind Power							
THEME 1							
	Erosion measures have been implemented	Partially Compliant	Although anti-erosion measures have been implemented and erosion has improved greatly since the previous audit, some erosion was observed on the roadsides during the site audit conducted on the 16 th of November 2021, however the holder remediated the erosion and evidence were provided to the Auditor (Appendix C, Photos 5-7). To remain compliant with the NEMA, 2014 EIA Regulations (as amended), the EMPr is being amended to include a method statement (procedure) to assist in adequately addressing erosion prevention and management on the	<ul style="list-style-type: none"> - Please consult the EMPr and Soil Erosion Management Plan (Appendix H of the EMPr) for measures to minimise erosion on site. - The method statement, to assist in adequately addressing erosion prevention and management, which will be included in the amended EMPr, must be studied and followed to solve this on-going issue. 	No new incidents of roadside soil erosion 30 days from the implementation of the amended EMPr (with method statement).	The Client	N/A

			access and internal roads of the Wind Facility.				
	On-site transmission lines have been buried	Partially compliant	<i>The transmission lines have not been buried. Although the transmission lines are overshadowed by the wind turbine structures, The World Bank best practices include minimising visual impacts by burying transmission lines.</i>	<ul style="list-style-type: none"> - In places where the transmission lines are likely to have a large visual impact, they should be buried. - Transmission lines must be well maintained so as not to increase their negative visual impact. 	Ongoing	The Client	N/A
EP 4	Social and Environmental Management System and Equator Principles Action Plan	COMPLIANCE	COMMENTS	SPECIFIC REMEDIAL ACTIONS	DEADLINE FOR ACTION	PARTY RESPONSIBLE FOR ACTION	
	The Equator Principles AP adequately outlines gaps and commitments to meet EPFI requirements in line with the applicable standards.	Partially compliant	<i>To achieve full compliance, the ESAP presented in Appendix A needs to be accepted, adopted and implemented by the Client.</i>	<ul style="list-style-type: none"> - The ESAP (Appendix A) must be accepted and adopted by the Client and EPFI and this must be covenanted in the financing documentation. 	Four months from acceptance of ESAP.	The Client and EPFI	N/A
EP 9	Reporting and Transparency	COMPLIANCE	COMMENTS	SPECIFIC REMEDIAL ACTIONS	DEADLINE FOR ACTION	PARTY RESPONSIBLE FOR ACTION	
	The borrower has ensured ongoing monitoring and reporting over the life of the loan.	Partially compliant	<i>Ideally, an Equator Principles audit should be conducted more frequently, especially where there are partial or non-compliances.</i>	<ul style="list-style-type: none"> - An independent environmental specialist must be appointed to monitor and report on the compliance of the Noblesfontein WEF with the EMPr and the Equator Principles on a quarterly and biannual basis respectively. 	Two months from acceptance of ESAP / Ongoing	The Client	N/A

APPENDIX B – ESAP Acceptance Letter

Our reference: 211101

Your reference: Environmental and Social Action Plan

Date: 15 December 2021

Reference: Annual Environmental and Social Monitoring (Equator Principles) Report – Environmental and Social Action Plan

To whom it may concern,

This letter serves to confirm that Coria (PKF) Investments 28 (Pty) Ltd is fully aware of all the material requirements and obligations of the Environmental and Social Action Plan (ESAP) (dated January 2022) and their roles in terms of the ESAP and fully acknowledge and understand these requirements and obligations and roles.

Furthermore, Coria (PKF) Investments 28 (Pty) Ltd commits to implementing all remedial actions presented in the ESAP and will provide proof of compliance to Terramanzi Group (Pty) Ltd.

The above is confirmed by signature hereto below:

ENTITY SIGNATORY

I fully understand the contents of the ESAP as well as my associated responsibilities and commit to implementing all remedial actions presented in the ESAP. I further understand that Terramanzi Group (Pty) Ltd will be required to audit and report on my compliance with the contents of this ESAP.

Rodrigo A Garcia Parra (Print name)



(Signed)

Dated: 15th December 2021

APPENDIX C – Site Photos



Photo 1: Water meter installed at the substation on site.



Photo 2: Evidence of a small hole in the waste skip at the substation, implying potential leakage of the skip.



Photo 3: Unsealed drums in the waste skip.



Photo 4: An effectively rehabilitated area at the Project site.

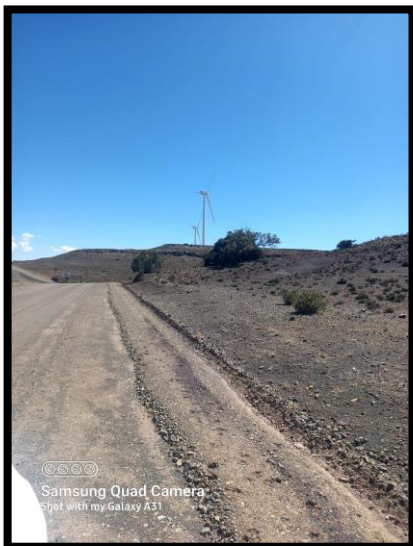


Photo 5: Evidence of erosion remediation along the access road.



Photo 6: Evidence of erosion remediation along the access road.



Photo 7 Evidence of erosion remediation along the access road.



Photo 8: An effectively rehabilitated area at the Project site.

APPENDIX D – Project Website

All necessary and appropriate project documentation is accessible to the public on the project's website:

<http://www.noblesfonteinprojects.co.za/equator-principals.html>