



ESMS Policy Manual

Date of issue 28.09.2019

1. Preamble

“Amethis” refers to a group of companies advising or managing several private equity funds or investment vehicles under the Amethis brand. Those vehicles, at the date of the ESMS, are Amethis Finance SICAR (“Fund 1”), its subsidiary Amethis Africa Finance Ltd, Amethis West Africa, Amethis Maghreb Fund I SICAV-SIF, Amethis Fund II SICAR. Amethis companies include Amethis Advisory, Amethis Investment Fund Manager, Amethis North Africa, Amethis West Africa, Amethis Advisory East Africa, and the General Partners of the above-mentioned funds.

Amethis recognizes Environmental and Social Risk management as serious issues that require systems to monitor and control in line with legal and international requirements. Amethis is committed to promoting the use of appropriate Environmental and Social Management System (ESMS) in order to improve the management of the environmental and social implications of its portfolio.

This document puts down a framework to facilitate the implementation of appropriate Environmental and Social Management System (ESMS) in Amethis with the prime objective of improving Environmental and Social impacts of its portfolio. The ESMS is integrated within the overall investment management framework of Amethis.

This document will be periodically revised to incorporate necessary changes required due to changing of business requirements and or changes in Environmental and Social legal requirements applicable to Amethis, its clients and investee companies.

The objective of this document is to:

- Present the goals targeted by Amethis through its investments
- Formalize the ESMS
- Integrate E&S Limited Partners’ requirements
- Present the procedures to be applied in order to
 - Identify and mitigate the E&S risks
 - Monitor, measure, report and review the management of E&S risks of the portfolio

Definitions & Acronyms

Amethis – together or individually Amethis Advisory, Amethis Investment Fund Manager, Amethis North Africa, Amethis West Africa, Amethis Advisory East Africa, and any of their subsidiaries or sister companies, and the General Partners of the following funds or vehicles and the vehicles themselves: Amethis Finance SICAR, its subsidiary Amethis Africa Finance Ltd, Amethis West Africa, Amethis Maghreb Fund I SICAV-SIF, Amethis Fund II SICAR

Company: any company in which Amethis is investing

ESMS – Environmental and Social Management System

E&S – Environmental and Social

ESIA – Environmental and Social Impact Assessment

ESAP – Environmental and Social Action Plan

EIA – Environmental Impact Assessment

DD – Due Diligence

IC - Investment Committee

IFC – International Finance Corporation

IFC-PS – IFC Performance Standards

IEE – Initial Environmental Examination

SDG – Sustainable Development Goals

2. Principles and commitments of Amethis

Vision: Africa, the next frontier market

Africa's population is forecasted to more than double to 2.4bn by 2050 and the continent is expected to face the fastest urbanization of any region in the world. Despite a 250\$ billion middle-class market confirming the continent's progress towards growth and development, poverty rate continues to reach highs. With a workforce projected to be larger than either China or India by 2034 whilst job creation is outpacing labor force growth, multinationals have been eyeing the continent for opportunities in consumer-linked sectors. For the first time in Africa, sectors delivering the highest returns are consumer-oriented. However macroeconomic turbulences have impacted various sectors (financial institutions vs. industry or FMCG) and categories of consumers (stronger impact for the bottom of the pyramid). Natural resources exporting countries have suffered from the dramatic decrease in commodity prices.

ESG Mission: Build regional champions for sustainable economic empowerment


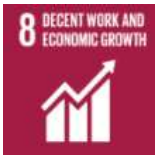

In this prospective context, we strive for support toward local SMEs in developing their activities to:

- Provide local markets with qualitative goods and services for the African consumer

- Support the development of local economies and play a catalyst effect for financing Africa's development, by demonstrating profitability on companies in the continent.
- Provide decent jobs, enabling workers to earn their living while not compromising their health and safety
- Protect the local environmental ecosystem by managing the environmental externalities and optimizing the resource consumptions

Values : What we stand for

Acknowledging the fact that its investment activity creates impact on an economic, social and environmental ecosystem, Amethis defined its impact strategy, and targeted its contribution to SDGs to be achieved.

| Sustainable Development Goal | Target | How do we plan to contribute within our portfolio | How do we plan to measure our contribution |
|--|---|--|---|
|  | By 2030, eradicate extreme poverty for all people everywhere, currently measured as people living on less than \$1.25 a day | HR policy promoting stable employment and salary decency | <ul style="list-style-type: none"> • Share of permanent employment • Share of full-time employment • Average daily salary • Average daily salary of lowest 25% salaries |
| | Implement nationally appropriate social protection systems and measures for all, including floors, and by 2030 achieve substantial coverage of the poor and the vulnerable | Promote social protection within portfolio companies | <ul style="list-style-type: none"> • Share of employees granted with medical cover |
|  | Achieve higher levels of economic productivity through diversification, technological upgrading and innovation, including through a focus on high-value added and labour-intensive sectors | Optimize operational performance | <ul style="list-style-type: none"> • Variation of turnover |
| | Protect labour rights and promote safe and secure working environments for all workers, including migrant workers, in particular women migrants, and those in precarious employment | Improve occupational health & safety conditions | <ul style="list-style-type: none"> • Frequency rate of work-related accidents • Number of fatalities |
|  | By 2030, achieve the sustainable management and efficient use of natural resources | Optimize consumption of natural resources | <ul style="list-style-type: none"> • KPIs on operational performance related to natural resources consumption |
| | By 2020, achieve the environmentally sound management of chemicals and all wastes throughout their life cycle, in accordance with agreed international frameworks, and significantly reduce their release to air, water and soil in order to minimize their adverse impacts on human health and the environment | Optimize and manage rejects into air, soil, water | <ul style="list-style-type: none"> • KPIs on operational performance related to rejects |
| | By 2030, substantially reduce waste generation through prevention, reduction, recycling and reuse | Limit waste production | <ul style="list-style-type: none"> • Waste production |

3. E&S requirements

Compliance with the law

Each portfolio company must comply with applicable ESG laws¹

Restrictions on activities

The fund will not invest in any of the activity mentioned in the Exclusion list.

Every portfolio company must avoid financing and/or carrying any activity mentioned on the Exclusion list.

Working conditions and labor rights

Each portfolio Company must:

- 1.1 not employ or make use of forced labour in accordance with ILO Convention No. 29 (Forced Labour) and ILO Convention No. 105 (Abolition of Forced Labour);
- 1.2 not employ or make use of child labour in accordance with ILO Convention No. 138 (Minimum Age) and ILO Convention No. 182 (Worst Forms of Child Labour);
- 1.3 pay wages which meet or exceed industry or legal national minima;
- 1.4 not discriminate in terms of recruitment, progression, terms and conditions of work and representation, on the basis of personal characteristics unrelated to inherent job requirements, including gender, race, colour, caste, disability, political opinion, sexual orientation, age, religion, social or ethnic origin, marital status, membership of workers' organisations, legal migrants, or HIV status (unless positive discrimination is permitted by law and is intended to address a historical imbalance);
- 1.5 adopt an open attitude towards workers' organisations and respect the right of all workers to join or form workers' organisations of their own choosing, to bargain collectively and to carry out their representative functions in the workplace in accordance with ILO Convention No. 87 (Freedom of Association and Right to Organise) and ILO Convention No. 98 (Right to Organise and Collective Bargaining);
- 1.6 provide reasonable working conditions including a safe and healthy work environment, working hours that are not excessive in accordance with ILO Convention No. 1 (Hours of Work (Industry)) and clearly documented terms of employment, respecting any collective bargaining agreements that are in place or (where these do not exist or do not address working conditions) or conditions established, by collective agreement or otherwise, for work in the trade or industry concerned in the area where the work is carried out;

¹ “**ESG Laws**” means Environmental Laws, Social Laws or Business Integrity Laws and the terms of any permits, licenses, consents, approvals or other authorisations held by a Group Company under Environmental Law or Social Law;

- 1.7 provide an appropriate grievance mechanism that is available to all workers and where appropriate other stakeholders, and which includes grievances brought by those affected by the operation of the Group; and
- 1.8 implement policies and procedures for, and encourage, the reporting of wrongdoing and misconduct by staff, employees and contractors in their dealings with each other or with third parties that includes protection for the reporter and appropriate disciplinary action for anyone found to harass the reporter.

Environmental and social impacts management

Environmental and social consequences of business activities must be managed according to the IFC Performance Standards and World Bank EHS Guidelines

4. Roles, responsibilities and oversight

The table below outlines the roles and responsibilities of individual functional heads regarding the operation of the ESMS:

| Roles and Responsibilities | |
|-----------------------------------|---|
| In charge | Key Responsibility Areas |
| ESG Manager | <p><u>ESMS:</u></p> <ul style="list-style-type: none"> - Set up, implement and revise the ESMS - Communicate the ESMS to the team - Identify training needs and estimate budget <p><u>Investment decision-making process:</u></p> <ul style="list-style-type: none"> - Ensure compliance with exclusion list - Provide with E&S risk mapping - Determine E&S risk classification - Consultation and pre-selection of E&S external consultants for due-diligence - Coordination with external consultants for E&S due-diligence - Determine E&S covenants to be included within the documentation - Design the ESAP and monitoring plan <p><u>Monitoring:</u></p> <ul style="list-style-type: none"> - Review specific projects documentations (EIA reports, permits, clearances) - Monitor and track project performance - Perform reporting compilation on accidents/incidents - Ensure regular reporting |

| | |
|---------------------|---|
| | <p><u>Communication:</u></p> <ul style="list-style-type: none"> - Provide LPs with E&S information when required - Inform LPs of any E&S accident/incident - Provide LP with regular reporting |
| Managing Partner | <p><u>ESMS:</u></p> <ul style="list-style-type: none"> - Sign-off and promote the ESMS - Review periodically the ESMS - Validate training budget - Ensure sufficient resources are allocated to the execution of the ESMS - Support and steer achievements of funds ESG objectives <p><u>Communication:</u></p> <ul style="list-style-type: none"> - Review E&S communication addressed to LPs or any external third party |
| Investment director | <p><u>ESMS:</u></p> <ul style="list-style-type: none"> - Acknowledge responsibility over every stage of the investment lifecycle - Be aware of provisions stated within the ESMS - Attend ESMS training provided by the ESG Manager <p><u>Investment decision-making process:</u></p> <ul style="list-style-type: none"> - Responsibility for correct execution of the whole E&S investment process - Inform the ESG manager of the timeline of the investment process, as well as actual progress - Appoint E&S consultants for due-diligence based on recommendations elaborated by the ESG manager - Ensure execution of every E&S steps within the investment process <p><u>Monitoring:</u></p> <ul style="list-style-type: none"> - Ensure adequate monitoring of the ESAP and E&S compliance at the board level - Consult the ESG manager when specific projects are launched - Support the ESG manager to gain access to the required information |
| Legal team | <p><u>Investment decision-making process:</u></p> <ul style="list-style-type: none"> - Support the ESG manager in the identification of the applicable legal framework - Support the ESG manager in the definition of the E&S covenants - Ensure inclusion of E&S covenants for every project <p><u>Monitoring:</u></p> <ul style="list-style-type: none"> - Support the ESG manager in monitoring evolutions of the legal framework - Support the ESG manager to manage potential E&S breaches identified |

5. Procedures

1. Investment decision-making process

Corporate direct investment

a. First preliminary screening

For the initial review conducted by the investment team, the E&S Manager will provide a first opinion on:

- Compliance with the exclusion list
- Risk Categorization

The E&S Manager will refine its opinion by:

- Eliminating any potential risks of non-compliance with the exclusion list
- Determining the inherent risk exposure of the target

Inherent risk mapping

Based on benchmarks and external databases, the E&S Manager will define the E&S risk universe associated with the target. External sources will also be used in order to score the level of each risks based on the risk rating scale displayed in Appendix 2.

Depending on the observed level of inherent risks, the target will be classified according to the IFC Environmental and Social Categorization. These categories are:

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

If the E&S manager determines that the project is not in compliance with Amethis policies and procedures, and subject to Amethis management approval, the transaction will not be considered for investment, and the target should be notified accordingly.

b. First Investment Committee

The E&S manager will attend the First Investment Committee in order to gather information requests on E&S issues that might be formulated by the Investment Committee.

The E&S Manager will provide a first analysis on the E&S risks involved in the transaction. He will draft the E&S chapter of the IC memorandum.

If the Investment Committee decides to pursue the investment process, an E&S consulting firm will systematically be hired to perform an E&S due diligence on the target company, in partnership with Amethis' internal E&S manager.

c. Detailed due diligence process

The E&S due-diligence has three goals:

- Evaluate the level of compliance of the company
- Understand the level of E&S risk management from the company to determine the residual E&S risk of the company
- Provide the needed information to design the ESAP

Compliance assessment

The first step of the due-diligence will be to evaluate the stringency of the local regulatory framework compared to IFC Performance Standards and EHS Guidelines. The combination of the highest expectations will determine the compliance framework for the company. The level of compliance of the company against this framework will be assessed through documentation review and site visits.

Residual risk mapping

The residual risk mapping will be achieved by assessing the following elements against the risk rating scale displayed in Appendix 2:

- The evaluation of risk management level of the company:
 - o Awareness of the company
 - Policy
 - Timed action plan
 - Measurable objectives
 - o Impact of the mitigation measures on the probability of risk occurrence
 - o Impact of the mitigation measures on the impact of the risk
- The coverage rate of application of mitigation measures

d. Investment Committee/AIFM approval

After the completion of the E&S due-diligence, the E&S manager will provide the investment committee with:

- A presentation of the residual ESG risks
- The axes of negotiation for the E&S action plan aiming either at:
 - o Mitigating high residual risks
 - o Achieve compliance

- Exploit a compelling opportunity
- A monitoring plan

e. Closing

Following the ratification of the investment by the board of the General Partner, the investment team, supported by the E&S manager will negotiate the following points:

Action plan

The action plan will be discussed with the company. The stated actions are aiming at three goals:

- Mitigate high residual risks
- Achieve compliance
- Exploit a compelling opportunity

The action plan should be timed, and cost estimation must be provided, even though those are being indicative.

Covenants

Covenants related to the fulfillment of the E&S action plan will be included in shareholder agreements.

Failure to complete actions aiming either at mitigating high residual risks or achieving compliance will trigger a breach in the shareholder agreements and allow the investor to exit its investment if needed.

Intermediaries investment

The investment process remains similar to the previous description. The E&S risk categorization is however updated based on the IFC classification. This category is further divided into:

FI-1: when a Financial Institution's (FI) existing or proposed portfolio includes, or is expected to include, substantial financial exposure to business activities with potential significant adverse environmental or social risks or impacts that are diverse, irreversible, or unprecedented.

FI-2: when an FI's existing or proposed portfolio is comprised of, or is expected to be comprised of, business activities that have potential limited adverse environmental or social risks or impacts that are few in number, generally site-specific, largely reversible, and readily addressed through mitigation measures; or includes a very limited number of business activities with potential significant adverse environmental or social risks or impacts that are diverse, irreversible, or unprecedented.

FI-3: when an FI's existing or proposed portfolio includes financial exposure to business activities that predominantly have minimal or no adverse environmental or social impacts.

2. Monitoring

Regular monitoring

E&S monitoring of portfolio companies is achieved both by calls and on-site visits conducted by the E&S team. The frequency of the E&S monitoring is based on the Risk Categorization of the company.

| Risk Category | External consultancy | Calls | On-site visits |
|---------------|---|---|---|
| A | If high risk mitigation plan is beyond 6 months | Every month | Every 6 months |
| B+ | If high risk mitigation plan is beyond one year | Every 3 months at the beginning and after the implementation of the Action Plan when needed | Every 12 months (first mission being within 8 months from the investment) |
| B | If high risk mitigation plan is beyond one year | Every 3 months at the beginning and after the implementation of the Action Plan when needed | Every 18 months (first mission being within 8 months from the investment) |
| C | None | Every 6 months | Every 24 months |

Monitoring calls and visits are aiming at:

- Knowing the stage of completion of the ESAP
- Being aware of on-going projects at the company level
- Understanding issues faced and support to overcome the issue for the company

Reporting

The Company shall as soon as it is available, but in any event no later than 60 days after financial closing, provide Amethis with an Annual Environmental and Social Monitoring Report. The template for this report will be agreed during the closing stage.

Access for environmental and social monitoring

The Company shall permit employees of the Shareholder and/or consultants or other professional advisers and contractors on behalf of the Shareholders free access at all reasonable times and on reasonable notice at the cost of the Company to carry out environmental and/or social monitoring visits by, (a) viewing the premises of the Company and (b) meeting and discussing matters with senior management and employees of the Company. The Company shall assist on a best effort basis in getting permission to visit plants and Associated Facilities of its clients and providers.

Notification of incidents (template Appendix 3)

The Company shall promptly, but in any event within 3 days after the occurrence of any of the events set out hereafter, supply to the Shareholders (i) details of any incident of an environmental nature (including without limitation any explosion, spill or workplace accident which results in death, serious or multiple injuries or material environmental contamination) or any incident of a social nature (including without limitation any violent labor unrest or dispute with local communities), occurring on or nearby any site, plant, equipment or facility of the Company which has or is reasonably likely to have a Material Adverse Effect or which has a material negative impact on the environment, the health, safety and security situation, or the social and cultural context, together with, in each case, a specification of the nature of the incident or accident and the on-site and off-site effects of such events and (ii) details of any action the Company proposes to take in order to remedy the effects of these events, and shall keep the Shareholders informed about any progress in respect of such remedial action.

Environmental and Social Claim

The Company shall inform the Shareholders in writing as soon as reasonably practicable upon becoming aware of the same of (i) any Environmental and Social Claim being commenced against it and (ii) any facts or circumstances which will or are reasonably likely to result in any Environmental and Social Claim being commenced or threatened against it.

6. External communications

Amethis provides E&S reporting at least once a year to its limited partners, 90 days following the end of financial year.

7. Training

Annually, an ESG training plan will be defined and budgeted. This training plan will contain:

- At least once a year, a training on ESMS procedures
- At least one ESG topic will be identified, and a training session will be organized accordingly.
- Specific training needs for employees regarding ESMS understanding and ESG performance

Appendix 1: Exclusion list

The Fund shall not finance the following activities:

- Production or trade in any product or activity deemed illegal under host country laws and France or regulations or international conventions and agreements, or subject to international bans, such as pharmaceuticals, pesticides/herbicides, chemicals, ozone depleting substances², PCBs, wildlife or products regulated under the Convention on International Trade in Endangered Species (CITES) of Wild Fauna and Flora
- Live animals for scientific and experimental purposes, including the breeding of these animals
- Unsustainable fishing methods such as blast fishing and drift net fishing in the marine environment using nets in excess of 2.5 kilometres in length;
- Production of, or trade in, arms (i.e. weapons, munitions or nuclear products, primarily designated for military/police purposes)
- Production of, use of, or trade in, unbonded asbestos fibres;
- Production or trade in radioactive materials. This does not apply to the purchase of medical equipment, quality control (measurement) equipment and any equipment where IFC considers the radioactive source to be trivial and/or adequately shielded.
- Production or activities involving harmful or exploitative forms of forced labor³/harmful child labor⁴
- Destruction⁵ of Critical Habitat⁶ and any forest project under which no sustainable development and managing plan is carried out.
- Any activity involving the production, use, trade in, or distribution of GMO seeds.
- Cross-border trade in waste and waste products unless compliant to the Basel Convention and the underlying regulations.
- Any activity involving significant altercation, damage or removal of way critical cultural heritage⁷.

² As specified in the 1999 Montreal Protocol on Substances that Deplete the Ozone Layer (see www.ozone.unep.org), as may be amended from time to time.

³ Forced labor means all work or service, not voluntarily performed, that is extracted from an individual under threat of force or penalty.

⁴ Harmful child labor means the employment of children that is economically exploitive, or is likely to be hazardous to, or to interfere with, the child's education, or to be harmful to the child's health, or physical, mental, spiritual, moral, or social development.

⁵ Destruction means the (1) elimination or severe diminution of the integrity of a habitat caused by a major, long-term change in land or water use or (2) modification of a habitat in such a way that the habitat's ability to maintain its role (see footnote 10) is lost.

⁶ Critical habitat is a subset of both natural and modified habitat that deserves particular attention. Critical habitat includes areas with high biodiversity value that meet the criteria of the World Conservation Union (IUCN) classification, including habitat required for the survival of critically endangered or endangered species as defined by the IUCN Red List of Threatened Species or as defined in any national legislation; areas having special significance for endemic or restricted-range species; sites that are critical for the survival of migratory species; areas supporting globally significant concentrations or numbers of individuals of congregatory species; areas with unique assemblages of species or which are associated with key evolutionary processes or provide key ecosystem services; and areas having biodiversity of significant social, economic or cultural importance to local communities. Primary Forest or forests of High Conservation Value shall be considered Critical Habitats.

⁷ Consists of internationally and nationally recognised historical, social and/or cultural heritage.

- Production and distribution of racist, anti-democratic media, neo-Nazi media, or with the intent to discriminate part of the population.
- Exploitation of diamond mines, and commercialization of diamonds, when the host country has not adhered to the Kimberley agreement⁸, or other similar international agreements (actual or to be formed), on similar extractive resources.
- Any sector or service subject to United Nations, European Union and/or French embargo without limitation.
- Any business relating to pornography or prostitution.
- Commercial concessions over, and logging on tropical natural forest; conversion of natural forest to a plantation
- Purchase of logging equipment for use in tropical natural forests or high nature value forest in all regions; and activities that lead to clear cutting and/or degradation of tropical natural forests or high nature value forest
- New palm oil plantation

Any businesses, if any of the following activities represents a substantial portion of such business⁹:

- Gambling, gaming casinos and equivalent enterprises;
- Production or trade in tobacco or tobacco related products; or
- Production or trade in alcoholic beverages (excluding beer and wine)

The Fund, except when engaged in **microfinance** activities as specified below*, must also apply the following exclusions in addition to the Exclusion List:

- Production or trade in wood or other forestry products other than from sustainably managed forests.

* When investing in **microfinance** activities, the Fund will apply the following items in addition to the Exclusion List:

- Production, trade, storage, or transport of significant volumes of hazardous chemicals, or commercial scale usage of hazardous chemicals. Hazardous chemicals include gasoline, kerosene, and other petroleum products.
- Production or activities that impinge on the lands owned, or claimed under adjudication, by Indigenous Peoples (as defined in Standard 7 of the Performance Standards), without full documented consent of such people

⁸ The Kimberley Process Certification Scheme (KPCS), is a certification standard for diamond production that concerns governments; the diamonds are controlled at each stage of the production chain, from extraction through to retail of the finished product. The KPCS was created to prevent and stop conflict diamond trade. It is designed to certify the origin of diamonds from sources which are free of conflict fueled by diamond production. Member states adhere to adopt national laws on the issue, and to put in place the necessary export and import control mechanisms to implement the KPCS. More than 75 countries involved in the production, commercialization, and transformation of diamonds participate.

⁹ For companies, “substantial” means more than 10% of their consolidated balance sheets or earnings. For financial institutions, “substantial” means more than 10% of their underlying portfolio volumes.

Appendix 2: Risk rating scale

Results of risk rating shall be displayed in a format of a heat map.

Risk rating is conducted based on two criteria:

- Risk impact assessment

Risk impact shall be represented in the ordinate axis of the heat map.

| Risk types | 1- Low | 2- Medium | 3- High |
|---|---|--|--|
| Financial impacts (fines and cost of remediation) | 1% of total equity | 5% of total equity | 10% of total equity |
| Human impacts | Reversible injury, recovery below 1 month | Reversible injury, recovery over 1 month | Irreversible injury or death |
| Environmental impacts | Reversible alteration of the ecosystem, recovery below 6 months | Reversible alteration of the ecosystem, recovery over 6 months | Irreversible alteration of the ecosystem |
| Reputational impacts | Bashing | Loss in revenue | Loss of license to operate |

- Probability of risk occurrence

Risk probability shall be represented in the abscissa axis of the heat map.

| | 1- Low | 2- Medium | 3- High |
|-------------|---------------------|----------------------|------------------------|
| Description | Maximum once a year | Maximum once a month | More than once a month |

Appendix 3: Notification of incident reporting template

| REPORT ON ESG SERIOUS INCIDENT FOR INVESTORS [NAME OF COMPANY] | |
|--|--|
| Date of report | |
| Fund/ contact person | / |
| Date of investment | |
| Date and time of accident / Date of notification to fund | [Date, Time] / [Date/ explanation of delay] |
| Type of accident | (e.g. Fatality, major oil spill, explosion) |
| Victims and damage | <ul style="list-style-type: none"> • Fatalities (including number deceased and differentiating between employee/ contractor fatalities and members of the public). • Number injured (mention hospitalisations/ loss of limb). • Loss/ damage to company facilities or operating environment. • Environmental damage (e.g. water pollution). |
| Immediate response | |
| Description of issue | <p>Include the following where available or relevant:</p> <ul style="list-style-type: none"> • names of involved (if fatalities) • witnesses (including where relevant staff, unions, police, other authorities and other parties) • routine/non-routine activity being undertaken • factual statement of what happened • scene inspection photos/notes • sequence of events pre-dating accident • immediate cause • unsafe acts in sequence • unsafe conditions in sequence • underlying causes of unsafe acts/conditions (initial view) • root cause(s) • corrective / preventive action for EACH significant cause • actioned, timed-bound plan (can be attached) • Interim preventive measures • Other interim actions required cross-check to other activities / locations for lessons learned • Any negative publicity (including media) resulting from the incident |
| Concluding statement - | Outline of accident, key causes, corrective/ preventative actions, final position, and lessons learned |
| Follow-up by fund manager | <ul style="list-style-type: none"> • Complete Sheet B based on preliminary investigation |

| FOLLOW-UP CHECKLIST | |
|--|---|
| Areas where further clarity is desired based on current information: | <ul style="list-style-type: none"> Based on LP feedback and internal review |
| Further information awaited (utilising third party expertise where necessary): | |
| Critical review of accident and investigation status | |
| Credibility of causes and corrective /preventive actions identified | |
| Outcome based on above: | <ol style="list-style-type: none"> 1. Accept report / findings Or 2. Conditionally accept report / require additional / different corrective actions Or 3. Reject report |
| Key follow up points | Schedule to check / verify implementation of corrective and preventive actions. Include dates. |
| Additional plans for verification / close-out of actions? | Is third party expertise required? |
| Lessons learned that could be shared with other portfolio companies? | |