

NSIA \$100million Corporate Loan Financing Agreement Environmental & Social Management Plan

General considerations

1. ***Nigeria Sovereign Investment Authority (NSIA)*** is planning to implement the \$100 million Corporate Loan (the ***Project***). The Bank has agreed to provide financing, implementation support and monitoring for the Project.
2. NSIA will implement measures and actions of this Environmental and Social Management Plan¹ (***ESMP***) so that the Project meets all the requirements of the Bank Environmental and Social Operational Safeguards (***OS***) and National policy and legal requirements.
3. Where the ESMP refers to specific plans, whether they have already been prepared or are to be developed, the ESMP requires compliance with all mandatory provisions of such plans.
4. The table below summarizes the material measures and actions that are required, the basis of the requirement, the timing of the measure or action, and the criteria to be used for determining whether the required measure or action has been successfully achieved. NSIA is responsible for compliance with all requirements of the ESMP even when implementation of specific measures and actions is conducted by an entity different from the Project Implementation Unit (PIU).
5. Implementation of the material measures and actions set out in this ESMP will be monitored and reported to the Bank by NSIA as required by the ESMP and the conditions of the legal agreement, and the Bank will monitor and assess progress and completion of the measures and actions throughout implementation of the Project.
6. As agreed by the Bank and NSIA, this ESMP may be revised from time to time during Project implementation, to reflect adaptive risk management of project changes and unforeseen circumstances or in response to assessment of project performance conducted under the ESMP itself. In such circumstances, NSIA will propose and agree changes with the Bank, and then update the ESMP to reflect such change.

¹ The ESMP refers to all the E&S risks/impacts and measures, as approved in all the disclosed E&S documents and agreed between the Bank and Borrower. For projects involving multiple subprojects, that are identified, prepared and implemented during the course of the project, the Borrower will need to demonstrate to the Bank, before the project appraisal, through the preparation of E&S documentation of a sample of subprojects, that it has the capacity to carry out appropriate environmental and social assessment of subprojects, and prepare and implement such subprojects in accordance with the national laws and the OSs. (***Section III.2.3 of Bank's ESP and section D of OSI***)

Material Actions² to Manage the Project's E&S Risks and Impacts		Basis for Requirement	Key Performance Indicator	Indicative Timing/Deadline
Periodic E&S implementation report to the Bank		Bank's ESP and OS1	Monthly Reports submitted in good standard	15 th day of the next month
Annual Independent E&S Performance Audit		Bank's ESP and OS1	Annually	End of Q1 all through the lifespan of the corporate loan
1	Recruitment of Project-Specific E and S specialists as part of the Project Implementation Unit	Disclosed ESIA, OS1	Seasoned E&S specialists as part of project team	By Project effectiveness date
2	Establishment of the Project Grievance Redress Mechanism (GRM) and disclosure to Public	OS1, OS10 and National requirements	Established GRM mechanism (whistleblower procedures)/channels Grievance log	During project implementation
3	Payment of compensation and reinstallation of affected people (when applicable)	OS 5 and OS10	Evidence of complete compensation or resettlement prior to disbursement (Conditional Project triggered KPI)	During project implementation
4	Incorporation of site-specific E&S measures in project request for proposals	SO1 & national requirements	RFPs detailing E & S requirements	Before advertisement for tender by project
5	Submission of high-risk activity's Contractor ESMP (C-ESMP) to Bank clearance	Bank's ESP and OS1	Contractor ESMP (Conditional Project triggered KPI)	To be submitted, reviewed and cleared by the Bank before disbursement to high-risk project
6	Establishment of the Contractor's Grievance Mechanism (GM) and information of workers	OS1, OS2, SO10 and Bank's Disclosure and Access to Information Policy	Established Contractor's Grievance Channels Grievance log (Conditional Project triggered KPI)	Before commencement of construction activities
7	Obtaining nationally required licenses prior commencement of subjected activities (excavations, tree-cutting, working at height, working in confined spaces, etc.)	OS1, OS2 and national labor laws	Valid operational licenses by relevant regulatory body (Conditional Project triggered KPI)	Prior to the specific project effectiveness date

² Please add any relevant key actions and/or indicate "Not applicable" in the third column ("Basis for requirement") for actions that are not applicable to the project.

8	Preparation, approval, and disclosure of specific E&S documents during Project implementation, including prior review of Category 1 terms of reference by the Bank	Bank's ESP, OS1 and national requirements	Final approved versions of relevant E&S documents (e.g., ESG Policy, HSE Policy, ESMPs, ESIA, Waste Management Plan)	During project implementation
9	Engagement with concerned stakeholders of each relevant specific E&S activity	OS1, OS10, Bank's Disclosure and Access to Information Policy	Stakeholder Engagement Plan (with adequate implementation budget)	Prior to the commencement of specific project
10	Establishment of Project-Specific Emergency Preparedness and Response mechanism	OS1 & OS4, national legislation on contingencies et	Emergency Preparedness and Response Plan	Throughout project lifespan
			Records of OHS incidents/accidents	Monthly (as part of reporting to the Bank)
11	Appropriate and timely handling of project-specific complaints/grievances	Bank's ESP and OS1	Records of grievances received and treated (grievance log)	Continuously throughout the lifespan of the corporate loan
12	Notification to riparian or alert to downstream exposed peoples	Bank's ESP and OS1, applicable International Treaty/Convention ratified	Stakeholder Engagement Plan (with adequate implementation budget)	Prior to the commencement of specific project
13	Capacity building of key project implementers	OS1	Evidence of relevant trainings conducted	Continuous/ Ongoing
14	Implementation of ESMS/Environmental & Social Action Plan (ESAP) ³	OS1 and OS9, national requirements	Approved ESMS Manual	N/A This already exists
14.1	<i>Approval of any required E&S management procedure</i>	Ditto	Board-approved ESMS	N/A This already exists
14.2	<i>Establishment of the E&S unit</i>	Ditto	An ESG Unit established within the NSIA	N/A. This already exists
14.3	<i>Capacity Building of the E&S Unit</i>	Ditto	Evidence of relevant training conducted in a year	Continuous/ Ongoing
			Evidence of additional E&S staff recruited	By end of 2025
14.4	<i>Processing the Value Chain E&S due diligence</i>	Ditto	E&S Due Diligence Checklist & Report, Investment Memo with E&S Section, ESAP, E&S Covenants in Investment Agreements	NSIA conducts E&S due diligence, prior to the commencement of specific project
15	Suspending works in the event of EOHS risk or incident, immediately notify the Bank, and resume works only upon no-objection of the Bank.	Bank's ESP	Number of site-specific incidents reported	Immediately and no later than 48 hours after the occurrence

³ Applies to non-sovereign operations and public sector projects implemented by permanent autonomous Agencies/Institutions.

16	Prepare the root-cause analysis (RCA) of any fatal EOHS incident and implement the Corrective Action Plan (CAP).	Bank's ESP and OS1	Root-cause Analysis Report/Corrective Action Plan	RCA to be completed within 7 working days after the incident (depending on the nature & scale of incident) & CAP immediately after the RCA
17	Disclosure of Project's E&S reports to the public	OS1, OS10, Bank's Disclosure and Access to Information Policy	Published Sustainability & Impact Report	Annually