



ENVIRONMENTAL AND SOCIAL MANAGEMENT SYSTEM (ESMS) MANUAL

**RURAL ELECTRIFICATION
AGENCY**

OCTOBER 2026

	RURAL ELECTRIFICATION AGENCY	REA-ESMS-MAN-001
	Environmental and Social Management System Manual	October 2026

RURAL ELECTRIFICATION AGENCY

INSTITUTIONAL ENVIRONMENTAL AND SOCIAL MANAGEMENT SYSTEM MANUAL

VOLUME 1: ESMS FRAMEWORK

OCTOBER 2026

Document status: This Volume establishes the corporate policy, governance, risk, information, and assurance architecture for REA's Institutional ESMS.

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Statement of the Managing Director and Chief Executive Officer

The Rural Electrification Agency is committed to expanding electricity access in a manner that protects people, respects rights and safeguards the environment. Our responsibilities extend from our own offices and field activities to the programmes, projects and counterparties through which we fulfil our mandate. Environmental and social performance is an integral part of how REA plans, finances, procures, delivers and monitors electrification.

I affirm REA's commitment to comply with applicable Nigerian law and the environmental and social requirements of its financing partners. REA will apply the mitigation hierarchy, protect workers and communities, prevent discrimination and forced or child labour, address gender-based violence and sexual exploitation, abuse and harassment, and maintain accessible grievance mechanisms without retaliation, protect biodiversity and cultural heritage, strengthen climate resilience and manage batteries, solar equipment and other waste responsibly throughout their lifecycle.

I am accountable for the implementation of this Environmental and Social Management System. The Board and its relevant committees provide oversight. Executive Management, Directors and programme heads own the risks arising from their decisions and delivery activities. GESIC serves as the Corporate ESMS Secretariat, led by a full-time Corporate ESMS Lead with direct access to my office. All respective units of the REA shall play their respective parts in implementing the actions set out in this ESMS manual. Developers, contractors, suppliers, operators and participating financial institutions are accountable for their contractual environmental and social obligations.

REA commits to establish, implement and maintain a clear and dedicated budget line for ESMS implementation. The annual corporate budget and each programme and project budget shall provide the staffing, training, consultation, assessment, monitoring, grievance management, information systems, independent assurance and emergency resources needed to meet the approved work plan.

Every employee and counterparty shall apply the requirements relevant to their work, report concerns promptly and cooperate with corrective action.

REA will communicate this policy and framework across the Agency and its delivery partners, disclosing the document appropriately. Management will review performance at least annually, act on adverse findings and maintain the resources needed to implement and improve the ESMS.

Name Abba Abubakar Aliyu
Managing Director and Chief Executive Officer

Signature 

Date 15th October 2026

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Environmental and Social Policy Statement

REA shall deliver rural electrification in a manner that protects people and the environment, respects human rights and promotes equitable electricity access. This policy applies to corporate activities, programmes, projects and counterparties within REA's control or material influence throughout their lifecycle.

REA commits to the following requirements:

1. Comply with Nigerian law, permits, licences and applicable financing safeguards. Apply the legally permissible requirement offering greater protection and resolve conflicts before commitment.
2. Screen and categorise activities before commitments; assess alternatives, apply the mitigation hierarchy and reject prohibited activities or unacceptable residual risks. Resource, implement and monitor required E&S instruments.
3. Provide fair employment, lawful freedom of association and collective bargaining, and safe workplaces. Prevent discrimination, forced labour, child labour and retaliation. Protect communities from electrical, construction, traffic, fire, pollution, health and security hazards.
4. Prevent and respond to gender-based violence and sexual exploitation, abuse and harassment through risk assessment, conduct codes, confidential reporting and survivor-centred referral. Provide differentiated measures for vulnerable people and accessible participation for persons with disabilities.
5. Avoid displacement where feasible. Complete lawful land processes, compensation at replacement cost and applicable livelihood assistance before displacement or restricted access, and verify livelihood restoration.
6. Protect biodiversity, ecosystem services and cultural heritage; prevent pollution and use resources efficiently. Assess climate risks and adapt without disproportionate burdens on vulnerable groups. Maintain safe, traceable end-of-life arrangements for batteries, PV modules and electronic equipment.
7. Engage stakeholders meaningfully and disclose relevant information. Maintain free, accessible corporate, community, consumer and worker grievance mechanisms, with confidential and anonymous options, without restricting legal or lender remedies.
8. Require competent staff and enforceable E&S obligations for developers, contractors, suppliers, operators and financial intermediaries. Apply responsible sourcing, due diligence, supervision, reporting, audit and remedies.
9. Establish, implement and maintain a clear, dedicated ESMS implementation budget line, supported by costed corporate and programme work plans. Provide the personnel, training, logistics, monitoring, grievance, emergency and assurance resources needed for effective implementation.
10. Report serious incidents promptly, investigate causes, verify corrective action and review effectiveness annually. Publicly report performance while protecting personal, confidential and security-sensitive information.

Name Abba Abubakar Aliyu

Managing Director and Chief Executive Officer

Signature 

Date 15th October 2026

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Key Terms and Abbreviations

Term	Meaning in this Manual
AfDB	African Development Bank.
AfDB ISS	African Development Bank Integrated Safeguards System (2023).
BESS	Battery Energy Storage System.
BPP	Bureau of Public Procurement.
CAP / CAPs	Corrective Action Plan / Corrective Action Plans.
CAPA	Corrective and Preventive Action.
C-ESMP / C-ESMPs	Contractor Environmental and Social Management Plan / Plans.
DARES	Distributed Access through Renewable Energy Scale-up. <u>World Bank</u>
DisCos	Electricity Distribution Companies.
DPO	Data Protection Officer.
EIA	Environmental Impact Assessment.
E&S	Environmental and social.
ESCP	Environmental and Social Commitment Plan.
ESG	Environmental, social and governance.
ESIA / ESIAs	Environmental and Social Impact Assessment / Assessments.
ESMF / ESMFs	Environmental and Social Management Framework / Frameworks.
ESMP / ESMPs	Environmental and Social Management Plan / Plans.
ESMS / ESMSs	Environmental and Social Management System / Systems.
ESS	World Bank Environmental and Social Standard.
ESS1–ESS10	World Bank Environmental and Social Standards 1 to 10.
E-waste	Electronic waste, including discarded electrical and electronic equipment.
FI / FIs	Financial Intermediary / Financial Intermediaries.
GBV	Gender-based violence.
GBV/SEA/SH	Gender-based violence / Sexual exploitation and abuse / Sexual harassment.
GDEI	Gender Diversity, Equity and Inclusion
GESIC	Gender, Environment, Social Inclusion and Counselling.
GHG	Greenhouse gas; used in relation to emissions, accounting and sustainability indicators.
GIIP	Good International Industry Practice.
GM	Grievance Mechanism.
GRM	Grievance Redress Mechanism.
HIV	Human Immunodeficiency Virus
HR	Human Resources.
IBAT	Integrated Biodiversity Assessment Tool.
ICT	Information and Communication Technology.
ID	Identifier.
IFC	International Finance Corporation.
ILO	International Labour Organization.
ISO	International Organization for Standardization.
ISO 14001	ISO standard for environmental management systems.
ISO 45001	ISO standard for occupational health and safety management systems.

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Term	Meaning in this Manual
ISS	Integrated Safeguards System, referring to the African Development Bank's safeguards framework.
IUCN	International Union for Conservation of Nature; referenced through the IUCN Red List.
KPI / KPIs	Key Performance Indicator / Key Performance Indicators.
LMP / LMPs	Labour Management Procedures.
LRP / LRPs	Livelihood Restoration Plan / Plans.
MD	Managing Director.
MD/CEO	Managing Director / Chief Executive Officer.
M&E	Monitoring and Evaluation.
NEMSA	Nigerian Electricity Management Services Agency.
NEP	Nigeria Electrification Project; also referred to by REA as the Nigeria Electrification Programme.
NERC	Nigerian Electricity Regulatory Commission.
NESREA	National Environmental Standards and Regulations Enforcement Agency.
OECD	Organisation for Economic Co-operation and Development.
OHS	Occupational health and safety.
O&M	Operation and Maintenance.
OS1–OS10	African Development Bank Environmental and Social Operational Safeguards 1 to 10.
PAPs	Project-Affected Persons.
PIO	Promotions, Information and Outreach, the REA function supporting disclosure and stakeholder communications.
PIU	Project Implementation Unit.
PMU / PMUs	Programme or Project Management Unit / Units.
PS1–PS8	International Finance Corporation Performance Standards 1 to 8.
PV	Photovoltaic.
RACI	Responsible, Accountable, Consulted and Informed.
RAP / RAPs	Resettlement Action Plan / Plans.
REA	Rural Electrification Agency.
REF	Rural Electrification Fund.
RPF	Resettlement Policy Framework.
SEA	Sexual exploitation and abuse.
SEA/SH	Sexual exploitation and abuse / Sexual harassment.
SEP / SEPs	Stakeholder Engagement Plan / Plans.
SH	Sexual harassment.
SHS	Solar Home System / Systems.
STI	Sexually Transmitted Infection.
UN	United Nations.
WB	World Bank.

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Executive Summary

REA's institutional ESMS is intended to operate as a management and decision system rather than a collection of stand-alone safeguard documents. The framework therefore connects policy commitments to authority, risk appetite, lifecycle gates, controlled procedures, evidence, escalation and assurance. Volume 1 sets the rules by which REA determines what must be done, who may decide, what evidence is required and how management knows that the system is effective.

Implementation readiness depends on integration with existing corporate and programme processes. The framework does not create a parallel administration detached from programme delivery. It requires that environmental and social controls be built into corporate planning, grant and subsidy design, procurement, legal review, budgeting, technical appraisal, contract management, monitoring, internal audit, and management review.

REA draws on environmental and social experience from development-partner programmes, including NEP and DARES, and coordinates the corporate framework through GESIC. The institutional ESMS integrates existing assessment instruments, specialist capacity, monitoring and community engagement into one consistent minimum for all funding sources, technologies, delivery models and lifecycle stages. Existing programme systems remain in use where equivalence is demonstrated and additional binding requirements are retained.

This Volume 1 establishes the policy, governance, risk, information and assurance architecture for that corporate system. It is designed to govern corporate operations, capital projects, REF activities, development-partner programmes, grants, subsidies, developer and financial-intermediary arrangements, mini-grids, solar home systems, grid extension, productive-use investments, public-institution solar systems, battery storage and other distributed-energy activities. Programme requirements that are more stringent remain applicable; this Manual creates the corporate minimum and an equivalence mechanism rather than displacing valid lender-specific systems.

The ESMS is based on the management-system cycle of Plan–Do–Check–Act. Environmental and social risk management is to be embedded before commitments are made, not added after project design or procurement. No project, grant, developer selection, site commitment, land transaction, contract award, mobilisation, commissioning or decommissioning decision may proceed without the applicable E&S gate and evidence defined by the system.

Institutional Management Priorities

Institutional control	Required implementation
Programme and departmental integration	Apply the corporate hierarchy and documented equivalence / bridging protocol.
Authority and risk governance	Use cross-functional governance, formal delegations, escalation and residual-risk acceptance.
Corporate evidence and accountability	Maintain legal, permit, incident, grievance, land, waste, audit and corrective-action registers with owners and reporting cycles.
Counterparty performance	Apply due diligence, selection criteria, contract controls, payment conditions, remedies and performance ratings.
Climate and lifecycle responsibility	Apply climate-risk assessment, resilience, sustainability indicators, battery / e-waste controls and documented GHG accounting.

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Institutional control	Required implementation
Assurance and improvement	Conduct risk-based annual internal audit, management review and verified corrective action.

Institutional model

The proposed model assigns Board-level oversight; executive accountability to the MD/CEO; cross-functional governance to an ESMS Steering Committee; corporate system coordination to GESIC; operational ownership to Directorates and PMUs; legal-register ownership to Legal Services; sustainable procurement and counterparty controls to Procurement and contract managers; performance-data ownership to M&E; employee labour and competency systems to HR; stakeholder disclosure support to PIO; privacy and system-security support to ICT and the Data Protection Officer; independent assurance to Internal Audit; and implementation obligations to developers, contractors, suppliers, operators and participating financial institutions.

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1. Introduction and ESMS System Architecture

This Chapter defines the institutional problem that the ESMS is designed to solve and the architecture through which the solution will operate. It establishes the relationship between REA’s corporate minimum, programme-specific requirements, Nigerian law and development-partner standards, and explains how those requirements are carried from strategy through project closure.

1.1 Background and Institutional Context

REA is the Federal Government agency responsible for advancing electrification of rural, unserved and underserved areas. Its portfolio operates within the decentralising electricity sector created by the Electricity Act 2023 and involves federal and state regulators, distribution companies, communities, private developers, contractors, suppliers, financial institutions and development partners. REA therefore manages E&S risk through multiple roles: policy and programme design, public and donor finance, eligibility setting, procurement, developer selection, technical verification, site development, community engagement, supervision, output verification and performance monitoring.

The risk profile differs by activity. Grid-extension works may create wayleave, vegetation-clearance, electrical-safety and community-access risks. Mini-grids may require land, community agreements, tariff and consumer engagement, biodiversity screening, battery management and operator oversight. Solar home system programmes rely heavily on product quality, consumer protection, distribution networks, data handling, labour conditions and end-of-life take-back. Public-institution or productive-use projects may involve large construction footprints, existing land users, livelihood dependence, cooling refrigerants, food-chain safety, security and operation-and-maintenance risks. The ESMS must therefore be risk-based and technology-specific rather than based on one generic checklist.

1.2 Purpose, Objectives and Expected Outcomes

The expected outcome is not limited to the preparation of compliant safeguard instruments. REA should be able to demonstrate that material risks are recognised before commitments are made, that decisions are taken by persons with defined authority, that controls are resourced and implemented, that affected people and workers can raise concerns safely, and that weaknesses are corrected before they become systemic failures.

The purpose of the ESMS is to integrate environmental and social risk management into REA governance and business processes so that risks and impacts are identified before commitments are made, managed throughout the lifecycle, verified through evidence and improved through review.

The ESMS objectives are to:

Clause	Mandatory requirement
a	establish a single corporate minimum applicable to all REA-controlled and REA-supported activities, regardless of funding source.
b	ensure consistent application of Nigerian legal requirements and applicable development-partner standards.
c	embed E&S considerations in strategy, programme design, project appraisal, land access, procurement, contracting, construction, operation, maintenance, repowering and decommissioning.
d	define authority, accountability, segregation of duties, escalation and residual-risk acceptance.

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Clause	Mandatory requirement
e	standardise screening, categorisation, assessment, mitigation, monitoring, grievance, incident, corrective-action, audit and reporting processes.
f	strengthen contractor, developer, supplier, operator and financial-intermediary due diligence and oversight.
g	protect workers, communities, vulnerable and disadvantaged persons, biodiversity, ecosystem services and cultural heritage.
h	promote gender equity, accessibility, climate resilience, pollution prevention, circularity and responsible end-of-life management.
i	provide auditable records for REA management, regulators, communities and development partners; and.
j	create a continual-improvement culture supported by targets, data, audit, management review and lessons learned.

1.3 Scope, Applicability and Interfaces

Applicability is determined by REA's control, influence, financing, approval, procurement or implementation role rather than by the label applied to an activity. Where REA designs eligibility rules, selects or supervises a developer, verifies outputs, controls disbursement, manages an asset or represents Government in a financing arrangement, the relevant ESMS controls shall be applied to the extent of that role and documented in the applicable agreement.

The ESMS applies to all activities over which REA has direct control or material influence. The application is proportional to the risk but is not optional. At minimum, it covers:

Clause	Mandatory requirement
a	Corporate activities: offices, facilities, staff travel, procurement, data systems, workplace safety, emergency preparedness, waste and stakeholder communications.
b	Programmes and projects: capital projects, REF, NEP, DARES and other current or future development partners or government-funded programmes.
c	Technologies: grid extension, isolated and interconnected mini-grids, solar home systems, rooftop and captive solar, public-institution systems, battery energy storage, productive-use equipment, clean cooling and related infrastructure.
d	Delivery models: direct implementation, grants, subsidies, results-based financing, public-private partnerships, developer and operator selection, technical assistance, financial intermediation and delegated implementation.
e	Counterparties: consultants, developers, contractors, subcontractors, suppliers, logistics providers, recyclers, operators, security providers and participating financial institutions.
f	Lifecycle: strategy, concept, site identification, feasibility, appraisal, land access, design, procurement, construction, commissioning, operation, maintenance, repowering, transfer and decommissioning.

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1.3.1 Corporate minimum and programme equivalence

The corporate ESMS is the minimum standard. A programme, lender, state regulator or contract may impose additional or more stringent requirements. Where a programme system is demonstrated to be equivalent or more stringent, it may be used without duplicating forms, provided that:

Clause	Mandatory requirement
a	the equivalence assessment is documented by GESIC and Legal Services.
b	all corporate minimum data and escalation requirements remain satisfied.
c	gaps are covered through a programme-specific bridging plan.
d	REA retains access to records and audit rights.
e	material risks and serious incidents are escalated through the corporate governance route.

1.4 Reference Framework and Hierarchy of Requirements

The requirements hierarchy must be resolved before project or transaction approval. The purpose of the hierarchy is not to choose the least demanding standard; it is to identify the complete set of legally and contractually applicable obligations and to adopt the requirement that provides the higher level of protection where requirements can lawfully be reconciled. The applicability decision shall be traceable to Legal Services and GESIC review.

The ESMS shall be implemented in accordance with applicable law and the standards contractually applicable to each activity. Where requirements differ, REA shall apply the legally permissible requirement that provides the higher level of protection unless the financing agreement or competent authority directs otherwise. Conflicts shall be referred to Legal Services and GESIC before commitment or implementation.

Framework	Application
AfDB	Integrated Safeguards System 2023, including the applicable Operational Safeguards and borrower guidance.
World Bank	Environmental and Social Framework, the applicable Environmental and Social Standards, Environmental and Social Commitment Plans and project instruments.
IFC	Performance Standards on Environmental and Social Sustainability and relevant Environmental Health and Safety Guidelines.
ISO management-system principles	Context, leadership, planning, support, operation, performance evaluation and improvement under the current applicable editions of ISO 14001 and ISO 45001.
Nigerian framework	Electricity Act 2023; EIA Act; NESREA Act and regulations; Land Use Act; labour and OHS laws; Employees' Compensation Act; NEMSA technical and safety requirements; Public Procurement Act and BPP instruments; Nigeria Data Protection Act and implementation directives; and other applicable federal and state requirements.
GIIP	Recognised engineering, labour, environmental, social, human-rights, security, climate and sector practices appropriate to distributed renewable-energy activities.

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Framework	Application
Human rights and labour	United Nations Guiding Principles on Business and Human Rights 2011 and International Bill of Human Rights; ILO Declaration on Fundamental Principles and Rights at Work 1998, amended 2022, and fundamental conventions.
Security and responsible sourcing	Voluntary Principles on Security and Human Rights 2000; UN Basic Principles on the Use of Force and Firearms 1990; OECD minerals supply-chain Due Diligence Guidance, Third Edition, 2016.

1.5 ESMS Principles and Lifecycle Integration

Lifecycle integration means that environmental and social risks are considered at the point when options remain open. Site alternatives, delivery models, technical specifications, land arrangements and procurement strategies have greater risk-reduction value when addressed during concept and feasibility stages than after contract award. The ESMS therefore uses decision gates and hold points to prevent late or irreversible commitments.

Principle	REA application
Avoidance first	Select alternatives that avoid displacement, sensitive habitats, unsafe design, avoidable emissions and other material impacts before relying on compensation or restoration.
Mitigation hierarchy	Avoid; minimize; restore or rehabilitate; then compensate or offset residual impacts where permitted and technically justified.
Proportionality	Match assessment, staffing, controls and assurance to the nature, scale, location and likelihood of risk.
Precaution	Where credible risk of serious or irreversible harm exists, absence of complete scientific certainty is not a reason to postpone protective action.
Meaningful participation	Provide timely, understandable, culturally appropriate and accessible information and opportunities to influence decisions.
Non-discrimination and inclusion	Identify and remove barriers affecting women, persons with disabilities, low-income households, displaced persons and other vulnerable or disadvantaged groups.
Polluter pays and lifecycle responsibility	Allocate prevention, control, clean-up, take-back and end-of-life costs to the responsible party through design, financing and contract arrangements.
Worker and community safety	No schedule, cost or output target overrides the right to safe work and protection of the public.
Accountability and transparency	Maintain traceable decisions, disclose required information and provide accessible remedy without retaliation.
Continual improvement	Use monitoring, incidents, grievances, audit findings, lessons and management review to improve system design and performance.

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1.5.1 ESMS document hierarchy

Level	Controlled documents and records
Level 1	Corporate policies and approved management commitments.
Level 2	This ESMS Manual defines scope, governance, risk methodology, information, and assurance.
Level 3	Corporate operational procedures in Volume 2.
Level 4	Guidelines, forms, checklists, standard clauses, registers and templates in Volume 3.
Level 5	Programme/project instruments: ESMFs, ESIAs, ESMPs, LMPs, SEPs, RAPs/LRPs, security plans, emergency plans, C-ESMPs and counterparty ESMSs.
Level 6	Implementation records: permits, monitoring data, land records, consultations, grievances, incidents, CAPs, audits, training and management-review evidence.

2. Institutional Policy Framework

The policies in this Chapter form the highest level of management below REA's statutory mandate and approved corporate instruments. They establish binding commitments and decision rules. Volume 2 converts those commitments into procedures, while Volume 3 provides the forms, registers, clauses and tools needed to produce consistent evidence.

2.1 Policy Governance and Implementation Rules

Each policy shall be deployed through an accountable owner, approved objectives, annual actions, performance indicators, resource requirements and assurance arrangements. Policy communication alone is not implementation. The owner responsible must be able to demonstrate how the policy has altered programme design, procurement decisions, operational controls and management reporting.

The policies in this Chapter are mandatory statements of REA intent and decision rules. They apply to REA employees, programmes and activities and shall be cascaded down to counterparties through procurement, financing and contract documents. Policy approval does not transfer accountability away from operational owners. Each Directorate and the PMU remain responsible for applying the policies to their decisions and records.

Clause	Mandatory requirement
a	Policies shall be approved through the REA governance route, as confirmed at validation, and communicated to all personnel and relevant external parties.
b	Policy owners shall translate commitments into procedures, objectives, indicators, annual work plans, budgets and competency requirements.
c	No policy waiver may be granted informally. Any proposed deviation requires a documented legal and E&S assessment, time-bound approval and corrective action.
d	Policies shall be reviewed at least every three years and after material legal change, organisational restructuring, major incidents, audit finding or portfolio expansion.
e	Current programme policies remain effective where they are more stringent or contractually binding.

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2.2 Environmental and Social Policy

This policy is the overarching commitment for management of environmental and social risks and impacts arising from REA's mandate. It governs both direct corporate activities and activities carried out by developers, contractors, suppliers, operators, financial intermediaries and other entities where REA has contractual or programme influence.

The policy is applied through the mitigation hierarchy and through mandatory decision gates. Where avoidance is feasible, the fact that mitigation or compensation may be available does not justify selection of a more harmful site, design or delivery option. Residual risk may only be accepted by the authority defined in the approved delegation framework.

Control item	Requirement
Policy owner	GESIC, with operational ownership shared across Directorates and PMUs
Approval authority	MD/CEO and relevant Board/Board Committee
Review frequency	At least every three years or earlier following material change
Status	Draft for validation and formal approval

Policy statement. REA shall deliver rural electrification in a manner that protects people and the environment, respects human rights and promotes equitable electricity access.

REA shall:

Clause	Mandatory requirement
a	screen and categorise every proposed activity before site, financing, procurement, contract or implementation commitment.
b	avoid activities that are prohibited by law, financing agreements or the REA exclusion criteria and reject sites or designs with unacceptable residual risk.
c	apply proportionate assessment and management instruments, including ESIA, ESMP, RAP, LRP, SEP, LMP, biodiversity, security, emergency, waste and other plans as required.
d	prevent pollution; use energy, water and materials efficiently; manage hazardous materials; and ensure safe battery, PV and e-waste collection, storage, transport, recycling and disposal.
e	protect biodiversity, ecosystem services and cultural heritage and apply chance-find procedures.
f	provide safe and healthy working conditions and protect communities from construction, electrical, traffic, fire, security and operational hazards.
g	avoid involuntary displacement where feasible and ensure lawful, transparent and livelihood-restoring land processes where impacts cannot be avoided.
h	undertake meaningful stakeholder engagement, disclose relevant information and operate accessible project, worker and corporate grievance mechanisms.
i	prevent discrimination, child labour, forced labour, retaliation, GBV, SEA and SH, and apply survivor-centred response protocols.
j	require developers, contractors, suppliers, operators and financial intermediaries to meet defined E&S requirements and demonstrate performance.

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Clause	Mandatory requirement
k	report material incidents promptly, investigate root causes, close corrective actions and share lessons; and.
l	monitor and publicly report appropriate E&S performance while protecting confidential and personal information.

Policy decision rules

Rule	Mandatory application
No screen, no commitment	An activity may not enter site acquisition, funding approval, procurement, award or mobilisation without documented E&S screening and an approved instrument pathway.
No land access before due process	No physical possession, construction, or restriction of access may occur before the applicable land, compensation, and livelihood requirements are completed.
No mobilisation without contractor readiness	Contractors must have approved E&S plans, competent staff, insurance, induction, emergency arrangements and required permits before mobilisation.
No payment without E&S evidence	Material E&S deliverables and corrective actions shall be linked to certification, payment and performance remedies.
Stop-work protection	Any person may stop or refuse work when presenting imminent danger, without retaliation; restarting requires competent clearance.

Minimum policy indicators

Clause	Mandatory requirement
a	percentage of new activities screened before commitment.
b	percentage of required instruments approved and disclosed before relevant decision gates.
c	number and rate of fatalities, serious incidents and high-potential near misses.
d	percentage of overdue high-risk corrective actions.
e	percentage of active contracts meeting E&S staffing and reporting requirements.
f	grievance acknowledgment, resolution and satisfaction measures; and
g	end-of-life recovery rates for batteries and electrical/electronic equipment where REA has control or contractual influence.

2.3 Environmental, Social and Governance (ESG) Policy

For REA, ESG is a management and accountability framework, not a communications label. ESG performance must connect electricity-access outcomes with the manner in which those outcomes are achieved. Reporting shall therefore present material adverse events, unresolved grievances, missed targets and corrective actions alongside positive development results.

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Control item	Requirement
Policy owner	GESIC and Strategy/Planning, with Finance, Procurement, Legal, M&E and Internal Audit
Approval authority	MD/CEO and relevant Board/Board Committee
Review frequency	Annual materiality review; policy review at least every three years
Status	Draft for validation and formal approval

Policy statement. REA shall integrate material environmental, social and governance considerations into strategy, programme design, financing, procurement, partnerships, performance management and public accountability so that electricity access outcomes are achieved ethically, inclusively and sustainably.

REA shall:

Clause	Mandatory requirement
a	maintain an ESG materiality assessment reflecting REA's mandate, stakeholders, technologies, geographic exposure and delivery models.
b	define measurable ESG objectives and integrate them into corporate and programme plans, budgets and management performance arrangements.
c	maintain transparent governance, segregation of duties, conflict-of-interest controls, whistleblowing protection and auditable decision records.
d	apply integrity and E&S due diligence to partners, beneficiaries, developers, suppliers, financial intermediaries and other counterparties.
e	report balanced performance, including adverse impacts, incidents, grievances, corrective actions and unmet targets, not only positive development outputs.
f	avoid unsupported sustainability claims and ensure published claims can be traced to verified data.
g	protect complainants, whistleblowers, workers and stakeholders from retaliation; and
h	use Internal Audit and, where appropriate, independent assurance to test ESG data and system effectiveness.

ESG materiality process

Annual ESG materiality cycle

1. Identify stakeholder and regulatory expectations
2. Map REA impacts, dependencies and financial/reputational exposure
3. Prioritise material topics through evidence and management review
4. Set objectives, owners, controls and indicators
5. Report, assure and revise

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2.4 Climate Change and Sustainability Policy

The climate and sustainability policy links the low-carbon purpose of rural electrification with the need to manage physical climate exposure and the full lifecycle of renewable-energy assets. Renewable technology is not automatically sustainable where infrastructure is poorly sited, climate-vulnerable, unsafe, short-lived, or dependent on uncontrolled battery and electronic-waste routes.

Control item	Requirement
Policy owner	GESIC and Strategy/Planning, supported by Technical Services, M&E, Procurement and Finance
Approval authority	MD/CEO and relevant Board/Board Committee
Review frequency	Annual targets; full policy review at least every three years
Status	Draft for validation and formal approval

Policy statement. REA shall support low-carbon, climate-resilient and resource-efficient electricity access by assessing physical and transition risks, designing infrastructure for changing climate conditions, progressively measuring greenhouse gas outcomes, and managing renewable energy assets across their full lifecycle.

REA shall:

Clause	Mandatory requirement
a	screen every material programme and project for acute and chronic climate hazards, including flooding, erosion, extreme heat, wind, lightning, drought, wildfire and supply-chain disruption.
b	incorporate climate projections and resilience measures into site selection, drainage, foundations, equipment ratings, cooling, fire protection, access, emergency planning and O&M arrangements.
c	apply energy and resource-efficiency criteria to REA facilities, designs and procurement.
d	quantify avoided emissions and material operational emissions using a documented methodology appropriate to the programme and data available.
e	prevent maladaptation and evaluate whether project benefits, affordability and reliability remain viable under plausible climate scenarios.
f	require lifecycle planning for batteries, PV modules, inverters, refrigerants and other equipment.
g	promote productive-use activities that strengthen community resilience without creating unacceptable environmental or social impacts; and
h	publish climate and sustainability performance after data boundaries and assurance arrangements are established.

Lifecycle gate	Climate/sustainability evidence
Concept	Preliminary hazard and emissions-relevance screen.

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Lifecycle gate	Climate/sustainability evidence
Feasibility/site selection	Location-specific climate risk assessment and alternatives analysis.
Design	Documented resilience measures, design standards and residual risks.
Procurement	Climate-resilient specifications, warranties, take-back and efficiency criteria.
Operation	Performance monitoring, maintenance, emergency preparedness and climate-event learning.
Decommissioning	Asset recovery, waste and site-restoration plan.

2.5 Gender Diversity, Equity and Inclusion Policy

Equity and inclusion require REA to examine who is able to participate, who can access and afford services, who receives economic opportunities, who bears unpaid or safety burdens, and whose views are absent from conventional engagement processes. The analysis shall be proportionate to risk but must influence decisions rather than remain a descriptive annex.

Control item	Requirement
Policy owner	GESIC and HR, with PIO, PMUs and project teams
Approval authority	MD/CEO and relevant Board/Board Committee
Review frequency	Annual inclusion review; policy review at least every three years
Status	Draft for validation and formal approval

Policy statement. REA shall promote equitable participation, access, benefit and protection for women, men, young people, persons with disabilities and vulnerable or disadvantaged groups across its workplace, programmes, procurement and community engagement.

REA shall:

Clause	Mandatory requirement
a	conduct gender and social-inclusion analysis proportionate to the activity and use the findings to shape design, consultation, affordability, livelihoods and benefit distribution.
b	collect and analyse disaggregated data where lawful, necessary and safe, while protecting privacy.
c	provide reasonable accommodation and accessible information, venues, channels and infrastructure for persons with disabilities.
d	prevent direct and indirect discrimination in recruitment, employment, procurement, community participation and access to programme benefits.
e	set practical participation and inclusion objectives for programmes and track both outputs and outcomes.
f	require codes of conduct, GBV/SEA/SH risk assessment, confidential reporting and survivor-centred referral pathways where risk is present.

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Clause	Mandatory requirement
g	avoid publishing personally identifiable survivor information or combining datasets that enable re-identification.
h	engage women and vulnerable groups separately where social norms or safety concerns limit open participation; and
i	include inclusion performance in contractor, developer and partner evaluations.

Minimum inclusion design checks

Clause	Mandatory requirement
a	Who may be excluded from access, consultation, employment, compensation, productive-use support or grievance channels?
b	What barriers arise from cost, language, literacy, disability, location, caregiving responsibilities, safety or social norms?
c	Could the activity increase household conflict, harassment, SEA/SH, exclusion or unpaid workload?
d	Are benefit, compensation and livelihood arrangements accessible to persons without formal title or bank accounts?
e	Are consultation times, venues, formats and facilitators appropriate and safe?

2.6 Sustainable Procurement Policy

Procurement is one of the principal mechanisms through which REA controls risks generated by third parties. Environmental and social requirements shall be defined before solicitation, assessed during selection, converted into enforceable contract obligations and linked to supervision, payment, remedies and future eligibility. Requirements introduced only after award are unlikely to be adequately priced or resourced.

Control item	Requirement
Policy owner	Procurement Directorate, supported by GESIC, Legal, Finance and technical/contract owners
Approval authority	MD/CEO and relevant procurement approval authorities
Review frequency	Annual effectiveness review; policy review at least every three years
Status	Draft for validation and formal approval

Policy statement. REA shall use procurement and financing decisions to prevent and manage environmental and social risk, obtain safe and durable goods and services, promote value over the lifecycle, and ensure that counterparties are capable, accountable, and contractually bound to meet REA requirements.

REA shall:

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Clause	Mandatory requirement
a	integrate E&S risk into procurement planning, market engagement, prequalification, evaluation, contract award, mobilisation, payment, performance review and close-out.
b	apply risk-proportionate due diligence to bidders, developers, suppliers, operators, financial intermediaries and material subcontractors.
c	use pass/fail minimum requirements for legal compliance, serious integrity concerns, forced and child labour, safety capacity, incident history and prohibited activities.
d	include scored E&S criteria where performance differences are material to delivery risk.
e	incorporate standard clauses covering staffing, plans, reporting, grievance, incident notification, audits, records, subcontractors, waste take-back, remedies, suspension and termination.
f	evaluate lifecycle cost, efficiency, durability, repairability, warranties, spare parts, take-back and responsible end-of-life arrangements.
g	require traceability and responsible sourcing for batteries, solar components, and other high-risk supply chains to the extent that is proportionate and feasible.
h	link payment and retention to verified E&S deliverables and correction of material non-conformities; and
i	maintain a Counterparty E&S Performance Register that informs future procurement decisions.

Stage	Mandatory sustainable-procurement control
Procurement planning	E&S risk allocation, market capacity, required specialists, budget, schedule and assurance.
Prequalification	Eligibility, legal compliance, systems, staffing, experience, serious incidents and sanctions.
Tender documents	E&S specifications, bill items, plans, reporting, data, clauses and evaluation methodology.
Evaluation	Documented technical assessment by competent E&S personnel; clarifications do not cure material non-compliance unless rules permit.
Pre-mobilisation	Approved C-ESMP and topic plans, permits, induction, insurance, emergency arrangements and baseline records.
Contract management	Inspections, performance rating, incident response, CAPs, payment controls and remedies.
Close-out	Demobilisation, site restoration, waste records, outstanding grievances, asset handover and final performance rating.

2.7 Data Privacy and Protection Policy

Environmental and social management routinely involves personal and sensitive information, including worker records, land and compensation data, household vulnerability information, complaints, health information and SEA/SH case data. Privacy controls are therefore part of harm prevention and shall be designed into forms, systems, access rights, retention periods and disclosure practices from the outset.

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Control item	Requirement
Policy owner	Data Protection Officer/ICT, with GESIC, Legal, HR, PIO and M&E
Approval authority	REA data governance approval authority
Review frequency	Annual privacy review and after material system or legal change
Status	Draft for validation and formal approval

Policy statement. REA shall process personal data lawfully, fairly, transparently and securely, collect only data necessary for defined purposes, protect data subjects from harm and embed privacy into ESMS forms, systems, engagement, grievance, land, labour, GBV and monitoring processes.

REA shall:

Clause	Mandatory requirement
a	maintain an ESMS record of processing activities identifying purpose, lawful basis, data categories, data subjects, recipients, retention and security controls.
b	apply privacy by design and default when creating forms, registers, mobile applications, dashboards and public reporting.
c	collect only the minimum necessary personal data and avoid collecting sensitive data without a defined lawful need and enhanced controls.
d	separate confidential GBV/SEA/SH and whistleblowing information from general grievance and project databases.
e	restrict access by role, maintain audit logs, encrypt data where appropriate and control downloads, sharing and portable media.
f	establish retention and secure-disposal schedules for grievance, worker, land, compensation, consultation, incident, medical and monitoring records.
g	conduct data-protection impact assessments for high-risk processing, including biometrics, geolocation, large-scale vulnerable-person data or linked beneficiary datasets.
h	manage processors and contractors through data-protection clauses and due diligence.
i	maintain breach detection, containment, assessment, notification and remediation procedures; and
j	enable data-subject rights and complaint channels in accordance with applicable Nigerian law.

Data type	Minimum control
General stakeholder/ grievance data	Restricted operational access; anonymised or aggregated external reporting.
Land and compensation records	Need-to-know access; secure identity and payment controls; retention tied to legal and audit requirements.

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Data type	Minimum control
Worker records	HR-controlled; project access limited to necessary compliance information.
Medical and injury information	Enhanced confidentiality; report only necessary facts and anonymised trends.
GBV/SEA/SH information	Survivor-centred, minimal data, separate storage, highly restricted access; no detailed case data in general registers.
Photographs, coordinates and beneficiary data	Document consent/lawful basis, use limitations and publication controls.

2.8 Labour Occupational Health and Safety and Human Rights Policy

REA shall respect the dignity and rights of workers and affected people in its direct activities and business relationships. This policy is guided by the United Nations Guiding Principles on Business and Human Rights, the International Bill of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work, including a safe and healthy working environment. It is implemented in accordance with applicable Nigerian law, public-service obligations and financing requirements.

Control item	Requirement
Policy owner	HR for employment and worker grievance; GESIC for corporate coordination; operational and OHS owners for workplace controls.
Approval authority	MD/CEO through the applicable Board and statutory governance route.
Review frequency	Annual effectiveness review and full policy review at least every three years or after material change.
Application	Direct employees, contracted workers and relevant primary-supply-chain risks, proportionate to REA's control and influence.

REA shall provide written and understandable employment terms; pay lawful wages and benefits on time; provide fair working hours, rest, leave and welfare facilities; prevent discriminatory recruitment, pay, promotion or dismissal; and provide reasonable accommodation. Workers shall be able to organise and bargain collectively in accordance with applicable law without interference or retaliation. Recruitment fees, retention of identity documents and coercive restrictions on movement are prohibited. Age verification and restrictions on hazardous work shall prevent child labour. Workforce reduction shall be planned transparently, with consultation, objective selection and lawful notice, compensation and transition support.

REA and its contractors shall identify occupational hazards, eliminate hazards where feasible and apply engineering and organisational controls before relying on personal protective equipment. Task risk assessments, safe isolation, permits to work, competent supervision, appropriate tools, free protective equipment, emergency arrangements and health surveillance shall be provided according to risk. Workers shall receive induction and task training and participate through OHS committees or worker representatives. Health programmes shall address relevant occupational disease, heat stress,

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communicable disease and HIV/STI awareness without discrimination or disclosure of confidential health information.

Every worker shall have a free and accessible grievance route, with confidential and anonymous options, independent escalation and protection from retaliation. HR shall manage direct-worker complaints; contract owners shall verify effective arrangements for contracted workers. SEA/SH complaints shall follow the protected referral arrangements in his manual. Grievance use does not limit access to trade-union representation, regulators or courts.

Security arrangements shall be proportionate, conflict-sensitive and consistent with the Voluntary Principles on Security and Human Rights and the United Nations Basic Principles on the Use of Force and Firearms by Law Enforcement Officials. REA shall assess foreseeable human-rights risks, vet and train security personnel, prohibit abuse and intimidation, maintain complaint channels and investigate credible misconduct through competent lawful processes.

Policy performance shall be assessed through employment compliance, worker participation, training and task authorisation, injuries and high-potential events, grievance access and timely remedy, supply-chain due diligence and verified closure of corrective actions. Low complaint or incident counts shall not be treated as proof of good performance without evidence that reporting is accessible and trusted.

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3. Governance, Roles and Accountability

The governance model follows a three-line logic adapted to REA. Operational Directorates, programmes and contract owners constitute the first line and remain accountable for risk ownership and control implementation. GESIC and other specialist functions provide second-line standards, review, challenge, and monitoring. Internal Audit provides independent third-line assurance and shall not assume operational ownership.

3.1 Governance Structure and Decision Authority

The governance framework is designed to place accountability at the level where resource and risk decisions are made while retaining technical independence, operational ownership, and assurance. GESIC coordinates the system but does not assume the duties of project owners, Procurement, Legal, HR, M&E, ICT, Finance, Security, or Internal Audit.

Institutional accountability chain -

1. REA Board / relevant Board Committee: oversight
2. MD/CEO and Executive Management: accountable leadership and resources
3. ESMS Steering Committee: cross-functional governance and escalation
4. GESIC: corporate ESMS secretariat and technical coordination
5. Directorates and PMUs: operational implementation
6. Developers, contractors, suppliers, operators and FIs: contractual implementation

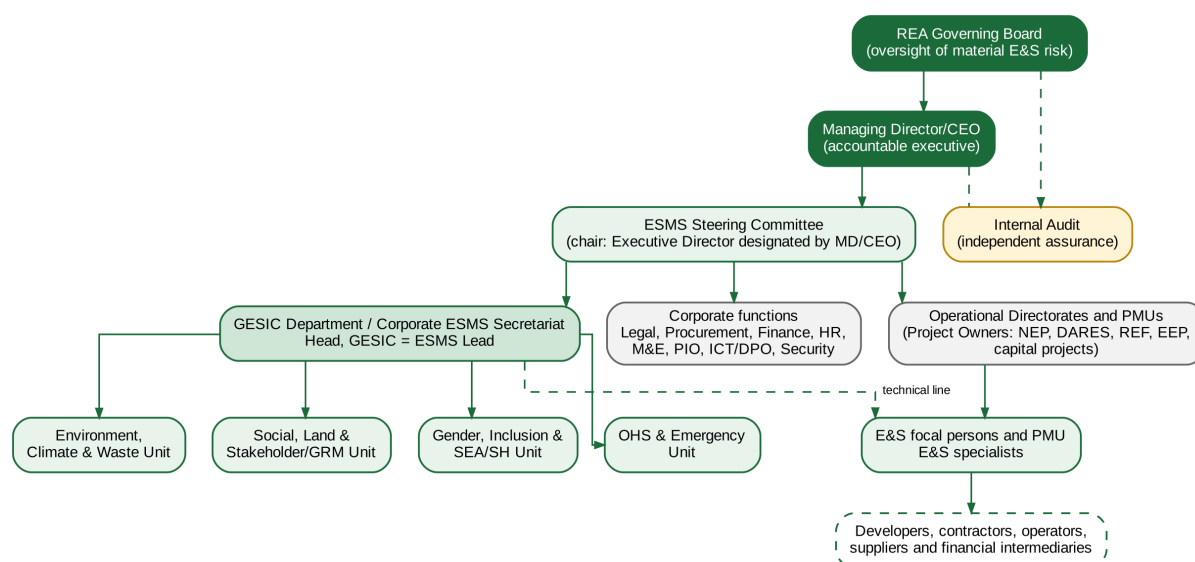


Figure 1: REA Institutional ESMS organogram

The MD/CEO is the accountable executive for the ESMS. The Corporate ESMS Lead, located within GESIC, reports on ESMS performance and material risks directly to the MD/CEO and serves the ESMS Steering Committee through the GESIC Secretariat. Directorate and PMU heads remain accountable for implementation and supervise their E&S specialists and focal persons. GESIC sets corporate methods, reviews higher-risk decisions and coordinates the specialist network. Supporting functions retain their statutory and professional responsibilities. Internal Audit reports through the applicable Board oversight route and maintains independence from operational approval and implementation.

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Contractual reporting from developers, contractors, operators, suppliers and financial intermediaries goes to the relevant project or contract owner, with material issues escalated to GESIC and management. The Steering Committee coordinates and escalates cross-functional matters; it does not replace the MD/CEO, statutory approval authorities or Internal Audit.

3.1.1 ESMS Steering Committee

REA shall establish an ESMS Steering Committee through an approved charter. The Committee shall not replace statutory procurement, audit, disciplinary or technical approval bodies. Its role is to resolve interfaces, review material risk, approve system documents within delegated authority, and ensure cross-Agency implementation.

Item	Approved requirement
Chair	Executive-level officer designated by the MD/CEO
Secretariat	GESIC.
Core membership	GESIC, Legal, Procurement, M&E, HR, Finance, PIO, ICT/DPO, Internal Audit observer, technical/project Directorates, PMU representatives, Security/Facilities and other functions as required.
Frequency	Quarterly as a minimum and extraordinary meetings after a serious incident, material compliance issue or major system change.
Quorum	As indicated in the approved Charter.
Standing agenda	Material risks; serious incidents; grievances and land issues; legal compliance; CAP ageing; contractor performance; data quality; resources; audit results; policy/procedure changes; development-partner commitments.
Records	Agenda, papers, attendance, declarations of interest, decisions, actions, owners, deadlines and escalation records.

3.2 Roles and Responsibilities

Responsibility must be attached to a named role with sufficient authority, competence, time and resources. Assignment to a committee, consultant or generic “project team” does not remove accountability from the designated REA decision owner. Where duties are delegated, the delegation, limits, reporting requirements and retained accountability shall be documented.

Role	Core accountability
REA Board / relevant committee	Approve policy where required; oversee material E&S and ESG risks; review serious incidents, systemic non-compliance, annual performance and management-review outcomes; challenge resource adequacy.
MD/CEO	Provide accountable leadership; approve the ESMS; assign authority and resources; ensure integration into strategy and budgets; accept defined high residual risks; direct response to material incidents.
Executive Management	Integrate ESMS requirements into Directorate plans; review performance; resolve resource and accountability gaps; enforce decisions.
ESMS Steering Committee	Coordinate functions; endorse procedures; review risk and performance; resolve programme interfaces; escalate material matters; monitor implementation roadmap.

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Role	Core accountability
GESIC	Maintain the corporate ESMS; advise on screening and instruments; review higher-risk assessments; coordinate focal persons; consolidate data; manage system training; support incident/grievance escalation; maintain selected registers; lead continual improvement.
Directorates/PMUs	Own risks arising from their activities; appoint competent specialists; complete screening and instruments; implement plans; supervise counterparties; maintain records; report performance and incidents.
Project development/technical teams	Integrate E&S into alternatives, site selection, design, specifications, land access, construction supervision, testing, commissioning, O&M and close-out.
Procurement and contract managers	Plan E&S procurement requirements; conduct due diligence; include criteria and clauses; obtain competent evaluation; enforce deliverables, payment controls and remedies; maintain counterparty ratings.
Legal Services	Maintain legal register; advise on land, contracts, permits, data and liabilities; verify compliance obligations; support disputes and regulator engagement.
M&E	Own the corporate E&S performance data architecture; define indicators and data quality controls; consolidate dashboards; support verification and reporting.
HR	Manage employee terms, conduct, competence, worker grievance, welfare, training records and workplace OHS interfaces; support disciplinary processes.
PIO	Coordinate corporate disclosure, accessible communications and stakeholder engagement support; maintain approved public information and feedback channels.
ICT and DPO	Protect ESMS systems and personal data; manage access, backup, retention and breach response; support privacy-impact assessment.
Finance	Budget for ESMS implementation; integrate E&S conditions into payment controls; track expenditure; support financial-intermediary oversight where applicable.
Internal Audit	Provide independent, risk-based assurance on system design and operating effectiveness; track management responses while preserving independence.
Security/Facilities/OHS functions	Assess security and workplace risks; manage emergency readiness; coordinate incident response; oversee security providers and facilities controls.
Developers/contractors/suppliers/operators/FIs	Comply with law, contracts and approved plans; maintain competent staff and systems; control subcontractors; report incidents and data; correct non-conformities; retain records; permit REA audit.

3.2.1 E&S focal-person network

Each relevant Directorate, PMU and corporate function shall designate an E&S focal person. Designation does not replace specialist staffing for higher-risk activities. Focal persons coordinate

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screening, records, reporting and escalation within their function and shall receive role-based training and adequate time allocation.

3.3 Escalation, Stop-Work and Residual-Risk Acceptance

Escalation is intended to move decisions to the level where the necessary authority and resources are available. It is not a substitute for immediate protective action. Imminent danger, unauthorized land entry, active violence, serious pollution, or other conditions capable of causing material harm require immediate control, including, where necessary, stop-work, while formal notification proceeds.

3.3.1 Escalation levels

Level	Trigger and response
Level 1 - Routine	Low/moderate non-conformity with no immediate serious harm; managed by project/contract owner within defined time.
Level 2 - Significant	Repeated non-compliance, material grievance, permit risk, serious near miss, unresolved land issue or overdue high-risk CAP; escalated to Directorate/PMU leadership and GESIC.
Level 3 - Material	Fatality, life-threatening injury, major pollution event, credible SEA/SH allegation requiring protected referral, violent conflict, significant displacement breach, regulatory enforcement, media-sensitive event or widespread system failure; immediate executive and development-partner notification as applicable.
Level 4 - Crisis	Multiple fatalities, catastrophic environmental harm, major security event, systemic fraud/retaliation or event threatening programme continuity or public trust; activate crisis management and Board oversight.

Exact notification times shall be defined in Volume 2 and aligned with applicable financing agreements. Where multiple requirements apply, the shortest notification period governs.

3.3.2 Stop-work authority

All workers and REA representatives have authority to stop or refuse work where there is a reasonable belief of imminent danger to people, serious environmental harm, unauthorised land entry, active conflict, unsafe electrical conditions or other material breach. No retaliation is permitted. Restart requires documented clearance by a competent person and the contract owner, with GESIC involvement for significant or material events.

3.3.3 Residual-risk acceptance

Residual risk	Minimum acceptance authority
Low	Accepted by designated project/contract manager within approved controls.
Moderate	Accepted by Directorate/PMU head with E&S concurrence.
Substantial/High	Accepted only by the MD/CEO or formally delegated executive authority after documented alternatives, legal review, mitigation, financing implications and monitoring commitments.
Unacceptable	Activity shall not proceed; redesign, relocate, change delivery model or reject.

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3.4 Competence, Resources and Organisational Change

Competence planning shall distinguish awareness, working knowledge, specialist capability, approval authority and independent assurance. The training plan shall be derived from role requirements and risk exposure. REA shall also assess whether organisational restructuring, staff turnover, new financing instruments, new technologies or rapid portfolio growth create capability gaps requiring interim controls.

REA shall determine the competence and resource requirements necessary to operate the ESMS across its portfolio. Staffing shall be based on risk, workload, geographic coverage, and delivery model rather than on a fixed, generic ratio. Higher-risk programmes require qualified environmental, social, land, labour/OHS, GBV, security, biodiversity, climate and data expertise as applicable.

Audience	Required competence
Board/Executive	Material risk oversight, legal duties, serious incidents, residual-risk acceptance and management review.
GESIC/PMU specialists	Advanced standards, assessment, land, labour/OHS, stakeholder engagement, GBV, climate, biodiversity, data and audit.
Technical/project teams	Screening, alternatives, design safeguards, site supervision, electrical/community safety, commissioning and close-out.
Procurement/ Legal/ contract managers	Due diligence, evaluation, clauses, remedies, supplier/FI risk and record integrity.
M&E/ICT/DPO	Indicator definitions, data quality, privacy, security, dashboards, trend analysis and disclosure.
HR/ OHS/ Security/ Facilities	Labour, worker grievance, workplace safety, emergency, incident investigation and security/human-rights controls.
Counterparties	REA minimum requirements, competent site personnel, plans, reporting, incident response and corrective action.

Competence shall be demonstrated through qualifications, relevant experience, assessed training, supervised practice, field observation and quality review of completed work. Attendance alone is not evidence of competence.

3.4.1 Minimum Staffing and Role Requirements

REA shall designate a full-time Corporate ESMS Lead within GESIC. At corporate level, environmental, social and stakeholder-engagement, and OHS competencies shall be continuously available through assigned qualified personnel. The social function shall include gender and SEA/SH coordination and qualified community liaison capability. Legal, Procurement, Finance, HR, M&E, ICT/DPO and Security/Facilities shall each identify a trained focal person. Vacancies or outsourcing do not suspend accountable ownership; written interim cover and escalation arrangements shall apply.

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Risk or delivery setting	Minimum implementation capacity	Specialist support and supervision
High and Substantial activities	Named E&S manager or lead; environmental and social specialists; dedicated OHS lead and community liaison officer during active works. Distinct functions shall not be combined where workload or independence is compromised.	Land / livelihood, biodiversity, GBV, security, climate and other specialists as triggered. GESIC reviews competence and coverage before mobilisation and commissioning.
Moderate activities and Category 2 projects	Named qualified E&S lead, HSE / OHS lead and community liaison officer, with environmental and social expertise appropriate to impacts. Roles may be shared between nearby sites only with a documented coverage assessment.	Site availability and specialist input must support inspections, worker engagement, community response and emergency needs.
Low activities	Trained accountable owner and focal person, with access to corporate E&S / OHS advice.	Screening, good-practice controls, records and escalation remain mandatory.
SHS and results-based financing windows	Programme E&S lead, consumer / community liaison capability, product / lifecycle expertise and field verification personnel.	Sampling and supplier / distributor oversight reflect dispersed sites, consumer risks and supply-chain exposure.
Financial-intermediary arrangements	FI-designated E&S manager and competent credit / subproject reviewers; named REA oversight owner.	Higher-risk subprojects receive specialist review and prior REA / lender clearance where required.
Corporate facilities and field missions	Facilities / OHS owner, trained emergency response team and Directorate focal persons.	Journey management, security, workplace safety, accessibility and waste controls are verified.

GESIC shall review staffing against the number and risk of active activities, travel distances, construction intensity, grievance workload, technologies and supervision arrangements at least quarterly. Programme and contract budgets shall fund the approved staffing plan. Consultants may provide technical services, but REA retains decision ownership and sufficient internal competence to commission, review and act on their work.

HR shall incorporate ESMS duties into job descriptions and performance objectives; programme and contract owners shall verify counterpart qualifications, role availability and replacement arrangements before accepting mobilisation.

3.4.2 Training and Competence Programme

The annual training programme in the ESMS Manual applies to the Board and executives, GESIC, focal persons, technical teams, corporate functions and counterparties. Induction shall precede assignment or site access. Role-specific training and assessed practice shall precede delegated approval or high-risk

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work. Refresher training shall occur at least annually, and after material changes, incidents or demonstrated competency gaps. Toolbox talks and emergency exercises shall supplement formal training.

HR and GESIC shall maintain the competence register, attendance and assessment records, authorisation status and refresher dates. Supervisors shall verify application in practice. A person who does not demonstrate required competence shall receive supervised support or have the relevant task or approval authority restricted until competence is established.

The foundational training topics below shall be mapped to assigned roles and functions in the annual training plan. HR and GESIC shall tailor depth and practical exercises to the relevant duties and risk exposure; competence assessment and refresher requirements above apply to each audience.

Role or function	Foundational training topics
All REA personnel and E&S focal persons	ESMS policy and responsibilities; conduct and non-discrimination; basic risk recognition; grievance access; incident reporting; confidentiality; escalation and stop-work arrangements.
Board, MD/CEO, executives and ESMS Steering Committee	E&S accountability; applicable safeguard commitments; risk acceptance and decision gates; resource adequacy; serious-incident oversight; performance reporting and management review.
GESIC, Corporate ESMS Lead and E&S specialists	Screening and categorisation; lender exclusion lists; assessment ToRs; instrument review and clearance; mitigation hierarchy; legal compliance; stakeholder safeguards; monitoring and corrective action.
Technical Directorates, PMUs, project and contract owners	Application of approved ESIA/ESMP and contractor plans; lifecycle risks; electrical and community safety; land and livelihood prerequisites; contractor supervision; change control and handover.
Procurement and Legal Services	Consultant competence and ToR evaluation; procurement exclusions and integrity; E&S contract clauses; permits and statutory approvals; conformity certification; evidence required for contract and activity release.
Finance and Accounts	ESMS budgeting and cost allocation; identification of funding sources; E&S conditions in payment verification; expenditure records; resource-gap escalation and financial-intermediary commitments.
Human Resources	Employment terms and minimum-wage compliance; prevention of forced and child labour; worker rights and grievance arrangements; SEA/SH prevention; induction, competence assessment and authorisation records.
PIO, social specialists and community liaison personnel	Stakeholder mapping; accessible and culturally appropriate consultation; inclusion of vulnerable groups; disclosure; grievance handling; protected SEA/SH referral and reporting back to communities.
M&E and programme reporting personnel	Indicators and baselines; field verification; data quality; compliance evidence; monitoring reports; corrective-action tracking and safe aggregate reporting.
ICT and Data Protection Officer	Lawful personal-data processing; access and retention controls; confidential worker, grievance and medical records; secure repositories; backups and data-breach response.

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Role or function	Foundational training topics
OHS, Security and Facilities personnel	Hazard assessment and control hierarchy; safe isolation and permits to work; protective equipment; emergency drills; incident response; proportional security and human-rights safeguards.
Internal Audit	Independent ESMS assurance; risk-based audit planning; sampling and evidence; financial and operational controls; audit findings and verification of corrective-action closure.
Developers, contractors, suppliers, operators and financial intermediaries	Applicable E&S contractual duties; exclusions and subproject screening; labour and OHS controls; responsible sourcing; waste and battery management; emergency, grievance and incident reporting requirements.

3.4.3 Dedicated ESMS Budget Line and Financial Controls

REA shall establish, implement and maintain a clear, dedicated budget line titled ESMS Implementation in its annual corporate budget and financial reporting system. Each programme and project shall include identifiable E&S allocations aligned with its risk and approved instruments. Finance shall assign the relevant account or cost-centre codes and distinguish corporate, programme and counterparty expenditure to prevent omission or double counting.

GESIC and Finance shall prepare a costed annual ESMS work plan before the budget approval cycle. The MD/CEO shall ensure that the approved allocations cover mandatory compliance and the resources necessary for the planned portfolio. The budget shall be reviewed quarterly against commitments, actual expenditure, remaining activities and resource gaps. Management shall provide supplementary resources or limit commitments where resources are insufficient to meet required controls.

Budget component	Costing basis	Accountable owner
Corporate staffing and specialist support	Approved positions, annual staff costs, specialist days and framework contracts.	HR and GESIC with Finance
Assessment and compliance	Number and scope of assessments, surveys, permits, specialist studies and legal support.	Programme heads and Legal
Training and competence	Audience, modules, provider days, exercises, assessment and refresher programme.	HR and GESIC
Stakeholder engagement and disclosure	Meetings, liaison, accessible venues, translation, disability accommodation and community reporting.	PIO and programme heads
Grievance management and SEA/SH referral readiness	Receiving channels, case administration, appeals, safe referral arrangements and perception surveys; confidential service costs protected.	HR / GESIC / programme owners
Monitoring and field supervision	Risk-based visit plan, travel, security, equipment, laboratory services and independent verification.	M&E and programme heads

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Budget component	Costing basis	Accountable owner
Information systems and records	Repository, access control, backups, privacy and cybersecurity requirements.	ICT / DPO and M&E
Emergency preparedness and response	Equipment, responder arrangements, drills, first aid and lawful contingency provision.	Facilities / OHS and project owners
Audit and management review	Annual internal audits, specialist assurance and independent High-risk programme audits.	Internal Audit and GESIC
Implementation and improvement	Pilot actions, system revisions, corrective action and approved contingencies.	GESIC and Finance

The costed work plan shall state quantity, unit cost, total cost, currency, funding source, timing, budget code and owner for each item, supported by approved pay scales, quotations, contracts or other reasonable estimates. The total annual ESMS allocation is the sum of these costed items and approved contingencies. Amounts become expenditure authority only through REA's lawful budget and procurement process. The implementation-phase resource schedule shall be incorporated into this costing.

Every ESMP shall contain one consolidated costed implementation table covering mitigation, specialist staff, SEP, community and worker GRMs, SEA/SH readiness, monitoring, emergency arrangements, audit and end-of-life obligations. Costs shall be assigned to REA, the programme, the contractor or another responsible party before Gate 3. Compensation and livelihood funding shall be secured and separately traceable before land access. Payment controls shall verify the required E&S deliverables and avoid funding duplicate items.

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4. ESMS Risk Management Framework

The risk framework provides a common method for translating diverse project, programme and corporate risks into consistent decisions. It operates at two connected levels: transaction-level assessment for individual activities and portfolio-level oversight of recurring, cumulative and systemic risk. A project that appears moderate in isolation may require stronger control where similar risks are repeated across a large national portfolio.

4.1 E&S Risk Universe and Risk Methodology

Risk assessment shall distinguish inherent risk from residual risk. Inherent risk reflects the exposure before controls; residual risk reflects the exposure after considering the design and demonstrated effectiveness of controls. Proposed actions that have not yet been implemented shall not be treated as effective controls when determining current residual risk.

REA shall maintain a corporate E&S Risk Register that captures strategic, programme, project, counterparty and operational risks. The register shall distinguish inherent risk, existing controls, control effectiveness, residual risk, actions, owners, deadlines and assurance status. It shall be reviewed at least quarterly for material activities and whenever conditions change.

Risk family	Representative REA exposures
Land and livelihoods	Land access, voluntary transactions, informal users, economic displacement, compensation, livelihood restoration, conflict and legacy claims.
Labour and OHS	Terms and conditions, child/forced labour, worker grievance, contractor welfare, electrical safety, work at height, excavation, lifting, traffic, heat and remote work.
Community health and safety	Electrocution, fires, traffic, excavation, public access, disease exposure, emergency communication, unsafe appliances and consumer safety.
Stakeholders and social inclusion	Exclusion, affordability, elite capture, misinformation, vulnerable groups, disability access, community conflict, benefit distribution and grievance trust.
GBV/SEA/SH	Worker-community interaction, labour influx, power imbalance, exploitation, harassment, retaliation and unsafe referral/data handling.
Biodiversity/cultural heritage	Habitat conversion, sensitive species, ecosystem services, vegetation clearance, bird/bat interaction, invasive species and chance finds.
Pollution/resource efficiency	Dust, noise, erosion, drainage, spills, fuels, oils, chemicals, refrigerants, water use, waste and hazardous materials.
Battery/PV/e-waste	Product quality, storage, fire, transport, leakage, informal recycling, take-back, cross-border movement and final disposal.
Climate and disaster risk	Flooding, extreme heat, wind, lightning, erosion, drought, wildfire, accessibility, resilience, GHG and maladaptation.
Security and human rights	Conflict, crime, community tensions, security personnel conduct, use of force, access restrictions and retaliation.
Governance/data/supply chain	Permits, corruption, conflicts of interest, privacy, data quality, counterparty capacity, responsible sourcing, sanctions and subcontractor control.

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4.1.1 Risk scoring

Risk significance shall be assessed using consequence and likelihood, adjusted for vulnerability, sensitivity, legal non-compliance, stakeholder concern, cumulative effects, reversibility and uncertainty. A numerical score supports consistency but does not replace professional judgement or mandatory legal/lender categorisation.

Likelihood	Guide
1 Rare	Not expected; exceptional circumstances.
2 Unlikely	Could occur but not anticipated under normal conditions.
3 Possible	May occur during the activity or lifecycle.
4 Likely	Expected in several circumstances or has occurred repeatedly.
5 Almost certain	Expected to occur frequently or is already occurring.

Consequence	Guide
1 Insignificant	Minor reversible effect; no injury; no legal breach; readily corrected.
2 Minor	First-aid injury, local short-term effect, low-level grievance or minor delay.
3 Moderate	Medical treatment/lost time, material livelihood or community effect, reportable breach, moderate remediation.
4 Major	Single fatality or life-threatening harm, major displacement breach, significant pollution, major conflict or regulatory action.
5 Severe/ Catastrophic	Multiple fatalities, irreversible ecological loss, widespread displacement, systemic abuse or crisis-level institutional impact.

Risk score equals likelihood multiplied by consequence. Indicative risk band: 1–4 Low; 5–9 Moderate; 10–16 Substantial; 17–25 High. Any consequence rated 5 shall be classified at least High regardless of likelihood. Legal prohibitions and unacceptable risks require rejection or redesign regardless of score. Critical habitat, displacement, SEA/SH, vulnerable-group, security and catastrophic-safety triggers require the applicable specialist assessment and may elevate category irrespective of score. Mandatory lender categorisation is recorded separately.

4.1.2 Corporate Process and Aspects Mapping

GESIC and each corporate function shall map its processes and facilities at least annually and before material change. The mapping shall identify activities, inputs, equipment, staff and contractors, outputs and waste, affected people and environmental receptors, existing controls and foreseeable failure or emergency conditions. Worker and facility walk-through input shall inform the assessment. Findings shall enter the Corporate E&S Risk Register using the scales in Section 4.1.1.

Corporate process	Principal aspects and potential impacts	Required controls
Offices and workplace services	Electrical / fire hazards, indoor health, accessibility, harassment, energy and water use, routine and electronic waste.	Facilities inspections, labour and accessibility controls, emergency plan, resource targets and authorised waste routes.

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Corporate process	Principal aspects and potential impacts	Required controls
Fleet logistics and field missions	Road incidents, emissions, fatigue, conflict exposure, heat stress, lone working and interaction with communities.	Journey approval, fit vehicles and drivers, security assessment, communications, welfare and incident escalation.
Warehouses and equipment handling	Lifting, stacking, battery damage / fire, chemical leakage, theft and uncontrolled end-of-life transfer.	Inventory, safe segregation, trained handlers, emergency readiness, inspection and licensed transfer evidence.
Procurement and contracting	Supplier labour abuse, unsafe products, weak contractor capacity, corruption and missed lifecycle obligations.	Due diligence, evaluation controls, clauses, responsible sourcing and performance remedies.
Data engagement and beneficiary verification	Privacy breach, exclusion, inaccessible consultation, inaccurate information and unsafe complaint handling.	Lawful data processing, accessible engagement, protected case channels, quality checks and feedback.

The assessment shall cover normal operations, non-routine work, emergencies and activities performed by third parties. Inherent and residual likelihood and consequence, control effectiveness, actions, owner, deadline and assurance shall be recorded separately. Corporate activities do not become exempt because their physical footprint is small.

4.2 Screening, Categorisation and Instrument Selection

Categorisation is a management decision with consequences for competence, assessment depth, disclosure, approval, supervision and budget. It shall not be reduced to a form-completion exercise. Where information is insufficient or uncertainty is material, REA shall adopt the more precautionary category until adequate evidence supports reclassification.

Screening is the first mandatory risk control. It determines eligibility, category, applicable standards, assessment instruments, specialist inputs, disclosure needs, approval route and indicative budget/schedule. Screening shall be completed by trained personnel, reviewed by GESIC for defined thresholds and updated when the activity changes.

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Corporate E&S screening workflow

1. Register activity and define scope
2. Apply exclusion and legal trigger checks
3. Screen location, technology, delivery model and counterparties
4. Assign provisional category and standards
5. Select assessment/management instruments and specialist studies
6. Approve screening and decision-gate conditions
7. Update after design, site or scope change

4.2.1 Exclusion criteria

REA shall maintain a controlled Exclusion List. At minimum, REA shall not finance, procure, support or knowingly facilitate activities that:

Clause	Mandatory requirement
a	are illegal under Nigerian law or prohibited under an applicable financing agreement.
b	use forced labour, exploitative child labour or trafficking.
c	require significant conversion or degradation of legally protected or critical habitat without the conditions required by applicable standards being demonstrably satisfied.
d	involve unauthorised physical displacement, coercive land donation or construction before compensation/livelihood obligations are completed.
e	create residual safety, pollution, security, or human rights risk assessed as unacceptable by the competent authority.
f	depend on disposal of hazardous, battery or e-waste through unlicensed or demonstrably unsafe channels; or
g	are associated with counterparties subject to applicable debarment, sanctions or serious unresolved E&S misconduct, unless lawfully cleared through documented due diligence and management approval.

REA shall comply with the exclusion lists and prohibitions of each lender and financier applicable to the relevant programme, project, subproject or financing window. GESIC and Legal Services shall incorporate these requirements into the controlled REA Exclusion List, identify the funding source and record the applicable list, version and effective date. Co-financed activities shall be checked against all applicable lists and binding financing conditions.

Accountable owners shall document this eligibility check before financing, procurement or activity approval, and repeat it when scope, counterparties, funding or applicable requirements change. Financial intermediaries and other implementing counterparties shall apply the relevant exclusions to their supported activities and provide verification records. An activity prohibited by an applicable lender or financier exclusion list shall be ineligible; internal approval, risk acceptance or mitigation measures shall not override that prohibition.

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4.2.2 Categorisation crosswalk

Corporate risk band / indicative lender category	Application
High / Category 1	Likely significant, diverse, irreversible or unprecedented impacts; major displacement, critical habitat, complex security or cumulative risk. Full assessment, senior approval, enhanced disclosure, independent review and intensive supervision.
Substantial / Category 1 or 2 depending on impacts and Lender	Material risks that are generally manageable with robust site-specific instruments and specialist oversight. Category shall follow the applicable lender definition, not automatic conversion.
Moderate / Category 2	Site-specific, predictable and largely reversible impacts manageable through proportionate ESIA/ESMP or targeted plans and routine supervision.
Low / Category 3	Minimal or negligible adverse impacts; screening record and good-practice controls are normally sufficient.
Financial intermediary / AfDB FI / World Bank FI arrangements	Assess FI capacity, portfolio risk, exclusion list, subproject screening, ESMS, reporting, audit rights and escalation. Higher-risk subprojects may require prior REA/lender review.

The crosswalk is indicative. The classification required by the financing agreement and the applicable framework shall be recorded separately. REA may apply a higher corporate category where portfolio, reputational, capacity or cumulative risks justify it.

4.2.3 Instrument selection

Instrument	When required
ESMF/ESMS	Programme or financing window where sites/subprojects are not fully known; defines screening, criteria, responsibilities and procedures.
ESIA	Activity with material site-specific impacts requiring baseline studies, alternatives, impact assessment and public consultation.
ESMP	Operational mitigation, monitoring, responsibility, schedule and cost measures; may be standalone or part of ESIA.
C-ESMP	Contractor's implementation plan showing methods, personnel, subplans, controls, monitoring and records.
RPF/RAP/LRP	Land acquisition, physical/economic displacement, access restriction, compensation or livelihood effects.
SEP and GM	Stakeholder identification, disclosure, engagement, vulnerable-group access, feedback and grievance arrangements.
LMP/worker plans	Terms, labour risks, contractor workforce, worker grievance, conduct, welfare and OHS.
Specialist plans	Biodiversity, cultural heritage, traffic, security, emergency, GBV/SEA/SH, waste, battery/e-waste, pollution, climate, community health and safety or other topic plans.

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Instrument	When required
ESCP/Action Plan	Time-bound commitments required to achieve compliance, close due-diligence gaps or meet financing conditions.

GESIC shall prepare or verify project-specific terms of reference (ToR) for each environmental and social assessment (ESA) instrument and specialist study, based on the approved screening and risk category. The ToR shall specify the scope, applicable Nigerian and financier requirements, baseline and alternatives analysis, assessment methods, stakeholder consultation and disclosure, required management plans, deliverables, timetable, team competencies and review arrangements. Required prior review of the ToR by a competent authority or financier shall be completed before commissioning.

Procurement, with technical input from GESIC, shall select consultants against the approved ToR and evaluation criteria established before solicitation. Evaluation shall assess relevant sector and instrument experience, professional eligibility where required, team qualifications, methodology, local context and stakeholder capability, work plan, resources, quality assurance and independence. Conflicts of interest, evaluation results, scoring or compliance findings and the selection decision shall be documented under the applicable procurement and financing requirements.

GESIC shall coordinate review and clearance through the following process. An instrument-specific checklist shall record each criterion as satisfactory, requiring revision or not applicable with justification. Mandatory gaps shall be closed through a documented comments and revision register before technical acceptance. Statutory approval and required financier clearance shall be recorded separately; neither replaces REA's responsibility for implementation.

Review stage	Acceptance criteria	Responsibility and record
Completeness and scope	Coverage of the approved ToR, screening category, required instruments, baseline, consultations, annexes and supporting evidence.	GESIC and programme owner; completeness checklist and identified gaps.
Technical and safeguard review	Adequate alternatives and impact analysis; mitigation hierarchy; labour/OHS, land, biodiversity and other triggered safeguards; feasible measures, owners, indicators, schedule and budget.	GESIC and relevant specialists, with Legal Services on legal requirements; documented review findings.
Revision and technical acceptance	Consultant responses address each finding; revised text and evidence close mandatory gaps; assumptions and residual risks are explicit and acceptable within delegated authority.	Consultant revises; GESIC verifies closure and records technical acceptance and any continuing conditions.
Statutory and financier clearance	Applicable regulatory submissions, permits or approvals and required lender review or no-objection are obtained; clearance conditions are included in the final instrument.	Accountable owner with GESIC and Legal Services; dated approvals, no-objections and conditions register.
Authorisation and implementation release	Final controlled version, required consultation/disclosure evidence, funded actions, assigned owners and relevant gate conditions are complete before the affected activity proceeds.	REA approval under delegated authority; final instrument, approval record and release checklist.

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Review stage	Acceptance criteria	Responsibility and record
Change and version control	Material changes are re-screened and affected instruments are revised and reviewed; further statutory or financier clearance is obtained where required.	Programme owner and GESIC; version history, updated checklist and clearance records.

Draft and final instruments shall be consulted on and disclosed at the stages, for the periods and through the channels required by the applicable legal and financing framework. GESIC shall retain the approved ToR, consultant evaluation, review checklists, revision register, consultation/disclosure evidence, final instrument and clearance records in the controlled repository. Approval conditions shall be transferred into implementation, procurement, supervision and monitoring arrangements.

4.2.4 Specialist Screening and Approval Triggers

Screening shall identify disadvantaged or vulnerable people and determine whether highly vulnerable rural minorities, Indigenous Peoples or Sub-Saharan African historically underserved traditional local communities, as defined by the applicable safeguard, are present in or have collective attachment to the area of influence. Identification shall be undertaken by competent social specialists with culturally appropriate community engagement; it shall not rely solely on administrative labels or the absence of formal land title.

Where relevant groups are identified, the instrument pathway shall include a Vulnerable Groups Plan or the Indigenous Peoples or equivalent plan required by the applicable framework, with differentiated engagement, benefit access, impact mitigation, budget and monitoring. GESIC shall record whether free, prior and informed consent is required, including applicable triggers involving traditionally owned or customarily used land and natural resources, relocation, or significant impacts on critical cultural heritage. Required consent and lender clearance shall be established and documented before the affected project component proceeds. Where consent cannot be established, that component shall not proceed unless redesigned to avoid the impacts in accordance with the applicable safeguard.

Protected areas, critical habitat, endangered species, important ecosystem services and material habitat conversion require qualified biodiversity assessment, alternatives analysis and explicit review against the applicable OS6/ESS6/PS6 requirements. Screening shall use current IUCN Red List information, IBAT where appropriate, and site-specific surveys. Natural-habitat impacts shall follow applicable no-net-loss requirements; critical-habitat activities shall meet the stricter eligibility, specialist review and net-gain requirements where required. Transmission routes shall assess bird collision/electrocution and other relevant wildlife impacts. The absence of mapped protected status does not establish absence of biodiversity risk.

Land acquired previously by Government, communities or developers shall undergo legacy land due diligence covering formal and informal users, women's interests, outstanding claims, compensation and livelihoods. Where gaps exist, a corrective or supplemental RAP/LRP shall be completed before REA-supported impacts. Voluntary land arrangements require documented informed consent, a genuine right to refuse and assessment of impacts on all users; a donation or sale label does not remove involuntary-resettlement requirements.

For every Substantial or High-risk project, GBV/SEA/SH risk assessment and mapped confidential referral pathways shall be verified before mobilisation. Codes of conduct shall record receipt, explanation in an understood language, acknowledgement as a condition of employment or site access,

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applicable sanctions and available reporting channels. Service-provider referral readiness shall be maintained without placing survivor-identifying information in general records.

Critical cultural heritage, sacred sites and restrictions on community access require specialist review and consultation before site or design approval. Continued community access shall be protected where safe and lawful. Chance finds shall trigger immediate work stoppage in the affected area, protection of the find, recording of date/time and responsible person, and competent clearance before restart. Security-sensitive activities require conflict-sensitive assessment and verified security-personnel controls.

4.3 Mitigation Hierarchy, Decision Gates and Change Management

Decision gates convert the mitigation hierarchy into enforceable management control. A gate may be passed only when the required evidence has been reviewed by the designated authority. Conditional approval shall identify each condition, owner, deadline, verification method and consequence of non-compliance; it shall not be used to defer a critical prerequisite such as lawful land access, required compensation, a statutory approval or an approved emergency arrangement.

4.3.1 Mitigation hierarchy

Priority / step	Required action
1	Avoid the impact through alternative site, route, design, technology, scale, timing or delivery model.
2	Minimise the impact through engineering, operational, scheduling, access, workforce and management controls.
3	Restore, rehabilitate or reinstate affected environmental and social conditions.
4	Compensate, offset or provide livelihood restoration for residual impacts where allowed and appropriate.
5	Document residual risk, monitoring, contingency measures and acceptance authority.

4.3.2 Mandatory decision gates

Decision gate	Minimum E&S evidence
Gate 0 – Strategy /programme concept	E&S objectives, risk appetite, delivery model, stakeholder and climate context, exclusion issues and indicative budget.
Gate 1 - Site/ subproject identification	Screening, alternatives, preliminary category, land status, stakeholder map and key studies.
Gate 2 - Feasibility/ appraisal	Completed assessment pathway, costs, schedule, permits, risk allocation and proposed instruments.
Gate 3 - Procurement/ financing	Approved requirements, clauses, evaluation criteria, counterparties and disclosed instruments as applicable.
Gate 4 - Award/ pre-mobilisation	Approved C-ESMP/plans, competent staff, permits, land readiness, baseline data, insurance, GM and emergency arrangements.
Gate 5 - Construction/ implementation	Monitoring, incident reporting, grievances, CAPs, payment evidence and change control.

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Decision gate	Minimum E&S evidence
Gate 6 - Commissioning/ operation	Safety certification, handover records, operator competence, emergency/O&M procedures, outstanding CAP and grievance status.
Gate 7 - Close-out/ repowering/ decommissioning	Waste and asset recovery, site restoration, livelihood commitments, final audit, data retention and lessons learned.

4.3.3 Management of change

Any material change in site, route, footprint, technology, capacity, design, schedule, financing, contractor, land arrangement, security context, climate exposure or operational model shall be screened before implementation. The change review shall determine whether category, instruments, consultation, permits, contract terms, disclosure or approval must be updated. Field instructions shall not be used to bypass E&S change control.

4.4 Legal Compliance, Corrective Action and Counterparty Risk

Legal compliance and contractual compliance are minimum conditions, not the full measure of acceptable performance. Corrective action shall address both the immediate non-conformity and its root cause. Counterparty controls shall account for the reality that a substantial share of REA's environmental and social risk is implemented through entities outside REA's direct employment structure.

4.4.1 Legal and permit management

Legal Services shall maintain a corporate E&S Legal and Other Requirements Register with support from GESIC and operational owners. The register shall identify the obligation, applicability, responsible owner, permit/approval, renewal date, evidence, compliance status, and action. Projects shall maintain site-specific permit schedules linked to the corporate register.

Compliance family	Indicative requirements — final applicability to be validated
Environmental assessment and permits	Environmental Impact Assessment Act, Cap E12, Laws of the Federation of Nigeria 2004; Federal Ministry of Environment approvals and applicable state requirements.
Environmental enforcement and waste	National Environmental Standards and Regulations Enforcement Agency (Establishment) Act 2007, as amended in 2018, and applicable subsidiary instruments. Relevant regulations include National Environmental (Construction Sector) Regulations 2011; National Environmental (Energy Sector) Regulations 2014; National Environmental (Electrical / Electronic Sector) Regulations 2022; and National Environmental (Battery Control) Regulations 2024.
Pollution and resources	Applicable NESREA regulations, including National Environmental (Sanitation and Wastes Control) Regulations 2009; National Environmental (Noise Standards and Control) Regulations 2009; National Environmental (Surface and Groundwater Quality Control) Regulations 2011; and National Environmental (Air Quality Control) Regulations 2021, as amended, together with permit-specific conditions.

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Compliance family	Indicative requirements — final applicability to be validated
Electricity and technical safety	Electricity Act 2023, applicable NERC / state electricity instruments, licence / permit conditions and NEMSA inspection, testing, certification and technical safety requirements under the current statutory framework. Standards Organisation of Nigeria Act 2015, No. 14, and applicable Nigerian Industrial Standards. Procurement shall verify valid SON Mandatory Conformity Assessment Programme (MANCAP) certification for locally manufactured regulated products and applicable SON Conformity Assessment Programme (SONCAP) certification for imported regulated products before acceptance, subject to the relevant scheme's scope and lawful exemptions.
Land and compensation	Land Use Act 1978, Cap L5, Laws of the Federation of Nigeria 2004; applicable state processes; legally and contractually applicable resettlement / livelihood safeguards and recognised user interests.
Labour and OHS	Labour Act, Cap L1, Laws of the Federation of Nigeria 2004, as amended; Factories Act, Cap F1, Laws of the Federation of Nigeria 2004; Employees' Compensation Act 2010; National Minimum Wage Act 2019, as amended by the National Minimum Wage (Amendment) Act 2024; applicable labour, public-service and safety regulations.
Procurement and integrity	Public Procurement Act 2007, No. 14; BPP instruments, applicable approval thresholds, bidding documents, debarment and integrity obligations..
Data protection	Nigeria Data Protection Act 2023 and applicable Nigeria Data Protection Commission implementation instruments, lawful processing, security and notification requirements.

4.4.2 Corrective and preventive action

Corrective Action Plan cycle

1. Record non-conformity, grievance, incident, audit or monitoring finding
2. Contain immediate risk and preserve evidence
3. Classify significance and assign owner
4. Analyse root and contributing causes
5. Approve corrective/preventive action, resources and deadline
6. Verify completion and effectiveness
7. Close with evidence or escalate overdue action
8. Share lessons and update controls

CAPs shall not be closed solely because an action is reported complete. A competent person must verify both implementation and effectiveness. High-risk actions may only be closed by GESIC or the designated independent verifier. Overdue actions shall be escalated according to risk and may trigger payment withholding, suspension or other remedies.

4.4.3 Counterparty and supply-chain risk

REA shall assess the E&S capacity and performance of developers, contractors, suppliers, operators, recyclers and financial intermediaries before selection and throughout the relationship. Due diligence

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shall be proportional to risk and include ownership, legal standing, sanctions/debarment, systems, staffing, incident history, labour practices, supply-chain exposure, waste routes, grievance capacity and subcontractor management.

Clause	Mandatory requirement
a	Critical equipment and battery suppliers shall provide product standards, safety information, warranties, traceability and take-back/end-of-life arrangements.
b	Contractors shall remain responsible for subcontractors and labour brokers; approval of a subcontractor does not transfer accountability to REA.
c	Financial intermediaries shall operate an acceptable ESMS, apply exclusions and categorisation, maintain competent staff and permit REA/lender review and audit.
d	Repeated poor performance shall affect future eligibility and may require increased supervision, CAP, suspension or termination.

4.4.4 Corporate Environmental and Social Management Programme

The corporate environmental and social management programme shall establish actions for twelve priority corporate risks. GESIC and operational owners shall translate the programme into the annual costed work plan and populate the risk register with verified inherent and residual ratings. Actions shall specify an objective, measurable indicator, target or acceptance criterion, owner, deadline, required budget and procedure. Unimplemented actions shall not reduce the current residual rating. The programme shall be reviewed quarterly and updated after incidents, significant grievances, audit findings or material changes.

Project management programmes shall apply the same structure to all material assessed impacts, with implementation schedules aligned to lifecycle gates. Monitoring shall verify both completion of mitigation and its effect on the affected people or environmental receptor. Controls that do not achieve the intended outcome shall be revised and funded through corrective action.

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5. Information, Performance and Assurance Framework

The ESMS requires one controlled information architecture capable of consolidating programme and corporate data without erasing legitimate differences in lender requirements. Registers, dashboards and reports shall use defined data owners, common identifiers, documented calculation methods and quality checks so that management decisions can be traced to reliable evidence.

5.1 Document Control and Records Management

REA shall maintain an ESMS Document Register identifying document number, title, owner, approver, version, effective date, review date, access location, retention and superseded status. Only approved current documents may be used. Programme documents shall be mapped to the corporate hierarchy and assessed for equivalence or bridging requirements.

Control	Minimum requirement
Creation	Use approved templates, document numbers, owners, reviewers and evidence references.
Review/approval	Competent technical, legal and operational review before issue; conflicts resolved and comments tracked.
Distribution	Controlled repository, role-based access, communication of changes and withdrawal of obsolete copies.
Change control	Revision history, reason, impact assessment, training/communication needs and effective date.
Records	Legible, traceable, dated, attributable and protected against unauthorised change or loss.
Retention/disposal	Schedule based on legal, contractual, land, worker, grievance, asset-life and audit requirements; secure disposal.

5.2 Monitoring, Reporting and Incident Management

Monitoring shall combine leading indicators, such as screening timeliness, training, inspections and closure of preventive actions, with lagging indicators such as incidents, grievances, regulatory breaches and environmental damage. A decline in reported incidents is not necessarily evidence of improvement where reporting culture or field coverage has weakened.

5.2.1 Monitoring framework

Monitoring shall test compliance, control implementation, outcomes and trends. It shall combine document review, site inspection, stakeholder feedback, grievance analysis, worker engagement, data validation, contractor reports, permit checks and targeted independent verification. Monitoring frequency shall be risk-based and increased after incidents, changes or poor performance.

Theme	Core corporate indicators
Screening and instruments	% activities screened before commitment; instrument approval/disclosure timeliness; screening rework rate.
Land and livelihoods	PAPs/land users identified; compensation and livelihood measures completed before access; unresolved legacy claims; restoration outcomes.

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Theme	Core corporate indicators
Labour/OHS	Workforce numbers; induction; hours worked; fatalities; lost-time and recordable injuries; high-potential near misses; worker grievances; OHS observations closed.
Community safety/stakeholders	Engagement coverage; vulnerable-group participation; community incidents; traffic/electrical safety events; grievance acknowledgement and closure.
GBV/SEA/SH	Risk controls and training coverage; referral readiness; only anonymised aggregate case-management indicators appropriate for management reporting.
Environment/biodiversity	Permit compliance; spills; waste quantities; restoration; sensitive-habitat actions; chance finds; water/noise/dust monitoring where applicable.
Battery/e-waste	Inventory, take-back, storage inspections, transporter/recycler licences, recovery and final-treatment evidence.
Climate/sustainability	Climate-risk assessments; resilience actions; service disruption from climate events; verified energy/GHG and resource indicators.
Counterparties/CAP	E&S performance ratings; audit coverage; overdue high-risk CAPs; repeat findings; payment withheld for E&S non-performance.
Capacity/system	Role coverage; competency assessments; training effectiveness; internal audit completion; management-review actions.

A KPI dictionary shall define formula, unit, boundary, exclusions, data source, owner, frequency, assurance, target and disclosure status. Current values shall not be invented; baselines shall be established from verified records after approval.

Each monitoring plan shall identify the impact or control, measure, parameter, unit, location and boundary, baseline, target or acceptable range, method and source, timing and frequency, responsible collector/reviewer, quality assurance, record, reporting recipient, corrective-action trigger and cost. Standards and permit limits shall be recorded explicitly. Exceedances shall trigger protective action, investigation and escalation proportionate to risk.

Indicator	Definition and minimum performance requirement	Owner and reporting
Screening before commitment	Activities screened before first commitment divided by all new activities committed in the period. Target 100%.	Programme owners; monthly to GESIC / M&E
Required instrument and hold-point completion	Applicable approvals, disclosures and critical prerequisites completed before the relevant gate. Target 100%; a missed critical prerequisite blocks release.	Project owner / GESIC; at every gate
Connections and electricity access	Verified new household, enterprise and public-institution connections, technology and location; sex of beneficiary or ownership where meaningful, lawful and safe. Distinguish connections from people estimated to benefit.	M&E; quarterly

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Indicator	Definition and minimum performance requirement	Owner and reporting
Employment and inclusion	Direct / contracted jobs and training opportunities by sex and role, including women in technical / leadership positions and disability inclusion where voluntary and lawful. Annual targets derive from verified baseline and delivery plan.	HR / PMUs / M&E; quarterly
Grievance service and trust	Acknowledgement and resolution within the published standards; appeal, satisfaction and accessibility. Target 100% acknowledgement within standard; investigate every overdue case. Conduct annual awareness / trust assessment.	PIO / PMUs / HR / GESIC; monthly / quarterly
High-risk corrective action	Number and share overdue, repeat findings and effectiveness checks. Target no overdue Critical / Major action without executive escalation and protective controls.	GESIC and owners; monthly
Resource and competence adequacy	Filled or formally covered required roles; competency authorisations; approved budget against required work plan and expenditure. Target full required coverage before activity release.	HR / Finance / GESIC; quarterly
Community reporting and emergency drills	Affected active sites reporting at required frequency; facilities / sites completing required drills. Target 100% applicable coverage.	PMUs / Facilities; quarterly

Development-outcome baselines and annual targets shall be approved in the programme monitoring framework using verified records. Reporting shall separate outputs from outcomes, identify denominators and avoid double counting beneficiaries across programmes. Sex-disaggregated grievance data shall be collected only where necessary and safe; SEA/SH statistics shall not expose identities or create pressure to suppress reporting.

5.2.2 Reporting lines

Reporting route	Minimum content/frequency
Site/contractor to project/ PMU	Routine monitoring; workforce; incidents; grievances; waste; permits; CAP and plan implementation.
Project/PMU to GESIC/ M&E	Monthly or quarterly consolidated performance according to risk and programme requirements.
GESIC/M&E to Steering Committee	Quarterly dashboard; material issues; trends; overdue actions; resource and policy decisions.
Executive/Board reporting	At least semi-annual material risk and annual ESMS performance, with immediate escalation of serious incidents.
Regulator/development partner/public	As required by law, financing agreements, disclosure commitments, and approved communication protocols.

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5.2.3 Incident management

All incidents, near misses, allegations and emergency events shall be reported promptly through a no-blame initial notification route, followed by classification, notification, investigation, corrective action and learning. Initial reports shall distinguish known fact from unverified information and shall protect privacy and legal privilege where applicable.

Stage	Requirement
Immediate response	Protect life, provide aid, stop work, secure area, prevent further harm, contact emergency services and preserve evidence.
Notification	Notify REA and relevant authorities/development partners within the shortest applicable time; do not wait for complete investigation.
Investigation	Competent and independent to the extent proportionate; identify root and contributing causes, not only individual blame.
Corrective action	Time-bound CAP, owner, resources, verification and effectiveness review.
Learning	Update risk assessments, design, procedures, training, contracts and supervision; communicate lessons without exposing confidential data.

The incident classifications below are the corporate standard and correspond to the escalation levels in Section 3. The highest credible actual or potential severity governs the initial classification. Uncertainty shall not delay protective action or serious-incident notification. Classification of an allegation is an escalation decision and does not determine culpability.

Incident class	Escalation level	Typical trigger and notification
Minor	Level 1 Routine	Limited reversible impact with no serious-harm potential. Notify the activity owner and record by the next working day.
Moderate	Level 2 Significant	Material but contained impact, repeated non-compliance, significant grievance or serious near miss. Notify the Directorate / PMU head and GESIC the same day; written initial record within 24 hours.
Major	Level 3 Material	Fatality, life-threatening injury, major pollution, displacement breach, credible SEA/SH allegation, serious security abuse or material regulatory event. Immediate verbal escalation; written notice within 24 hours of awareness.
Critical	Level 4 Crisis	Multiple fatalities, catastrophic harm, major violent / security event or systemic event threatening continuity or public safety. Immediate crisis activation, MD/CEO and Board escalation; written notice within 24 hours of awareness.

For Major and Critical events, the site or contract owner shall immediately notify the Directorate/PMU head and GESIC; GESIC shall immediately alert the MD/CEO, Legal and relevant response functions. The authorised programme representative shall notify the financing partner immediately by the fastest available channel and provide a written initial notification within 24 hours of REA or the responsible

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counterparty becoming aware, or sooner where a binding requirement applies. Applicable regulator and emergency-service notification shall occur within the statutory or emergency timeframe. A designated deputy shall act when the principal recipient is unavailable.

The initial notification shall state the activity, location, event time and awareness time, known impacts, immediate protective measures, responsible contact and next update. It shall identify uncertainty without delaying notice. GESIC and Legal shall maintain a live recipient and deadline schedule in the incident register for each financing agreement and regulator. The shortest applicable deadline governs. Contractors shall notify REA immediately so that REA can meet its external obligations.

Initial investigation scope and responsible personnel shall be agreed within two working days for serious events, with a preliminary factual update within five working days unless the financing partner requires earlier reporting. The competent investigation plan shall set the final-report date and interim updates; any change requires recorded executive/lender agreement as applicable. Corrective actions shall specify owners, resources, dates and effectiveness checks. Serious outstanding risk shall remain subject to stop-work or other protective restrictions.

SEA/SH notification shall be limited to the minimum non-identifying information required by the applicable protocol. Referral shall be survivor-centred, confidential and based on informed consent, subject to applicable mandatory legal duties explained by trained personnel. General incident investigation shall not seek a survivor's detailed narrative or disclose case identities.

5.3 Internal Audit, Management Review and Continual Improvement

Assurance activities shall test system design, implementation and effectiveness. Management review is the point at which executive leadership evaluates whether the ESMS remains suitable for REA's mandate, adequately resourced and effective in controlling material risk. Decisions and resource commitments arising from review shall be recorded and tracked to closure.

5.3.1 Internal audit

Internal Audit shall establish a risk-based ESMS audit programme covering corporate functions, programmes, projects and selected counterparties. Audit independence shall be preserved: auditors shall not audit work for which they were directly responsible. Audit criteria shall include this Manual, procedures, law, financing commitments, contracts and approved plans.

Clause	Mandatory requirement
a	The annual audit plan shall consider risk category, spend, incident history, complaints, new programmes, geographic exposure, counterparty performance and time since last audit.
b	Findings shall be graded, assigned, tracked and verified through the CAP process.
c	Material findings shall be reported to Executive Management and the relevant Board oversight route.
d	REA may use qualified external assurance where independence, specialist expertise or development-partner confidence requires it.

Internal ESMS audit shall be undertaken at least annually and after significant changes or events where risk warrants additional review. Every High-risk programme shall undergo an independent E&S audit at least every two years, or more frequently where law, financing requirements or performance require it. The reviewer shall be independent of the audited work, have appropriate specialist competence and report findings to management, the relevant oversight route and the financing partner as required.

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5.3.2 Management review

The MD/CEO and Executive Management shall conduct a formal management review at least annually. The review is a decision forum, not a presentation meeting. It shall determine whether the ESMS remains suitable, adequate and effective and shall approve resources and changes.

Clause	Mandatory requirement
a	status of prior review actions.
b	changes in law, standards, strategy, portfolio, organisation and stakeholder expectations.
c	objectives, KPIs, trends, data quality and target performance.
d	serious incidents, high-potential near misses, grievances, land and GBV/SEA/SH control performance.
e	legal compliance, permits, development-partner commitments and regulator findings.
f	contractor, developer, supplier and FI performance.
g	audit, inspection and CAP results, including overdue actions.
h	adequacy of staffing, competence, budget, systems and logistics.
i	climate, biodiversity, waste and lifecycle performance.
j	recommendations for policy, procedure, objectives, risk appetite and investment changes.

Required outputs are documented decisions on improvements, resources, responsibilities, deadlines, policy or objective changes, risk acceptance, disclosures and follow-up assurance.

5.3.3 Continual improvement

REA ESMS Plan–Do–Check–Act cycle

1. PLAN: policy, legal obligations, risks, objectives and resources
2. DO: procedures, procurement, implementation, competence and communication
3. CHECK: monitoring, grievances, incidents, data, audit and evaluation
4. ACT: corrective action, management review, lessons and system revision

Improvement priorities shall be based on risk and evidence. Repeated findings, recurring grievances, ageing CAPs, data gaps and weak contractor performance are indicators of systemic causes and shall not be treated as isolated events.

5.4 Emergency Preparedness and Response

Every REA corporate facility and every High, Substantial or Moderate-risk project shall maintain an approved and tested Emergency Preparedness and Response Plan appropriate to its hazards. Low-risk activities shall have documented proportionate arrangements and contacts. Project readiness shall be verified before Gate 4 mobilisation and Gate 6 energisation or operation. The plan shall cover credible fire, electrical, battery thermal-runaway, chemical/spill, flood/extreme-weather, medical, traffic and security scenarios identified by the risk assessment.

The responsible facilities or project owner shall appoint an emergency response team comprising an incident commander and deputy, OHS/emergency coordinator, technical isolation personnel, trained first aiders, evacuation/muster wardens, security/access personnel and a communications liaison as

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appropriate to the site. Duties, command succession, alarms, safe shutdown, rescue restrictions, evacuation routes, accessible assembly points and accounting for workers/visitors shall be documented. Only trained and equipped personnel may undertake hazardous response.

Plans shall identify verified local fire, medical, ambulance, police and other responder contacts, capability, access and travel constraints, mutual-aid arrangements and backup communications. Response equipment shall be inspected and maintained. Remote locations shall provide contingency transport, communication and medical referral appropriate to foreseeable delays. Contractors and operators shall demonstrate compatible arrangements and participate in joint exercises where interfaces matter.

A practical drill shall be conducted at least annually at every applicable facility/site and before first energisation or material change to a mini-grid, public-institution system or BESS installation. Additional exercises shall follow significant incidents, plan changes or identified weaknesses. Drill records shall test alarms, command, isolation, evacuation, accountability, responder coordination and community warning; corrective actions shall be assigned and verified. Desktop exercises alone shall not substitute for testing critical field arrangements.

Mini-grid, BESS and SHS customers and nearby communities shall receive understandable electrical and fire-safety information, warning signs, emergency contacts, safe-use instructions and advice on damaged equipment. Operators shall explain isolation and access restrictions without encouraging untrained public intervention. Information shall be accessible in relevant languages and formats.

5.5 Corporate Stakeholder Engagement and Disclosure

REA's Corporate Stakeholder Engagement Framework applies across its institutional activities and supports programme-specific SEPs. It covers affected communities and customers, employees and contracted workers, federal/state authorities and regulators, DisCos and utilities, developers and suppliers, financial institutions, development partners, civil society and other interested parties. Engagement shall begin while alternatives remain open and continue throughout implementation and operation.

Stakeholder analysis shall record interests, influence, degree of impact, vulnerability and preferred communication separately. Impact zoning shall overlay project components and foreseeable impacts with settlements, livelihoods, land use, public facilities and sensitive receptors, and validate the mapping with affected groups. Highly affected people and groups with limited influence shall receive priority engagement, including separate safe consultations where needed. The map shall be updated at least annually and after material change.

Each SEP shall specify applicable requirements, previous engagement, stakeholder analysis, information to disclose, methods and timetable, responsibilities, budget, GRM access, monitoring and reporting back. Engagement shall be voluntary, free from coercion and reprisal, culturally appropriate and accessible to people with low literacy, disabilities or language barriers. Community representatives shall not be assumed to represent all affected interests. Significant promises and decisions shall be recorded with owners and follow-up dates.

PIO and GESIC shall disclose the approved E&S Policy and this Volume 1 Environmental and Social Policy and Procedure Summary on the REA website and support Bank disclosure after due authorisation. Approved versions shall also be accessible at REA facilities and relevant project offices. Disclosure shall show the version, approval/effective date and public contact route. Project assessment and

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management instruments shall be disclosed in accordance with law, financing requirements and the SEP, in understandable summaries and relevant local languages.

Public release shall be authorised by the MD/CEO or the formally delegated authority, with Legal, GESIC and DPO/PIO checks for accuracy, privacy and security. Protected personal data, SEA/SH case details, commercially confidential information and sensitive security or cultural information shall not be released. The controlled repository shall retain the approval and disclosure record.

5.6 External Communications and Grievance Redress

REA shall maintain publicly accessible channels for enquiries, feedback and complaints even where an activity has no identified affected community. PIO shall receive and route corporate communications; GESIC shall coordinate E&S cases with the accountable function or programme. The public channels shall be publicised on the website, at facilities and project offices and through community engagement. Programme-specific routes shall supplement these channels and shall not prevent escalation to REA.

The community/consumer GRM and worker GRM shall be free, understandable, accessible, predictable and rights-compatible. They shall accept oral, written, confidential and anonymous submissions without retaliation. Assistance shall be available for low literacy, language and disability needs. No complainant shall be required to waive legal rights or use the GRM before seeking regulator, court or lender remedy.

Step or service	Community and consumer GRM	Worker GRM
Receive and register	Record promptly; offer a safe acknowledgement and case reference.	HR or authorised worker channel records promptly, separately from community cases.
Acknowledge	Within 2 working days, where contact is possible.	Within 2 working days, where contact is possible.
Assess and assign	Initial assessment within 5 working days; identify urgency, owner and safe handling.	Initial assessment within 5 working days; protect confidentiality and address conflicts of interest.
Respond and resolve	Seek resolution within 30 calendar days. Where justified complexity prevents this, agree and communicate a reasoned timetable and updates.	Seek resolution within 20 working days; communicate justified extensions, interim protection and updates.
Urgent or sensitive matter	Immediate / same-day protective action and appropriate escalation / referral; serious incident notification applies.	Immediate / same-day action for imminent danger, retaliation or serious rights concerns.
Appeal and closure	Offer review by a person / body not responsible for the original decision. Record response, satisfaction or disagreement, remedy evidence and any post-closure monitoring.	Independent HR / management review or other lawful channel; closure requires response and verified action, not a signature alone.

Records shall include case identifier, receipt date/channel, complaint and requested outcome, activity/location, category, assigned owner, deadlines, actions and resources, response dates, days to closure, appeal and post-closure monitoring. Personal profile data shall be optional, minimal and

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purpose-based. Anonymous cases shall be processed as far as information permits. Land and livelihood complaints shall remain open until the agreed remedy is verified or the outstanding dispute is explicitly recorded and escalated.

SEA/SH complaints shall be routed immediately to the trained focal person and protected referral pathway. Only a restricted minimum case record shall be maintained, with informed-consent and lawful confidentiality controls. General registers shall contain only non-identifying administrative references needed for accountability. Referral and support shall not depend on proof of an allegation or completion of a general investigation.

GESIC, HR and programme owners shall review trends and overdue cases monthly, act on systemic causes through CAPA and assess awareness, access and trust at least annually. Approved budgets shall cover channels, liaison, case administration, appeal, safe referral and monitoring. Public reporting shall show aggregate service performance and unresolved issues without compromising privacy.

5.7 Ongoing Reporting to Affected Communities

Project and programme owners shall provide affected communities with updates at least quarterly during construction and at least annually during operation, with additional communication after material changes, serious incidents or commitments affecting them. Reports shall explain ESMP implementation, relevant monitoring results, safety and environmental events, aggregate grievance performance, action taken on concerns, outstanding commitments and corrective actions.

The community liaison officer shall agree appropriate formats and venues with affected groups. These may include community meetings, accessible noticeboards, local-language leaflets, radio, phone messages and the website. Information shall be understandable and shall provide an opportunity to ask questions and influence follow-up. Digital publication alone is insufficient where access or literacy is limited.

The reporting record shall identify date, audience, format/language, information shared, questions and responses, decisions, follow-up owner and next update. GESIC and M&E shall track reporting coverage and verify delivery through field checks and community feedback. PIO shall support consistency with authorised public information and protected-data requirements.

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Annex A: Framework Alignment Matrix

Topic	Reference alignment	REA ESMS location
Policy, leadership, governance	AfDB OS1; WB ESS1; IFC PS1; ISO leadership/context	Chapters 1–3
Labour and OHS	AfDB OS2; WB ESS2; IFC PS2; ISO 45001	Policy commitments and Volume 2 procedures
Resource efficiency and pollution prevention	AfDB OS3; WB ESS3; IFC PS3; ISO 14001	Chapters 2 and 4; Volume 2
Community health, safety and security	AfDB OS4; WB ESS4; IFC PS4	Chapters 2–4; Volume 2
Land, resettlement and livelihoods	AfDB OS5; WB ESS5; IFC PS5	Chapters 2 and 4; Volume 2
Biodiversity and living resources	AfDB OS6; WB ESS6; IFC PS6	Chapters 2 and 4; Volume 2
Vulnerable groups / historically underserved communities	AfDB OS7; WB ESS7 where applicable; IFC PS7 where applicable	GDEI Policy; screening and stakeholder procedures
Cultural heritage	AfDB OS8; WB ESS8; IFC PS8	Risk framework and Volume 2
Financial intermediaries	AfDB OS9; WB ESS9	Counterparty risk framework and Volume 2
Stakeholder engagement and disclosure	AfDB OS10; WB ESS10; IFC PS1	Policies, governance and Volume 2
Monitoring, audit and improvement	AfDB/WB/IFC supervision expectations; ISO performance evaluation/improvement	Chapter 5

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Annex B: Governance RACI

Activity	Responsible	Accountable	Consulted	Informed
Approve corporate policies	Board/relevant authority	MD/CEO	GESIC, Legal, Executive	All Directorates/ PMUs
Maintain ESMS Manual/procedures	GESIC	MD/CEO/Steering Committee per delegation	Legal, M&E, HR, Procurement, PMUs	All users
Screen/categorise activity	Project/ Programme owner	Directorate/PMU Head	GESIC, technical, Legal	Procurement, M&E
Approve high-risk instruments	Project/ Programme owner and GESIC	Delegated executive authority	Legal, development partner, regulators	Procurement, M&E, PIO
Maintain legal register	Legal Services	Head of Legal	GESIC and owners	Steering Committee
E&S procurement controls	Procurement/contract owner	Procurement approval authority	GESIC, Legal, Finance, technical	M&E/Internal Audit
Incident response	Site/contract owner	Directorate/PMU Head; executive for material events	GESIC, Legal, HR/OHS, Security, PIO	Board/partners/ regulators as required
Corporate E&S reporting	M&E/GESIC	Steering Committee/Executive	All data owners, DPO	Board/partners/ public as approved
Internal audit	Internal Audit	Head of Internal Audit / oversight route	GESIC and audited functions	Executive/Board
Management review	GESIC secretariat	MD/CEO	Executive, Steering Committee, Internal Audit	Board/ relevant committee

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Annex C: Corporate Register Set

Register	Owner	Minimum content
Portfolio and Counterparty Register	Planning/M&E with GESIC	All programmes, projects, technologies, phases, locations, delivery models and counterparties.
Legal and Other Requirements Register	Legal Services	Applicable law, permit, licence, obligation, owner, evidence and status.
E&S Risk Register	GESIC and operational owners	Inherent/residual risks, controls, actions, owner and assurance.
Screening and Categorisation Register	GESIC/PMUs	Screening date, category, standards, instruments, approval and change history.
Land and Livelihood Register	Project owners/Legal/GESIC	Land status, users, instruments, compensation, access and restoration outcomes.
Stakeholder and Grievance Registers	PIO/PMUs/GESIC/HR for worker GM	Stakeholders, engagements, grievances, resolution and protected case handling.
Incident Register	GESIC with HR/OHS/Security/PMUs	Events, classification, notification, investigation, CAP and lessons.
Corrective Action Register	GESIC/M&E	Finding, risk grade, owner, due date, evidence, verification and ageing.
Battery, PV and E-Waste Register	GESIC/Facilities/PMUs	Inventory, storage, movement, take-back, transporter/recycler and treatment evidence.
Contractor/ Developer/ Supplier/ FI Performance Register	Procurement/contract owners	Due diligence, ratings, incidents, CAPs, sanctions and close-out.
Training and Competence Register	HR/GESIC/PMUs	Role requirements, training, assessment and competence status.
Audit and Management Review Register	Internal Audit/GESIC	Plan, findings, decisions, actions and closure.

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Annex D: Information and Evidence-Closure Register

ID	Evidence required	Owner	Purpose	Timing
EV-01	Approved organogram, Directorate mandates and job descriptions	HR/Corporate Services	Governance and RACI	Immediate
EV-02	Complete programme, project, technology, phase and counterparty inventory	Planning/ M&E/ Programmes	Scope and risk universe	Immediate
EV-03	All corporate/programme E&S policies, frameworks, procedures and tools	GESIC/PMUs	Equivalence and document hierarchy	Immediate
EV-04	E&S staffing, qualifications, vacancies, workload and geographic coverage	HR/GESIC/PMUs	Workforce and competence plan	Immediate
EV-05	E&S budgets and actual expenditure	Finance/Programmes	Resource adequacy	Short term
EV-06	Legal permits, approvals, notices and compliance records	Legal/Projects/GESIC	Legal register	Immediate
EV-07	Representative tenders, evaluations, contracts and developer/FI agreements	Procurement/Legal	Counterparty controls	Immediate
EV-08	Incident, grievance, land, CAP, audit, training and waste records	Relevant owners	Performance baseline	Immediate–short term
EV-09	Data-protection policies, processing records, systems and retention	ICT/DPO/Legal	Privacy procedure	Short term
EV-10	Development-partner and regulator comments on draft ESMS	GESIC/Management	Alignment and approval	Validation phase

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Annex E: Glossary of Key Terms

Term	Meaning for this Manual
Activity	Any corporate action, programme, project, subproject, grant, financing, procurement, contract, facility or operation within ESMS scope.
Associated facility	A facility not financed as part of the activity but necessary for its viability and meeting applicable framework conditions.
Corrective Action Plan	Documented action to correct a non-conformity, address root cause, prevent recurrence and verify effectiveness.
Environmental and Social Management System	Policies, governance, procedures, tools, resources, records and assurance used to manage E&S risk and performance.
Material incident	An event with actual or credible potential for serious harm, legal breach, significant stakeholder concern, programme impact or reputational consequence.
Residual risk	Risk remaining after planned controls and mitigation are applied.
Vulnerable or disadvantaged group	Persons more likely to be adversely affected or limited in their ability to access benefits, information, participation or remedy due to personal, social, economic or contextual factors.

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Annex F: Policy Deployment and Annual Planning Framework

Each corporate policy shall be translated into an annual deployment record. The purpose is to demonstrate that policy approval has changed management practice and resource allocation. The record shall be maintained by the policy owner and reviewed through the ESMS Steering Committee and management review process.

Deployment element	Minimum requirement	Evidence
Material issues	Identify the material policy issues arising from the corporate risk register, baseline, incidents, grievances, legal change and portfolio plans.	Approved material-issues assessment.
Objectives and targets	Set measurable objectives with baseline, target, owner and timeframe.	Annual ESMS objectives and target register.
Actions and resources	Define activities, budget, competence, technology and external support required.	Approved work plan and budget linkage.
Integration points	Identify the corporate, programme, procurement and contract processes through which the policy will be implemented.	Process and contract integration record.
Monitoring and reporting	Define data owner, calculation method, frequency, quality control and reporting route.	KPI dictionary and reporting calendar.
Assurance and improvement	Define management checks, internal audit coverage and review of effectiveness.	Assurance plan and management review actions.

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Annex G: Management Review Minimum Agenda

Management review shall be evidence-based and decision-oriented. Papers should distinguish information provided for noting from matters requiring a decision, risk acceptance, resource allocation or escalation. The review shall consider both corporate and programme-level performance and shall record dissenting technical advice where management takes a different decision.

Agenda item	Minimum management question
Changes in context	Have legal, lender, organisational, technology, security, climate or stakeholder changes altered the suitability of the ESMS?
Performance against objectives	Are approved targets being met, and are reported improvements supported by reliable data?
Material risks and incidents	Are residual risks within approved authority, and have serious incidents and high-potential events produced effective corrective action?
Grievances and stakeholder confidence	Do grievance patterns indicate recurring design, contractor, access, affordability, land or conduct problems?
Compliance and assurance	What do regulatory findings, supervision, lender review and internal audit indicate about system effectiveness?
Resources and competence	Are staffing, budget, specialist support, digital systems and field coverage sufficient for the portfolio?
Counterparty performance	Are developers, contractors, suppliers, operators, recyclers and FIs meeting requirements, and should eligibility or contract remedies change?
Improvement decisions	What changes, investments, policy revisions or pilots are approved, by whom and by when?

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Annex H: Validation Workshop Decision Register

The validation workshop shall not be limited to editorial review. It must close institutional design decisions needed for operationalisation. Each decision shall be supported by evidence or formally adopted as a new arrangement, assigned to an accountable owner and reflected in the final controlled Manual.

Decision area	Decision required	Evidence / output
Governance	Confirm approving authority, ESMS Steering Committee membership, chair, secretariat and meeting cycle.	Approved governance charter.
GESIC mandate	Confirm corporate coordination role, reporting line, staffing, delegated review authority and relationship with PMUs.	Approved mandate and organisation record.
Delegations	Confirm risk acceptance, categorisation, stop-work, restart and corrective-action closure authorities.	ESMS delegation matrix.
Corporate functions	Confirm Legal, Procurement, HR, Finance, M&E, ICT/DPO, PIO, Security and Internal Audit roles.	Approved RACI and job responsibility updates.
Systems and registers	Confirm system of record, identifiers, data ownership, access controls, reporting calendar and retention.	ESMS information architecture decision.
Resources	Confirm minimum staffing, budget lines, training plan, specialist framework contracts and digital investment.	Resourced implementation plan.
Pilot	Select representative activities, success criteria, review dates and scale-up decision.	Approved pilot charter.

Controlled-document notice: Printed or downloaded copies are uncontrolled unless their version and effective date are verified against the approved REA ESMS repository. Programme and lender requirements that are more stringent remain applicable and shall be documented through equivalence or bridging arrangements.

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References

No.	Reference
1	Rural Electrification Agency. Baseline Assessment Report: Development and Operationalisation of an Environmental and Social Management System for REA. September 2026.
2	African Development Bank Group. Integrated Safeguards System 2023 and associated Borrower Guidance Notes.
3	World Bank. Environmental and Social Framework and Environmental and Social Standards.
4	International Finance Corporation. Performance Standards on Environmental and Social Sustainability and Environmental, Health and Safety Guidelines.
5	International Organization for Standardization. ISO 14001 environmental management system principles and ISO 45001 occupational health and safety management system principles, current applicable editions.
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Next controlled volumes: Volume 2 contains detailed operational procedures, workflows, mandatory records and escalation requirements. Volume 3 contains forms, registers, checklists, standard clauses, terms of reference and reporting templates. All three volumes form the comprehensive ESMS Manual.