



ENVIRONMENTAL AND SOCIAL MANAGEMENT SYSTEM

2026



**BETTER COOKING
COMPANY LIMITED**

ENVIRONMENTAL AND SOCIAL MANAGEMENT SYSTEM

Developed by Catalyst in partnership with Nefco

Document Control

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SECTION ONE

COMPANY HISTORY

Company overview and project background

Better Cooking Company (BCC) is a pioneering fuel utility company dedicated to providing high-quality, clean cookstoves and sustainable, locally produced biomass fuel pellets (i.e., biofuels) (refer to Figure 1). With a mission to offer families in developing economies a clean, sustainable, and affordable way to prepare meals, we have been breaking barriers across Africa to offer a completely sustainable product, supply chain, and service (refer to Figure 2). Our innovative approach addresses critical issues such as deforestation, indoor air quality, health outcomes, and emission reductions.

We are deeply committed to climate awareness and sustainability, recognizing the crucial role of carbon credits in making clean cooking solutions more accessible and affordable. Currently operating in Kenya and Uganda, with potential expansions into Malawi, Tanzania, and Zambia, We aim to revolutionize cooking methods for a globally expanding consumer market. Our products and services provide local communities and restaurants with clean and efficient cooking solutions, tackling the pressing problems of indoor air pollution and deforestation through a fully sustainable supply chain.

With proven technology that contributes significantly to combating global climate change, We stand out with their unique ability to meter and measure emissions. We are the only company worldwide to have conducted baseline surveys on the usage of harmful fuels prior to introducing their eco-friendly stoves to households and restaurants (see Figure 3 for an example of the Betterstove). This enables us to provide validated, area-specific data to demonstrate the effectiveness of their technology. Our stoves also feature digital remote monitoring to ensure continued use, preventing a regression to harmful traditional methods.

Our company's efforts are widely recognized within the industry and the climate change sector. By playing their part in a thriving global market for clean and efficient household cooking solutions, we can significantly improve livelihoods, empower women, diminish the threats of forest degradation and biodiversity loss, and combat climate change through their clean cook stove products. The immediate benefits to individuals and the clear environmental advantages underscore the

company's impact. By preventing deforestation and promoting sustainable cooking practices, we play a vital role in preserving the planet's "lungs" and innovating climate solutions.



Figure 1: EcoMoto pellet briquette fuel made in Kenya from 100% waste biomass (Source: <https://ecosafi.com/the-difference/>)

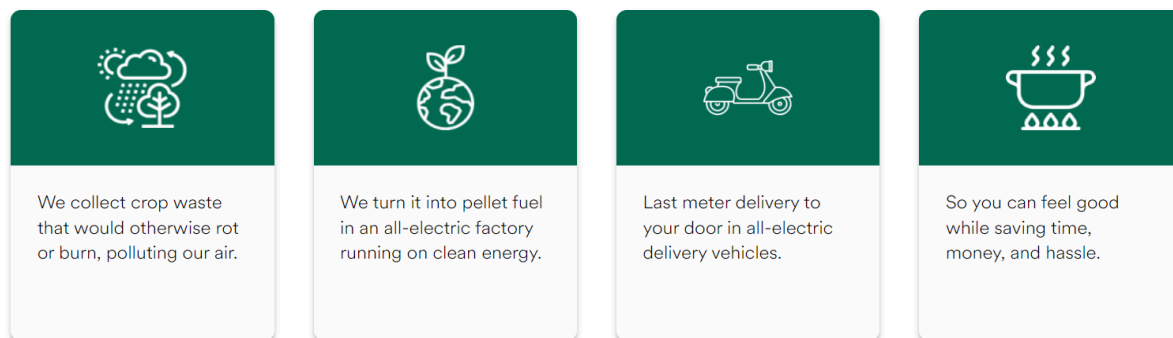


Figure 2: BCC's commitment to sustainability (Source: <https://ecosafi.com/impact/>)



Figure 3: EcoSafi Betterstove (Source: [EcoSafi Receives "A" Rating From Bezero Carbon \(Carbonherald.Com\)](https://carbonherald.com/news/eco-safi-receives-a-rating-from-bezero-carbon/))

Area of Influence

BCC currently operates in Kenya and Uganda, and aims to revolutionize cooking methods for their globally expanding consumer market with potential expansions into Malawi, Tanzania, and Zambia. This ESMS covers the operations in Kenya and can be tailored for other countries if necessary.

BCC's impact on the UN SDGs

Core SDG's

BCC advocates for clean cooking technologies that significantly lower greenhouse gas (GHG) emissions compared to traditional methods, thereby mitigating climate change by reducing carbon emissions and cutting down on indoor air pollution, a significant health hazard in many developing regions. BCC's cleaner cooking solutions not only mitigate these health risks but also decrease reliance on fossil fuels and encourage the use of sustainable energy. By promoting sustainable practices and reducing deforestation, often driven by the demand for cooking fuel, BCC contributes to a healthier environment. A healthier environment, in turn, positively impacts public health by reducing diseases associated with pollution and environmental degradation.

The core SDGs are:

- **13 – CLIMATE ACTION:** Take urgent action to combat climate change and its impacts;

- **7 – AFFORDABLE AND CLEAN ENERGY:** Ensure access to affordable, reliable, sustainable, and modern energy for all and
- **3 – GOOD HEALTH AND WELL-BEING:** Ensure healthy lives and promote well-being for all at all ages.

Other SDGs

BCC actively works to reduce deforestation by offering sustainable alternatives to wood and charcoal for cooking. By providing clean energy solutions, BCC enhances community resilience to climate change, as reliable energy access improves food security, health, and livelihoods, helping communities better cope with climate-related challenges. Traditional cooking methods that use wood or charcoal generate harmful smoke, leading to respiratory problems, especially among women and children. BCC offers its cookstove at no cost, provided that users purchase biofuel from them, which is significantly more affordable than LPG gas.

- **12 – RESPONSIBLE CONSUMPTION AND PRODUCTION:** Ensure sustainable consumption and production patterns;
- **11 – SUSTAINABLE CITIES AND COMMUNITIES:** Make cities and human settlements inclusive, safe, resilient, and sustainable;
- **5 – GENDER EQUALITY:** Achieve gender equality and empower all women and girls;
- **1 – NO POVERTY:** End poverty in all its forms everywhere;
- **2 – ZERO HUNGER:** End hunger, achieve food security and improved nutrition and promote sustainable agriculture;
- **10 – REDUCE INEQUALITIES:** Reduce inequality within and among countries.

SECTION TWO

ABOUT THE ENVIRONMENTAL AND SOCIAL MANAGEMENT SYSTEM (ESMS)

This ESMS is a set of principles, requirements, processes, and tools that help integrate environmental and social risk management into BCC's core business processes. The ESMS ensures that BCC activities comply with its own environmental and social commitments, the national regulations of the countries where it operates, and the environmental and social standards of international donors and investors. Compliance with the ESMS shall be a condition for all BCC operations.

A core principle of this system is continual improvement—an ongoing cycle of review, correction, and enhancement. This approach is typically guided by the Plan-Do-Check-Act (PDCA) cycle, as outlined below.

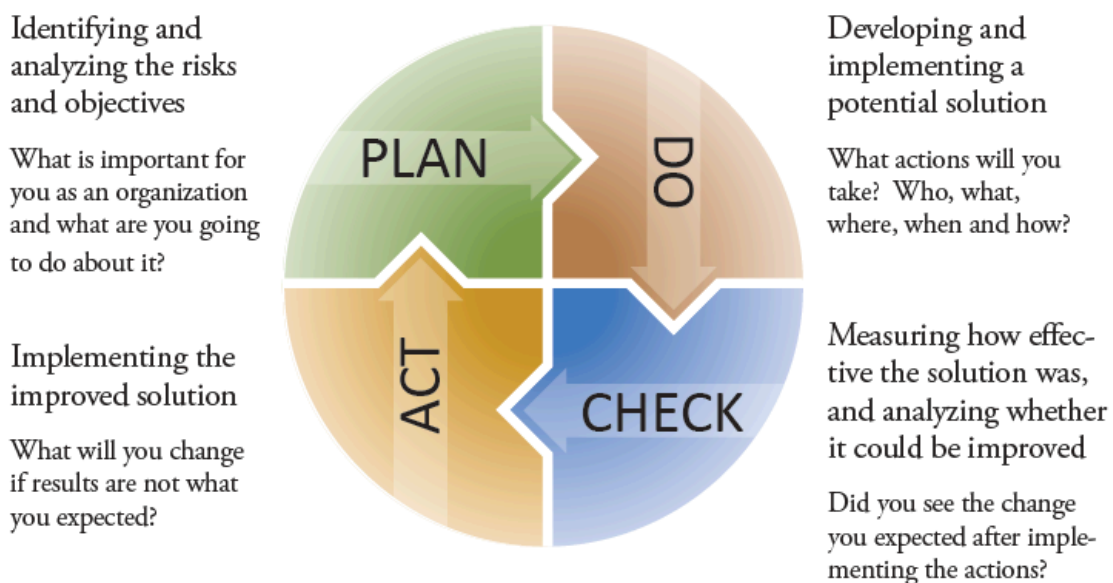


Figure 4: PDCA (Deming) cycle

The ESMS has been designed to:

- Identify and manage the E&S risks of potential investments;
- Monitor and report on the E&S risks of ongoing operations;

- Assist BCC to analyse, control, and reduce the negative environmental and social impacts;
- Improve on the positive benefits that are realised from its interventions and activities;
- Address current and future E&S risks of operations by guiding E&S requirements during the investment decision-making process and management of clients.
- Ensure compliance with relevant environmental, social, and health and safety regulations in all jurisdictions where BCC operate;
- Provide a framework for regular stakeholder engagement to build trust and promote transparency in project impacts and mitigation measures;
- Support continuous improvement through regular audits, evaluations, and feedback loops for E&S performance;
- Foster a culture of sustainability among employees, contractors, and partners by integrating E&S values into daily practices and policies;
- Enable prompt response and corrective action for any unforeseen E&S issues that may arise during project execution;
- Establish clear roles, responsibilities, and accountability mechanisms for E&S risk management across all operational levels.

Structure of ESMS

This ESMS has 9 interrelated sections/elements. Each of these elements is important because they help you to assess, control, and continually improve your environmental and social performance, as part of the Plan-Do-Check-Act cycle:

1. **Policy:** Reflects BCC's commitment to responsibly managing environmental and social risks and impacts.
2. **Identification of Risks and Impacts:** Identifying environmental and social risks across all operational levels, following a structured risk assessment approach.
3. **Management Programs:** Developing actionable and measurable plans to address identified risks, incorporating continuous improvement mechanisms.

4. **Organizational Capacity and Competency:** Providing regular training to employees on ESMS-related policies and procedures to foster a culture of environmental and social responsibility within the organization.
5. **Emergency Preparedness and Response:** Developing robust emergency response protocols under IFC standards to address potential environmental or social incidents, ensuring rapid response and minimizing negative impacts.
6. **Stakeholder Engagement:** Building and maintaining open lines of communication with stakeholders, including employees, customers, community members, and regulators.
7. **External Communications and Grievance Mechanisms:** Establishes channels for external communication and provides mechanisms for stakeholders to express concerns or grievances.
8. **Ongoing Reporting to Affected Communities:** Focuses on providing regular, clear, and relevant updates to communities impacted by the organization's operations
9. **Monitoring and Review:** Establishes processes for assessing the effectiveness of the organization's policies, programs, and management systems.

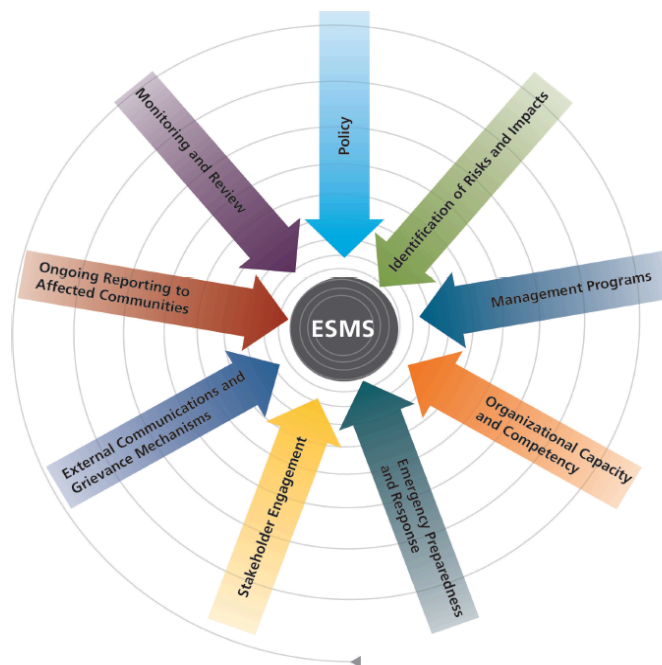


Figure 4: ESMS components

The implementation of this ESMS will be done following the IFC Performance Standard 1, which establishes the importance of integrated assessment to identify the environmental and social

impacts, risks, and opportunities of projects; effective community engagement through disclosure of project-related information and consultation with local communities on matters that directly affect them; and the client's management of environmental and social performance throughout the life of the project. Overall responsibility for system implementation rests with BCC.

1. ENVIRONMENTAL AND SOCIAL (E&S) POLICY

Purpose and Scope

This Environmental and Social Policy outlines our commitment to sustainable and responsible business practices across all our activities, products, and services. It applies to all employees, contractors, suppliers, and stakeholders engaged with our company. The policy is aligned with and supported by related internal policies, including those on waste management (including e-waste), gender, human rights, labour conditions, child and forced labour, occupational health & safety, anti-corruption, and consumer protection.

The policies mentioned here are standalone documents and form part of BCC's broader management framework. Each policy is governed independently and is supported by its own organisational structure, including clearly defined roles and responsibilities, as well as arrangements for implementation, monitoring, and accountability.

Policy Statement

Better Cooking Company is dedicated to leading the clean cooking industry in advancing **environmental, social, and economic sustainability**. We acknowledge our responsibility to minimize negative impacts on the environment and society while maximizing positive contributions to sustainable development. Our commitment extends to the protection of the environment, the upholding of human rights, and the promotion of fair, safe, and inclusive labor practices, including prohibition of child labour, forced labour, bonded labour, human trafficking, and any form of exploitation within its operations.

Leadership Commitment

This policy is fully endorsed by the senior management and Board of Directors, who provide oversight, leadership, and resources to ensure its effective implementation and continuous improvement.

Commitments

1. Environmental Stewardship

We are committed to complying with all applicable **environmental laws and regulations**, and to minimizing our environmental footprint by focusing on the following:

- **Resource Efficiency and Cleaner Production:** Use energy, water, and raw materials efficiently while reducing reliance on non-renewable resources.
- **Emissions and Effluents:** Monitor and control emissions and effluents to reduce their impact on air, water, and land.
- **Greenhouse Gas (GHG) Emissions:** Measure, report, and reduce GHG emissions across operations and supply chains.
- **Pollution Control:** Prevent and minimize the release of pollutants into the environment through sound operational practices.
- **Hazardous Waste Management:** Ensure safe handling, storage, transportation, and disposal of hazardous materials in line with international best practices.
- **Waste Management:** Apply the 5Rs – *Reduce, Reuse, Recycle, Recover, and Responsible Disposal* – across all operations, including e-waste management.
- **Biodiversity and Ecosystem Protection:** Assess and mitigate any negative impacts of our operations on ecosystems and biodiversity.

2. Social Responsibility

We are committed to fostering positive social outcomes by:

- Upholding human rights and promoting equality and diversity.
- Ensuring fair labor conditions, including occupational health and safety.
- Prohibit the employment of children below the legal minimum age (18 years), in line with the Children Act (2022), and the ILO Conventions 138 and 182.
- Prohibit all forms of forced labour in line with Article 29 of the Constitution of Kenya (2010), the Employment Act (2007) and the ILO Conventions 29 and 105.
- Promoting gender equality and women's empowerment.

- Supporting community engagement and development initiatives.
- Protecting consumer rights through safe, ethical, and transparent business practices.

3. Economic Sustainability

We conduct business responsibly to ensure long-term financial sustainability while delivering positive environmental and social value. We:

- Strengthening local economies by sourcing responsibly and supporting inclusive value chains.
- Encourage innovation in clean energy technologies.
- Partner with stakeholders to drive shared value and resilience.

4. Risk Identification and Management

- Regularly identify, assess, and manage environmental and social risks and impacts.
- Implement mitigation strategies through a formal **Environmental and Social Management System (ESMS)**.
- Maintain clear procedures to respond to environmental or social incidents.

5. Compliance and Accountability

- Comply with all relevant laws, regulations, and international standards.
- Assign clear accountability for policy implementation and ESMS monitoring.
- Take corrective action for any cases of non-compliance.

6. Communication and Transparency

- Communicate this policy openly and make it accessible to employees, stakeholders, and the public.
- Provide transparent reports on sustainability performance.

- Encourage stakeholder engagement and feedback for continuous improvement.

7. Monitoring, Review, and Continuous Improvement

- Set measurable objectives and targets aligned with our sustainability commitments.
- Monitor, review, and report performance regularly.
- Review and update this policy every two years, or sooner if necessary, to ensure continued relevance and effectiveness.

Oversight and Responsibility

Overall accountability for implementing this policy and the ESMS rests with the Head of HR. All employees and contractors share responsibility for adhering to and promoting the principles of this policy.

Endorsement

This E&S Policy has the full support of our leadership. It reflects our commitment to sustainability, compliance, and responsibility towards our people, stakeholders, and the environment.

Signed on behalf of BCC

Jordyan Woodley

Chief Executive Officer

Better Cooking Company

Date:

2. IDENTIFICATION OF RISKS AND IMPACTS

BCC is committed to high standards and leadership in the environmental and social aspects of its operations for its consumers, contractors, and the communities in which it operates. Some BCC activities are a source of risk for people and the environment. These risks must be identified, evaluated, and managed to eliminate or minimize them in line with applicable principles of IFC Performance Standard 1.

For this purpose, we used the three tools presented below: the Risk Identification Worksheet, the Process Mapping, and the Risk Assessment Form.

2.1. Risk Identification Worksheet

This worksheet is used to identify the potential risks and the negative impacts based on the BCC operation and operating environment. It also helps the company identify the areas where problems are more likely to arise. Based on the potential negative impacts presented, the BCC chooses the presented risk factors.

The table below presents those risks and potential negative impacts separated according to the three categories (labor and working conditions, environmental, community health and safety risks).

LABOR AND WORKING CONDITIONS RISKS		
RISK FACTORS	My company has the following conditions	Potential negative impact (A yes response means that there is a potential negative impact)
There is a difference in nationality, race, or religion between workers and managers.	Yes	Discrimination.
		Disciplinary abuse and harassment.
		Unequal pay and benefits
Our managers and supervisors are not aware of the workers' rights under the national labor law or collective agreements.	No	Inadequate wages, benefits and contracts.
		Excessive overtime
		Discrimination
		Disciplinary abuse and harassment.
We have an apprentice program that provides young workers with training and work experience.	No	Forced labor.
		Child labor
Children accompany their parents during work or leisure time	No	Child labor.
		Exposure of children to workplace hazards



LABOR AND WORKING CONDITIONS RISKS		
Female workers make up the majority of the workforce	Yes	Discrimination
		Disciplinary abuse and (sexual) harassment.
Most managers and/or security staff are male workers	No	Discrimination Disciplinary abuse and (sexual) harassment.
We do not have a system for recording the “in” and “out” time for workers.	No	Excessive working hours.
		Lack of overtime payment
Some workers are paid based on the tasks performed (quota) rather than hours worked.	Yes	Health and safety risks.
		Inadequate wage payment.
		Excessive working hours
Wages paid do not always meet the legal minimum wage or a level to meet the basic needs of a family.	No	Malnutrition.
		Child labor.
		Excessive overtime.
		Exhaustion.
We routinely use recruiting agencies and contract workers.	No	Inadequate wages and benefits compared to permanent workers
		Job insecurity
We routinely use homeworkers or contractors that use homeworkers.	No	Inadequate wages, benefits and contracts.
		Forced labor.
		Child labor.
We routinely use seasonal or temporary workers.	Yes	Inadequate wages, benefits and contracts.
		Excessive overtime.
Some of the workers in my company are migrants from another area.	Yes	Less favorable contract terms
		Discrimination based on ethnicity, language, religion, etc.
Migrant workers or seasonal workers are employed in more hazardous jobs.	No	Discrimination.
We provide a dormitory for some of our workers.	No	Lack of freedom of movement.
		Lack of clean, adequate space.
		Excessive charges for the use of the dormitory
The dormitories are not regularly inspected for their cleanliness, hygienic conditions, adequate space availability, or safe drinking water and sanitation.	No	Lack of clean, adequate space.
		Illness or health hazards due to a lack of sanitation or access to a clean drinking water supply.
Workers are not free to move out of their dormitories	No	Lack of freedom of movement.
		Forced labor.
There are security guards at our company.	Yes	Lack of freedom of movement.
		Harassment.
We are located in a free-trade zone.	No	Inadequate wages, benefits and contracts.
There are large fluctuations in working hours based on work demand.	No	Excessive overtime. No payment of overtime due to hour averaging. Layoffs
There is a labor shortage in the area	No	Child labor.
Our region does not have a strongly established union structure.	No	Discrimination. Restriction on freedom of association and collective bargaining.



LABOR AND WORKING CONDITIONS RISKS		
There is no history of collective bargaining, unions or other forms of worker representation at our company	Yes	Lack of freedom of association.
The union members and worker representatives do not enjoy the same benefits as the other workers	No	Lack of freedom of association. Discrimination.
The hiring, compensation and promotion of workers is not based on the job requirements and workers' skills.	No	Discrimination.
There is no procedure for workers to express their complaints (grievance mechanism)	No	Discrimination Disciplinary abuse and harassment. Worker injuries and chronic conditions.
The organization has done a collective dismissal in the past or it may be vulnerable to collective dismissal due to poor financial conditions or technical reasons.	Yes	Sudden loss of income and economic hardship for affected workers Reputational damage and reduced employee trust Low morale and anxiety among the remaining staff
We do not verify the age of workers at the time of hiring.	No	Child labor. Hiring young workers. Exposure of young workers to hazardous jobs.
Workers are required to deposit money or their original documents (e.g. certificates, landing documents, passports, etc.) as a condition of their employment.	No	Forced labor.
		Harassment.
We withhold one-month salary from workers as security deposit	No	Forced labor.
Our workers don't have access to separate and clean areas for eating and changing clothes	No	Worker illnesses
Sanitation and washing facilities are not inspected regularly.	No	Worker illnesses due to infectious diseases
Our production/ processing activities include lifting, carrying or repetitive motions.	Yes	Worker injuries and chronic conditions
Large equipment is used in our operations.	Yes	Worker injuries and chronic conditions
Equipment, machinery and tools are not regularly inspected and maintained.	No	Worker injuries such as lacerations, loss of limbs or digits.
Our production activities involve workers routinely interacting with machinery.	No	Worker injuries and chronic conditions.
There is noise due to certain activities.	Yes	Increased absenteeism and compensation claims Hearing loss or long-term auditory damage Reduced productivity and work quality
		Noise-Induced loss
Our workers work long hours in areas with exposure to sunlight, ultraviolet radiation and/or excessive heat.	No	Heat and sun-induced dermatitis. Melanoma. Lip cancer. Dehydration.



LABOR AND WORKING CONDITIONS RISKS		
Workers are required to work at confined and high elevations.	No	Fall injuries.
		Head injuries from falling objects
Our tools are not well-maintained or ill designed for the job.	No	Fatigue.
		Physical injury such as cuts and lacerations
Roadways and paths are narrow, restricting vehicular or personnel movements.	No	Worker injury or death due to hazards related to head-on crashes between vehicles or overturns off the side of the road
Electrical equipment used is not regularly inspected and maintained	No	Workers exposure to severe shocks, burns or electrocution
Confined spaces are not yet identified, and workers are not fully trained in safe operating practices.	No	Workers exposure to toxic gases (hydrogen sulfide, methane, ammonia, carbon monoxide, carbon dioxide). Oxygen deficiency and asphyxiation
We use open trucks to transport workers from location to another	No	Physical injury.
		Fatalities due to vehicle worker collisions or other accidents.
Our production activities involve materials or processes that could cause fires or explosions	Yes	Worker injuries or fatalities.
Some hazardous materials are not identified or labeled and some of the workers may not be trained in safe handling of chemicals or other hazardous substances	No	Worker illnesses.
		Exposure to hazardous chemicals
We have not identified all operations where personal protective equipment (PPEs) is required	No	Worker injuries.
		Exposure to hazardous material and chronic conditions.
Not all workers are aware of the workplace hazards and how to use the appropriate PPEs.	No	Worker injuries.
		Exposure to hazardous material and chronic conditions.
Our workers are not aware of what to do in case of an emergency. Emergency routes and exits are often blocked and locked	No	Injuries and loss of life.
Our Processing activities involve workers routinely interacting with machinery, equipment with sharp edges and/or slippery work surfaces.	No	Worker injuries and chronic conditions.
Our processing activities involve some levels of noise.	Yes	Worker injuries and chronic conditions.
Our processing activities involve the handling of living and dead animals that can transmit diseases to humans.	No	Worker illnesses.
Our processing activities involve the handling of animal feces without proper personal protective equipment.	No	Worker illnesses.
Bathrooms are not properly cleaned and often lack running water, soap and toilet paper.	No	Worker illnesses.



LABOR AND WORKING CONDITIONS RISKS

The companies in our supply chain would probably answer “Yes” to most of the questions above.	No	All of the above
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ENVIRONMENTAL RISKS

Our operations have high requirements for power supply.	Yes	High energy consumption.
We require large quantities of fuel (gas/diesel/etc.) for our operations	No	Air emissions.
We have various processes and utility equipment, which may generate air emissions, noise (dust arresters, drying machines, blowers, drills, electric tools, etc.).	Yes	Air emissions.
		Solid waste (e.g. waste from equipment maintenance, fly and bottom ash from coal-based boilers)
		Hazardous waste (e.g. waste oil, oil-soaked filters and rags).
		Liquid waste (e.g. boiler blow-down, waste oil).
		Noise generation.
We generate some quantities of solid waste from our processes.	No	Solid waste.
		Liquid waste
		Contamination of land, groundwater and/or surface water due to improper disposal of solid and liquid waste.
We use animal manure in our processes.	No	Land contamination. Ground or surface water contamination.
We dispose of our solid waste in our landfill or city’s landfill facility.	Yes	Contamination of land, groundwater (due to leachate) and/or surface water (due to run-off).
We generate hazardous or toxic solid or liquid waste such as chemical residues and sludge from wastewater treatment plants.	No	Contamination of land, groundwater and/or surface water (due to run-off) if disposed of improperly.
We discharge our wastewater (process effluent) in a nearby river, lake or any other water body.	No	Contamination of receiving water body and aquatic life.
		Eutrophication due to high BOD5 or COD.
We treat our wastewater and sewage (from toilets, washrooms, etc.) before it is discharged.	No	Energy consumption.
		Solid waste generation (e.g. sludge from treatment process, treatment chemicals).
		Land and/or water contamination due to improper disposal of solid waste (e.g. sludge).
We do not re-use (part of) our treated wastewater (process effluent) for processing purposes.	No	Water consumption.
We use some banned or restricted chemicals/materials in our processes.	No	Non-fulfillment of regulatory requirements.
		Air, land or water pollution, depending on current usage.



ENVIRONMENTAL RISKS		
		Exposure of workers or consumers to banned chemicals.
We face problems related to pests/vectors.	No	Use of chemicals.
		Chemical exposure to workers.
		Land or water contamination due to disposal of infested material.
We require some extensions of land (for extension purposes).	Yes	Loss of biodiversity.
		Soil degradation.
		GHG emissions
We don't have sufficient fresh water supplies to meet our requirements	No	Groundwater depletion in the region.
We need to store large quantities of raw materials at the site.	Yes	Solid waste due to possible contamination or deterioration of raw materials.
		High energy consumption or emissions due to cold storage.
We generate large (or significant) quantities of solid or liquid waste due to poor quality of raw materials or rotting of material due to prolonged storage.	No	Solid waste. Liquid waste. Contamination of land, groundwater and/or surface water due to improper disposal of solid and liquid waste. Wastewater from cleaning. High energy consumption or emissions due to cold storage.
We generate large (or significant) quantities of solid or liquid waste from our manufacturing process, which are not reprocessed into byproducts, fertilizers or energy.	No	Solid waste. Liquid waste. Contamination of land, groundwater and/or surface water due to improper disposal of solid and liquid waste. Wastewater from cleaning.
The quantity of solid/liquid waste from rejected finished product due to contamination, rotting, expiry, etc. is high (or significant) at our facility.	No	Solid waste. Liquid waste. Contamination of land, groundwater and/or surface water due to improper disposal of solid and liquid waste. Wastewater from cleaning. High energy consumption or emissions due to excess or extra production.
Our operations generate large (or significant) quantities of wastewater (e.g. raw material washing, processing, floor cleaning, bottle washing, etc.).	No	Contamination of ground and/or surface water due to improper disposal of wastewater.
We utilize our treated wastewater (process effluent) for irrigation (either by ourselves or provide it to community).	No	Contamination of land, groundwater (due to leachate), surface water (due to run-off) and/or crops if toxic chemicals are present in the treated wastewater.
Our operations may have an impact on the surrounding forest or wildlife.	No	Loss of native species. Impact on biodiversity.



COMMUNITY HEALTH, SAFETY AND SECURITY RISKS

Our operations involve air emissions, water discharge, solid waste disposal, leakage of chemicals or gases, etc., that may pass on to the surrounding community.	No	Air, water or land contamination, which can affect the health and livelihood of local communities
We use certain banned or restricted chemicals, pesticides or herbicides in our operations.	No	Exposure of community to banned chemicals/hazardous substances directly or through contaminated water and soil. Impact on wildlife
We plan to develop new infrastructure, buildings, equipment and other facilities (new demo farms).	Yes	Exposure of communities to air emissions, noise, and accidents due to equipment and vehicular movement.
		Impact on wildlife, biodiversity and local livelihoods due to natural habitat conversion.
We plan to decommission and dispose of old infrastructure, buildings, equipment and other facilities.	Yes	Health risks to communities as a result of exposure to toxic substances (e.g. from chemicals, heavy metals, asbestos, etc.), and air emissions and noise due to equipment and vehicular movement.
There is significant movement of vehicles in and around our facilities due to our operations.	No	Exposure of communities to air emissions, noise, and accidents due to vehicular movement.
We store hazardous chemicals or hazardous waste in our facility.	No	Health risks to communities and negative impacts on wildlife and biodiversity due to the intentional or unintentional (spills) release of hazardous or toxic substances contaminating air, land, or water.
We discharge water from our operations, which may have an impact on surrounding water bodies (e.g. wastewater from workers' residential facilities, other production facilities, etc.)	No	Negative impacts on local food security and income generation due to contamination of aquatic life. Diseases/illness among local communities due to the use of contaminated water.
We hire temporary and migrant workers.	Yes	Communicable diseases brought or spread by the influx of workers.
We hire private security personnel (only in the office).	Yes	Conflicts with communities.
Our operations have close proximity with the local community.	Yes	Conflicts with communities and indigenous people (e.g. due to emissions and odor from our operations, sharing of local resources, etc.).
We sometimes have complaints from the local community.	Yes	Conflicts with communities.
Our operations use some quantities of water.	No	Potential negative effects for fisheries. Lack of water for irrigation for nearby farmers, negative effect on availability of drinking water.

COMMUNITY HEALTH, SAFETY AND SECURITY RISKS

Our operations involve risk of fires and explosions.	Yes	Collapse of the building. Fires and explosions may affect nearby buildings. Injuries and loss of life.
Our processing activities and treatments involve biomass or other liquids or solids that may lead to foul odors.	No	Exposure of the community to foul odors.

2.2. Process Mapping Tool

The Process Mapping Tool is used to identify in more detail where problems are likely to arise within your processes. It is a structured method for visually mapping out the steps of an organization's activities to identify potential environmental and social (E&S) risks. For each activity/ process, the necessary inputs, outputs (in terms of waste, emissions, or byproducts), and the possible negative E&S impacts. This tool can also be used to identify whether you can improve your workflow to be more efficient.



Inputs	Process steps	Outputs	OHS hazards and potential negative impacts on workers	Risks and potential negative impacts on the environment and community	Opportunity For Waste Reduction/Energy & Water Savings
Water, energy, raw materials, chemicals, labor etc.	Operational activity	Waste, emissions, byproducts	Injuries, long-term illnesses	Environmental pollution, shortage of resources	Improved process reuse and recycling
Bagasse, transport, Labour, PPE, energy (fuel or electricity)	Collection - Loading & Offloading (mechanical and manual)	Exhaust fumes from trucks Dust	Bruises and strains (machine accidents) Respiratory issues (dust inhalation) Hearing problems (noise exposure)	Air pollution Noise pollution Truck traffic disturbance	Automation to reduce overreliance of manual loading processes
Trucks, energy (fuel), labour, cover material	Transportation to the plant	CO2 emissions Road dust Possible spillage	Bruises and strains or fatality (road accidents) Fatigue (driver)	GHG emissions Road accidents (increased traffic) Noise pollution	Use of fuel-efficient or alternative-fuel trucks
Energy (electricity), machine, labour	Pre-cleaning & screening the bagasse (take out debris such as stone and metals)	Separated debris Dust Noise	Bruises and strains (machine-related accidents) Respiratory issues (dust inhalation) Hearing problems (noise exposure)	Dust emissions Improper waste disposal	Recycle metal waste



Inputs	Process steps	Outputs	OHS hazards and potential negative impacts on workers	Risks and potential negative impacts on the environment and community	Opportunity For Waste Reduction/Energy & Water Savings
Bagasse, Labour, energy, Mechanical drying, PPE, Manual drying	Drying (to acquire the required moisture content for further production).	Dust Moisture Flue gas emissions (CO2, particulate matter)	Burns Heat stress Health issues (exposure to flue gases)	Air pollution Dust cover affecting vegetation Fire GHG emissions Odors	Installation of fire suppression equipment. Use high-efficiency burners
Dried bagasse, Mechanical conditioner, Labour, PPE	Milling (to attain the correct size of fibers for pelletization).	Dust Noise Vibrations	Bruises and strains (machine-related accidents) Respiratory issues (dust inhalation) Hearing problems (noise exposure)	Dust emissions Noise pollution	Employee training in machine handling Controlled exposure with adequate breaks during the production process Use of energy-efficient motors
Milled bagasse, Mechanical conditioner, energy, steam or water, labour, PPE	Conditioning (to adjust the temperature and moisture of the milled bagasse)	Steam emissions. Condensate water	Burns (steam) Slips (wet floor)	Wastewater	Reuse condensate Monitor water efficiency
Bagasse, energy, Mechanical sieving, labour, PPE	Pelletization (Bagasse compression and sieving to form pellets).	Noise Heat Small pellet fines	Bruises, strains, entanglement (machine-related accidents) Respiratory issues (dust inhalation) Hearing problems (noise exposure)	Noise pollution GHG emissions	Installation of modern power-saving machines Employee training in proper handling Recycle pellet fines back into the process



Inputs	Process steps	Outputs	OHS hazards and potential negative impacts on workers	Risks and potential negative impacts on the environment and community	Opportunity For Waste Reduction/Energy & Water Savings
Pellets, Mechanical cooler (compressed air), Labour, PPE, energy	Cooling (to attain packaging temperatures).	Noise Dust Warm exhaust air	Respiratory issues (dust inhalation) Burns (fire risk due to dust accumulation)	Noise pollution Airborne dust	Employee training in compressor handling Automate the process Recover warm air for pre-drying
Energy, laboratory and equipment, samples, labour	Screening and Quality control	Rejected pellets Fines	Repetitive strain injuries Respiratory issues (dust inhalation)	Disposal of rejected material	Recycle rejected pellets Reprocess fines
Pellets, Packaging material, energy, Labour, PPE,	Packaging and storage (Loading and sealing).	Dust Plastic waste Damaged bags	Bruises, strains, cuts, etc. (manual handling injuries) Fire hazard	Plastic waste generation Fire risk Dust dispersion	Automate the process Train employees in proper machine operations Use recyclable or biodegradable packaging
Labour, Mechanical loading, Transportation, fuel	Transport to end users (manual, mechanical or a combination of both).	Exhaust fumes Noise	Loading-related accidents Fatigue (manual loading) Motor vehicle accidents	Air pollution Noise pollution	Properly coordinated loadings Employee training in handling loading tasks, such as forklift operation Use of fuel-efficient or alternative-fuel trucks

2.3. Risk Assessment Form

This form serves as a key tool for identifying and prioritizing the most significant risks, ensuring that those with the highest likelihood of occurrence and potential impact are addressed first.

After identifying potential risks in the previous steps (risk identification worksheet and process mapping tool), a comprehensive list of all identified risks has been compiled. The next crucial step is to prioritize these risks by assessing two key factors for each:

- **Probability of Occurrence:** How likely is it that the risk will occur? It can be from low to extreme.
- **Severity of Impact:** What would be the impact if the risk occurred? It can be from low to extreme.

The risk matrix below offers a clear, visual guide for prioritizing risks based on probability and severity ratings. This matrix categorizes risks into four levels:

- **Critical:** Represents the highest-priority risks and requires immediate action. Activities must not commence or must be stopped until the risk is effectively controlled.
- **High:** Involves either high probability or high severity. These risks require urgent attention, and activities must be suspended until adequate control measures are implemented.
- **Medium:** Significant but less urgent risks. Additional control measures may be required to reduce the risk to an acceptable level.
- **Low:** Risks that can generally be managed with existing controls. Routine monitoring is required, with minimal additional intervention beyond current measures.

Pr o b a b i l i t y	Very likely (5)	Medium (5)	High (10)	Critical (15)	Critical (20)	Critical (25)
	Likely (4)	Low (4)	Medium (8)	High (12)	Critical (16)	Critical (20)
	Possible (3)	Low (3)	Medium (6)	High (9)	High (12)	Critical (15)
	Unlikely (2)	Low (2)	Low (4)	Medium (6)	Medium (8)	High (10)
	Very unlikely (1)	Low(1)	Low (2)	Low (3)	Low (4)	Medium (5)
Severity		Insignificant (1)	Low (2)	Medium (3)	High (4)	Very High (5)

Table 1: risk matrix



By focusing first on **Critical** risks, followed by **High**, **Medium**, and **Low** categories, BCC can ensure that resources are allocated effectively to mitigate or eliminate risks with the most significant potential impact.

The risk assessment form enables precise identification of locations where the most significant risks are likely to occur. Additionally, it includes detailed notes explaining the rationale behind the prioritization rating assigned to each identified risk. This ensures a clear understanding of both the risk location and the factors influencing its priority level.

COMPANY AREA OR DEPARTMENT	RISK	PROBABILITY OF OCCURRING (very likely, unlikely, possible, likely very likely)	SEVERITY IF OCCURRED (insignificant, low, medium, high, very high)	RISK PRIORITIZATION (low, medium, high, critical)	NOTES (Explaining why the chosen probability and severity)
Factory (Rotary drum dryer, Hammer mill, Pelletizer)	High energy consumption, due to the use of machinery for the manufacturing process (pellets production)	Very likely	High	Critical	The company has made provision of timers and better-rated electric motors to ensure power usage is managed
Factory (Hammer mill)	Occupational exposure to bagacillo from bagasse and other airborne dust, which may result in bagassosis, occupational asthma, and other respiratory illnesses	Possible	Medium	High	The company has made provision of high-capacity dust arrestors.
Warehouse	Exposure to excessive dust from the stored products	Unlikely	Medium	Medium	
HR	Possibility of discrimination, disciplinary abuse, and harassment due to differences in nationality, race, religion, or sex	Unlikely	High	Medium	
HR	Possibility of excessive working hours and lack of payment due to the lack of in-and-out control	Unlikely	High	Medium	
HR	Possibility of harassment due to the presence of security guards at the facilities	Unlikely	High	Medium	

COMPANY AREA OR DEPARTMENT	RISK	PROBABILITY OF OCCURRING (very likely, unlikely, possible, likely very likely)	SEVERITY IF OCCURRED (insignificant, low, medium, high, very high)	RISK PRIORITIZATION (low, medium, high, critical)	NOTES (Explaining why the chosen probability and severity)
HR	Unfair terms of employment (excessive overtime, lack of payment) due to the use of seasonal, temporary workers, and payment based on the quota method	Unlikely	High	Medium	
Factory	Worker injuries and chronic conditions due to the constant interaction with machinery (moving mechanical components, including screw conveyors, belt conveyors, and pulleys)	Possible	Very high	Critical	The machine interaction at the factory is constant
Factory (Hammer mill, Pelletizing machine, Vibrating sieve)	Worker illnesses and the possibility of hearing impairment due to excessive noise exposure	Possible	Medium	High	Most of the work at the factory involves noise exposure. The company provides adequate PPE to minimize
Factory	Ergonomics risks from repetitive work, poor posture, and manual handling that could result in musculoskeletal injuries	Possible	Medium	High	The company has provided adequate PPE to cushion the employees.
Factory	Impact on wildlife and biodiversity, and the livelihood of the communities, due to the changing of the natural habitat (factory expansion)	Possible	Low	Medium	

COMPANY AREA OR DEPARTMENT	RISK	PROBABILITY OF OCCURRING (very likely, unlikely, possible, likely very likely)	SEVERITY IF OCCURRED (insignificant, low, medium, high, very high)	RISK PRIORITIZATION (low, medium, high, critical)	NOTES (Explaining why the chosen probability and severity)
Factory	Deficient housekeeping standards result in unsafe material stacking and obstruction of emergency exits, posing risks to workers safety and emergency preparedness	Possible	High	High	
Local Communities	Conflicts with the community due to the presence of security guards	Possible	Low	Medium	
Factory (Pelletizing machine)	Worker injuries (burns), due to possible contact with a hot surface from the pelletizers and dryers	Unlikely	Medium	Medium	The company has provided adequate PPE to cushion the employees.
Factory	Possibility of slips, trips, and falls due to the accumulation of dust, oil, or pellets on floors	Unlikely	Medium	Medium	The company ensures proper housekeeping to ensure that the floors and walkways are always clear.
Warehouse	Possibility of slips, trips, and falls due to the accumulation of dust or pellets on floors	Unlikely	Insignificant	Low	The company ensures proper housekeeping to ensure that the floors and walkways are always clear.
Factory	Poorly rooted electrical cables are laid on the ground within workstations, presenting trip and fall hazards.	Possible	High	High	
Factory	Potential increased carbon footprint from excessive energy consumption	Possible	Medium	High	

COMPANY AREA OR DEPARTMENT	RISK	PROBABILITY OF OCCURRING (very likely, unlikely, possible, likely very likely)	SEVERITY IF OCCURRED (insignificant, low, medium, high, very high)	RISK PRIORITIZATION (low, medium, high, critical)	NOTES (Explaining why the chosen probability and severity)
Factory	Possibility of fire due to the presence of many ignition sources and combustible material	Very likely	Very high	Critical	Fire suppression tanks and firefighting team, and equipment are in place. We also have SLA's with other service providers to ensure that once an outbreak is reported, it's contained in the shortest time possible.
HR	Possibility of a lack of freedom due to the absence of a workers union	Very unlikely	medium	Low	
HR	Possibility of collective dismissal due to the vulnerability of the company's business	Possible	High	High	
Local Communities	Exposure of communities to air emissions, noise, dust, and possible road accidents	Possible	High	High	The company ensures that transportation, production, and other processes are handled with care. Employees handling this are well-trained, and refresher training is offered to improve handling.
Local Communities	Possibility of conflicts with the community	Possible	Low	Medium	The company, through the Community Liaison committee, ensures that conflicts are handled amicably and in time to avoid the ballooning of issues
Local Communities	Exposing the community to odor emissions resulting from the wet bagasse	Possible	Insignificant	Low	



3. MANAGEMENT PROGRAMS

A management program is centered on action plans and improved procedures to help the company avoid, minimize, or compensate for the risks and impacts identified. The first attempt is to avoid or prevent the risks, if that is not possible, then you should try to minimize the risk. In case avoiding or minimizing is not likely, you should try to offset or compensate for the affected ones.

This process builds on the earlier risk prioritization phase. Action plans and procedures will be developed specifically for the prioritized risks, following the classifications previously assigned. When setting objectives and defining actions, remember that this ESMS is a dynamic system. It may require adjustments over time to respond to evolving needs or changes within BCC.

3.1. Action Plans

A chart used to identify the actions that the company will take concerning the prioritized risks (the risks that need to be addressed first), and how those actions will be managed.

Based on the Risk Assessment Form, BCC prioritized the following eight key risks:

Risk 1: High energy consumption, due to the use of machinery for the manufacturing process (pellets production);

Risk 2: Occupational exposure to bagacillo from bagasse and other airborne dust, which may result in bagassosis, occupational asthma, and other respiratory illnesses;

Risk 3: Worker injuries and chronic conditions due to the constant interaction with machinery (moving mechanical components, including screw conveyors, belt conveyors, and pulleys);

Risk 4: Worker illnesses and the possibility of hearing impairment due to excessive noise exposure;

Risk 5: Potential increased carbon footprint from excessive energy consumption;

Risk 6: Possibility of fire due to the presence of many ignition sources and combustible material;

Risk 7: Possibility of collective dismissal due to the vulnerability of the company's business;

Risk 8: Exposure of communities to air emissions, noise, dust, and possible accidents due to the decommissioning process;

Risk 9: Deficient housekeeping standards resulting in unsafe material stacking and obstruction of emergency exits, posing risks to workers safety and emergency preparedness;

Risk 10: Poorly rooted electrical cables laid on the ground within workstations, presenting trip and fall hazards;

Risk 11: Ergonomics risks from repetitive work, poor posture and manual handling that could result in MSDs (musculoskeletal Disorders) - production units, loading/ unloading.

For each prioritized risk, was established:

- **Mitigation Hierarchy:** Determine whether to avoid, minimize, or compensate for the risk.
- **Action:** Define the specific actions needed to achieve the chosen mitigation strategy.
- **Objectives and Targets:** Set clear goals and targets intended to be achieved.
- **Deadlines:** Establish timelines for achieving these objectives and targets.
- **Responsible Staff:** Identify the team member(s) accountable for implementing actions and monitoring progress toward the objectives and targets.
- **Resources Required:** Specify the staff time and financial resources needed.
- **Operational Procedures:** Outline the necessary SOPs to support the execution of all defined actions

Risk 1: High energy consumption, due to the use of machinery for the manufacturing process (pellets production)

MITIGATION HIERARCHY	ACTION	OBJECTIVE AND TARGET	DEADLINE	RESPONSIBLE STAFF	RESOURCES REQUIRED	OPERATIONAL PROCEDURES
Minimize	Ensure a strict Planned Preventive Maintenance schedule and ensure faults are addressed promptly.	Objective: Reduce energy consumption during the production process Target: 10-30% energy consumption savings	Ongoing	Managing Director Production manager	Staff time: Medium Capital Intensity: Medium	Procedure improvement Preventive maintenance procedure
		Objective: Ensure machines operate at optimal efficiency Target: 5–10% improvement in machine efficiency	Ongoing	Maintenance Team Production manager	Staff Time: Medium Capital Intensity: low	Preventive maintenance procedure
Compensate /Offset	Compensate for the GHG emissions produced with reforestation programmes	Objective: Neutralise GHG emissions Target: compensate 70% of calculated annual CO2-equivalent emissions	1 year	Managing Director Production manager	Staff Time: Low Capital Intensity: medium	

Risk 2: Occupational exposure to bagacillo from bagasse and other airborne dust, which may result in bagassosis, occupational asthma, and other respiratory illnesses

MITIGATION HIERARCHY	ACTION	OBJECTIVE AND TARGET	DEADLINE	RESPONSIBLE STAFF	RESOURCES REQUIRED	OPERATIONAL PROCEDURES
Avoid	Install ventilation, feed covers, and fully enclosed transfer points to prevent dust escape during input, output stages, and have adequate air flow for floor workers.	Objective: Prevent dust release Target: 100% enclosure of feed and discharge points.	3 months	Inventory Team Inventory Supervisor	Staff Time: Low Capital Intensity: Low	Dust suppression & enclosure procedure
Minimize	Implement scheduled industrial vacuuming and wet-down cleaning for dust-prone equipment areas.	Objective: Protect workers Target 1: all dust-prone equipment areas cleaned.	1 month	Inventory Supervisor	Staff Time: medium Capital Intensity: Low	Dust control & housekeeping procedure
	Enforce mandatory PPE use (N95/P2 masks, goggles)	Target 2: Achieve 100% PPE compliance in high-dust zones	2 months	Inventory Supervisor Technical Team Lead HR	Staff Time: Low Capital Intensity: Low	PPE distribution and use procedure
	Conduct periodic medical screening for respiratory health	Objective: Identify early signs of dust-related respiratory issues among workers. Target: Check 100% of exposed workers.	Start within 6 months; repeated annually	Logistics Manager Technical Team Lead	Staff Time: Low Capital Intensity: medium	Coordinate with HR on the health checks provider

Compensate / Offset	Provide additional support (job rotation or lighter duties) for workers affected by respiratory conditions.	Objective: Reduce health deterioration among sensitive workers Target: 100% reassignment within 14 days of medical recommendation.	1 month after screening	HR	Staff Time: Low Capital Intensity: Low	Worker health accommodation procedure
	Compensation following Work Injury Benefits Act (WIBA) to provide financial support and medical benefits to employees affected by occupational disease	Objective: Ensure the injured worker is compensated Target: Employees diagnosed with dust induced occupational illness	As required	HR EHS Operations manager	Staff Time: Low Capital Intensity: medium	WIBA compensation

Risk 3: Worker injuries and chronic conditions due to the constant interaction with machinery (moving mechanical components, including screw conveyors, belt conveyors, and pulleys)

MITIGATION HIERARCHY	ACTION	OBJECTIVE AND TARGET	DEADLINE	RESPONSIBLE STAFF	RESOURCES REQUIRED	OPERATIONAL PROCEDURES
Avoid	Redesign workflow to eliminate manual interaction	Objective: Remove the need for manual operation of machinery Target: 80% reduction in manual interaction	1 year	Operations Manager	Staff Time: High Capital Intensity: Low	
	Installation of appropriate machine guarding, interlock systems, and accessible emergency stop buttons or pull cords	Objective: Prevent contact with moving parts Target: 100% guarded equipment	6 Months	Maintenance Supervisor Operations Manager	Staff Time: Medium Capital Intensity: Medium	
Minimize	Implement LOTOTO, develop SOPs, and ensure workers are trained on machine safety	Objective: Prevent accidental startups of machines Target: Ensure 100% training in machine safety	1 Month	Production Supervisor Maintenance Supervisor EHS	Staff Time: Medium Capital Intensity: Medium	Safe Operating Machinery Procedure
	Enforce appropriate PPE use	Objective: Eliminate entanglement injuries Target: 100% workers	Ongoing	EHS HR	Staff Time: Low Capital Intensity: Low	
	Implement regular health checks — to detect early signs of work-related conditions,	Objective: Early detection of work-related health changes	1 year	HR	Staff Time: Low	Schedule screenings

	protect employee wellbeing, and prevent minor issues from becoming serious.	Target: achieve at least 75% employee screening			Capital Intensity: medium	
Compensate /Offset	Provide additional support (job rotation or lighter duties) for affected workers.	Objective: Offset negative health impacts. Target: 100% reassignment within 14 days of medical recommendation.	1 month after screening	HR	Staff Time: Low Capital Intensity: Low	Worker health accommodation procedure
	Compensation following Work Injury Benefits Act (WIBA) to provide financial support and medical benefits to employees affected by work-related injury.	Objective: Compensate affected workers Target 1: Injured employee	3 months	HR	Staff Time: medium Capital Intensity: medium	Worker health accommodation procedure

Risk 4: Worker illnesses and the possibility of hearing impairment due to excessive noise exposure

MITIGATION HIERARCHY	ACTION	OBJECTIVE AND TARGET	DEADLINE	RESPONSIBLE STAFF	RESOURCES REQUIRED	OPERATIONAL PROCEDURES
Avoid	Replace excessively noisy equipment to improve overall workplace safety and comfort.	Objective: Eliminate the noise hazard at the source Target: Reduce noise levels by 5 dB	12 months	Logistics Manager Operations Manager	Staff Time: High Capital Intensity: High	Equipment replacement & safe operating procedure Noise assessment
	Clear labelling of high noise zones to alert employees and prevent accidental exposure.	Objective: Avoid worker exposure to excessive noise Target: All employees and visitors	12 months	Operations Manager	Staff Time: Low Capital Intensity: Low	Noise assessment
Minimize	Noise level assessments to identify hazardous areas Monitor exposure against legal/OSHA thresholds and implement controls to protect employees' hearing.	Objective: Protect employees Target: 100% involved workers	Quarterly	Inventory Supervisor HR	Staff Time: Low Capital Intensity: Low	Noise monitoring procedure
	Mandatory PPE (earmuffs) to protect employees hearing and prevent long-term noise-induced hearing loss.		2 months	Supervisors HR	Staff Time: Low Capital Intensity: Low	PPE distribution and use procedure

	Audiometric testing - Detects early signs of hearing loss and helps prevent further damage.		6 months start	HR	Staff Time: medium Capital Intensity: medium	Audiometric screening procedure
Compensate /Offset	Compensation following the Work Injury Benefits Act (WIBA) provides financial support and medical benefits to employees affected by work-related injuries or illnesses.	Objective: Compensate affected workers Target 1: all employees exposed	1 year	HR	Staff Time: medium Capital Intensity: medium	WIBA Compensation
	Work reassignment to move affected employees to safer roles, prevent further health deterioration, and maintain productivity	Target 2: Reassign affected workers within 30 days of test results.	1 year	HR & Operations	Staff Time: medium Capital Intensity: Low	Workforce analysis
	Provide ergonomic rotation or alternative duties for workers showing early signs of hearing loss.		After each screening cycle	HR	Staff Time: Low Capital Intensity: Low	Worker health accommodation procedure

Risk 5: Potential increased carbon footprint from excessive energy consumption

MITIGATION HIERARCHY	ACTION	OBJECTIVE AND TARGET	DEADLINE	RESPONSIBLE STAFF	RESOURCES REQUIRED	OPERATIONAL PROCEDURES
Avoid	<p>Explore the incorporation of renewable energy into the production cycle.</p> <p>Explore the availability of low-energy consumption motors</p>	<p>Objective: Reduce over-reliance on non-renewable sources</p> <p>Target: 75% use of solar energy for day-to-day operations.</p>	1 year	Managing Director	<p>Staff Time: Medium</p> <p>Capital Intensity: High</p>	Continuous process improvement
Minimize	<p>Install solar energy capacity based on the machine requirement.</p> <p>Check with the power provider to ensure that we are balancing power usage to enjoy low tariff rate hours</p>	<p>Objective: Reduce the carbon footprint</p> <p>Target: 75% of power usage to be from solar.</p>	1 year	Managing Director	<p>Staff Time: Medium</p> <p>Capital Intensity: High</p>	Continuous process improvement
Compensate /Offset	Continuously monitor power usage versus production output.	<p>Objective: To ensure that we are constantly meeting the 75% target of use of renewable power sources</p> <p>Target: 100% compliance with the set target</p>	Ongoing	Finance Manager	<p>Staff Time: Low</p> <p>Capital Intensity: Low</p>	Continuous process improvement

Risk 6: Possibility of fire due to the presence of many ignition sources and combustible material

MITIGATION HIERARCHY	ACTION	OBJECTIVE AND TARGET	DEADLINE	RESPONSIBLE STAFF	RESOURCES REQUIRED	OPERATIONAL PROCEDURES
Avoid	Keep combustible material away from ignition sources	Objective: Avoid fire eruptions	Ongoing	Maintenance Supervisor, EHS	Staff Time: Medium Capital Intensity: medium	
	Remove excessive material, only keeping the required quantities, and store the remaining accordingly.	Target: All identified risk areas		Production Supervisor		
Minimize	Install, inspect, and maintain fire extinguishers, alarms, and fire pumps	Objective: Early detection of fire sources and improve worker readiness for fire events.	3 months	Logistics and Technical Manager	Staff Time: medium Capital Intensity: High	Emergency fire response procedure
	Plan preventive maintenance to prevent machinery fires					
	Conduct fire drills and train employees on emergency evacuation routes.			Management team		
	Implement hot work permit					
Compensate /Offset	Insurance coverage for fire-related losses	Objective: Compensate affected workers	Annually	HR Management team	Staff Time: Low Capital Intensity: Low	Insurance Policy Document.
	Support for affected workers in case of fire-related incidents (medical care, redeployment).	Target 1: All insurable company property and staff Target 2: 100% support cases addressed within 7 days.	As Needed	HR Management team	Staff Time: Low Capital Intensity: medium	Worker health accommodation procedure

Risk 7: Possibility of collective dismissal due to the vulnerability of the company's business

MITIGATION HIERARCHY	ACTION	OBJECTIVE AND TARGET	DEADLINE	RESPONSIBLE STAFF	RESOURCES REQUIRED	OPERATIONAL PROCEDURES
Avoid	Offer staff a chance to take unpaid leave. Temporarily reduces payroll costs without layoffs, helping the company manage cash flow while retaining staff.	Objective: Encourage cost saving through voluntary staff downtime and reduce labour costs without terminating staff	1 year	HR	Staff Time: medium Capital Intensity: High	Scenario planning
	Allow two employees to share one full-time role, reducing staffing costs while retaining talent and maintaining productivity.	Target: All departments	1 year	HR	Staff Time: medium Capital Intensity: medium	Workforce analysis
Minimize	Reduce non-essential expenses to improve financial stability and minimize the need for staff layoffs.	Objective: Reduce costs Target: All departments	1 year	Finance manager	Staff Time: medium Capital Intensity: medium	Business Risk monitoring
	Pause recruitment to prevent overstaffing and manage workforce costs during periods of business vulnerability.		6 months	HR	Staff Time: medium Capital Intensity: medium	Workforce analysis
	Ensure all workforce decisions follow legal requirements, reducing the risk of disputes or penalties during downsizing or restructuring.	Objective: Ensure fairness and protect the company brand if layoffs occur. Target: Exiting employees	as needed	HR	Staff Time: Low Capital Intensity: Low	Legally compliant redundancy

Compensate /Offset	Provides guidance, counselling, and job placement assistance to help employees move smoothly to new opportunities	Objective: Assist laid-off or exiting employees Target: Exiting employees	as needed	HR and affected departments	Staff Time: Low Capital Intensity: Low	Outplacement support
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Risk 8: Exposure of communities to air emissions, noise, dust, and possible accidents

MITIGATION HIERARCHY	ACTION	OBJECTIVE AND TARGET	DEADLINE	RESPONSIBLE STAFF	RESOURCES REQUIRED	OPERATIONAL PROCEDURES
Avoid	Install stronger dust collection equipment. Actively monitoring and collecting all dust emission points	Objective: Capture all dust being emitted and reuse it where possible in the production line Target: 95-100% of all dust being emitted	Ongoing	Production Manager Maintenance supervisor Operations Manager	Staff Time: Low Capital Intensity: Medium	Machinery Inspection Procedures
Minimize	Regularly inspect and seal all dust emission points. Create scheduled maintenance to ensure all identified areas are worked on promptly	Objective: Reduce the chances of dust emissions impacting the nearby population. Target: 100% machine efficiency	Ongoing	Production manager Maintenance supervisor	Staff Time: Low Capital Intensity: Low	Machinery Inspection Procedures

Compensate /Offset	Establish a checklist of dust-prone areas in the factory	Objective: To ensure that all dust emitting area is worked on immediately Target: 100% resolution within 24-48 hours of observation	Ongoing	Production manager Maintenance supervisor	Staff Time: Low Capital Intensity: Low	Machinery Inspection Procedures
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Risk 9: Deficient housekeeping standards resulting in unsafe material stacking and obstruction of emergency exits, posing risks to workers safety and emergency preparedness

MITIGATION HIERARCHY	ACTION	OBJECTIVE AND TARGET	DEADLINE	RESPONSIBLE STAFF	RESOURCES REQUIRED	OPERATIONAL PROCEDURES
Avoid	Clear gangways, exits, and workstations of excess material, i.e., bagasse, fines, pellets, and empty sacs	Objective: Ensure gangways and exits are always clear Target: Gangways, workstations, and exits	1 Month	Production Supervisor EHS	Staff Time: medium Capital Intensity: Low	Housekeeping procedure
	Designate proper storage areas and marking of gangways	Objective: Prevent the blocking of walkways and fire equipment Target: All identified areas	1 Month	Maintenance Supervisor EHS	Staff Time: Medium Capital Intensity: Low	

	Implement housekeeping SOP	Objective: Maintain an orderly workplace. Target: All identified areas	2 Months	Quality Control Team	Staff Time: Medium Capital Intensity: Low	
Minimize	Ensure appropriate PPE is worn (Helmet, Safety Boots)	Objective: Reduce injury severity from slips and falls Target: 100% workers	Ongoing	EHS	Staff Time: Medium Capital Intensity: Low	PPE distribution and use procedure
Compensate /Offset	Compensation following the Work Injury Benefits Act (WIBA) provides financial support and medical benefits to employees affected by work-related injury.	Objective: Compensate affected workers Target: Injured employee	3 months	HR	Staff Time: Medium Capital Intensity: Medium	WIBA Compensation

Risk 10: Poorly rooted electrical cables laid on the ground within workstations, presenting trip and fall hazards.

MITIGATION HIERARCHY	ACTION	OBJECTIVE AND TARGET	DEADLINE	RESPONSIBLE STAFF	RESOURCES REQUIRED	OPERATIONAL PROCEDURES
Avoid	Reroute cables underground and ensure they are insulated and properly covered or overhead, either trunked or put on cable trays Implement cable management SOPs and their routine inspections	Objective: Eliminate trip or electrical hazards Target: 100% protected rooting	6 Months	Maintenance Supervisor	Staff Time: Medium Capital Intensity: Medium	

Minimize	Ensure the cables on workstation floors or walkways are taped down Place warning signs in risk areas, Enforce PPE use for all workers	Objective: To reduce exposure Target: All identified areas	1 Month	Maintenance Supervisor EHS	Staff Time: Medium Capital Intensity: Medium	
Compensate /Offset	Compensation following the Work Injury Benefits Act (WIBA) to provide financial support and medical benefits to employees affected by work-related injury.	Objective: Compensate affected workers Target: Injured employee	3 months	HR	Staff Time: Medium Capital Intensity: Medium	WIBA Compensation

Risk 11: Ergonomics risks from repetitive work, poor posture, and manual handling that could result in musculoskeletal injuries (production units, loading/ unloading)

MITIGATION HIERARCHY	ACTION	OBJECTIVE AND TARGET	DEADLINE	RESPONSIBLE STAFF	RESOURCES REQUIRED	OPERATIONAL PROCEDURES
Avoid risk	Using mechanical aids, i.e., forklift, shovel, crane for lifting tasks, and belt conveyors for manual handling tasks where applicable	Objective: Reduce exposure to mental or ergonomic stressors. Target: Manual handling tasks	Ongoing	Managing Director Operations Manager	Staff time: Low Capital Intensity: Medium	

	Automate repetitive tasks — to save time, reduce human error, and allow staff to focus on higher-value work		1 year	HR	Staff Time: low Capital Intensity: Medium	
Minimize	Ensure employees are trained in manual handling and lifting Encourage all workers to take regular breaks Implement job rotation to avoid fatigue	Objective: Reduce exposure to MSDs, ensure use of proper manual handling and lifting techniques Target: 100% employees at risk	Ongoing	HR EHS Production Manager	Staff Time: Medium Capital Intensity: low	Track rotation schedule & document training
Compensate / Offset	Ensure employees exposed to ergonomic hazards undergo periodic medical checkups and follow up if injuries occur	Objective: Detect early signs of injury and act accordingly Target: Ensure 100% employees are exposed	Ongoing	Managing Director Operations Manager	Staff Time: low Capital Intensity: Medium	
	Compensation following the Work Injury Benefits Act (WIBA) to provide financial support and medical benefits to employees affected by work-related injuries or illnesses.	Objective: Compensate employees Target: All injured employees	Ongoing	HR EHS Production Manager	Staff Time: low Capital Intensity: Medium	WIBA compensation

3.2. Operational Procedures

When implementing the Action Plan, it's beneficial to establish procedures that integrate actions into routine, daily processes and practices. Procedures should guide staff on the specific steps needed to manage prioritized risks and support the overall goals of the ESMS. Standardizing these actions helps in creating consistency and improving accountability and efficiency across the organization.

These procedures can take various forms, such as text, flowcharts, or pictograms, whichever format serves as the most effective communication tool for your company. For this specific ESMS, BCC has chosen the text format as the most effective communication tool.

Below are some operational procedures developed to help implement the above-defined action.

- Dust Control & Housekeeping Procedure
- PPE Distribution and Use Procedure
- Safe Operating Machinery Procedure
- Settlement/Compensation of Affected Communities
- Worker Health Accommodation Procedure
- WIBA Compensation

Title: Dust Control & Housekeeping Procedure

Procedure Number: BCC001/25

Number of pages: 2

1.0 Purpose

To establish standardized practices for controlling dust and maintaining proper housekeeping in the sugarcane pellet manufacturing facility. This ensures a safe and healthy working environment, reduces fire and explosion risks, protects equipment, and ensures compliance with occupational health and environmental regulations.

2.0 Scope

This procedure applies to all areas of the sugarcane pellet manufacturing process, including Bagasse drying, bagasse milling, and pelletizing operations; material handling, storage, and transfer points; and cleaning and maintenance activities.

All personnel, contractors, and visitors who are exposed to dust-generating activities.

3.0 Definitions

Dust: Fine particulate matter generated during cane crushing, drying, grinding, or pelletizing processes.

Housekeeping: Regular cleaning and organization of work areas to prevent hazards, including dust accumulation.

Dust Suppression: Measures to minimize airborne dust, including water sprays, vacuum systems, or extraction systems.

PPE: Personal Protective Equipment designed to protect workers from inhalation or contact with dust (e.g., masks, respirators, protective clothing).

4.0 Responsibilities

Plant Manager: Ensure the implementation and effectiveness of dust control and housekeeping measures; allocate resources for dust control systems and cleaning equipment.

Supervisors: Identify dust-prone areas and ensure that dust suppression and housekeeping measures are applied consistently; Monitor compliance with dust control procedures; Report failures or unsafe conditions.

Environmental/Safety Officer: Conduct dust monitoring and audits; Maintain records of housekeeping and dust control activities; Provide training and guidance on dust control measures.

Operators and Workers: Follow dust control and housekeeping procedures; Use PPE correctly; Report dust hazards or equipment malfunctions.

Contractors and Visitors: Comply with dust control measures and use PPE as required.

5.0 Work/ Procedure Instructions

Dust Identification and Assessment

Identify all sources of dust in the facility, including cane storage, grinding, drying, and pelletizing areas.

Conduct risk assessments for dust generation and accumulation.

Dust Control Measures

Install local exhaust ventilation (LEV) at dust-generating points.

Use water sprays, misting systems, or dust suppressants where feasible.

Enclose conveyors, crushers, and grinding equipment to prevent dust escape.

Minimize drop heights and control material flow to reduce airborne dust.

Housekeeping Practices

Implement daily cleaning schedules to remove settled dust from floors, ledges, and equipment.

Use industrial vacuums rather than dry sweeping to avoid dust dispersion.

Store raw materials and finished pellets in designated, covered areas.

Remove waste and spill materials promptly.

PPE Usage

Provide appropriate respiratory protection in areas where dust levels exceed safe limits.

Ensure protective clothing, gloves, and eyewear are worn where necessary.

Monitoring and Reporting

Conduct regular inspections of dust control systems and housekeeping practices.

Record and report any dust incidents, equipment failures, or unsafe conditions.

6.0 Reference documents

Occupational Health and Safety Policy

Environmental Management Plan (EMP)

ISO 14001 and ISO 45001 standards

Dust monitoring guidelines and local environmental legislation

7.0 Records

Dust monitoring logs

Housekeeping inspection checklists

PPE issuance and training records

Incident and near-miss reports

8.0 Approving authority: CEO, Jordyan Woodley

9.0 Issue date: 8th Dec 2025

Revision date: 8th Dec 2026

Title: PPE Distribution and Use Procedure

Procedure Number: BCC002/25

Number of pages: 2

1.0 Purpose

To establish a standardized approach for the distribution, proper use, maintenance, and monitoring of Personal Protective Equipment (PPE) to ensure the safety and health of all employees, contractors, and visitors.

2.0 Scope

This procedure applies to: All personnel, including employees, contractors, and visitors, all work areas and activities where PPE is required, including manufacturing, construction, maintenance, and operations, with potential exposure to hazards.

3.0 Definitions

PPE (Personal Protective Equipment): Equipment worn to minimize exposure to hazards that can cause injuries or illnesses.

Hazard: Any source of potential damage, harm, or adverse health effect.

Fit Testing: A process to ensure PPE, particularly respiratory protection, properly fits the wearer.

Inspection: Checking PPE for damage, wear, and compliance before use.

4.0 Responsibilities

Management: Approve and provide resources for PPE procurement, distribution, and training; Monitor compliance and effectiveness of the PPE program.

Supervisors: Identify tasks requiring PPE; Ensure employees wear PPE correctly; Report missing, damaged, or non-compliant PPE.

Safety Officer / EHS Department: Develop and maintain PPE standards; Conduct training and awareness programs; Monitor usage, perform audits, and maintain PPE records.

Employees and Contractors: Use PPE correctly according to the task and hazard assessment; Inspect PPE before use and report defects; Attend required training on PPE use and care.

5.0 Work/ Procedure Instructions

PPE Selection

Conduct a hazard assessment for each task or activity.

Select PPE appropriate to the identified hazards (e.g., helmets, gloves, safety glasses, respiratory protection, hearing protection, safety footwear, protective clothing).

Ensure PPE meets national and international standards (ISO, ANSI, EN, or local regulations).

PPE Distribution

Maintain a centralized PPE inventory.

Issue PPE to employees based on role, task, and exposure.

Document each distribution in a PPE log with date, recipient, and type of equipment.

PPE Use

Ensure employees and contractors always wear PPE in designated areas.

Use PPE according to manufacturer instructions and company guidelines.

Replace or repair damaged or worn PPE immediately.

PPE Maintenance and Storage

Clean and maintain PPE regularly to ensure effectiveness.

Store PPE in clean, dry, and designated areas.

Conduct periodic inspections to ensure integrity and functionality.

Training and Awareness

Provide training on proper selection, use, care, and disposal of PPE.

Conduct refresher training annually or when new PPE is introduced.

Emphasize the importance of PPE compliance and hazard awareness.

Monitoring and Compliance

Supervisors and Safety Officers conduct routine checks to ensure proper PPE use.

Non-compliance is addressed promptly according to the company's safety policy.

Maintain records of inspections, training, and incidents involving PPE.

6.0 Reference documents

Occupational Health and Safety Policy

Job Hazard Analysis (JHA) / Risk Assessment Reports

Manufacturer instructions and PPE standards

ISO 45001:2018 – Occupational Health and Safety Management Systems

7.0 Records

DPPE issuance logs

Training attendance records

PPE inspection and maintenance logs

Incident reports related to PPE

8.0 Approving authority: CEO, Jordyan Woodley

9.0 Issue date: 8th Dec 2025

Revision date: 8th Dec 2026

Title: Procedure for Safe Operating Machinery

Procedure Number: BC003/25

Number of pages: 3

1.0 Purpose

To provide guidelines for the safe operation of machinery to minimize the risk of injury, equipment damage, and ensure compliance with safety standards in BCC.

2.0 Scope

This procedure applies to all employees, contractors, and any personnel operating or interacting with machinery in the workplace, covering both routine and non-routine operations in BCC.

3.0 Definitions

Machinery: Any equipment or mechanical device used in the workplace, including but not limited to production machines, vehicles, power tools, and heavy equipment.

Lockout/Tagout (LOTO): A safety procedure used to ensure machinery is properly shut off and cannot be started until maintenance or repair work is completed.

Operator: An individual who is authorized and trained to use specific machinery.

PPE (Personal Protective Equipment): Safety equipment such as gloves, helmets, goggles, and hearing protection that should be worn when operating machinery.

4.0 Responsibilities

Supervisors/Managers: Ensure that machinery operators are trained, conduct regular safety inspections, and ensure the availability of appropriate PPE.

Machinery Operators: Follow safe operating procedures, use required PPE, report malfunctions, and avoid using machinery they are not trained or authorized to operate.

Maintenance Personnel: Perform regular maintenance and inspections of machinery and ensure that any defects or malfunctions are addressed immediately.

Safety Officer: Monitor compliance with machinery safety procedures, conduct audits, and provide necessary training.

5.0 Work/ Procedure Instructions

Pre-Operation Check:

Inspect the machinery before each use to ensure it is in safe working condition (check for wear, damage, or any loose parts).

Verify that all guards and safety devices are in place and functional.

Ensure the operator is wearing the appropriate PPE for the task.

Confirm that the work area is clear of obstructions or other hazards.

Safe Start-Up Procedure:

Follow the manufacturer's instructions for safely starting the machinery.

Ensure that all emergency stop devices and controls are accessible to the operator.

Conduct a functional test of the machine at low speed (if applicable) to confirm it is operating correctly.

Operating Machinery:

Only trained and authorized personnel may operate machinery.

Operate the machinery within the manufacturer's guidelines and recommended operating conditions (e.g., speed, load limits).

Stay alert and focused during the operation. Do not engage in activities that may distract from safe operation.

Never bypass or disable any safety devices or interlocks on the machine.

Handling Malfunctions:

If any abnormal sounds, vibrations, or performance issues are detected, immediately stop the machine and report the malfunction to a supervisor.

Use the Lockout/Tagout procedure to ensure the machine is completely powered down before any maintenance or repair is performed.

Shutting Down Machinery:

Follow the manufacturer's shutdown procedure when finished using the machine.

Remove any materials or tools from the machine before turning it off.

Ensure that the machine is fully powered down and any power sources are disconnected, if applicable.

Maintenance and Repairs:

Regular preventive maintenance should be performed according to the schedule provided by the manufacturer.

Use Lockout/Tagout procedures to ensure machinery is de-energized before maintenance or repairs are performed.

Only qualified maintenance personnel are authorized to perform repairs on machinery.

Training:

All machinery operators must receive training on the specific machinery they will be using, including safe operating practices, emergency procedures, and PPE requirements.

Refresher training should be provided at regular intervals or whenever new machinery is introduced.

Emergency Procedures:

In the event of a machinery-related accident, immediately stop the machine and follow emergency response protocols.

Report the incident to the safety officer and complete an incident report.

6.0 Reference documents

- Machinery Operation Manuals
- Lockout/Tagout Procedures
- Manufacturer's Maintenance Guidelines
- OHS Standards and Regulations

7.0 Records

- Machinery inspection and maintenance logs
- Operator training records and certifications
- Incident and accident reports related to machinery use
- Lockout/Tagout logs

8.0 Approving authority: Managing Director, Neil Hellings

9.0 Issue date: 5th Dec 2025

Revision date: 5th Dec 2026

Title: Settlement/Compensation of Affected Communities

Procedure Number: BCC004/25

Number of pages: 2

1.0 Purpose

To ensure fair, transparent, and timely compensation for communities that are adversely affected by project activities. It provides clear guidelines for identifying impacts, assessing damages, and managing the settlement process in compliance with legal requirements and company policies.

2.0 Scope

This procedure applies to all project activities under BCC that may result in economic, physical, or social impacts on local communities. It covers both temporary and permanent impacts, including land acquisition, access restrictions, livelihood disruptions, environmental damage, and cultural heritage impacts.

3.0 Definitions

Affected Community: A group of people, households, or settlements that suffer adverse impacts due to project activities.

Compensation: Financial payments, in-kind support, or other remedial measures provided to offset losses or impacts experienced by affected communities.

Community Impact Report: A document that details the nature and extent of project impacts on surrounding communities.

Livelihood Restoration: Measures taken to restore or improve the economic conditions of affected individuals or communities.

4.0 Responsibilities

Data Associates: Engage with communities to identify and document impacts and facilitate compensation discussions, and maintain communication throughout the process.

HR Manager: Ensure implementation of this procedure and that resources for compensation are allocated, and support the verification of claims and implementation of mitigation actions.

Talent Manager: Oversee the overall compensation strategy and ensure compliance with environmental and social standards, and review and update this procedure annually.

HR Manager and Customer Service: Review disputed claims and oversee resolution processes, ensuring fair outcomes and transparency in settlement decisions.

5.0 Work/ Procedure Instructions

Impact Identification and Assessment:

Conduct community consultations and baseline studies to identify affected groups and potential impacts. Prepare a Community Impact Report detailing findings.

Notification and Engagement:

Inform communities of their eligibility for compensation and explain the process.

Provide information in local languages and accessible formats.

Compensation Planning:

Assess losses (land, resources, income, access, cultural assets) using fair and transparent valuation methods. Develop compensation packages in consultation with affected communities.

Approval and Agreement:

Submit compensation plans to the Project Manager and Sustainability Manager for review.

Draft and sign written agreements with community representatives.

Disbursement:

Deliver compensation in accordance with the agreed terms (cash, in-kind, or services).

Provide documentation of all payments or support delivered.

Follow-up and Monitoring:

Conduct follow-up visits to verify satisfaction and effectiveness of compensation.

Record lessons learned, and update the procedure accordingly.

Grievance Handling:

Maintain an accessible grievance mechanism throughout the process.

Record and resolve complaints promptly, involving the Grievance Committee when needed.

6.0 Reference documents

BCC E&S Policy

National Compensation regulations and standards

7.0 Records

Community Impact Reports

Valuation reports and compensation assessments
Signed compensation agreements and payment records
Grievance records and resolution logs
Monitoring and follow-up reports

8.0 Approving authority: Managing Director, Neil Hellings

9.0 Issue date: 5th Dec 2025

Revision date: 5th Dec 2026

Title: Worker Health Accommodation Procedure

Procedure Number: BCC005/25

Number of pages: 2

1.0 Purpose

To ensure that workers with medical conditions, disabilities, or temporary health limitations are provided with appropriate accommodation in the workplace. This supports employee well-being, productivity, and compliance with occupational health and safety requirements.

2.0 Scope

This procedure applies to: All employees, including permanent, temporary, and contract workers; All work areas, departments, and operations within the organization. Situations involving permanent or temporary health conditions, injuries, disabilities, or pregnancy.

3.0 Definitions

Accommodation: Adjustments or modifications to the work environment, job tasks, or work schedule to enable an employee to perform their duties safely and effectively.

Reasonable Accommodation: Any change that does not impose undue hardship on the company while allowing the employee to perform essential job functions.

Medical Restrictions: Limitations prescribed by a licensed healthcare professional regarding the type or duration of work that can be safely performed.

4.0 Responsibilities

Management: Approve health accommodation and provide necessary resources;
Ensure compliance with occupational health regulations and organizational policy.

HR: Receive accommodation requests and confidential medical information;

Coordinate with supervisors and occupational health professionals to implement accommodation; Maintain records of all accommodations;

Assess accommodation requests and provide recommendations; Monitor implementation and effectiveness of accommodation.

Supervisors: Support employees in providing accommodation; Ensure team compliance with temporary or permanent adjustments; Communicate any concerns to HR or Safety Officer.

Employees: Submit timely accommodation requests with relevant medical documentation; Follow recommended accommodation and notify management of changes in condition.

5.0 Work/ Procedure Instructions

Identification of Need

Employees may request accommodation due to medical conditions, disability, pregnancy, or temporary limitations.

Supervisors or occupational health personnel may identify potential needs through health assessments or workplace observations.

Accommodation Assessment

HR and Occupational Health review the medical documentation and the job requirements.

Determine suitable accommodation, such as: Modified work duties or schedules, Ergonomic workstations or equipment; Temporary reassignment to safer tasks; Provision of additional PPE.

Implementation

Communicate approved accommodations to the employees and relevant supervisors.

Adjust work environment, schedule, or equipment as needed.

Monitor and document implementation progress.

Monitoring and Review

Regularly review the effectiveness of accommodation.

Adjust accommodation if the employee's health condition changes or if job requirements evolve.

Maintain confidentiality and compliance with relevant data protection laws.

Documentation

Record all requests, medical documentation, approvals, and reviews.

Keep records confidential and store securely.

6.0 Reference documents

Occupational Health and Safety Policy

Employee Health Records

Medical Certificates and Reports

Relevant labor and disability laws

ISO 45001:2018 – Occupational Health and Safety Management Systems

7.0 Records

Accommodation request forms

Medical documentation (confidential)

Implementation and monitoring reports

Review and adjustment logs

8.0 Approving authority: CEO, Jordyan Woodley

9.0 Issue date: 8th Dec 2025

Revision date: 8th Dec 2026

Title: WIBA Compensation

Procedure Number: BCC006/25

Number of pages: 3

1.0 Purpose

To establish a standardized process for reporting, managing, and claiming compensation under the Work Injury Benefits Act (WIBA) for employees who suffer work-related injuries or occupational diseases. This ensures compliance with the law, timely compensation, and proper support for affected employees.

2.0 Scope

This procedure applies to: All employees, including permanent, temporary, and contract workers, all work-related injuries, occupational diseases, or fatalities occurring within the company's operations. Human Resources, Safety Officers, Supervisors, and medical personnel are involved in managing workplace injuries.

3.0 Definitions

WIBA: Work Injury Benefits Act, which provides compensation to employees for injuries or diseases contracted in the course of employment.

Work-Related Injury: Any injury sustained in the course of employment, including accidents and occupational diseases.

Compensation Claim: The formal process through which an employee seeks benefits under WIBA.

Medical Assessment: Evaluation by a registered medical practitioner to determine the nature and extent of injury.

4.0 Responsibilities

Employer / Management: Ensure compliance with WIBA requirements; Provide timely support and documentation for compensation claims; Maintain records of workplace injuries and claims.

HR Department: Guide employees through the WIBA claims process; Submit required forms to the relevant authorities; Follow up on claims and ensure timely payment of compensation.

Department Heads: Report incidents immediately to HR; Provide necessary information and assistance to injured employees; Implement corrective measures to prevent recurrence.

HR: Investigate incidents to determine causes; Ensure proper reporting and compliance with WIBA regulations.

Employees: Report injuries or occupational illnesses promptly; Provide accurate information and cooperate with medical assessments.

5.0 Work/ Procedure Instructions

Incident Reporting

Immediately report any work-related injury or occupational disease to the supervisor.

Complete an incident report form detailing the circumstances and witnesses.

Medical Treatment

Arrange prompt medical attention for the injured employee.

Obtain a medical certificate stating the nature of the injury, treatment required, and expected recovery period.

Claim Filing

HR collects all relevant documentation, including the incident report, medical certificate, and employment details.

Complete the WIBA claim form (as required by law).

Submit the claim to the relevant Workers' Compensation authority within the prescribed timeframe.

Follow-Up

Monitor the progress of the claim.

Communicate updates to the injured employee.

Ensure that compensation payments are received and disbursed appropriately.

Record Keeping

Maintain records of all incidents, medical reports, and WIBA claims securely.

Update incident logs and risk registers to inform prevention measures.

Prevention and Continuous Improvement

Analyze reported incidents to identify trends and hazards.

Implement corrective and preventive measures to minimize recurrence.

Conduct periodic training on workplace safety and WIBA procedures.

6.0 Reference documents

Work Injury Benefits Act (WIBA) 2007

Company Health and Safety Policy

Incident Report Forms

Medical Certificates and Occupational Health Records

7.0 Records

Incident reports

Medical certificates

WIBA claim forms

Compensation payment records

Corrective action and preventive measures reports

8.0 Approving authority: CEO, Jordyan Woodley

9.0 Issue date: 6th Dec 2025

Revision date: 6th Dec 2026

4. ORGANIZATIONAL CAPACITY AND COMPETENCY

Organizational capacity refers to the resources, systems, and structures that enable an organization to achieve its goals, while organizational competency is the skills and knowledge that ensure effective and efficient operations. Both are essential for the organization's success and can be enhanced through leadership development, strategic planning, and resource management. Strengthening these areas helps organizations innovate, adapt, and sustain long-term growth.

Below, we present BCC strategies that will be used while implementing ESMS.

4.1. Training Plan Worksheet

A well-implemented ESMS is ultimately about trained, committed people. It is necessary to define specific training for each group/ department, to raise awareness, gain commitment, or give the employees the knowledge and skills they need to implement the ESMS. After looking carefully at the Action Plans and the Operational Procedures developed, BCC decided that the training presented below are the ones that will be useful for the full and accurate implementation of the ESMS.

DEPARTMENT	MODULE 1	MODULE 2	MODULE 3	MODULE 4	MODULE 5	MODULE 6	MODULE 7
Senior management	Introduction to ESMS	Stakeholder engagement Sectoral best practices	Labor Standards Environmental and social performance issues				
ESIA Auditors	Introduction to IFC Performance Standards Sectoral best practices.	Introduction to ESMS					
ESMS Team	Introduction to IFC Performance Standards and the nine ESMS elements	Environmental and social reporting	Stakeholder engagement	Environmental legal requirements	Monitoring of performance indicators; Internal auditing	Identification and evaluation of environmental and social risks and impacts Root cause analysis	
HR	Occupational health and safety Disciplinary procedures Complaint management and resolution procedure for workers and community	Applicable Environment, OHS, WIBA and Labor regulations Social and labor policies- The Kenyan Labour Laws: Hiring, non-discrimination,	Orientation to fire safety	Evacuation plan and fire drills	First aid	Use of personal protective equipment and safe machine handling,	Emergency response procedures

DEPARTMENT	MODULE 1	MODULE 2	MODULE 3	MODULE 4	MODULE 5	MODULE 6	MODULE 7
		anti- harassment, remuneration, and other labor policies					
Logistics & Supply Chain	Introduction to IFC Performance Standards and ESMS Sectoral best practices for logistics Transport and supply chain operations	Introduction to ESMS; Environmental and social risks and impacts associated with logistics and supply chain activities	Applicable environmental, OHS, and transport regulations; Contractor and driver compliance requirements	Stakeholder engagement and community health and safety related to logistics movements and supply chain activities	Monitoring of logistics and supply chain performance indicators; Internal audits and incident reporting	Identification and evaluation of environmental and social risks and impacts in logistics and supply chain operations; Root cause analysis	Emergency response procedures for logistics and supply chain incidents (road accidents, spills, fire, injuries)
Operations	ESMS awareness Preventive maintenance, Machine operation safety	Risk assessment (Impact, Identification, Controls), SOP development Document control	Environmental controls (Dust, spills & waste management) Incident investigations and mitigation measures	Monitoring and compliance Review	Emergency Preparedness and response (Fires, spills, First Aid, use of emergency equipment)		
Production, Administration and Transportation	ESMS awareness Machine operation safety Safety regulations, Certification compliance	Tasks Standard Operating Procedures Safe working practices (safe material storage and handling, ERP, PPE use)	Environmental awareness Training (Waste management, environmental incidents reporting, E&S Policy)	Hazard spotting and risk control (Environment and safety)	Emergency Preparedness and response (Fires, spills, First Aid, use of emergency equipment)	Incident, near miss, and noncompliance reporting (Environment and safety)	

DEPARTMENT	MODULE 1	MODULE 2	MODULE 3	MODULE 4	MODULE 5	MODULE 6	MODULE 7
All workers	Occupational health and safety Disciplinary procedures Complaint management and resolution procedure for workers		Orientation to fire safety	Evacuation plan and fire drills	First aid	Use of personal protective equipment and safe machine handling	Emergency response procedures

4.2. Roles, Responsibilities, and Authorities to Develop and Implement ESMS

Developing and implementing an ESMS involves several phases, each requiring careful planning and execution. Senior management support and commitment are critical to implementing a sustainable ESMS. Along with that, staff from all levels, from the middle management, supervisors, and workers, must take responsibility in the process, and time must be allocated accordingly. A well-balanced ESMS Team is a prerequisite for meaningful engagement with other peers and colleagues. To be truly effective, the ESMS Team needs to consult with people from all levels of the company, including supervisors and workers, as they are key frontline identifiers of problems.

Here's a roadmap with an estimated staff time and the timeframe to develop and implement the ESMS. They estimated a total of 186 days to put the system in place.



1. Policy		Seniormgt time	Mid-mgt time	Supervisors time	Workers time	MONTH																							
						1				2				3				4				5				6			
Developing	Kick-off meeting at senior management level to discuss ESMS implementation	0.15	0.15			█																							
	Selection (including communication/ coordination) of ESMS core team (personnel from different key departments)	0.25	0.5	0.5		█																							
	Appreciation/awareness workshop for senior management and core team on ESMS requirements	0.1	1.5	1						█																			
	Review/upgrading of existing environment and social policy, or formulation of organization's environmental and social policy	0.5	1	1						█																			
Implementing	Design, printing and display of ESMS policy in key areas			0.25										█															
	Uploading of ESMS policy on company website	0.5								█																			
	Communicate ESMS policy to workers and key external stakeholders	0.5												█															
	Training and awareness-raising of employees on ESMS policy and information dissemination	0.25	1	1	2									█															

2. Risk and Impact Identification					MONTH											
	Senior mgt time	Mid-mgt time	Supervisors time	Workers time	1		2		3		4		5		6	
Developing	Mapping of activities, processes and key stakeholders, including suppliers and contractors	0.5	0.5	1.5												
	Identification and compilation of regulatory and other requirements, including stakeholder expectations	0.5	1	1												
	Initial environment and social review, identification and evaluation of environment and labor risks (including supply chain)	1	4	3	2											
Implementing	Training and awareness of employees on environmental, social and labor risks and risks identification process	0.25	1	1	2											
	Training and awareness of employees on regulatory and other requirements, including stakeholder expectations	0.25	1	1	2											
	Training and awareness-raising of employees on environment, social and labor risks and information dissemination	0.25	1	1	2											



3. Management Programs		Seniormgt time	Mid-mgt time	Supervisors time	Workers time	MONTH							
						1	2	3	4	5	6		
Developing	Preparation of ESMS manual (formulation and documentation of procedures related to ESMS)		4	2		██████████							
	Formulation, compilation of environmental objectives/ targets and social performance improvement measures	0.25	0.5	1	1								
	Formulation and development of environment and social action plans	0.1	2.5	2									
	Development of operational procedures	0.1	3	2	2								
Implementing	Communication, awareness-raising and training of employees on ESMS procedures	0.25	1	1	2								
	Communication and awareness of employees on environmental objectives and social performance improvement measures	0.25	1	1	2								
	Communication and awareness of employees on environmental and social action plans	0.25	1	1	2								
	Training of employees on environmental and social operational procedures		1	2	4								

4. Organizational Capacity and Competency					MONTH											
	Seniormgt time	Mid-mgt time	Supervisors time	Workers time	1		2		3		4		5		6	
Developing	Environmental and social awareness program for middle management		1.5													
	Environmental and social awareness program for workers			5												
	Competency program for ESMS core team		1.5	2												
	Internal auditor training for the organization's ESMS assessors/auditors	1	2													
Implementing	General awareness-raising and training on environment, social and labor issues/ESMS for senior and middle management	1	1	1	2											
	Environmental and social awareness program for workers		1	1	2											
	Competency program for ESMS core team		2	2												
	Internal auditor training for the organization's ESMS assessors/auditors		2	2												



5. Emergency Preparedness and Response		Senior mgt time	Mid-mgt time	Supervisors time	Workers time	MONTH														
						5	6	7	8	9	10									
Developing	Review key risks and existing emergency preparedness plan		0.5	0.5		█														
	Upgrade/prepare the emergency preparedness plan	0.1	2	0.5		█	█													
	Communicate to workers, potentially affected communities and relevant government agencies (if required)	0.15	0.25			█														
Implementing	Raise awareness and communication to employees and affected communities on key risks and emergency issues and emergency planning	0.25	1	1	2			█												
	Training of employees on emergency preparedness plan		1	1	4				█											
	Communication and awareness-raising on emergency procedures to affected communities and relevant authorities (if required)	0.25	1	1	2					█										

6. Stakeholder Engagement		Senior mgt time	Mid-mgt time	Supervisors time	Workers time	MONTH														
						5	6	7	8	9	10									
Developing	Mapping of all stakeholders, stakeholder analysis and engagement planning	0.5	0.5			█														
	Develop/upgrade stakeholder communication/consultation; information disclosure and engagement strategy/program	0.25	1.5	0.5		█														
Implementing	Communication to employees on key stakeholders and their environment and social/labor expectations		1	1	1				█											
	Communication, awareness-raising and training of employees on the strategy/program for stakeholder engagement/ consultation/ communication and information disclosure		1	1	2								█							



7. External Communications and Grievance Mechanisms					MONTH																		
	Senior mgt time	Mid-mgt time	Supervisors time	Workers time	5			6			7			8			9			10			
Developing	Review external communication system, including receiving and handling feedback, concerns and complaints		0.25	0.25																			
	Develop/upgrade system for regular engagement, receiving, documenting and responding to feedback and grievances	0.25	2	1																			
Implementing	Review external communication, feedback, stakeholder concerns and complaints and communicate to key personnel	1		1																			
	Training, awareness-raising and implementation of stakeholder engagement, receiving, documenting and responding to feedback and grievances		1	1	2																		

8. Ongoing Reporting to Affected Communities					MONTH																		
	Senior mgt time	Mid-mgt time	Supervisors time	Workers time	5			6			7			8			9			10			
Developing	Review existing system for reporting and disclosure		0.25																				
	Develop/upgrade system for external reporting and disclosure (including collection, validation and verification of information)	0.1	0.75	0.5																			
Implementing	Communication and disclosure to key external stakeholders and affected communities	0.25	2.5																				
	Communication, awareness-raising and training on external reporting and disclosure (including collection, validation and verification of information)		3	1	4																		



9. Monitoring and Review					MONTH												
	Senior mgt time	Mid-mgt time	Supervisors time	Workers time	6	7	8	9	10	11	12						
Developing	Establish procedure to monitor and measure ESMS performance, compliance and stakeholder requirements	0.25	1	0.5	█												
	Implementation of ESMS monitoring program, establishing benchmarks and integration with existing system	0.5	2	1	█												
	Final review and complete ESMS documentation	0.5	2		█												
	Conduct internal audit/evaluation of ESMS performance against the management program requirement/benchmarks	0.25	1	1	0.5		█										
	Establish relevant operational controls and formulation of corrective and preventive actions		1.5	0.5	0.5			█									
	Review by the senior management to assess performance and effectiveness of ESMS	0.5	0.25					█									
	Documentation and communication on ESMS conformance, regulatory compliance and stakeholder requirements		1														█
Implementing	Communication, awareness, training and implementation of ESMS monitoring program and established benchmarks	0.25	1	1													█
	Communication of internal audit/performance measurement findings and ESMS performance to the employees		1	1													█
	Communication, awareness and training of employees on operational controls and corrective and preventive actions	0.25	1	1	2												█
	Communication on outcomes of review of the ESMS performance by senior management and key decisions taken	1															█
	Total	14.80	68.90	54.50	47.00												

5. EMERGENCY PREPAREDNESS AND RESPONSE

Emergencies can happen everywhere. The key is to plan how to respond to them and try to prevent their negative effects as much as possible. An Emergency Preparedness and Management Plan (EPMP) is essential for any organization to effectively respond to and manage emergencies, minimizing harm and ensuring continuity of operations. One golden rule to remember is that the emergency plan must be site-specific, and it should be frequently reviewed for its suitability and effectiveness.

5.1. Emergency Response Procedures

Looking at the BCC risk assessment, the following emergency scenarios were identified, along with the corresponding procedures developed to address them.

- Hostile Intruder or Active Shooter
- Civil unrest
- Workplace violence
- Cybersecurity Incidents
- Ergonomics, employee injury, or fatal accidents
- Harassment or discrimination
- Employee sabotage due to dissatisfaction
- HRIS system crash
- Mental health issues/crisis
- Medical Emergencies
- Substance abuse crisis
- Respiratory & Occupational Illnesses
- Dust Control & Air Quality Emergencies
- Natural Disasters – General
- Road Accidents

- Fire and Explosion (manmade or accidental)
- Rescue of Fallen workers and confined spaces
- Major power failures
- Structural Failures
- Vehicle accidents (company vehicles, forklifts, heavy equipment)
- Critical supply shortages
- Regulatory / Environmental Enforcement Incident
- Transport and Delivery Incidents
- Environmental Releases Affecting Community
- Material Handling Accidents
- Natural Disasters – Earthquake or floods
- Electric Shock/ Electrocution

Title: Hostile Intruder or Active Shooter Response Procedure

BCC has a documented internal procedure for this scenario which is reviewed annually. For further information, contact safety@ecosafi.com.

Title: Civil Unrest Response Procedure

BCC has a documented internal procedure for this scenario which is reviewed annually. For further information, contact safety@ecosafi.com.

Title: Workplace Violence Response Procedure

Procedure Number: BCC009/25

Number of Pages: 2

1. Purpose and Scope

- 1.1. Purpose:** To provide guidance for preventing, recognizing, and responding to incidents of workplace violence to ensure a safe and secure environment for all personnel.
- 1.2. Scope:** This procedure applies to all employees, contractors, and visitors at BCC facilities and project sites.

2. Definitions

Workplace Violence: Any act or threat of physical violence, harassment, intimidation, or other threatening disruptive behavior that occurs at the work site.

Verbal Abuse: The use of threatening or offensive language intended to intimidate or cause distress.

Physical Assault: Intentional infliction of harm to another person.

Occupational Safety & Health Team (OSH): Trained staff responsible for assessing and managing emergency situations.

3. Responsibility and Authority

Direct Supervisor: Responsible for identifying early signs, intervening, and reporting.

HR Department: Leads investigations and ensures support for affected individuals and responds to physical threats or violent acts.

All Employees: Must report threats or violent behavior immediately.

4. Work Instructions

Maintain open communication among staff.

Promote a respectful workplace culture.

Display emergency contact and reporting procedures.

Alert a supervisor or the Security Team.

If there is immediate danger, evacuate the area or seek a safe space.

Call emergency services if necessary.

After the Incident:

Do not confront the aggressor alone.

Provide statements to HR or management during the investigation.

Follow up with counselling services if needed.

5. First Aid and Rescue Operations

Provide basic first aid if injuries occur, using designated first aid kits.

Contact emergency medical services for severe injuries.

Ensure affected individuals receive psychological support or trauma counselling.

6. Emergency Response Team

NAME	TITLE	CELL PHONE
Emergency Response Team	BCC Safety Team	safety@ecosafi.com

ERT members may be called on short notice. A printed list should be posted in key locations.

7. Reference Documents

Company Workplace Conduct Policy

Grievance Procedures

Guidelines on Violence and Harassment at Work

8. Records

Incident reports

Witness statements

Training attendance logs

Counselling or support referrals

9. Approving Authority: Chief Executive Officer

10. Issue Date: 23rd December 2025

Next Review: 23rd December 2026

Title: Cybersecurity Incidents Response Procedure

BCC has a documented internal procedure for this scenario which is reviewed annually. For further information, contact safety@ecosafi.com.

Title: Ergonomics, Employee Injury or Fatal Accidents Response

Procedure Number: BCC011/25

Number of Pages: 3

1. Purpose and Scope

- 1.1. **Purpose:** To establish a structured response process for ergonomics-related issues, employee injuries, or fatal accidents in order to minimize harm, ensure timely medical response, comply with legal requirements, and prevent recurrence.
- 1.2. **Scope:** This procedure applies to all employees, contractors, and third parties working on BCC premises or representing the company. It covers identification, reporting, emergency response, investigation, corrective action, and post-incident review of ergonomics-related injuries, workplace accidents, and fatalities.

2. Definitions

Workplace Injury: Any physical harm sustained by an employee while performing work-related duties.

Fatal Accident: A work-related incident resulting in loss of life.

Ergonomic Risk: Physical factors such as poor posture, repetitive motion, or improper workstation setup that may cause injury.

Incident Investigation: A formal process to determine the root cause of an accident or injury.

Occupational Safety & Health Team (OSH): Trained staff responsible for managing emergency situations.

First aid- immediate care given to a casualty before professional medical treatment.

3. Responsibility and Authority

OSH Team: Leads incident response, investigation, and compliance with occupational safety law and coordinates first aid, emergency services, and site control.

Direct Supervisors: Ensure safe working conditions and immediate reporting of incidents.

Employees: Report injuries, hazards, or accidents immediately and follow safety instructions.

4. Work Instructions

Identify injury, accident, or unsafe ergonomic conditions.

Report immediately to the Supervisor, Health & Safety Officer, or HR.

Secure the accident scene.

Stop unsafe activities.

Preserve evidence for investigation.

Provide first aid or emergency medical assistance.

Arrange transport to medical facilities if required.

Support injured employees during recovery or return-to-work.

Implement corrective actions to eliminate hazards.

Conduct investigation and root cause analysis.

Document findings and preventive measures.

Update policies and procedures as needed.

If a fatality occurs:

The HSE shall inform senior management and notify relevant authorities (DOSHS &WIBA).

The operations manager shall assist with reporting to the police and other procedures to follow as per DOSHS requirements.

5. First Aid and Rescue Operations

Provide immediate first aid or emergency response.

Engage external emergency services when necessary.

Support affected employees and colleagues.

6. Emergency Response Team

NAME	TITLE	CELL PHONE
Emergency Response Team	BCC Safety Team	safety@ecosafi.com

ERT members may be called on short notice. A printed list should be posted in key locations.

7. Reference Documents

Occupational Safety and Health Policy

Occupational Safety and Health Act 2007

Incident Reporting Policy

Work Injury Benefits Act (WIBA)

Company Ergonomics Guidelines

8. Records

Accident and injury reports

Medical and insurance records

Investigation reports

Corrective action records

WIBA claim forms

9. Approving Authority: Chief Executive Officer

10. Issue Date: 23rd December 2025

Next Review: 23rd December 2026

Title: Harassment or Discrimination Incident Response Procedure

Procedure Number: BCC012/25

Number of Pages: 2

1. Purpose and Scope

1.1. Purpose: To establish a structured response process for harassment or discrimination incidents in order to protect employees, ensure confidentiality, uphold dignity, and comply with legal and ethical standards.

1.2. Scope: This procedure applies to all BCC employees, contractors, and third parties. It covers reporting, investigation, interim measures, resolution, and post-incident review of harassment or discrimination complaints.

2. Definitions

Harassment: Unwelcome conduct that creates a hostile, intimidating, or offensive work environment.

Discrimination: Unfair treatment based on protected characteristics.

Complainant: Person reporting the incident.

Respondent: Person accused of misconduct.

Investigation Panel: Authorized personnel responsible for investigating complaints.

3. Responsibility and Authority

Head of Talent: Leads incident handling and investigation

Direct Supervisors: Ensure safe reporting channels and non-retaliation.

All Employees: Report incidents promptly and cooperate with investigations.

Investigation Panel: Conducts impartial investigations and recommends actions.

4. Work Instructions

Receive complaints verbally or in writing.

Report immediately to HR or the designated officer.

Implement interim protective measures.

Prevent retaliation or further harm.

Conduct confidential interviews.

Review evidence and documentation.

Apply disciplinary or corrective measures.

Communicate outcomes appropriately.

Review policy effectiveness.

Implement preventive training.

5. First Aid and Rescue Operations

Provide psychological support and counseling referrals.

Ensure complainant's safety and well-being.

6. Emergency Response Team

NAME	TITLE	CELL PHONE
Emergency Response Team	BCC Safety Team	safety@ecosafi.com

ERT members may be called on short notice. A printed list should be posted in key locations.

7. Reference Documents

- Anti-Harassment Policy
- Gender & Inclusion Policy
- Employment Act
- Company Code of Conduct

8. Records

- Complaint records
- Investigation reports
- Disciplinary records
- Training records

9. Approving Authority: Chief Executive Officer

10. Issue Date: 23rd December 2025

Next Review: 23rd December 2026

Title: Employee Sabotage Due to Dissatisfaction Response Procedure

BCC has a documented internal procedure for this scenario which is reviewed annually. For further information, contact safety@ecosafi.com.

Title: HRIS System Crash Response Procedure

Procedure Number: BCC014/25

Number of Pages: 2

1. Purpose and Scope

- 1.1. Purpose:** To establish a structured response process for HRIS system failures to ensure data integrity, continuity of HR operations, and timely system restoration.
- 1.2. Scope:** Applies to all BCC HR staff, IT personnel, and system users. Covers detection, reporting, recovery, and review of HRIS outages.

2. Definitions

HRIS Crash: Unexpected failure or unavailability of the HR information system.

Data Loss: Inaccessibility or corruption of HR data.

Backup: Stored copies of HR data for recovery.

3. Responsibility and Authority

Head of Talent: Coordinates HR operational continuity

IT Officer: Leads system recovery and technical response.

Users: Report system issues immediately

4. Work Instructions

Identify system outage or malfunction.

Report to IT immediately.

Suspend data entry activities.

Preserve backups.

Restore system from backups.

Validate data accuracy.

Resume HR operations after clearance.

Review system reliability and controls.

5. First Aid and Rescue Operations

Provide manual HR support processes.

Communicate system status to staff.

6. Emergency Response Team

NAME	TITLE	CELL PHONE
Emergency Response Team	BCC Safety Team	safety@ecosafi.com

ERT members may be called on short notice. A printed list should be posted in key locations.

7. Reference Documents

HRIS Policy

IT Disaster Recovery Plan

8. Records

System logs

Backup records

Incident reports

Post-incident review reports

Staff training records

9. Approving Authority: Chief Executive Officer

10. Issue Date: 23rd December 2025

Next Review: 23rd December 2026

Title: Mental Health Issues / Crisis Response Procedure

Procedure Number: BCC015/25

Number of Pages: 2

1. Purpose and Scope

- 1.1. Purpose:** To establish a structured response process for mental health issues or crises to protect employee well-being, ensure timely support, and prevent harm.
- 1.2. Scope:** Applies to all BCC employees and managers. Covers identification, reporting, intervention, and follow-up of mental health crises.

2. Definitions

Mental Health Crisis: A situation where an employee poses risk to themselves or others due to psychological distress.

Psychological First Aid: Immediate emotional support.

3. Responsibility and Authority

Head of Talent: Coordinates response and support.

Direct Supervisors: Identify warning signs and report concerns.

OSH Team: Assists in emergency intervention.

4. Work Instructions

Identify signs of distress.

Report immediately to HR.

Ensure employee safety.

Remove immediate risks.

- Engage professional support services.
- Support return-to-work or medical leave.
- Review the effectiveness of the response.

5. First Aid and Rescue Operations

- Provide psychological first aid.
- Contact emergency medical services if required.

6. Emergency Response Team

NAME	TITLE	CELL PHONE
Emergency Response Team	BCC Safety Team	safety@ecosafi.com

ERT members may be called on short notice. A printed list should be posted in key locations.

7. Reference Documents

- Mental Health Policy
- Employee Assistance Program

8. Records

- Incident notes
- Referral records

9. Approving Authority: Chief Executive Officer

10. Issue Date: 23rd December 2025

Next Review: 23rd December 2026

Title: Medical Emergencies Response Procedure

Procedure Number: BCC016/25

Number of Pages: 2

1. Purpose and Scope

- 1.1. Purpose:** To establish a structured response process for medical emergencies in order to provide immediate assistance, minimize injury or loss of life, and ensure timely access to professional medical care.
- 1.2. Scope:** This procedure applies to all employees, contractors, visitors, and third parties on company premises or engaged in company-related activities. It covers detection, reporting, emergency response, medical intervention, recovery, and post-incident review.

2. Definitions

Medical Emergency: Any sudden illness, injury, or health condition requiring immediate medical attention.

First Aid: Immediate assistance given to an ill or injured person before professional medical treatment is available.

Emergency Medical Services (EMS): External medical responders such as ambulance services or hospitals.

Incident Response Plan (IRP): A formal process for managing emergencies.

3. Responsibility and Authority

Operations Manager - Ensure adequate resources are available for the response teams and ensure effective communication with senior management and relevant stakeholders.

Head of Talent: Coordinates emergency response and ensures documentation and follow-up.

Direct Supervisors: Ensure immediate reporting and access to emergency support.

All Employees: Report medical emergencies immediately and follow instructions provided by responders.

OSH Team: Executes emergency response, communication, and coordination with medical services.

4. Work Instructions

Identify signs of a medical emergency (collapse, severe pain, breathing difficulty, loss of consciousness)

Report immediately to the Supervisor, HR, or ERT.

Secure the area to ensure safety.

Prevent crowding and ensure clear access for responders.

Emergency Medical Response:

Provide first aid where trained to do so.

Contact emergency medical services immediately.

Support affected individuals during treatment and recovery.

Facilitate safe return to work or medical leave as required.

Conduct an incident review and document findings.

Update procedures and training where necessary.

5. First Aid and Rescue Operations

Assess airway, breathing, and circulation

Assist the victim according to the condition (provide immediate first aid using available resources).

Call an ambulance for serious cases.

Monitor the victim until medical help arrives.

Engage external medical services promptly.

Support colleagues affected by the incident.

6. Emergency Response Team

NAME	TITLE	CELL PHONE
Emergency Response Team	BCC Safety Team	safety@ecosafi.com

ERT members may be called on short notice. A printed list should be posted in key locations.

7. Reference Documents

Occupational Safety and Health Policy

First Aid Policy

Incident Response Plan

Local Emergency Medical Guidelines

8. Records

Medical emergency incident reports

First aid treatment records

Witness statements

Post-incident review reports

9. Approving Authority: Chief Executive Officer

10. Issue Date: 23rd December 2025

Next Review: 23rd December 2026

Title: Substance Abuse Crisis Response Procedure

Procedure Number: BCC017/25

Number of Pages: 2

1. Purpose and Scope

1.1. Purpose: To establish a structured response process for substance abuse crises in order to protect employee safety, maintain workplace order, and provide appropriate medical and psychosocial intervention.

1.2. Scope: This procedure applies to all employees, contractors, and visitors. It covers identification, reporting, containment, intervention, recovery, and post-incident review of substance abuse-related incidents.

2. Definitions

Substance Abuse: Misuse of alcohol, drugs, or controlled substances that affects an employee's behavior, performance, or safety.

Substance Abuse Crisis: A situation where substance use poses immediate risk to the individual or others.

Rehabilitation Support: Professional medical or counseling services aimed at recovery.

Occupational Safety & Health Team (OSH): Trained staff responsible for managing emergency.

3. Responsibility and Authority

Head of Talent: Leads incident handling, support measures, and disciplinary processes where applicable.

Supervisors/Department Heads: Identify signs of substance abuse and report incidents immediately.

Employees: Report concerns and comply with safety instructions.

OSH Team: Manages immediate safety and emergency response.

4. Work Instructions

Identify signs of impairment, erratic behavior, or intoxication.

Report immediately to HR or Management.

Remove affected individuals from safety-sensitive duties.

Ensure the safety of the individual and others.

Arrange medical assessment or counseling support.

Engage emergency services if required.

Implement rehabilitation support or return-to-work plans.

Apply disciplinary measures in line with company policy where applicable.

Review contributing factors and preventive controls.

Update awareness and training programs.

5. First Aid and Rescue Operations

Provide medical assistance if the individual is unwell or unconscious.

Engage emergency medical services where necessary.

Ensure dignity and confidentiality.

6. Emergency Response Team

NAME	TITLE	CELL PHONE
Emergency Response Team	BCC Safety Team	safety@ecosafi.com

ERT members may be called on short notice. A printed list should be posted in key locations.

7. Reference Documents

Substance Abuse Policy

Disciplinary Policy

Employee Assistance Program (EAP)

Occupational Safety and Health Policy

8. Records

Incident reports

Medical or referral records

Disciplinary and rehabilitation records

Training and awareness records

9. Approving Authority: Chief Executive Officer

10. Issue Date: 23rd December 2025

Next Review: 23rd December 2026

Title: Respiratory & Occupational Illnesses Response Procedure

Procedure Number: BCC018/25

Number of Pages: 2

1. Purpose and Scope

1.1. Purpose: To establish a structured response process for respiratory and occupational illnesses in order to protect employee health, minimize exposure risks, and ensure compliance with occupational health regulations.

1.2. Scope: This procedure applies to all employees exposed to workplace hazards. It covers identification, reporting, medical evaluation, containment, recovery, and post-incident review of respiratory and occupational illness cases.

2. Definitions

Occupational Illness: A disease or condition arising from workplace exposure to physical, chemical, or biological hazards.

Respiratory Illness: A condition affecting breathing or lung function due to workplace exposure.

Exposure Incident: Contact with hazardous substances beyond permissible limits.

Occupational Safety & Health Team (OSH): Trained staff responsible for emergency coordination

3. Responsibility and Authority

Head of Talent: Leads response, exposure assessment, and compliance actions.

Direct Supervisors: Identify symptoms and ensure prompt reporting.

All Employees: Report symptoms and comply with medical evaluations.

OSH Team: Assists in emergency response and isolation measures.

4. Work Instructions

Identify symptoms such as breathing difficulty, coughing, dizziness, or fatigue.

Report immediately to HR or an OSH team member

Remove affected employee from the exposure source.

Isolate the hazardous area if necessary.

Refer the employee for medical assessment.

Conduct exposure monitoring where applicable

Support treatment and rehabilitation.

Implement workplace controls and PPE adjustments.

Review exposure controls and preventive measures.

Update health surveillance programs.

5. First Aid and Rescue Operations

Provide immediate medical support.

Ensure access to fresh air and emergency care.

Engage external medical services if required.

6. Emergency Response Team

NAME	TITLE	CELL PHONE
Emergency Response Team	BCC Safety Team	safety@ecosafi.com

ERT members may be called on short notice. A printed list should be posted in key locations.

7. Reference Documents

Occupational Safety and Health Policy

Health Surveillance Policy

Hazard Identification and Risk Assessment (HIRA)

Applicable Occupational Health Regulations

8. Records

Medical surveillance records

Exposure monitoring reports

Incident investigation reports

Corrective action records

9. Approving Authority: Chief Executive Officer

10. Issue Date: 23rd December 2025

Next Review: 23rd December 2026

Title: Dust Control & Air Quality Emergencies Response Procedure

Procedure Number: BCC019/25

Number of Pages: 3

1. Purpose and Scope

1.1. Purpose: To establish a structured response process for dust control and air quality emergencies in order to protect employee health, minimize exposure to airborne contaminants, ensure compliance with occupational and environmental regulations, and maintain safe operations.

1.2. Scope: This procedure applies to all employees, contractors, and visitors in areas where dust or air quality may pose health or operational risks.

2. Definitions

Dust Control Emergency: A situation where airborne dust exceeds safe limits or creates a hazard to health, safety, or operations.

Air Quality Emergency: An event where indoor or outdoor air is contaminated or polluted beyond permissible exposure levels.

Particulate Matter (PM): Fine airborne particles that can affect respiratory health.

Personal Protective Equipment (PPE): Equipment such as masks, respirators, or protective clothing used to reduce exposure.

Emergency Response Team (ERT): Trained staff responsible for managing and coordinating dust and air quality emergencies.

3. Responsibility and Authority

Health & Safety Officer: Leads emergency response, coordinates monitoring and mitigation measures, and ensures compliance with regulations.

Supervisors/Department Heads: Identify air quality hazards, enforce protective measures, and ensure staff reporting.

Employees: Immediately report any dust or air quality hazards, follow safety instructions, and use PPE as required.

ERT: Executes technical response measures, containment, remediation, and communication actions.

4. Work Instructions

Monitor dust and air quality using instruments and observation.

Report immediately to the Supervisor, Health & Safety Officer, or ERT when dust or pollutant levels exceed safe limits.

Isolate affected areas to prevent further exposure.

Limit personnel access until the environment is safe.

Activate dust suppression systems if available.

Implement dust control measures such as wetting, vacuuming, or air filtration.

Increase ventilation and monitor air quality continuously.

Provide PPE to affected personnel.

Confirm air quality has returned to safe levels before resuming normal operations.

Document all actions taken and exposure levels measured.

Conduct root cause analysis to determine sources and contributing factors.

Update policies, controls, and training to prevent recurrence.

5. First Aid and Rescue Operations

Provide immediate support to employees experiencing respiratory distress or irritation.

Relocate affected individuals to areas with safe air quality.

Escalate to medical personnel if health symptoms persist or worsen.

6. Emergency Response Team

NAME	TITLE	CELL PHONE
Emergency Response Team	BCC Safety Team	safety@ecosafi.com

ERT members may be called on short notice. A printed list should be posted in key locations.

7. Reference Documents

Occupational Safety and Health Policy

Environmental Policy

Dust Control Guidelines

Air Quality Standards (Local and International)

8. Records

Incident reports

Air quality monitoring data

Remediation and PPE records

Post-incident review reports

9. Approving Authority: Chief Executive Officer

10. Issue Date: 23rd December 2025

Next Review: 23rd December 2026

Title: Natural Disasters (General) Response Procedure

Procedure Number: BCC020/25

Number of Pages: 2

1. Purpose and Scope

1.1. Purpose: To establish a structured response process for natural disasters in order to protect employees, minimize property damage, ensure business continuity, and comply with safety regulations.

1.2. Scope: This procedure applies to all employees, contractors, and visitors. It covers detection, reporting, evacuation, emergency response, recovery, and post-incident review for natural disasters such as floods, earthquakes, storms, or fires.

2. Definitions

Natural Disaster: Any severe natural event such as floods, earthquakes, hurricanes, or fires that threatens safety or operations.

Evacuation: Organized removal of employees from dangerous areas.

Emergency Response Team (ERT): Trained staff responsible for coordinating disaster response and ensuring safety.

3. Responsibility and Authority

Health & Safety Officer: Leads disaster preparedness and response, coordinates evacuation, and ensures compliance.

Supervisors/Managers: Ensure employees are aware of evacuation plans and report incidents immediately.

Employees: Follow emergency procedures, report hazards, and assist colleagues as needed.

ERT: Executes emergency response, coordinates evacuation, and liaises with authorities.

4. Work Instructions

Monitor alerts for natural disasters.

Report any immediate hazards or damages to ERT or the supervisor.

Evacuate employees safely according to established procedures.

Isolate affected areas, if possible, to prevent further damage.

Provide first aid and support to injured employees.

Coordinate with emergency services.

Assess damage to property and operations.

Support employees and restore normal operations as soon as safe.

Conduct root cause and impact analysis.

Update disaster preparedness plans and training.

5. First Aid and Rescue Operations

Provide immediate medical assistance to affected employees.

Assist in evacuation and rescue operations.

Liaise with external emergency responders.

6. Emergency Response Team

NAME	TITLE	CELL PHONE
Emergency Response Team	BCC Safety Team	safety@ecosafi.com

ERT members may be called on short notice. A printed list should be posted in key locations.

7. Reference Documents

- Occupational Safety and Health Policy
- Disaster Preparedness & Response Plan
- Local Emergency Management Guidelines

8. Records

- Incident and evacuation reports
- Medical and first aid records
- Damage assessment reports
- Post-incident review reports

9. Approving Authority: Chief Executive Officer

10. Issue Date: 23rd December 2025

Next Review: 23rd December 2026

Title: Road Accidents Response Procedure

Procedure Number: BCC021/25

Number of Pages: 3

1. Purpose and Scope

- 1.1. Purpose:** To establish a structured response process for road accidents involving employees or company vehicles, ensuring immediate care, minimizing harm, and complying with legal and safety requirements.
- 1.2. Scope:** This procedure applies to all employees traveling for work or using company vehicles. It covers detection, reporting, first aid, emergency services engagement, recovery, and post-incident review.

2. Definitions

Road Accident: Any traffic-related collision involving employees or company vehicles.

First Aid: Immediate care provided at the scene before professional medical assistance arrives.

Emergency Services: Police, ambulance, or fire services responding to road accidents.

Emergency Response Team (ERT): Trained staff responsible for coordinating response during road emergencies.

3. Responsibility and Authority

HR / Safety Officer: Coordinates accident response, documentation, and communication.

Drivers / Employees: Report accidents immediately and follow safety protocols.

Supervisors / Managers: Support response, coordinate with authorities, and ensure employee safety.

ERT: Provides first aid, ensures scene safety, and liaises with emergency services.

4. Work Instructions

Detection and Reporting:

Immediately report the accident to local authorities and the company.

Notify Supervisor, HR, or ERT.

Containment:

Ensure the scene is safe and prevent further accidents.

Assist injured persons without moving them unless necessary.

Emergency Medical Response:

Provide first aid if trained.

Call emergency medical services for professional care.

Recovery:

Support injured employees through medical treatment.

Document vehicle damage and circumstances.

Post-Incident Review:

Conduct root cause analysis to prevent recurrence.

Update driving and safety policies if required.

5. First Aid and Rescue Operations

Provide immediate assistance to injured employees.

Coordinate with emergency services for evacuation.

Support witnesses and colleagues at the scene.

6. Emergency Response Team

NAME	TITLE	CELL PHONE
Emergency Response Team	BCC Safety Team	safety@ecosafi.com

ERT members may be called on short notice. A printed list should be posted in key locations.

7. Reference Documents

Occupational Safety and Health Policy

Road Safety Policy

Traffic Laws & Regulations

8. Records

Accident reports

Medical treatment records

Vehicle damage reports

Post-incident review reports

9. Approving Authority: Chief Executive Officer

10. Issue Date: 23rd December 2025

Next Review: 23rd December 2026

Title: Fire and Explosion Response Procedure

Procedure Number: BCC022/25

Number of Pages: 3

1. Purpose and Scope

- 1.1. Purpose:** To establish a structured emergency response process for fires and explosions within Logistics and Supply Chain operations to minimize harm, protect people and assets, contain damage, and resume safe operations quickly.
- 1.2. Scope:** This procedure applies to all employees, drivers, contractors, and visitors working at or within the vicinity of BCC logistics, warehouse, and supply chain facilities, including those handling or near combustible materials such as bagasse, fuel, or chemicals.

2. Definitions

Fire: Combustion producing heat, flame, and smoke.

Explosion: Rapid release of energy caused by a rapid chemical or physical reaction resulting in a sharp increase in pressure and temperature, e.g., a dust explosion.

Combustion: A chemical reaction producing heat and light, usually with flames.

Ignition Source: Heat, sparks, open flame, or equipment that can start a fire.

Bagasse: A dry, fibrous by-product of sugarcane, highly combustible.

Evacuation Zone: The hazard area to be cleared of people during a fire/explosion.

Fire Triangle: The three elements needed to sustain fire – heat, fuel, and oxygen.

Fire Warden: A trained employee designated to lead evacuation and confirm area clearance.

Fire extinguisher: Portable device used to control small fires.

3. Responsibility and Authority

Warehouse Coordinator: Leads response efforts; has full authority to initiate evacuation, notify emergency services, and activate fire protocols.

Logistics Coordinator: Supports safety officers in halting operations, coordinating with drivers, and clearing the area.

Operations Manager - Contact outside government agencies such as the fire brigade, DOSHS, and County ambulances in the event of fires or explosions.

Fire Wardens/ HSE officer: Execute evacuation, ensure zones are clear, and guide personnel to muster points.

Drivers & Technicians: Follow evacuation instructions immediately, shut off engines, and proceed to safe areas.

Security team -Access control and evacuation

All Staff: Raise alarm, evacuate promptly, and assist others if safely do so.

4. Work Instructions

Detect fire or explosion, shout a warning, and activate the nearest fire alarm.

Call 999 or local fire services and give the location, type of fire, and any trapped individuals.

Only trained staff may attempt firefighting if the fire is small and safe to control.

Evacuate immediately along marked routes; do not use lifts or re-enter the affected area.

Report to the muster point and check in with the supervisor or fire warden.

Prevent access to the incident zone until all-clear is given.

Extinguishers will only be used by individuals who are trained.

Fire pumps will be activated and operated by trained fire marshals, who will be allowed to fight the fire if there is a backup exit

If in the factory, the operations manager will proceed to call Sony and the county Fire Departments for help.

5. First Aid and Rescue Operations

Administer basic first aid for burns, smoke inhalation, and trauma.

Do not move injured persons unless in immediate danger.

Notify arriving medics of injury types and count.

Secure flammable substances near the incident if safe to do so.

6. Emergency Response Team



NAME	TITLE	CELL PHONE
Emergency Response Team	BCC Safety Team	safety@ecosafi.com

ERT members may be called on short notice. A printed list should be posted in key locations.

7. Reference Documents

Fire Safety Policy

Facility Site Map and Evacuation Routes

MSDS for Bagasse and Fuels

Hot Work Permit Procedure

Incident Investigation SOP

8. Records

Fire incident reports

Fire drill logs

Equipment maintenance logs (extinguishers, alarms)

First aid and training attendance records

9. Approving Authority: Chief Executive Officer

10. Issue Date: 15th January 2026

Next Review: 15th January 2027

Title: Rescue of a fallen worker and confined space Response Procedure

Procedure Number: BCC023/25

Number of Pages: 3

1. Purpose and Scope

1.1. Purpose: To establish an emergency response sequence for rescuing and providing first aid to an employee who has fallen from height and an employee involved in a confined space emergency, aiming to protect rescuers, prevent secondary incidents, and ensure timely medical care.

1.2. Scope: This plan applies to all work at height activities, all confined spaces (Kiln, Silos, water tanks), employees, and contractors

2. Definitions

Fall Incident: Any unintentional descent of a person from an elevated surface, regardless of injury.

Rescue Plan: A predefined and rehearsed method to safely retrieve a fallen or suspended worker.

Harness Suspension Trauma: A potentially fatal condition caused by prolonged suspension in a safety harness.

Fall Protection Equipment: Safety gear such as harnesses, guardrails, anchor points, and lanyards.

Recovery Zone: Designated area where the worker is brought post-rescue for first aid or medical attention.

Fallen worker: An employee who has fallen from a height and is arrested by a personal fall protection system

Confined Space: A space with limited entry/exit not designated for continuous occupancy and may contain hazardous atmospheres.

3. Responsibility and Authority

Operations Manager: Contact outside government agencies such as DOSHS, County ambulance

HSE Officer: Stop all work in the affected area and authorize the rescue method

Emergency Response Team: Perform rescue as trained using the correct equipment

Hole watcher (Confined space): Maintains entry control, monitors personnel working in the area

Rescue team: a designated group of trained employees responsible for responding to workplace emergencies

Warehouse Coordinator: Oversees all fall incident responses; authorizes rescue attempts and coordinates emergency services.

Operations Coordinator: Leads rescue team efforts and confirms scene safety before initiating recovery.

Rescue Team Members: Trained personnel responsible for executing the fall rescue plan using approved equipment.

Employees: Alert the rescue team, assist if trained and keep clear of hazard zones

4. Work Instructions

Fall from height (on the ground):

- Raise alarm and stop work
- Shut down nearby moving equipment if safe
- Call a first aider and site HSEO/Supervisor
- Call an ambulance/ emergency medical service
- Prepare for the safe transfer of the casualty.

Fall from height (Suspended worker):

- Raise alarm and stop work below and around the victim
- Secure drop zone and overhead hazards
- Select an appropriate rescue method, either forklift with an approved man basket or ladder rescue, if the victim is conscious
- Lower the victim smoothly to the ground
- Administer first aid and call an ambulance.

Confined Space:

(All personnel entering a confined space must wear a full-body safety harness with an industrial rope securely attached to the harness, anchored outside the confined space).

- Stop all work related to the confined space
- The hole watcher shall inform the supervisor, rescue team, and HSEO immediately
- Pull the worker slowly and steadily using the rope attached to the harness, use mechanical aids i.e., pulleys, for heavy workers
- Maintain constant communication
- Administer first aid and call for medical assistance

5. First Aid and Rescue Operations

- Check airway, breathing, and circulation
- Control bleeding
- Stabilise fractures
- Transport the worker to a medical facility
- Do not attempt rescue if not trained.

6. Emergency Response Team

NAME	TITLE	CELL PHONE
Emergency Response Team	BCC Safety Team	safety@ecosafi.com

ERT members may be called on short notice. A printed list should be posted in key locations.

7. Reference Documents

Occupational Safety and Health Act 2007- sections 77 and 79

8. Records

Incident investigation reports

First aid treatment records

General register records

Medical reports

WIBA claim forms

9. Approving Authority: Chief Executive Officer

10. Issue Date: 02nd January 2026

Next Review: 02nd January 2027

Title: Major Power Failures Response Procedure

Procedure Number: BCC024/25

Number of Pages: 2

1. Purpose and Scope

1.1. Purpose: To ensure a safe and effective response during major power outages that disrupt logistics, warehouse, transport, or supply chain operations and may pose safety or operational hazards.

1.2. Scope: This procedure applies to all logistics, storage, handling, and dispatch areas within BCC, covering both planned and unplanned power losses affecting equipment, lighting, communication systems, and security infrastructure.

2. Definitions

Power Failure: A complete or partial loss of electricity supply for a prolonged duration.

UPS (Uninterruptible Power Supply): A backup power system to maintain temporary operation of critical systems.

Emergency Lighting: Battery-powered lighting automatically activated during power loss.

Critical Equipment: Devices or systems that must remain powered or shut down safely (e.g., cold storage, security systems, servers).

3. Responsibility and Authority

Warehouse Coordinator: Leads electrical fault assessment and coordinates generator start-up.

Logistics Coordinator: Secures the warehouse, halts sensitive operations, and updates stakeholders.

Security Team: Ensures access control and surveillance continuity.

All Staff: Follow instructions, shut down non-essential equipment, and avoid use of elevators or powered machines.

4. Work Instructions

Detect power outage and notify the Maintenance and Logistics Supervisors.

Confirm the extent of power loss (local vs facility-wide) and activate backup lighting.

Initiate generator or UPS if the outage extends beyond 5 minutes.

Stop all powered machinery, forklifts, or conveyor belts to prevent hazards.

Relocate staff from dark or high-risk zones.

Communicate status and estimated downtime to relevant teams and suppliers.

Resume operations only after clearance by Maintenance.

5. First Aid and Rescue Operations

Check for workers who may be trapped in lifts, cold rooms, or equipment cages.

Provide immediate assistance to anyone injured during sudden shutdowns.

Ensure portable lighting and radios are available at first aid stations.

Keep exits and emergency escape routes illuminated or clearly marked.

6. Emergency Response Team

NAME	TITLE	CELL PHONE
Emergency Response Team	BCC Safety Team	safety@ecosafi.com

ERT members may be called on short notice. A printed list should be posted in key locations.

7. Reference Documents

Power Backup Procedures
Generator Inspection Checklist
Electrical Maintenance Logs
Facility Emergency Lighting Map

8. Records

Power outage incident logs
Generator activation and fuel records
Equipment shutdown and restart logs
Staff communication records

9. Approving Authority: Chief Executive Officer

10. Issue Date: 15th January 2026

Next Review: 15th January 2027

Title: Structural Failures Response Procedure

Procedure Number: BCC025/25

Number of Pages: 2

1. Purpose and Scope

- 1.1. Purpose:** To provide a structured response to structural failures that pose immediate risks to personnel, goods, and equipment within logistics and supply chain facilities.
- 1.2. Scope:** This procedure applies to all warehouses, storage racks, loading bays, delivery platforms, and built infrastructure under BCC's Logistics and Supply Chain operations.

2. Definitions

Structural Failure: Partial or total collapse of a physical structure (roof, platform, wall, rack) due to overload, defect, or environmental stress.

Collapse Zone: The hazard area around a failed structure where debris or instability poses a threat.

Unsafe Structure Tag: Label placed to restrict entry into damaged or unstable areas.

Engineer of Record: The professional responsible for structural integrity assessment.

3. Responsibility and Authority

Warehouse Coordinator: Leads emergency response, initiates evacuation, and isolates the hazard area.

Warehouse Supervisor: Coordinates inventory safety, staff accounting, and communication with senior management.

External Maintenance Team: Provides structural assessments and assists with stabilization.

All Staff: Evacuate immediately, avoid collapse zones, and report any observed damage.

4. Work Instructions

On signs of structural damage or collapse, raise an alarm and evacuate the area.

Activate emergency services and inform safety officers and supervisors.

Establish and mark a collapse zone perimeter; prohibit entry.

Account for all personnel and check for missing or trapped individuals.

Cease all operations in adjacent areas until the structure is declared safe.

Document the scene with photos for investigation; do not disturb debris unless for rescue.

5. First Aid and Rescue Operations

Locate and assist any injured workers, ensuring personal safety.

Do not attempt heavy debris removal without proper tools and rescue support.

Provide first aid and keep the victim stable until help arrives.

Ensure clear access paths for medics and responders.

6. Emergency Response Team

NAME	TITLE	CELL PHONE
Emergency Response Team	BCC Safety Team	safety@ecosafi.com

ERT members may be called on short notice. A printed list should be posted in key locations.

7. Reference Documents

Structural Inspection Logs

Warehouse Layout and Structural Design Plan

Facility Evacuation Protocol

Hazard Tagging Procedure

8. Records

Structural failure incident reports

Engineer assessments and clearance forms

Staff injury and evacuation logs

Post-incident photos and investigation findings

9. Approving Authority: Chief Executive Officer

10. Issue Date: 15th January 2026

Next Review: 15th January 2027

Title: Vehicle Accidents (Company Vehicles, Forklifts, Heavy Equipment) Response Procedure

Procedure Number: BCC026/25

Number of Pages: 2

1. Purpose and Scope

- 1.1. Purpose:** To outline emergency actions required in the event of a vehicle-related accident within logistics and supply chain operations to ensure quick response, injury management, and reporting.
- 1.2. Scope:** This procedure applies to company-operated vehicles, forklifts, trucks, and other heavy equipment used within BCC's logistics, warehouse, and distribution operations.

2. Definitions

Vehicle Accident: Any collision, overturning, or incident involving company vehicles or forklifts causing injury, damage, or disruption.

Critical Zone: The immediate area surrounding the vehicle incident where hazards may exist.

Heavy Equipment: Includes forklifts, loaders, cranes, and similar mobile industrial machinery.

Spotter: A trained staff member responsible for guiding vehicle maneuvers in tight or high-traffic zones.

3. Responsibility and Authority

Logistics Coordinator: Leads on-scene response, documents the accident, and coordinates communication.

Safety Officer: Assesses safety risks, ensures incident containment, and initiates internal investigation.

Drivers and Operators: Must stop equipment, remain at the scene, and assist with initial reporting.

All Staff: Avoid entering the critical zone until declared safe.

4. Work Instructions

Stop the vehicle/equipment immediately after an incident.

Turn off the engine and activate hazard signals.

Report the incident to the Safety Officer and Supervisor.

Secure the area and restrict access to the critical zone.

Administer first aid to any injured persons and call emergency responders if needed.

Take photos and measurements if safe; preserve the scene for investigation.

Do not resume equipment operation until cleared by the Safety Officer.

5. First Aid and Rescue Operations

Stabilize any injured workers; do not move them unless there is danger.

Call emergency medical services immediately for serious injuries.

Use fire extinguishers if a vehicle fire risk exists.

Provide emotional support and isolate victims from onlookers if needed.

6. Emergency Response Team

NAME	TITLE	CELL PHONE
Emergency Response Team	BCC Safety Team	safety@ecosafi.com

ERT members may be called on short notice. A printed list should be posted in key locations.

7. Reference Documents

Vehicle Operations SOP

Forklift Safety Procedures

Accident Reporting Form

Spotting and Reversing Guidelines

8. Records

Vehicle accident reports

Driver/operator statements

Injury and treatment records

Insurance and police report documentation

9. Approving Authority: Chief Executive Officer

10. Issue Date: 15th January 2026

Next Review: 15th January 2027

Title: Critical Supply Shortages Response Procedure

Procedure Number: BCC027/25

Number of Pages: 2

1. Purpose and Scope

1.1. Purpose: To outline a contingency response plan to manage critical supply shortages that could impact logistics, manufacturing continuity, or customer delivery commitments.

1.2. Scope: This procedure applies to the procurement, supply planning, inventory control, and distribution operations under the Logistics and Supply Chain Department of BCC.

2. Definitions

Critical Supply: A material, component, or resource without which operations would be significantly impaired.

Stockout: A condition in which a requested item is unavailable for issue or shipment.

Buffer Stock: Predefined safety inventory held to protect against disruptions.

Supply Chain Disruption: Any event that interrupts the normal flow of goods, including delays from suppliers, transportation issues, or regulatory blocks.

3. Responsibility and Authority

Logistics Manager: Leads shortage assessment, coordinates alternative sourcing, and approves crisis-level reallocation.

Warehouse Coordinator: Confirms shortage impact, validates buffer stock, and tracks usage.

Procurement Team: Contacts vendors and identifies substitute sources.

Warehouse Team: Prioritizes distribution based on revised allocation plans.

4. Work Instructions

Identify shortage through system alerts, supplier notification, or warehouse reporting.

Verify stock levels, pending orders, and delivery forecasts.

Convene a response meeting with supply chain, procurement, and logistics leads.

Activate internal communication with relevant departments on the shortage and expected impact.

Explore alternative suppliers or substitute materials.

Allocate remaining stock based on the criticality of demand.

Monitor replenishment status and update management daily until resolved.

5. First Aid and Rescue Operations

Not applicable to physical rescue but may involve production recovery planning.

Prioritize supply to health/safety-related operations (e.g., PPE, fuel for generators).

Flag any impact on emergency stocks or disaster preparedness reserves.

6. Emergency Response Team

NAME	TITLE	CELL PHONE
Emergency Response Team	BCC Safety Team	safety@ecosafi.com

ERT members may be called on short notice. A printed list should be posted in key locations.

7. Reference Documents

Approved Vendor List

Buffer Stock Policy

Emergency Procurement SOP

Daily Stock Monitoring Sheet

8. Records

Stockout reports

Shortage of communication logs

Supply chain risk review minutes

Reallocation and substitution records

9. Approving Authority: Chief Executive Officer

10. Issue Date: 15th January 2026

Next Review: 15th January 2027

Title: Regulatory / Environmental Enforcement Incident Response Procedure

Procedure Number: BCC028/25

Number of Pages: 2

1. Purpose and Scope

- 1.1. **Purpose:** To provide a standardized response for unplanned inspections, investigations, or enforcement actions initiated by regulatory or environmental authorities within Logistics and Supply Chain operations.
- 1.2. **Scope:** This procedure covers all interactions with regulators related to the environment, transport safety, chemical handling, or licensing compliance at BCC logistics, warehouse, and distribution facilities.

2. Definitions

Regulatory Enforcement: Any official visit or action by government, environmental, or licensing authorities.

Notice of Violation (NOV): A formal citation issued for a breach of regulations.

Permit Documentation: Legal approvals required for certain operations (e.g., fuel storage, emissions).

Designated Liaison: Company representative assigned to communicate with regulators.

3. Responsibility and Authority

Compliance Officer / Safety Officer: Serves as official point of contact and manages authority interaction.

Logistics Manager: Supports document access and directs site readiness actions.

Warehouse Team: Cooperates with instructions, ceases activities when requested.

All Staff: Maintain professionalism, avoid speculation, and defer communication to assigned liaison.

4. Work Instructions

Receive and document details of the inspection or incident from the visiting official.

Notify Compliance Officer and Logistics Manager immediately.

Escort the authority to designated safe areas; provide required documentation only.

Cease operations in areas under inspection if instructed.

Record inspector requests, questions, and observations neutrally.

Do not admit fault or speculate—await official guidance from Compliance.

After the visit, initiate internal review and corrective actions if necessary.

5. First Aid and Rescue Operations

Not applicable unless the incident involved injury or environmental hazard.

If a physical spill or release occurred, follow environmental release protocol.

Notify EHS and prepare MSDS and containment reports for submission.

6. Emergency Response Team

NAME	TITLE	CELL PHONE
Emergency Response Team	BCC Safety Team	safety@ecosafi.com

ERT members may be called on short notice. A printed list should be posted in key locations.

7. Reference Documents

Site Environmental Permits

Transport Licensing Files

MSDS Binder and Spill SOP

Past Inspection Reports

8. Records

Inspection and visit logs

Notices of Violation or Compliance Letters

Internal investigation and response reports

Corrective Action Tracking Sheets

9. Approving Authority: Chief Executive Officer

10. Issue Date: 15th January 2026

Next Review: 15th January 2027

Title: Transport and Delivery Incidents Response Procedure

Procedure Number: BCC029/25

Number of Pages: 2

1. Purpose and Scope

- 1.1. **Purpose:** To define the appropriate response measures in the event of transport or delivery-related emergencies, including vehicle breakdowns, route disruptions, or incidents during goods transfer.
- 1.2. **Scope:** This procedure applies to all company-owned or contracted vehicles and drivers operating under BCC's Logistics and Supply Chain Department for raw material collection and customer deliveries.

2. Definitions

Transport Incident: Any unplanned event affecting scheduled deliveries or fleet movement.

Delivery Disruption: A delay or obstruction that prevents timely handover of goods to the intended recipient.

Breakdown Support: External or internal assistance provided to restore vehicle operability.

Proof of Delivery (POD): Documented confirmation of goods successfully received at destination.

3. Responsibility and Authority

Logistics Coordinator: Monitors vehicle movement, receives alerts, and dispatches support; Verifies vehicle condition and recovery, and communicates with customer service.

Drivers: Must report incidents immediately, secure cargo, and follow safety protocols.

Customer Service Team: Notifies recipients of delays and adjusts delivery schedules.

4. Work Instructions

Driver alerts Transport Coordinator via phone or radio with location and nature of incident.

Assess whether support is needed (mechanical, towing, medical, security).

Deploy response team or third-party recovery service.

Inform client of potential delay and reschedule delivery as needed.

Secure cargo to prevent theft, loss, or environmental damage.

Complete incident report and submit it to Fleet Supervisor within 24 hours.

Review route, vehicle, and delivery plan to identify corrective actions.

5. First Aid and Rescue Operations

In case of injury, driver or witness calls emergency services and provides first aid if trained.

Use safety triangles and wear high-visibility clothing when stopped roadside.

Secure accident scene and provide accurate info to responders.

6. Emergency Response Team

NAME	TITLE	CELL PHONE
Emergency Response Team	BCC Safety Team	safety@ecosafi.com

ERT members may be called on short notice. A printed list should be posted in key locations.

7. Reference Documents

- Driver Emergency Contact List
- Transport Risk Register
- Delivery SOP
- Proof of Delivery Procedure

8. Records

- Driver incident reports
- Delivery failure logs
- Communication records with clients
- Vehicle recovery and maintenance reports

9. Approving Authority: Chief Executive Officer

10. Issue Date: 15th January 2026

Next Review: 15th January 2027

Title: Environmental Releases Affecting Community Response Procedure

Procedure Number: BCC030/25

Number of Pages: 2

1. Purpose and Scope

- 1.1. Purpose:** To establish emergency protocols for responding to chemical or material releases from logistics and supply chain operations that could impact the surrounding community or environment.

1.2. Scope: This procedure applies to fuel handling areas, bagasse storage, chemical transport, and any other logistics operations at BCC that could result in off-site environmental exposure.

2. Definitions

Environmental Release: Uncontrolled discharge of hazardous substances (e.g., fuel, smoke, dust, runoff) into the environment.

Community Exposure: When nearby residents, property, or water sources are affected by operational hazards.

Notification Threshold: Predetermined volume or severity at which authorities and the public must be informed.

Containment Measures: Steps taken to stop further spread of hazardous material.

3. Responsibility and Authority

Safety Officer: Leads emergency response and external communication.

Warehouse Coordinator: Assesses site of release and halts source activities.

Environmental Compliance Officer: Determines reporting needs and interfaces with regulators.

Drivers and Staff: Alert supervisors, evacuate if required, and avoid contaminated zones.

4. Work Instructions

Identify type and extent of release (chemical, dust, smoke, water runoff).

Notify internal Safety and Environmental contacts immediately.

Evacuate affected workers and suspend logistics operations near the source.

Activate spill containment or emission shutdown measures.

If offsite impact is suspected, notify relevant authorities and prepare community advisory.

Document release conditions and actions taken.

Conduct post-event environmental sampling and reporting.

5. First Aid and Rescue Operations

Move exposed individuals to fresh air or clean areas.

Provide eyewash or skin rinse if applicable.

Call medical services for respiratory or chemical exposure symptoms.

Isolate affected zones and prevent re-entry until cleared.

6. Emergency Response Team

NAME	TITLE	CELL PHONE
Emergency Response Team	BCC Safety Team	safety@ecosafi.com

ERT members may be called on short notice. A printed list should be posted in key locations.

7. Reference Documents

Spill Control SOP

Environmental Permit Conditions

Community Health and Safety Policy

Emissions and Waste Handling Records

8. Records

Environmental incident reports

Regulator notification forms

Community advisory communications

Spill and emissions logs

9. Approving Authority: Chief Executive Officer

10. Issue Date: 15th January 2026

Next Review: 15th January 2027

Title: Material Handling Accidents Response Procedure

Procedure Number: BCC031/25

Number of Pages: 2

1. Purpose and Scope

1.1. Purpose: To outline immediate response procedures for accidents involving the manual or mechanical handling of materials, including lifting, loading, unloading, and stacking activities.

1.2. Scope: This procedure applies to all staff and contractors engaged in material handling tasks across the Logistics and Supply Chain operations at BCC.

2. Definitions

Material Handling Accident: An event involving dropped loads, pinch/crush injuries, falls during lifting, or equipment misuse during material movement.

Manual Handling: Lifting, carrying, pushing or pulling loads without mechanical aid.

Mechanical Handling: Use of tools such as forklifts, pallet jacks, hoists, or conveyors.

Unsafe Load: Any object too heavy, unbalanced, or hazardous to move without proper controls.

3. Responsibility and Authority

Warehouse Coordinator: Leads incident response and scene control.

Safety Officer: Coordinates injury assessment, reporting, and corrective measures.

Equipment Operators: Must stop operations and secure equipment post-incident.

All Staff: Immediately report incidents and cooperate with rescue efforts.

4. Work Instructions

Stop all handling operations in the affected area.

Assess for injuries and call first aid or emergency medical help.

Prevent others from entering the scene; mark off with cones or tape.

Use safe lifting aids to free trapped individuals if safe to do so.

Document equipment settings, load position, and worker statements.

Re-inspect tools, equipment, and procedures before resuming work.

5. First Aid and Rescue Operations

Do not move injured persons unless in immediate danger.

Stop bleeding and immobilize limbs if fractures are suspected.

Use mechanical aids or lifting teams to shift heavy loads off victims.

Transport injured persons to medical facilities as advised.

6. Emergency Response Team

NAME	TITLE	CELL PHONE
Emergency Response Team	BCC Safety Team	safety@ecosafi.com

ERT members may be called on short notice. A printed list should be posted in key locations.

7. Reference Documents

Manual Handling Guidelines
Forklift Safety SOP
Load Rating and Stacking Limits Chart
First Aid Response SOP

8. Records

Incident and injury reports
Equipment re-inspection logs
Worker witness statements
Return-to-work assessments

9. Approving Authority: Chief Executive Officer

10. Issue Date: 15th January 2026

Next Review: 15th January 2027

Title: Natural Disasters (earthquake or floods) Response Procedure

Procedure Number: BCC032/25

Number of Pages: 3

1. Purpose and Scope

- 1.1. Purpose:** Describes the guidelines that will be applied in the event of a medical emergency. It outlines the course of action to personnel in the management and employees on how to proceed in such situations. This procedure aims to provide a seamless response to such occurrences.
- 1.2. Scope:** This procedure is applicable to all personnel working at BCC plant and its drying fields, including its customers and visitors.

2. Definitions

Earthquake: A sudden violent shaking of the ground, typically causing great destruction, because of movements within the earth's crust or volcanic action.

Floods: an overflow of a large amount of water beyond its normal limits.

Crouch: To bend one's body low to the ground, usually by bending knees and leaning forward slightly(squat).

Stall: stop running.

3. Responsibility and Authority

Operations Manager: Ensure adequate resources are available to mount an adequate response and ensure effective communication with all stakeholders, including Directors and applicable statutory authorities.

HSE Officer: Carry out relevant assessments and establish the effects of the Earthquakes for onward action.

Employees: Ensure personal safety by following emergency instructions and assisting others if safe to do so.

4. Work Instructions

In the event of floods, if Indoor:

Be ready to evacuate as directed by the HSEO or Emergency Response team and/or the shift supervisor.

Follow the recommended primary or secondary evacuation routes.

If outdoors:

Climb to high ground and stay there.

Avoid walking or driving through flood water

If the car stalls, abandon it immediately and climb to higher ground.

Earthquakes:

If inside:

Stay inside a secure building. Remain under cover.

Move away from windows, shelters, and heavy objects, including furniture and bookshelves.

Take cover under a desk, table, or counter.

If shelter is not available, move to an inside wall or corner, turn away from windows, kneel beside a wall, bend head down, and put your hands.

If notebooks or jackets are handy, hold these over your head for protection from flying glass and ceiling debris.

If outside:

Remain in a safe area.

Move to an open space, away from buildings and overhead power lines.

Lie down or crouch low to the ground to prevent falling.

5. First Aid and Rescue Operations

Administration of first aid is restricted to trained first aiders.

Employees assigned rescue responsibilities under the Emergency Responsibility Assignment policy shall provide assistance.

Do not enter unstable or flooded areas.

Watch for falling objects, live electrical wires, and gas leaks.

Use PPE (gloves, boots, helmet if available).

Call Emergency Services immediately

Check responsiveness and breathing.

Prioritize: Unconscious persons, Severe bleeding, Suspected fractures or spinal injuries

Do not move injured persons unless they are in immediate danger.

Severe Bleeding: Apply firm direct pressure; Elevate limb if possible

Fractures / Crush Injuries: Immobilize; Do not realign bones

Breathing Problems: Move to fresh air; Monitor breathing; Provide CPR if trained

Flood Exposure: Remove wet clothing; Keep the person warm.

6. Emergency Response Team

NAME	TITLE	CELL PHONE
Emergency Response Team	BCC Safety Team	safety@ecosafi.com

ERT members may be called on short notice. A printed list should be posted in key locations.

7. Reference Documents

Occupational Health and Safety Act 2007

8. Records

Incident report

Accident reports

Insurance records

9. Approving Authority: Operations Manager

10. Issue Date: 02nd January 2026

Next Review: 02nd January 2027

Title: Electric shock and electrocution Response Procedure

Procedure Number: BCC033/25

Number of Pages: 2

1. Purpose and Scope

1.1. Purpose: To ensure rapid and safe response to electric shock incidents and minimize secondary hazards to rescuers by providing clear work instructions and first aid.

1.2. Scope: This plan applies to all personnel working in areas with electrical equipment, high voltage equipment or energized machines.

2. Definitions

Electric shock: Injury caused when the human body comes into contact with an electric current.

Electrocution: Fatal electric shock due to exposure to high voltage or prolonged current.

Isolation: the process of disconnecting electrical sources to prevent further harm during rescue.

3. Responsibility and Authority

HSE Officer/supervisor: Activate emergency procedures, coordinate rescue and ensure scene safety.

Employees: Alert the emergency response team, avoid touching the victim while energized and clear the area.

Rescue team/ first aiders: perform safe disconnection of power, rescue the victim, and provide first aid.

4. Work Instructions

Ensure you're safe before attempting a rescue.

Identify the source of electricity.

Turn off the circuit breaker or unplug the equipment.

If direct isolation is not possible, use insulated or non-conductive objects (dry wooden stick) to separate the victim from the source.

Do not touch the victim while the circuit is live.

Once the victim is free from the electrical source, move them to a safe location.

If electrocution occurs, immediately switch off the power, and keep all bystanders clear.

If there is no pulse or breathing, commence CPR.

Call emergency services immediately.

5. First Aid and Rescue Operations

Check ABC.

Begin CPR if necessary

Treat electric burns if any

Monitor victim until medical help arrives

6. Emergency Response Team

NAME	TITLE	CELL PHONE
Emergency Response Team	BCC Safety Team	safety@ecosafi.com

ERT members may be called on short notice. A printed list should be posted in key locations.

7. Reference Documents

Fire Risk Reduction Rules 2007

Electricity Act Cap 411

8. Records

Incident investigation reports

First aid treatment records

General register records

Medical reports

WIBA claim forms

9. Approving Authority: Operations Manager

10. Issue Date: 02nd January 2026

Next Review: 02nd January 2027

6. STAKEHOLDER ENGAGEMENT

All the people and organizations that BCC may have impacted are considered the Company's Stakeholders. An effective stakeholder engagement ensures that diverse perspectives are considered and that there is transparency and collaboration throughout the process. It can be approached by first identifying who these stakeholders are, understanding their interests and concerns, developing an Engagement Plan, engaging with them, monitoring and evaluating the engagement, and sustaining long-term relationships with them.

Effective stakeholder engagement is critical to the success of any project or initiative, ensuring that all relevant voices are heard and that the outcomes are broadly supported.

6.1. Stakeholder Mapping – identification and analysis

The first step in the process of engagement with the stakeholder is to identify those who are affected by or have an interest in the company's operations, they can be internal or external to the company. After the identification, it is necessary to list and register their interests and concerns, and if their concerns or interests are the same, the stakeholders can be grouped to make the engagement process easier. The environmental and social key risks previously identified can help in identifying those stakeholders.

STAKEHOLDER	ISSUES/CONCERNS/INTERESTS
a. Employees	Fair recruitment and employment terms, Timely and accurate payment of wages and benefits, Safe and healthy working conditions, Access to grievance and disciplinary procedures, Equal opportunity, non-discrimination, and gender equity, Job security, performance management, and career development, Protection from harassment, exploitation, and abuse (SEAH), Access to medical and insurance benefits,



STAKEHOLDER	ISSUES/CONCERNS/INTERESTS
	Support during emergencies or fatalities
b. Employer	Clean environment, Financial sustainability Recognition, Efficiency and productivity, Protecting company reputation and stakeholder trust, Business continuity, Employee retention, Compliance
c. Local Community	Employment opportunities Fair labor practices, Health, safety, and environmental considerations, Respectful engagement and community relations
d. Government and Regulatory Authorities (Ministry of Labour, occupational safety and health authorities, statutory bodies (e.g., NSSF, NHIF), and tax authorities).	Compliance with national labor laws and regulations, Workplace health and safety standards, Statutory contributions and reporting, Employment contracts and records
e. County Govt.	Compliance (Trade License, Distribution permits)
f. Environmental Authority (NEMA)	Regulatory compliance (waste management, pollution), Regulatory fees
g. Non-Governmental Organizations (NGOs) working on labor rights, gender equality, occupational health, or community development.	Ethical employment practices, Gender equity and inclusion, Protection of vulnerable groups, Compliance with social safeguards
h. External Auditors and Certification Bodies	Accurate HR documentation and records, Compliance with labor, social, and governance standards, Evidence of grievance mechanisms and corrective actions, Ethical employment practices
i. Legal Advisors	Accurate and complete information, Compliance with labor and employment laws, Risk mitigation and dispute resolution



STAKEHOLDER	ISSUES/CONCERNS/INTERESTS
<p>j. Insurance and Benefits Providers.:</p> <p>Providers of medical insurance, work injury benefits, and other employee-related insurance cover</p> <p>Providers of motor vehicles and property covers</p>	<p>Accurate employee data,</p> <p>Timely premium payments,</p> <p>Claims management and reporting,</p> <p>Workplace risk mitigation, compliance to regulations</p>
<p>k. Training and Capacity-Building Providers</p>	<p>Clear scope of work and contractual terms,</p> <p>Timely payment for services,</p> <p>Alignment of training with BCC's needs and values</p>
<p>l. Investors, Donors, and Partners</p>	<p>ESG and labor compliance,</p> <p>Reputational risk management,</p> <p>Transparency and accountability,</p> <p>Workforce stability and capacity</p>
<p>m. Suppliers of HR-Related Services - Suppliers of payroll services, HR systems, recruitment services, training services, and occupational health services.</p>	<p>Clear contractual arrangements,</p> <p>Timely payments,</p> <p>Accurate information sharing,</p> <p>Long-term business relationships profitability</p>
<p>n. Suppliers (equipment and materials)</p>	<p>Compliance clauses in contracts,</p> <p>Payments,</p> <p>Profitability</p>
<p>o. Customers</p>	<p>Customer care services,</p> <p>Compliance,</p> <p>CSR,</p> <p>Sustainability,</p> <p>Quality Products,</p> <p>Brand reputation</p>
<p>p. Contractors</p>	<p>Regulatory Compliance clauses in contracts,</p> <p>Payments</p>
<p>q. SONY Sugar Company LTD and Transmara Sugar Company LTD</p>	<p>Efficient waste management(bagasse),</p> <p>Compliance & environmental responsibility,</p> <p>Operational continuity\</p>

STAKEHOLDER	ISSUES/CONCERNS/INTERESTS
r. Job Candidates and Prospective Employees	Transparent and fair recruitment processes, Equal opportunity and non-discrimination, Clear communication on roles, terms, and expectations, Data privacy during recruitment

6.2. Stakeholder Categorization

The categorization process consists of defining to what degree the stakeholders influence the company (Power) and how the company impacts the stakeholders (Interest). This degree varies from low to high as shown on the Power/ Interest Grid shown below.

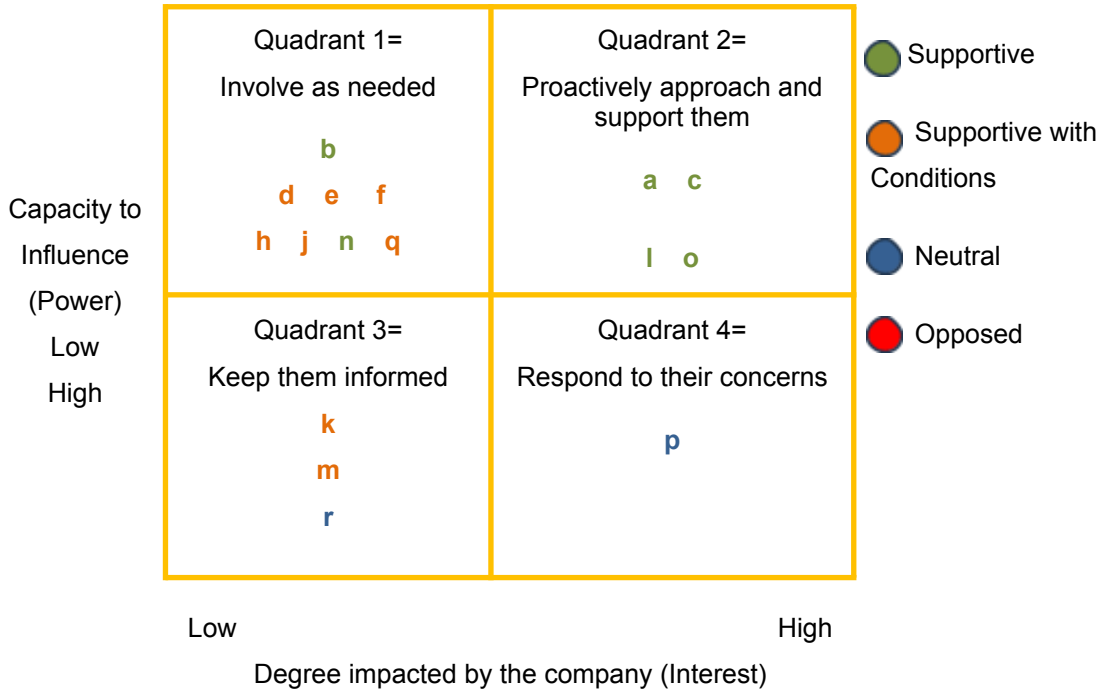
High power - High interest (Q2): these are the stakeholders, are decision makers and have the biggest impact on the project success and hence you must closely manage their expectations – **Proactively approach and support them.**

High power - Low Interest (Q1): these are the stakeholders needed to be kept in loop, these stakeholders need to be kept satisfied even though they aren't interested, because they yield power. These types of stakeholders should be dealt with cautiously as well, since they may use their power in an undesired way in the project if they become unsatisfied – **Involved as needed.**

Low power – High interest (Q4): keep these people adequately informed and talk to them to ensure that no major issues arise. These people can often be very helpful with the details of your project – **Respond to their concerns.**

Low power - low interest (Q3): monitor these people, but do not bore them with excessive communication – **Keep them informed.**

Categorization also implies defining what the stakeholder's current relationship with the company is, it can be supportive, supportive with conditions, neutral, or opposed. The categorization results will define the engagement method to be used with each group.



6.3. Stakeholder Engagement Plan

Based on the information above, the BCC prepared a Stakeholder Engagement Plan. This plan will define how to engage with each of the groups listed. The most affected groups, and those that can greatly influence the BCC, are the ones that will need more attention, however, this does not necessarily mean that the stakeholders with low influence or less affected will be ignored. The SEP addresses all the stakeholders currently identified, and it may or may not change over time, depending on the changes or needs of BCC.

STAKEHOLDER ENGAGEMENT PLAN				
Stakeholder	Concerns	Engagement method	Information to disclose and report back	Most valuable info to obtain
a. Employees	Fair recruitment and employment terms Timely and accurate payment of wages and benefits Safe and healthy working conditions Access to grievance and disciplinary procedures Equal opportunity, non-discrimination, and gender equity Job security, performance management, and career development Protection from harassment, exploitation, and abuse (SEAH) Access to medical and insurance benefits Support during emergencies or fatalities	Grievance mechanism (open at all times) Regular staff meetings (monthly/quarterly) One-on-one performance and well-being check-ins (annually) Staff surveys (annually) HR notices via email and notice boards (weekly/as needed) Tuesdays & Thursdays (TBTs) Quarterly safety committee meetings Toolbox talks Safety Committee meetings Suggestion box	HR policies and procedures Health and safety guidelines (Workplace hazards & controls, safe working procedures) Updates on benefits, payroll, and statutory contributions Survey results (aggregated) Policy and procedural changes	Employee expectations on fair treatment, safety, and benefits Feedback on wellbeing, harassment, discrimination, or grievances Suggestions for improving workplace practices Workers feedback Training gaps/needs
b. Employer	Clean environment Returns	Management meetings Emails	Production performance Compliance status	Resources availability

STAKEHOLDER ENGAGEMENT PLAN

Stakeholder	Concerns	Engagement method	Information to disclose and report back	Most valuable info to obtain
		Cellphone communications Weekly/as needed	Stakeholders issues	
c. Local Community	Employment opportunities Fair labor practices Health, safety, and environmental considerations Respectful engagement and community relations	Community meetings (periodic) Engagement via local leaders Community grievance mechanism Cellphone communication Quarterly CSR meetings	Job opportunities and policies Responses to grievances Social impact updates Nature of operations Environmental Controls	Community concerns and expectations Feedback on BCC's presence Local leadership structure
d. Government and Regulatory Authorities (Ministry of Labour, occupational safety and health authorities, statutory bodies (e.g., NSSF, NHIF), and tax authorities).	Compliance with national labor laws and regulations Workplace health and safety standards Statutory contributions and reporting Employment contracts and records	Statutory reporting (as required) Inspections and audits Formal correspondence Incident reporting. Actioning compliance issues As required/during inspections	Employment records and contracts Statutory contribution records Labour practices, safety performance & incidents (DOSHS), compliance status	Regulatory guidance and updates on Labour laws OSH requirements and policies Compliance expectations and best practices Inspections findings/recommendations
e. County Govt.	Compliance (Trade License, Distribution permits)	Permit application Inspections Annually/as per regulations	County laws to comply with Business permits and licenses	County regulatory requirements Permit/ license renewal timelines & charges Changes in county by laws



STAKEHOLDER ENGAGEMENT PLAN

Stakeholder	Concerns	Engagement method	Information to disclose and report back	Most valuable info to obtain
f. Environmental Authority (NEMA)	Regulatory compliance (waste management, pollution), Regulatory fees	Submission of annual environmental monitoring report License application Audits Inspections Actioning compliance issues License/audit renewals	Progress on environmental issues Environmental incidents Results of environmental monitoring	Water management control measures in place Changes in regulations License/permit use conditions Further corrective actions to implement
g. Non-Governmental Organizations (NGOs) working on labor rights, gender equality, occupational health, or community development.	Ethical employment practices Gender equity and inclusion Protection of vulnerable groups Compliance with social safeguards	Ad hoc consultations Policy sharing when relevant	Relevant policies (gender, SEAH, labor) High-level labor practice updates	Best practices Feedback on social safeguards
h. External Auditors and Certification Bodies	Accurate HR documentation and records Compliance with labor, social, and governance standards Evidence of grievance mechanisms and corrective actions Ethical employment practices	Scheduled audits and assessments Document sharing and interviews	HR policies and procedures Audit evidence and records Corrective action plans and follow-up	Audit findings and recommendations Areas for improvement

STAKEHOLDER ENGAGEMENT PLAN

Stakeholder	Concerns	Engagement method	Information to disclose and report back	Most valuable info to obtain
i. Legal Advisors	<p>Accurate and complete information</p> <p>Compliance with labor and employment laws</p> <p>Risk mitigation and dispute resolution</p>	<p>Ad hoc consultations</p> <p>Legal briefs and case updates</p>	<p>HR policies and case details</p> <p>Employment disputes and risks</p>	<p>Legal guidance and recommendations</p>
<p>j. Insurance and Benefits Providers:</p> <p>Providers of medical insurance, work injury benefits, and other employee-related insurance cover</p> <p>Providers of motor vehicles and property covers</p>	<p>Accurate employee data</p> <p>Timely premium payments</p> <p>Claims management and reporting</p> <p>Workplace risk mitigation</p> <p>Compliance to regulations</p>	<p>Regular communication for payroll and claims</p> <p>Contract management meetings</p> <p>Incident and claims reporting</p> <p>Policy reviews</p> <p>Risk controls as per insurance advise (annually, upon accident occurrence)</p>	<p>Employee data and eligibility</p> <p>Claims and incident reports</p> <p>Policy/cover conditions</p> <p>Incidents reports/claims</p> <p>Risk category of the company</p>	<p>Service performance feedback</p> <p>Risk insights</p>
k. Training and Capacity-Building Providers	<p>Clear scope of work and contractual terms</p> <p>Timely payment for services</p> <p>Alignment of training with BCC's needs and values</p>	<p>Contractual meetings and planning</p> <p>Training evaluations</p>	<p>Training objectives and requirements</p> <p>Feedback on training outcomes</p>	<p>Suggestions to improve learning and skills outcomes</p>
l. Investors, Donors, and Partners	<p>ESG and labor compliance</p> <p>Reputational risk management</p> <p>Transparency and accountability</p> <p>Workforce stability and capacity</p>	<p>Reports and briefings (quarterly / annual)</p> <p>Meetings and due diligence engagements</p>	<p>HR and labor compliance indicators</p> <p>Serious incidents and mitigation actions</p>	<p>ESG expectations</p> <p>Reporting requirements</p>

STAKEHOLDER ENGAGEMENT PLAN

Stakeholder	Concerns	Engagement method	Information to disclose and report back	Most valuable info to obtain
			Workforce capacity information	
m. Suppliers of HR-Related Services - Suppliers of payroll services, HR systems, recruitment, training, and occupational health services.	Clear contractual arrangements Timely payments Accurate information sharing Long-term business relationships Profitability	Contract management meetings Regular communication	Scope of work and expectations Payment timelines	Service performance feedback Improvement recommendations
n. Suppliers (equipment and materials)	Compliance clauses in contracts Payments Profitability	Delivery and quality reviews Procurement meetings As needed	Products specifications, payment terms Procurements SOPs	Supply reliability Pricing trends
o. Customers	Customer care services Compliance CSR and Sustainability Quality Products Brand reputation	Grievance mechanism Cellphone communication Contract review meetings As per contract	Policy and customer satisfaction Product pricing/changes	Product performance
p. Contractors	Regulatory Compliance clauses in contracts Payments	Pre job meetings Contract performance reviews Emails, cellphone communication	Scope of work, site safety & environmental requirements Performance expectations	Contractors' certifications Resource capacity

STAKEHOLDER ENGAGEMENT PLAN

Stakeholder	Concerns	Engagement method	Information to disclose and report back	Most valuable info to obtain
		Contract renewal, during contract period		
q. SONY Sugar Company LTD and Transmara Sugar Company LTD	Efficient waste management(bagasse) Compliance & environmental responsibility Operational continuity\	Contract reviews, supply coordination meetings Joint planning discussions Monthly	Bagasse collection schedules Payment terms Bagasse collection capacity	Bagasse availability Supply disruptions
r. Job Candidates and Prospective Employees	Transparent and fair recruitment processes Equal opportunity and non-discrimination Clear communication on roles terms, and expectations Data privacy during recruitment	Recruitment communications (as needed) Interviews and selection updates	Job requirements Timelines, and terms Selection outcomes	Candidate expectations Feedback on recruitment process fairness

7. EXTERNAL COMMUNICATION AND GRIEVANCE MECHANISM

Effective external communication and a robust grievance mechanism are essential for maintaining positive relationships with external stakeholders and ensuring that concerns are addressed in a fair and timely manner.

7.1. External Communications

The external communication strategy ensures that relevant information is shared with external stakeholders, such as communities, customers, partners, and regulatory bodies, in a transparent and timely manner. Even if there are no affected stakeholders identified, The company must maintain publicly available and easily accessible channels for stakeholders to contact them in necessary (e.g., email address, helpline, forms, etc.).

The BCC external communication procedure will include methods to receive, register, and validate public communications and information requests; assess and prioritize issues raised; provide track, and document responses; and adjust the management program as needed.

7.2. Checklist for Effective Grievance Mechanism

A grievance mechanism should provide accessible channels for stakeholders to contact the company, either openly or anonymously to ask questions, raise concerns, or file complaints related to the organization's activities (e.g., suggestion boxes, hotlines, email, or regular meetings).

It ensures that issues are addressed promptly, fairly, and transparently. A designated person or team should handle all grievances, following procedures for registering, categorizing, investigating, and resolving issues. Additionally, a system should communicate decisions and updates on pending actions, ensuring stakeholders know when to expect a response. The company has also to ensure the confidentiality of individuals involved in the grievance process, respecting their privacy rights.

The most important thing is to make sure the grievance mechanism is understandable, accessible, trusted culturally appropriate and at no cost.

Company implemented a grievance mechanism for external stakeholders. Below are the key aspects of the BCC grievance mechanism.

KEY ASPECTS OF EFFECTIVE GRIEVANCE MECHANISMS	COMPANY'S METHOD
Provide ease of access to confidentially communicate or file complaints, including anonymous ones	Form and instructions on website that people can fill in and submit online. https://bettercooking.typeform.com/grievance
	Email address hr@ecosafi.com , info@ecosafi.com
	Telephone hotline. +254711082400
Publicize the system so that stakeholders know it exists and how to access it	Employee handbook, HR policies, and internal emails – Written guidance shared and periodically reinforced.
	Hold a meeting with community leaders and other stakeholders for the general manager/designated community liaison to explain your written procedures.
Foster sense of legitimacy and trust; encourage dialogue and shared responsibility for outcomes	Major cases reviewed by a formal multi-stakeholder oversight body (that includes, for example, the company, representatives from the affected communities, NGOs, academics and/or a municipality representative).
	Provide transparent funding for expert research, so that any collection of evidence is independent and unbiased.
	Resolve the most serious claims through independent mediation.
Be transparent about the process and outcomes	Summarize all cases in detail – include information about whether the complaint was accepted, and provide information about the process and timeline for investigation and resolution of the case.
	Report back to the complainant through a letter/email/community liaison.
Implement a predictable and defined process that includes assignment of responsibility, time limits and monitoring of outcomes	Assign an employee or team to record complaints and work with the relevant staff and external stakeholders to investigate complaints, determine the necessary actions in response, and report back on the outcomes.
Make the system a source of continual learning	Management team periodically reviews complaints and the complaint system to monitor the effectiveness of the system and integrate results into the company's systems.
	Company conducts perception surveys among affected stakeholders to learn about their awareness of the mechanism, and to assess the perceived trustworthiness of and ease of access to the grievance mechanism and its outcomes.

7.3. Grievance Mechanism Procedure

BCC developed grievance mechanisms to ensure that internal (workers) and external stakeholders (including individuals, communities, and groups) can raise concerns, issues, or complaints regarding the company's operations.

7.3.1. Internal Grievance Mechanism

Purpose: To outline how staff grievances and cases touching on discipline will be handled at BCC.

Scope: Any complaint or dispute that may arise from BCC workers.

Open Door Policy

BCC promotes an open-door policy so that employee concerns can be discussed informally before using a formal grievance handling procedure. They ought to instill a spirit of openness and communication among their team.

Employees should initially try to address issues or complaints with their respective supervisors through the "Open Door" policy. However, if the employee chooses not to do this for any reason, or if the issue or complaint persists after doing so, they should bring it up with HR.

Each case will be handled as confidentially as is reasonable under the circumstances, and anyone who reports a problem in good faith will not have their employment negatively impacted. Retaliation will not be tolerated against anyone who raises a problem or concern.

All employees are free to express their ideas to management.

Procedure steps

1. Formal Filing of a Grievance

The employee may pursue a formal filing procedure under the guidance of HR if an open door policy approach to conflict settlement between the parties is unsuccessful. When formal complaint is lodged, grievance handling will be guided by the following principles:

Confidentiality. An allegation against someone will only be known to those involved in making or investigating a complaint. Everyone involved in the investigation must keep all confidential information about the case.

Impartiality. Both parties will be given an equal opportunity to explain and offer details during the investigation, and no assumptions will be formed before all the information is available. Management will take all necessary steps to ensure no victimization occurs against anyone who makes a complaint.

Timeliness. We will respond as soon as we can to all allegations or concerns. The goal is to settle all claims within two weeks of the staff member receiving the complaint and conducting the investigation. The complainant will be advised of the next steps within 24 hours.

Fairness. Everyone concerned will get fair treatment, and every claim will be considered carefully. If they choose to do so choose, all parties involved will have access to support and representation throughout the process.

2. Lodge a formal complaint

- The complainant will submit a written complaint detailing their grievance to Human Resources.
- The other party will then be informed by HR that a complaint has been made against them, providing details of the complaint within 48 hours of complaint being raised
- The accused will provide a written response to the complaint.
- After that, HR will carry out an investigation by interviewing both the complainant and the accused and compiling information from any other sources that might have information related to the complaint.
- HR will compile a report based on the investigations A resolution meeting is held and the agreed outcome is documented. The worker can bring one or two peers for support during this meeting; those workers will also be covered under the non-reprisal clause.

3. What happens after a complaint has been lodged and investigations done?

HR will hold a meeting with the complainant and the accused to give details of the investigation.

A written apology, counseling, a formal warning, disciplinary action, termination, etc. are all possible results of the grievance process and resolution of the matter. The resolution's objectives ought to be to clarify any misunderstandings, to make people aware of how inappropriate their

behavior was, and to stop it from happening again. Similar consequences may be pursued if it is determined that the complaint was frivolous, careless, or malicious rather than true.

If either party is found guilty, disciplinary action will be taken as determined by HR. A letter will be issued to the offender.

This letter should indicate that either party can appeal against the decision. An appeal will be made to the CEO or manager of the one issuing the letter within 7 days of issuance of the letter.

Discipline

BCC encourages its staff to uphold high standards of conduct as per company policy. However, BCC has established disciplinary procedures to deal with non-conformance in the case that an employee disregards the necessary standards.

Disciplinary Measures

1. Verbal Counseling/Warning

Verbal counseling is used as the first step in cases involving minor offenses to control an employee's performance or conduct.

Minor violations are offenses of a less serious character that do not significantly affect the performance of other staff members, customers, suppliers, or members of the general public.

Before the next disciplinary action can be taken, a maximum of three verbal warnings or counseling sessions must be given. A record of the same shall be kept by HR in the employee file.

The validity of a verbal warning or counseling is for one calendar year, and the issuer must make it clear why the warning is being issued.

An employee may appeal a verbal warning issued within a week from the date of issuance of the warning. The appeal will be made to the supervisor's supervisor.

2. Written Warning

Where an employee's performance or conduct has not improved following the Verbal counseling, the employee will be issued with a written warning and a record kept in the personal file. If within this period an employee commits a second offense, he/she shall be served with a second and

final written warning. If the third offense is committed before the final warning, the employee contract may be terminated.

A written warning can be issued if an employee has committed an offense that does not warrant a verbal warning. The Human Resource Department will be in charge of drafting and issuing warning letters and keeping a record of the same. Warning recorded shall be valid for one calendar year.

3. Suspension

In a situation where an employee will be required to be away from work to pave the way for investigation to be carried out, a suspension letter will be issued to the employee. Suspension will be for a maximum of 7 days.

4. Termination and Summary Dismissal

Termination and Summary Dismissal from employment shall be in compliance with Part VI of the Employment Act, 2007."

Disciplinary Hearings

A Disciplinary Hearing shall be held before the termination of any employee. The purpose of the disciplinary hearings will be:

- For the employee to have the opportunity to be heard and make any presentation pertaining to the matter at hand.
- To explain to the employee and their representative the reason why the company is considering disciplinary action/ termination/dismissal.

All the proceedings of the hearing must be recorded, and this will be done in the form of written minutes and will be signed by all members present in the hearing meeting"

The Committee

Once a matter that would occasion a disciplinary hearing has been reported to HR, HR shall carry out investigations to determine if the complaint has any merit. If the complaint is found to be meritorious, HR shall appoint a four-member disciplinary committee who shall decide the way to move forward with the complaint. HR is the chair of the committee.

The Chair of the committee shall inform the Committee of the charges against the employee, and shall serve to the employee Notice of the Disciplinary Hearing against them. Should the same be

deemed necessary by the Committee investigating the case the employee shall be required to leave the office premises upon receipt of the Notice and shall not return until the date of the hearing, to pave the way for investigations.

The hearing

The Disciplinary hearing will be in five stages:

1. Notice Period

An employee that shall be subject to a disciplinary hearing must be informed of the pending proceedings before the disciplinary hearing. The notice should contain the particulars of the charge against the employee, and shall inform the employee of their right to bring a representative who is a fellow employee to the hearing. In case the employee does not want to bring a representative, he/she should put it in writing to HR.

The employee shall be allowed to request any documents that the employee deems necessary. The company may not unreasonably withhold such documents. Where the requested document cannot be availed the HR will explain the reason for the same in writing.

2. Submission of Documentation

Either party must submit the documents that they intend to rely on to the other party before the scheduled date of the disciplinary hearing 24 hours before the time of the meeting

3. The Hearing Process

The hearing shall be an inquisitorial process whereby the Committee will be allowed to question both the employee and any witness brought before them. Minutes of the hearing shall be recorded and shall be signed by all present in the meeting.

The HR shall ensure that the employee has been informed of their right to bring a representative who should be a current BCC employee. Should the employee opt not to have a representative, this should be expressly recorded in the minutes of the hearing.

During the hearing the employee shall be confronted with the relevant facts by the HR laying their case against the employee. The Committee may call witnesses and present documentary evidence against the employee.

The Employee and/ or their representative shall be given the opportunity to study any documents and cross-examine any witnesses called. The employee and/ or their representative shall also be given the opportunity to call any witnesses and present any evidence.

The Committee may request the provision of such other evidence that they deem necessary. Such evidence shall not be unreasonably withheld, delayed or denied.

4. Returning a Verdict

The Committee must deliver a verdict after the disciplinary hearing. The verdict shall be determined by a simple majority of the Committee, where there is a tie the Chairperson's decision shall stand. If the employee is found guilty as charged, the Chairperson must inform the employee of:

- The reasons for finding the employee guilty
- The disciplinary action to be taken against the employee
- The reason for deciding on the disciplinary action

The Employee shall be given the opportunity to address the Chairperson on the applicable disciplinary action. The Chairperson shall inform the Employee of the right to appeal the decision. The decision of the Committee shall remain in force unless overturned by the appeal.

5. Appeal

An employee must inform HR of their intention to appeal the decision of the Committee after being informed of the ruling.

The Appeal shall be before the COO or any person that they may assign to adjudicate the matter on their behalf (their assignee), and a representative of HR who shall record the proceedings. The employee must be given written notice of the date and time of the Appeal.

The employee may have a representative present. The employee may request any further documentation that they deem necessary; this request shall not be unreasonably withheld, denied or delayed.

The COO or their assignee may request any information that they deem to be necessary for the equitable determination of the Appeal.

The decision of the Chair or their assignee shall be final.

Letter confirming the verdict

After the verdict of the Appeal, or the time within which an employee may request an appeal lapse, HR will prepare and send letters confirming the agreed course of action to the Committee members, the accused employee and the COO.

7.3.2. External Grievance Mechanism

- 1. Purpose:** Establish a transparent, fair, and accessible process through which external stakeholders can raise concerns or complaints related to the environmental, social, or operational impacts of BCC activities. It aims to ensure that grievances are addressed in a timely, respectful, and effective manner.
- 2. Scope:** This procedure applies to all external grievances related to BCC operations, including but not limited to product use and safety concerns, community health, safety, and environmental impacts, land access or resource use, labor and working conditions affecting contractors or suppliers, and other social sensitivities. It covers all individuals or groups who may be directly or indirectly affected by the company's operations.

3. Definitions

Grievance/Complaint: Any concern, dissatisfaction, or dispute raised by an external stakeholder (interested or affected parties).

Complainant: The individual raising grievance.

Grievance Mechanism: A formal structure for submitting, processing, and resolving grievances.

Resolution: The agreed-upon outcome or decision addressing the complaint.

4. Procedure description and Responsibilities

Receive: Receive complaints from groups and individuals affected by our operations via proper communication channels

Responsible party: HR department

Timeline: NA

Register: Review grievance type, verify facts and assign responsible personnel

Responsible party: HR department

Timeline:3 working days

Screen and Assess: Engage relevant departments, meet with complainant if needed

Responsible party: HR department

Timeline: 5 working days

Address: Provide an explanation or solution. Discuss and agree on corrective actions

Responsible party: Affected department

Timeline: 5 working days

Document: Document and record the issue and the response

Responsible party: Affected department

Timeline: 5 working days

Track: Track issues raised and actions taken

Responsible party: affected department

Report: Final feedback provided, complainant signs off if satisfied

Responsible party: Affected department and HR

Timeline:10 working days

Update: If unsatisfied, the complainant can escalate to Top Management or 3rd party mediator

Responsible party: HR department

Timeline: 7 working days

5. Reference Documents

BCC Code of Conduct

Grievance Register Form

Stakeholder Engagement Procedure

6. Records

Grievance Log/Register

Grievance Forms

Investigation Reports

Correspondence and Resolution Agreements

7. **Approving Authority:** CEO

8. **Date Issued:** 29th January 2026

Next Review: 29th January 2027

7.4. Grievance Log

Below is an example of a grievance log

1. GRIEVANCE IDENTIFICATION NUMBER	
2. DETAILS OF COMPLAINT	
2.1 When it occurred	
2.2 Where it occurred	
2.3 How it occurred and who was involved	
2.4 Complainant(s)'s story and expectation	
2.5 Date grievance was recorded	
2.5 Place/method grievance was received	
3. PROFILE OF COMPLAINANT(S)	
3.1 Gender	
3.2 Age	
4. CONTACT INFORMATION OF COMPLAINANT(S)	
4.1 Anonymous (Y/N)	
4.2 Phone	
4.3 Email	
4.4 Address	
5. COMPLAINT ACCEPTED (Y/N)	
5.1 COMPLAINT NOT ACCEPTED	
5.1.1 Action taken	Clearly not related to the operations of the organization – rejected
	Labor-related grievances – transfer to Human Resources
	Commercial disputes – transfer to commercial dispute resolution mechanisms or civil court
	Related to governmental policy and institutions – transfer to authorities
	Other
5.1.2 Complainant notified (Y/N)	



5.1.3 Method of notification	
5.1.4 Date of closure	
5.2 COMPLAINT ACCEPTED	
5.2.1 Category of complaint	Particulate emissions to air
	Odor
	Noise
	Effluents
	Company vehicles
	Influx of migrant workers
	Security personnel
	Other
5.2.2 Photos and documentary evidence of legitimacy	
5.2.3 Resolution	First: Internal - Responsible people/division:
	Second: Multi-stakeholder oversight body
	Third: Independent mediation
5.2.4 Resolution/corrective action taken	
5.2.5 Complainant notified (Y/N)	
5.2.6 Method of notification	
5.2.7 Complainant(s) satisfied or appealed	
5.2.8 Photos and documentary evidence of closure	
5.2.9 Resources spent	
5.2.10 Date of closure	
5.2.11 Number of days from complaint to closure	
6. POST CLOSURE MONITORING REQUIRED (Y/N)	
6.1 Method and frequency of monitoring required	
7. PREVENTIVE MEASURES TO AVOID REOCCURRENCE OF SIMILAR GRIEVANCES	
7.1 Suggested preventive actions	

8. ONGOING REPORTING TO THE AFFECTED COMMUNITIES

8.1. Formats and Venues for Ongoing Reporting

- **Community meetings and forums** (e.g., town halls, barazas, civic center meetings) to share updates and receive feedback.
- **Posters and notice boards** at operational sites displaying grievance contacts and reporting channels.
- **Meetings** with community leaders and stakeholder representatives to communicate key issues and resolutions.
- **Written communications** to complainants and stakeholder representatives to confirm receipt and resolution of grievances.
- **Phone calls and emails** to follow up on specific concerns and provide updates on grievance status.
- **Company website** and public information materials (where applicable) to share grievance contact details and SEP information.

Our company engages with affected communities through regular meetings and forums, consultations with community leaders, and the use of notice boards, posters, written communications, phone calls, emails, and public information materials (including its website, where applicable) to share updates and communicate grievance procedures and contact details. The company also follows up on concerns, confirms grievance resolutions, and, when necessary, provides free training sessions to explain grievance resolution processes.

We regularly update local villages (affected Sublocations within the company's Operational administrative locations and communities) on the progress in addressing issues identified through its stakeholder engagement process and grievance mechanisms. We also conduct Community sensitization & informational meetings through Local Chiefs and village managers, participation in Community Liaison Committees (CLC). During these forums, reports are presented in the local and national languages in a clearly interpretable system. When needed, the company also offers free customized training sessions to explain the processes through CLC used to resolve issues raised.

We engage with other institutions, e.g., schools, and offer environmental protection support. Tree seedlings are provided to basic schools and planting sessions organized by us involving affected schools, the community, and local administration. The company also organizes Sports tournaments where affected communities are engaged and their grievances addressed openly.

9. MONITORING AND MANAGEMENT REVIEW

Monitoring and reviewing environmental and social management plans are a key component in the development and implementation of ESMS. It involves continuous assessment and evaluation of the effectiveness of the ESMS in managing and mitigating environmental and social risks associated with BCC operations. This process is crucial to ensure that the ESMS remains relevant, effective, and aligned with regulatory requirements, industry standards, and organizational goals.

The ESMS is related to the PDCA cycle of continual improvement:

- **Plan** – Form and assignment of the team to implement the ESMS;
- **DO** – Development and implementation of the action plans and procedures;
- **Check** – Monitoring;
- **Act** – Review.

This ESMS shall be reviewed whenever necessary, and any significant changes will be informed to all BCC stakeholders.

9.1. Monitoring Plan

Monitoring measures intent (are the nine elements of the ESMS in place), implementation (are the action plans being carried out? Are procedures being followed?), and effectiveness (is the company in compliance with laws and regulations? Is the company making progress toward the overall objectives and targets? How is the company's environmental and social performance in general?).

A key aspect of monitoring is defining relevant indicators. These are quantitative or qualitative measures of progress against set goals. Some indicators might focus on performance, evaluated against the criteria defined in your environmental and social policy. Other indicators can look at the processes or inputs that you use to try to achieve performance.

It is helpful to have a mix of performance and process indicators to get a deeper understanding of whether you are measuring the appropriate things and whether you are taking the appropriate actions.

Based on the Action Plans developed in section 3 (Management Programs), below are the performance and process indicators that BCC will evaluate to see if the actions are being implemented and if the targeted objectives are being achieved.

Risk 1: High energy consumption, due to the use of machinery for the manufacturing process (pellets production)

Objective: To reduce energy consumption during the production process

Target: 10-30% energy consumption savings

PERFORMANCE INDICATORS	
Monitoring Indicators	Monitoring records
Total energy consumption per ton of pellets produced (kWh/t)	Monthly energy consumption report

PROCESS INDICATORS	
Monitoring Indicators	Monitoring records
Percentage of machinery maintained according to the energy-efficiency schedule	Maintenance logbooks
Percentage of recommended energy-saving measures implemented	Energy Efficiency Action Plan

Objective: Ensure machines operate at optimal efficiency to reduce energy consumption.

Target: 5–10% improvement in machine efficiency

PERFORMANCE INDICATORS	
Monitoring Indicators	Monitoring records
Energy savings achieved per machine per month (%)	Monthly comparison report: current vs baseline efficiency
kWh per machine operating hour	Energy Meter Readings Machine Performance Reports

PROCESS INDICATORS	
Monitoring Indicators	Monitoring records
Number of machines checked for operational efficiency per month	Inspection checklist
Percentage of machine operators trained in efficient operation practices	Training Attendance Sheets Competency Assessment Forms

Objective: Neutralise GHG emissions

Target: compensate 70% of calculated annual CO₂-equivalent emissions

PERFORMANCE INDICATORS	
Monitoring Indicators	Monitoring records
Total annual GHG emissions (tCO ₂ e) calculated	GHG Inventory Report Energy and Fuel Consumption Logs Emission Factor Reference Documentation
Percentage of annual CO ₂ -equivalent emissions compensated	Annual carbon offset report

PROCESS INDICATORS	
Monitoring Indicators	Monitoring records
Verification of offset projects for credibility and compliance	Audit/verification reports from independent third parties
Annual GHG inventory prepared and reviewed	HG Calculation Worksheets Management Review Minutes

Risk 2: Occupational exposure to bagacillo from bagasse and other airborne dust

Objective: Prevent dust release

Target: 100% enclosure of feed and discharge points

PERFORMANCE INDICATORS	
Monitoring Indicators	Monitoring records
Percentage of equipment areas with visible dust escape	Dust emission inspection form
Number of complaints related to poor ventilation	Worker complaint log
Number of areas with fully enclosed feed points	Equipment inspection checklist

PROCESS INDICATORS	
Monitoring Indicators	Monitoring records
Frequency of equipment inspections	Inspection calendar Maintenance logs
Number of SOPs for dust-reducing modifications	SOP repository Revision logs
Frequency of internal audit reports verifying adherence	Internal audit tracker

Objective: Protect workers

Target 1: all dust-prone equipment areas cleaned.

Target 2: Achieve 100% PPE compliance in high-dust zones

PERFORMANCE INDICATORS	
Monitoring Indicators	Monitoring records

PPE compliance rate among workers in high-dust zones	Daily PPE checklist Supervisor reports
Percentage of workers trained in PPE usage and risks	Training attendance sheets

PROCESS INDICATORS	
Monitoring Indicators	Monitoring records
Frequency of daily cleaning of dust-prone areas	Cleaning schedule records
Timeliness of PPE replacement and distribution	PPE issuance logs

Objective: Identify early signs of dust-related respiratory issues among workers.

Target: Annual health checks for 100% of exposed workers.

PERFORMANCE INDICATORS	
Monitoring Indicators	Monitoring records
Number of early respiratory issues detected	Health surveillance reports
Number of complaints of breathing difficulties	Medical department logs

PROCESS INDICATORS	
Monitoring Indicators	Monitoring records
Scheduling of annual medical checks	Medical appointment calendar
Compliance with mandatory health assessments	HR tracking sheet

Objective: Reduce health deterioration among sensitive workers.

Target: 100% reassignment within 14 days of medical recommendation.

PERFORMANCE INDICATORS	
Monitoring Indicators	Monitoring records
Percentage of affected workers reassigned within 14 days	HR reassignment logs Medical reports
Percentage of exposed workers receiving medical clearance post-reassignment	Medical clearance forms

PROCESS INDICATORS	
Monitoring Indicators	Monitoring records
Follow up on reassigned workers' health status	Post-reassignment health assessments
Review of alternative task placements	Reassignment approval forms

Risk 3: Worker injuries and chronic conditions due to the presence and constant interaction with heavy machinery and repetitive motion

Objective: Reduce exposure to mental or ergonomic stressors.

Target 1: Automate 1 major task

Target 2: Operational Efficiency



PERFORMANCE INDICATORS	
Monitoring Indicators	Monitoring records
Number of tasks automated	Automation Implementation Report Monthly operations log
Reduction in the number of machinery-related injuries.	Medical records
Decrease in sick leave days linked to physical or ergonomic strain.	HR attendance and sick leave logs

PROCESS INDICATORS	
Monitoring Indicators	Monitoring records
Percentage of tasks assessed for automation feasibility	Task assessment checklist Engineering feasibility report
Percentage of workers trained in ergonomic and machinery safety practices.	Training attendance sheets and materials
Number of high-risk manual tasks assessed for automation.	Task assessment checklist

Objective: Reduce operator errors

Target: 100% workers trained

PERFORMANCE INDICATORS	
Monitoring Indicators	Monitoring records
Percentage of workers trained	Training attendance registers HR training completion records
Reduction in machinery-related incidents.	Operator error logs.
Decrease in near-miss reports.	Near-miss reporting records.

PROCESS INDICATORS	
Monitoring Indicators	Monitoring records
Training frequency and coverage	Training schedule Training feedback forms
Percentage of workers trained in machinery operation and safety.	Training attendance sheets and materials.
Number of refresher training sessions conducted.	Training evaluation and assessment reports.

Objective: Early detection of work-related health changes

Target: achieve at least 75% employee screening

PERFORMANCE INDICATORS	
Monitoring Indicators	Monitoring records
Number of early health issues detected	Medical follow-up reports Occupational health incident logs
Number of employees identified with early-stage health concerns.	HR attendance and sick leave logs.

Decrease in sick leave related to preventable conditions.	Health assessment reports.
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PROCESS INDICATORS	
Monitoring Indicators	Monitoring records
Scheduling and completion of health screenings	Medical appointment schedule HR tracking sheets
Percentage of employees screened for work-related health risks	Screening attendance sheets and results.
Number of follow-up actions initiated after screenings.	Follow-up action logs.

Objective: Offset negative health impacts.

Target: 100% reassignment within 14 days of medical recommendation.

PERFORMANCE INDICATORS	
Monitoring Indicators	Monitoring records
Percentage of affected workers reassigned within 14 days	HR reassignment logs Personnel file updates
Decrease in sick leave days post-reassignment.	Occupational health follow-up reports.
Number of employees maintaining work capacity after reassignment.	Sick leave and attendance records.

PROCESS INDICATORS	
Monitoring Indicators	Monitoring records
Time tracking between medical recommendations and reassignment	HR action log
Percentage of medical reassignment requests actioned within 14 days	Reassignment request forms and approval records.

Risk 4: Worker illnesses and the possibility of hearing impairment due to excessive noise exposure

Objective: Eliminate the noise hazard at the source

Target: Reduce noise levels by 5 dB:

PERFORMANCE INDICATORS	
Monitoring Indicators	Monitoring records
Average noise level at high-noise workstations	Noise measurement reports (sound level meter)
Reduction in measured workplace noise levels (dB).	Noise monitoring reports.
Reduction in hearing impairment cases.	Employee health complaints log.

PROCESS INDICATORS	
Monitoring Indicators	Monitoring records



Frequency of noise monitoring	Noise monitoring schedule Inspection checklists
Completion of equipment maintenance to reduce noise.	Maintenance and inspection records.
Percentage of high-noise areas assessed for mitigation.	Noise control implementation logs.

Objective: Avoid worker exposure to excessive noise

Target: All employees and visitors

PERFORMANCE INDICATORS	
Monitoring Indicators	Monitoring records
Number of unauthorized entries into high-noise zones	Access control logs
Decrease in hearing impairment or threshold shift cases.	Hearing test results.
Number of workers and visitors using hearing protection correctly.	PPE usage and compliance logs.

PROCESS INDICATORS	
Monitoring Indicators	Monitoring records
Installation of warning signage in high-noise areas	Photographic evidence
Number of training sessions on noise hazards and protection conducted.	Training attendance sheets and materials.
Frequency of noise exposure monitoring in work and visitor areas.	Noise monitoring reports.

Objective: Protect employees

Target: 100% involved workers

PERFORMANCE INDICATORS	
Monitoring Indicators	Monitoring records
PPE (hearing protection) compliance rate (%)	PPE compliance audit reports Daily supervisor checklists
Decrease in complaints or reports of noise discomfort	Incident and complaint logs.
Number of workers maintaining normal hearing thresholds.	HR attendance and health follow-up records.

PROCESS INDICATORS	
Monitoring Indicators	Monitoring records
Percentage of workers trained in noise risks and PPE use	Training attendance registers Training evaluation forms
Number of awareness or safety briefings conducted.	Compliance with noise exposure control measures.
Compliance with noise exposure control measures.	Noise control inspection reports.

Objective: Compensate affected workers

Target 1: all employees exposed

Target 2: Reassign affected workers within 30 days of test results.

PERFORMANCE INDICATORS	
Monitoring Indicators	Monitoring records
Percentage of exposed employees receiving audiometric tests	Audiometric test reports Health surveillance database
Reduction in prolonged hearing-related work issues.	Occupational health follow-up reports.
Number of workers successfully reassigned within 30 days.	HR reassignment logs.

PROCESS INDICATORS	
Monitoring Indicators	Monitoring records
Follow-up and compensation actions implemented	Medical follow-up reports Compensation/insurance claim records
Timeliness of reassignment following test results.	HR action tracking sheets for reassignment.
Number of affected employees counseled or guided on next steps.	Communication logs with affected employees.

Risk 5: Potential increased carbon footprint from excessive energy consumption

Objective: Reduce over-reliance of non-renewable sources and high cost of power

Target: 75% use of solar energy for day-to-day operations.

PERFORMANCE INDICATORS	
Monitoring Indicators	Monitoring records
Percentage of total electricity supplied by solar energy	Monthly electricity bills (grid vs solar) Energy balance calculation sheets
Decrease in monthly electricity costs.	Solar energy production logs.
Percentage of total energy sourced from solar.	Sustainability or environmental monitoring reports

PROCESS INDICATORS	
Monitoring Indicators	Monitoring records
Operational status of solar power system	Solar system operation logs Maintenance and fault reports
Number of systems or equipment converted to solar use.	Maintenance logs for solar systems.
Percentage of operations powered by solar energy.	Solar installation and commissioning reports.

Objective: Reducing the carbon footprint

Target: 75% of power usage to be from solar.

PERFORMANCE INDICATORS	
Monitoring Indicators	Monitoring records

Reduction in electricity-related CO ₂ emissions compared to baseline	Baseline vs current GHG comparison report
Percentage of total power consumption is met by solar energy.	Solar energy generation logs.
Decrease in reliance on non-renewable power sources.	Environmental monitoring and sustainability reports.

PROCESS INDICATORS	
Monitoring Indicators	Monitoring records
Accuracy and completeness of energy and GHG data collection	Energy data collection sheets
Percentage of operational areas connected to solar power.	Solar installation and maintenance records
Number of systems converted or upgraded for solar integration	Energy usage tracking sheets.

Objective: To ensure that we are constantly meeting the 75% target of use of renewable power sources

Target: 100% compliance with the target set

PERFORMANCE INDICATORS	
Monitoring Indicators	Monitoring records
Number of non-compliance incidents with renewable energy target	Non-compliance and corrective action logs
Reduction in deviations from the 75% solar usage target.	Solar energy production logs.
Percentage of monthly energy consumption from renewable sources.	Monthly energy consumption reports.

PROCESS INDICATORS	
Monitoring Indicators	Monitoring records
Frequency of internal energy performance reviews	Monthly/quarterly review schedules Review meeting minutes
Number of corrective actions taken when targets are not met	Corrective action logs.
Timeliness of energy usage reviews and audits.	Audit and review documentation

Risk 6: Possibility of fire due to the combustible nature of the material used (sugarcane bagasse)

Objective: Reduce combustibility

Target 1: maintain moisture range between 5-7%

Target 2: Zero visible buildup during inspections.

PERFORMANCE INDICATORS	
Monitoring Indicators	Monitoring records
Average moisture content of stored bagasse	Moisture measurement logs
Percentage of bagasse inspected that meets target range	Inspection verification sheets

PROCESS INDICATORS	
Monitoring Indicators	Monitoring records
Frequency of moisture monitoring	Daily/weekly monitoring logs
Adherence to handling protocols	Supervisor reports Audit logs

Objective: Early detection of fire sources and improve worker readiness for fire events.

Target 1: install device in all areas

Target 2: Conduct drills 2× per year.

PERFORMANCE INDICATORS	
Monitoring Indicators	Monitoring records
Percentage of operational areas with fire detection devices	Fire detection inventory report
Percentage of workers trained in fire response	Fire drill attendance logs

PROCESS INDICATORS	
Monitoring Indicators	Monitoring records
Maintenance of fire systems	Maintenance schedules Inspection records
Frequency of emergency drills conducted	Drill reports Training logs

Objective: Offset and compensate affected workers

Target 1: All insurable company property and staff

Target 2: 100% support cases addressed within 7 days.

PERFORMANCE INDICATORS	
Monitoring Indicators	Monitoring records
Percentage of insured workers and properties	Insurance registry logs
Timeliness of incident reporting and response	Incident forms Response logs

PROCESS INDICATORS	
Monitoring Indicators	Monitoring records
Claims processed and resolved	Compensation claims forms
Post-incident support provided	Staff support documentation

Risk 7: Possibility of collective dismissal due to the vulnerability of the company's business

Objective: Encourage cost saving through voluntary staff downtime and Reduces labour costs without terminating staff

Target: All departments

PERFORMANCE INDICATORS	
Monitoring Indicators	Monitoring records
Percentage reduction in labour costs without terminations	Payroll comparison reports (baseline vs current) Finance cost analysis reports
Decrease in overtime and unnecessary operational expenses.	Departmental attendance and work logs.
Number of employees participating in voluntary downtime programs.	Records of voluntary downtime participation.

PROCESS INDICATORS	
Monitoring Indicators	Monitoring records
Communication of cost-saving measures to employees	Internal communication emails/notices Staff meeting minutes
Percentage of departments implementing voluntary downtime measures	Departmental cost-saving implementation logs.

Objective: Reduce costs

Target: All departments

PERFORMANCE INDICATORS	
Monitoring Indicators	Monitoring records
Total operational cost reduction achieved	Monthly financial performance reports
Decrease in unnecessary expenditures.	HR and operational expense logs.
Achievement of set cost reduction targets per department.	Cost reduction tracking reports.

PROCESS INDICATORS	
Monitoring Indicators	Monitoring records
Regular financial performance reviews conducted	Monthly review schedules
Number of cost-reduction initiatives executed.	Expense monitoring sheets.

Objective: Ensure fairness and protect the company brand if layoffs occur.

Target: Exiting employees

PERFORMANCE INDICATORS	
Monitoring Indicators	Monitoring records
Number of grievances related to the dismissal process	Grievance logs Grievance resolution reports
Number of layoffs conducted in compliance with company policy and labor laws.	HR layoff and exit records.

PROCESS INDICATORS	
Monitoring Indicators	Monitoring records
Communication with affected employees and stakeholders	Employee notification letters Stakeholder communication records
Timeliness of implementing exit and severance processes.	Severance and reassignment processing records.

Objective: Assist laid-off or exiting employees with resources that make it easier for them to transition into new jobs.

Target: Exiting employees

PERFORMANCE INDICATORS	
Monitoring Indicators	Monitoring records
Number of employees supported through training or referrals	Training attendance records Referral or recommendation letters
Feedback ratings from existing employees on the support received.	Exit interview and feedback forms.

PROCESS INDICATORS	
Monitoring Indicators	Monitoring records
Follow up with exiting employees	Follow-up communication records
Percentage of existing employees receiving reference letters or documentation on time.	Reference letter issuance records.
Timeliness of delivering transition resources after notice of exit.	HR transition assistance tracking sheets.

Risk 8: Exposure of communities to air emissions, noise, dust, and possible accidents

Objective: Capture all dust being emitted and reuse it where possible in the production line

Target: 95-100% of all dust being emitted

PERFORMANCE INDICATORS	
Monitoring Indicators	Monitoring records
Percentage of generated dust captured by filtration/cyclone/bag filter systems	Dust collection system reports Maintenance Inspection Records
Tons (or kg) of captured dust reintegrated into production per month	Production Records Material Reuse Log



	Waste Tracking Register
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PROCESS INDICATORS	
Monitoring Indicators	Monitoring records
Operational efficiency of dust capture systems	System inspection checklists
Percentage of scheduled maintenance activities completed on time	Preventive Maintenance Schedule Equipment Service Reports
Number of complaints received per quarter	Grievance Register Community Engagement Reports Corrective Action Log

Objective: Reduce the chances of dust emissions impacting the nearby population.

Target: 100% machine efficiency

PERFORMANCE INDICATORS	
Monitoring Indicators	Monitoring records
Number of uncontrolled dust emission incidents	Incident reporting forms Corrective action reports
Particulate matter levels at nearest community receptor	Air Quality Monitoring Reports Laboratory Analysis Results

PROCESS INDICATORS	
Monitoring Indicators	Monitoring records
Routine inspection of dust-emitting machinery	Inspection checklists
Percentage of monitoring equipment calibrated as scheduled	Calibration Certificates Monitoring Equipment Log

Objective: To ensure that all dust emitting area is worked on immediately

Target: 100% resolution within 24-48 hours of observation

PERFORMANCE INDICATORS	
Monitoring Indicators	Monitoring records
Percentage of dust-related issues resolved within defined timeframe	Corrective action tracking logs Issue closure reports
Number of recurring dust emission cases in the same area	Inspection Reports Root Cause Analysis Reports Maintenance History Log

PROCESS INDICATORS	
Monitoring Indicators	Monitoring records
Assignment and follow-up of corrective actions	Corrective action registers Follow-up verification reports
Frequency of dust inspections during operations	Environmental Monitoring Checklist

	Supervisor Inspection Log HSE Monitoring Reports
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Risk 9: Deficient housekeeping standards

Objective: Ensure gangways and exits are clear at all times

Target: Gangways, workstations, and exits

PERFORMANCE INDICATORS	
Monitoring Indicators	Monitoring records
Slip, trip, and fall accidents	Monthly work-related accident reports
Fire drill observations focusing on response time	Fire Drill records

PROCESS INDICATORS	
Monitoring Indicators	Monitoring records
Percentage of exits kept clear during inspections	Daily/monthly monitoring logs
Number of housekeeping inspections conducted	Inspections checklists

Objective: Maintain an orderly workplace

Target: All identified areas

PERFORMANCE INDICATORS	
Monitoring Indicators	Monitoring records
Number of near misses/injuries related to unsafe stacking	Monthly safety reports

PROCESS INDICATORS	
Monitoring Indicators	Monitoring records
Percentage of stacks within the required heights as per SOP	Stacking SOP
Number of employees trained in safe stacking and housekeeping procedures	Attendance register

Objective: Reduce injury severity from slips and falls

Target: 100% workers

PERFORMANCE INDICATORS	
Monitoring Indicators	Monitoring records
Number of slips, trips and fall injuries	Monthly work-related accident reports
Number of lost hours as a result of Slips trips and fall injuries	Monthly work-related accident reports

PROCESS INDICATORS	
Monitoring Indicators	Monitoring records

Percentage of identified housekeeping issues resolved within the defined timeframe	Corrective Action Register Maintenance Work Orders Hazard Identification Log
Percentage of workers trained annually	Training attendance sheets

Objective: Compensate affected workers

Target: Injured employee

PERFORMANCE INDICATORS	
Monitoring Indicators	Monitoring records
Percentage of employees compensated as a result of entanglement with machines/crush injuries	Dosh forms records Insurance claim forms

PROCESS INDICATORS	
Monitoring Indicators	Monitoring records
Follow-up and compensation actions implemented	Medical follow-up reports Compensation / insurance claim records

Risk 10: Poorly rooted electrical cables laid on the ground within workstations, presenting trip and fall hazards.

Objective: Eliminate trip or electrical hazards, to prevent unsafe cable placement

Target: 100% protected rooting

PERFORMANCE INDICATORS	
Monitoring Indicators	Monitoring records
Trip incidents involving cables	Monthly safety reports
Near misses related to electrical cables	Monthly safety reports

PROCESS INDICATORS	
Monitoring Indicators	Monitoring records
Cables rerouted or protected	Electrical inspection logs
Percentage of electricians trained on proper cable management	Attendance register

Objective: To prevent unsafe cable placement

Target: All identified areas

PERFORMANCE INDICATORS	
Monitoring Indicators	Monitoring records
Number of reported incidents per month/quarter	Accident/Incident Report Forms Incident Register Log Investigation Reports
Percentage of inspected areas without loose ground cables	Workplace Inspection Checklists Cable Management Audit Reports



	Corrective Action Tracking Log
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PROCESS INDICATORS	
Monitoring Indicators	Monitoring records
Number of inspections conducted per month	Scheduled Inspection Reports HSE Monitoring Checklist Supervisor Inspection Log
Percentage of employees trained annually	Training Attendance Sheets Training Materials

Objective: To reduce exposure

Target: All identified areas

PERFORMANCE INDICATORS	
Monitoring Indicators	Monitoring records
Number of reported incidents per month/quarter	Accident/Incident Report Forms Incident Register Log Investigation Reports
Percentage of identified areas compliant during inspections	Workplace Inspection Checklists Cable Management Audit Reports Corrective Action Tracking Log

PROCESS INDICATORS	
Monitoring Indicators	Monitoring records
Number of inspections conducted per month	Scheduled Inspection Reports HSE Monitoring Checklist Supervisor Inspection Log
Percentage of employees trained annually	Training Attendance Sheets Training Materials

Objective: Compensate affected workers

Target: Injured employee

PERFORMANCE INDICATORS	
Monitoring Indicators	Monitoring records
Percentage of employees compensated as a result of entanglement with machines/crush injuries	Dosh forms records Insurance claim forms

PROCESS INDICATORS	
Monitoring Indicators	Monitoring records
Follow-up and compensation actions implemented	Medical follow-up reports Compensation/insurance claim records

Risk 11: Ergonomics risks from repetitive work, poor posture, and manual handling – production units, loading/ unloading

Objective: Reduce exposure to mental or ergonomic stressors.

Target: Manual handling tasks

PERFORMANCE INDICATORS	
Monitoring Indicators	Monitoring records
Number of MSDs injuries reported	Accident reports Risk register
Lost time injuries due to MSDs	Compiling, filing and submission of monthly WIBA sick leave summary reports

PROCESS INDICATORS	
Monitoring Indicators	Monitoring records
Provision of mechanical aids for high-risk tasks, i.e., use of forklifts, conveyor belts	Pre-job risk assessment records
Percentage of employees involved in manual handling trained annually	Training Attendance Sheets Toolbox Talk Records

Objective: Reduce exposure to MSDs, ensure use of proper manual handling and lifting techniques

Target: 100% employees at risk

PERFORMANCE INDICATORS	
Monitoring Indicators	Monitoring records
Number of MSDs injuries reported	Accidents reports Risk register

PROCESS INDICATORS	
Monitoring Indicators	Monitoring records
Training in proper manual handling techniques and lifting	Training attendance sheets
Monitoring the job rotation schedule	Job rotation schedule

Objective: Detect early signs of injury, ensure fitness at work, and support rehabilitation where needed

Target: Ensure 100% of employees exposed to manual labor are subjected to medical surveillance

PERFORMANCE INDICATORS	
Monitoring Indicators	Monitoring records
Results from annual medical exams	Medical examination records
Employees feedback on ergonomics improvement	Training records

PROCESS INDICATORS	
Monitoring Indicators	Monitoring records
Subjecting employees to annual, periodic medical exams	Medical exam report

Objective: Compensate employees

Target: All injured employees

PERFORMANCE INDICATORS	
Monitoring Indicators	Monitoring records
Percentage of employees with musculoskeletal injuries worth compensating	Dosh forms records

PROCESS INDICATORS	
Monitoring Indicators	Monitoring records
Follow-up and compensation actions implemented	Medical follow-up reports Compensation/insurance claim records

9.2. Audit Guidance

Below are the steps that will help BCC to get a broad view of all potential risk areas and elements of the ESMS beyond those that may have been targeted in the initial risk assessment.

A. PREPARATION	
	Collect audit and inspection reports on the company's environmental and labor performance for the previous two years.
	Collect corrective action plans generated from previous audits or inspections and review the status of each action item that was agreed upon. Are they all closed out? Focus your review on open items and the underlying factors that prevent you from completing the corrective action plan.
	Ascertain the general level of PPE use in the organization. Ensure that auditors wear the same PPE as employees are required to wear: head, hearing, eye, skin protection, protective boots, clothing, etc. Do not allow any auditor to enter work areas without the clothing/gear required for the operations activity, and that employees are required to wear.
	Obtain site plans for all the relevant operational areas. Ensure the auditing team has a working knowledge of the operations to be evaluated.
	Research and refer to current local environmental and labor laws and regulations.



	Basic labor code issues: (i) regular weekly work hours, (ii) labor contract provisions, (iii) rest periods, lunch, etc., (iv) overtime requirements, limits and exceptions, (v) hour averaging and banking hours, (vi) minimum wage, (vii) social system payment liability, (viii) annual leave, (ix) laws to protect disadvantaged workers, (x) severance pay.
	Basic environmental code issues: (i) wastewater, (ii) storm water, (iii) spill prevention and response, (iv) construction/demolition/remodeling, (v) hazardous materials, (vi) hazardous waste, (vii) toxic chemical release, (viii) air emissions, (ix) solid waste, x - battery storage, handling and disposal, xi - E waste management, xii - Safe transport of stoves and fuel, xiii - end of life stove recycling.
	Review regulatory permit(s) conditions and specific requirements along with most recent review and corrective action reports.
	Review certification(s) audit reports (e.g., ISO 14001, OSHAS 18001, BSCI or SA8000) for nonconformance, mandatory remedial actions, recommendations, etc. Summarize the status of items (open or closed).
	Review any government inspection reports, third-party audit reports, etc.
	Review the stakeholder engagement plan and records of grievances by external stakeholders. Pay attention to emergency preparedness and response capability to include the community if necessary; use of chemicals and accidental releases of hazardous materials affecting the community, e.g., dyes and chlorine; discharges of wastewater or other wastes to areas affecting local communities; exacerbation of flooding; limits of water availability, use and physical access; diminution of quality of life due to the operation.
	Pay special attention in observation/document review/interviews to issues identified in previous reports.
	Research and understand the national and local context of labor union rights and activity, local environmental groups and community activist organizations.
	Schedule sufficient time to conduct the scope of the audit. Announce the availability of confidential meeting schedules with employees; schedule, arrange and conduct while protecting employee confidentiality.

B. INTRODUCTORY MEETING WITH MANAGEMENT

	Meet with the senior management and department managers before conducting audit activities to review ESMS issues and the purpose of the audit.
	Share an agenda and itinerary for the meeting with senior management and local supervisors.
	With department managers, review the prior audit reports and performance to date in meeting corrective actions.
	Discuss non-retaliation against cooperating workers; inform management that future audits will include reviews of the continued employment of workers interviewed.



C. OPERATIONAL WALK-THROUGH

	<p>Conduct operational walk-through following production processes. Refer to previous relevant physical walk-through assessments of the facility; determine if all previous nonconformance/action items are closed out - if not, why not?</p>
	<p>Minimize the number of managers and supervisors who accompany you on the walk-through. One or two escorts of non-supervisory staff based on knowledge/responsibilities, are usually sufficient.</p>
	<p>During the walk-through, be aware of your body language and the message this sends to workers; ensure that you are equipped with/wearing the same PPE required of employees.</p>
	<p>Take note of all things observed that require attention:</p> <ol style="list-style-type: none"> 1. Water used indiscriminately for watering as well as washing and cleaning 2. Water wastages/inefficiencies 3. Energy wastage 4. Evidence of spillages 5. Dry cleanup and collection of organic solids 6. Harborage or other unorganized storage of materials 7. Wastes and discards 8. Workplace availability of data on hazards or banned or restricted chemicals in use (MSDS/ICSC) 9. Movement of materials: hand trucks, forklifts, etc. Are the passageways and transit routes clearly marked? Is color-coding used for non-pedestrian movement? 10. Obvious hazards for heads, hearing, sight, life, and limb: workplace hazards attenuated; employee awareness? 11. PPE used as prescribed, available, replaced at no cost; employee awareness 12. Are employees able to explain jobs and responsibilities? 13. Evidence of QA team activity.
	<p>Verify that fire exits in buildings (e.g. storage or maintenance areas, administrative buildings, etc.) exist and open on demand; no means to prevent exit; panic bars in good working order; clear egress once exit opened; emergency exits clearly marked; nearest exits clearly marked; hose cabinets equipped with hoses, nozzles, etc.; prohibited areas clearly marked; electrical cabinets closed and sealed; lockout/tag-out procedures and tools (tags, locks, warning labels and signs) clearly available near electrical cabinets; first aid cabinets and equipment; emergency lighting; emergency preparedness and evacuation plans in place; and that employees are trained on using these.</p>
	<p>Ask an employee to show you how to get out, assuming that there is now a fire; follow the employee; ask another to tell/show you what happens if he/she was just injured.</p>



	Indoor working conditions should be verified for adequacy if there is potential for risks such as heat, light, noise and dust. Use measuring devices to determine air quality, noise level, and temperature.
	Following the walk around, conduct a walk-through of the dormitory facilities, canteens, washrooms and changing rooms (if relevant). Note the condition and adequacy of these areas.
	Suggest best practice to supervisors and managers during the walk-through; ensure that the suggestion is filtered by processes/operations practicalities.
	Give sufficient attention to all ESMS elements during the operation/dormitory walk-through. Knowledge of procedures, training using the procedures, awareness of complaints management and resolution procedure, employment rights, HR policy and provisions, etc.
	Pay special attention to areas identified in previous corrective action requests. Focus on open non-conformances from previous audits: why did they occur? Elucidate the underlying cause and try to diagnose and prescribe preventive and ameliorative measures. The individual who is responsible for the item is not as important as why it occurred and how the company can prevent non-conformances and unplanned events in the future.

D. INTERVIEWING WORKERS

	Select at least 5 percent of workers, max. 100 workers. Conduct individual and group interviews for balanced response.
	Select workers who are representative of the workforce population (gender, race, age, religion, functional departments, etc.).
	If the factory has contracted or migrant workers, make sure to include them as well.
	Do not allow supervisors or managers to influence selection of workers for interviews or the interviews.
	Conduct on-site interviews in areas that protect worker confidentiality and where the worker would feel comfortable. Make sure supervisors or managers are not in or near the space where the interviews are conducted. Keep them away from the selection and interview process.
	Conduct interviews early in the audit to allow for follow-up.
	Make sure to tell the workers that everything they say is confidential and that management has been warned against retaliation.
	Be sensitive to cultural and gender issues.
	Plan for an average of fifteen minutes per interview; however, use common sense in terminating interviews that are becoming nonproductive and extending interviews with people who are candid or openly addressing critical issues.
	Formulate questions prior to the interviews to make sure you cover all specific areas of the ESMS review through the aggregated interviews. Always ask employees how processes may be improved, water use reduced, energy saved, waste reduced, etc.



	<p>If you plan to take notes, ask the workers if it is OK and clearly explain reason for taking notes. Try to minimize note taking as much as possible during the interview. Finish writing your notes immediately after the interview, so you have accurate documentation.</p>
	<p>Have your worker representatives recommend a preferred approach to building rapport with workers.</p>
	<p>Ask workers specifically about follow-up on previous corrective action plans. What non-conformances remain open; what issues presented through the complaints management and resolution mechanism remain open?</p>
	<p>Make sure your questions address the following:</p> <p>LABOR ISSUES</p> <ul style="list-style-type: none"><input type="checkbox"/> Do workers know about and understand company policies related to labor and working conditions?<input type="checkbox"/> Do workers understand their rights under the law related to freedom of association and collective bargaining?<input type="checkbox"/> Do workers understand how their wages are calculated for base time, performance and overtime?<input type="checkbox"/> Are workers aware of any dismissal, transfer, demotion or other punitive action against workers due to their exercising their rights under either their contracts or local or national law?<input type="checkbox"/> Ask workers about the status of trade unions, worker committees or other worker groups and whether there is management interference.<input type="checkbox"/> Ask questions to determine conformance to discrimination and sexual harassment policies.<input type="checkbox"/> Do workers understand the company's grievance mechanism, and do they feel it is operational and free from retaliation? <p>OCCUPATIONAL HEALTH AND SAFETY ISSUES</p> <ul style="list-style-type: none"><input type="checkbox"/> Do workers feel safe and protected in their jobs? For example, are they provided with PPE that is appropriate and works? Is their physical environment free of hazards? Are they expected to reduce physical hazards or are engineering controls in place? Are there job hazards assessments done routinely and when the processes or materials change? Have issues submitted through the complaints management and resolution mechanism been addressed?<input type="checkbox"/> Do they feel there is adequate safety equipment, such as extinguishers/hydrants and first aid kits? Are there sufficient safety drills if an emergency, such as a fire, typhoon, flood or windstorm, were to occur and necessitate an evacuation from buildings? Witness the emergency mock drills and make note of shortcomings; ask an employee to pretend he/she has just been injured and explain what to do next.<input type="checkbox"/> Are they instructed and trained on these risks at regular intervals?



<input type="checkbox"/> Have any workers been involved in accidents at the facility and, if so, what happened afterwards? <input type="checkbox"/> Is the environment comfortable to work in, in terms of temperature, exposure to heat and sun?
<input type="checkbox"/> Do they feel that chemicals, waste and other substances are stored or disposed of safely and appropriately at the facility? Is there sufficient access to Material Safety Data Sheets (MSDSs) and/or International Chemical Safety Cards (ICSCs) and appropriate training in their use? What is the management's response to any expressed issues through the complaint management and resolution mechanism?
If the organization employs contract workers, make sure to ask questions that address possible violations and areas of abuse. Do you feel different from a permanent employee? Why?
Conduct some worker interviews off-site if possible.

E. INTERVIEWING AFFECTED COMMUNITIES AND OTHER STAKEHOLDERS

<p>The stakeholder mapping exercises, and stakeholder consultation meetings should help identify the relevant population that is affected by the facility and its activities.</p>
<p>Select a sample of individuals that represent the views of this affected community. This group may include members of the public as well as NGOs, campaign groups, trade unions, local businesses and government authorities. If possible, target NGOs that are industry-specific. Seek out former employees, if possible, but filter out disgruntled former employees or those with a personal agenda against the company.</p>
<p>Gauge awareness of the grievance mechanism. Has it been tested? Does it work? Does the company utilize it in practice or ignore it? Is it taken seriously?</p>
<p>Be sure to include representatives from indigenous or marginalized groups in these interviews.</p>
<p>Make sure your questions address the following:</p> <ul style="list-style-type: none"> <input type="checkbox"/> How have the facility's operations affected the physical environment (air, water, land) near them? <input type="checkbox"/> Has this resulted in either air, land or water contamination? <input type="checkbox"/> Has wildlife been affected by the facility's activities? <input type="checkbox"/> Has the facility's business impacted local livelihoods or access to traditional hunting/ fishing/ breeding/ religious/ other grounds due to natural habitat conversion? <input type="checkbox"/> Have any health risks or deterioration to well-being been associated with the facility from exposure to toxic chemicals, from air emissions or noise pollution? Note any neighbors or employees who have become ill or have ill children. <input type="checkbox"/> Have any contagious or vector-borne diseases been on the rise due to an influx of workers in the area or increase in local vectors (e.g. mosquitos, flies)? Is the community aware of an increase in the rat/mouse or other vermin population?



	<input type="checkbox"/> Have these affected groups had any clashes with security hired at the facility?
	<input type="checkbox"/> Have any of these groups been approached or invited by the company running the facility to discuss their concerns at meetings? Have any of their grievances been addressed or investigated? Has the company followed up on questions? <input type="checkbox"/> Impact of clean cookstove adoption on indoor air pollution <input type="checkbox"/> Reduction of charcoal/firewood dependency in communities <input type="checkbox"/> Community perception of BCC's environmental contribution

F. ON-SITE DOCUMENT REVIEW

LABOR ISSUES:	
	Make sure you review the relevant documents for the following areas:
	1. Human resources: Management-worker committee meeting minutes, memos and letters, budgets related to implementing labor policy, training material, logs and curricula or written communications to workers that address all issues, training records and instructor qualifications.
	2. Working conditions: Contracts for all workers; policies and procedures related to wages, benefits, hours and leave; evidence of communication and training on wage calculation; personnel files; time cards; payroll records and pay stubs (selected without management interference); criteria used to set performance pay bonuses; and employment and termination records.
	3. Are employees' payment methods secured? Can employees opt to have payments deposited into an account? Are employees paid in cash at the facility (which can lead to significant risks during their commute)?
	4. Collective bargaining: Collective bargaining policy, agreement and documentation (such as minutes and records of collective bargaining sessions).
	5. Discrimination: Discrimination policy; related procedures; documentation handling discrimination issues; diversity training and attendance log; hiring, promotion and termination records; gender demographics in facility at worker and manager levels.
	6. Retrenchment: Policies and procedures for workforce reduction, severance and transition; documentation of prior workforce reductions; minutes of management meetings and communications to workers on this issue.
	7. Complaint management and resolution mechanism: Documented procedure, communications, records and logs of grievance handling.
	8. Child labor: Procedure for age verification, documentation of apprentice program, birth and medical records and school records of workers.
	9. Forced labor: Employment contracts (as well as for those workers hired through recruitment agencies), payroll records, timesheets and wage deduction, worker passports and IDs.



	<p>10. Health and safety: Accident and medical treatment logs, equipment safety logs, logs of fire and safety drills, health and safety risk analyses, government health inspection reports, safety certificates and training curriculum and logs, and evidence of changes to all of this when company processes, methods, chemicals, materials are changed, reordered, etc.</p>
	<p>11. Compliance to: Employment Act (Kenya), Occupational Safety and Health Act (OSHA) 2007, NEMA regulations, Data Protection Act, County environmental permits.</p>
	<p>Select files and/or records at random to generate a representative sample of the workforce population and functional distribution in the factory. Seek some files to corroborate interviews conducted earlier.</p>
	<p>Balance your time and effort investigating all areas of labor standards at work. Document review is particularly critical for wages, working hours, health and safety, use of sub-contractors, hiring and termination.</p>
	<p>If the operation employs contract workers, address potential areas of abuse in the document review. Specifically review the contract with the workers.</p>
	<p>Identify all significant incidences of non-conformance in preparation for your management meeting.</p>
ENVIRONMENTAL AND OHS ISSUES:	
	<p>Make sure you review the relevant documents for the following areas:</p>
	<p>1. Emergency response and preparedness: Examine the facility's emergency response procedures and accident reports, as well as documents indicating that workers have been trained on these issues.</p>
	<p>2. Environmental management: Examine any company's environmental policies and environmental management system policies and reports, including sustainability reports, energy consumption records, guidelines and monitoring, resource use and waste generation. Note the status of previously identified non-conformances.</p>
	<p>3. Insurance: Identify documents that indicate legal permits have been obtained, insurance policies are in place and the relevant legal authorities have been notified of the facility's activities.</p>
	<p>4. Technical: Documents on production processes, and storage, purchase and maintenance of facility equipment. Availability of MSDS/ICSCs and employee training and orientation to the specific risk posed by materials in use; response to submissions through the complaint management and resolution mechanism.</p>
	<p>5. Waste disposal: Policies, procedures and guidelines on elimination and recycling of waste emissions and effluents to air, water and land, including monitoring of the quantity and quality, treatment and disposal of all waste, including wastewater and solid waste; are employees/area supervisors queried for opinions on improvements?</p>



<p>6. Hazardous material: Inventory of chemicals and toxicology sheets (MSDS/ICSCs from ILO/WHO/EU/UNEP, etc.). Avoid total reliance upon manufacturer's statements. Does procurement mandate furnish such materials (MSDS/ICSC)?</p>
<p>7. Health and safety: Check for the existence of logs of accident and fatality rates and monitoring of these statistics; health and safety guidelines or handbooks for workers; job hazard analyses and engineering corrections to eliminate hazards at the source, as opposed to requiring employees to mitigate environmental hazards; provision of appropriate PPE that cover actual, defined technical, physical, biological and chemical hazards in the workplace; records of OHS Committee meetings, training, Tool Box safety meetings, etc.</p>
<p>8. Work environment: Look for guidelines, reports, logs and "ecomaps" of the facility work environment that monitor emissions of dust, odors, sources of noise and vibrations and worker exposure to heat and cold. LEL meters and audible and visual alarms are mandatory wherever there may be accumulations of dust or ambient dust.</p>
<p>9. Review of: ESG reporting consistency, Impact reporting accuracy (stoves deployed, emissions reduced), Gender inclusion data, SEAH compliance.</p>
<p>10. During walk-through, include: Warehouse stacking safety, Distribution vehicle safety compliance, Field sales staff PPE use, Safe stove demonstration procedures.</p>

G. CLOSING MEETING WITH MANAGEMENT

<p>Conduct a closing meeting with senior management and department managers.</p>
<p>Present your preliminary findings with particular emphasis on the positives as well as areas for improvement and why. All new and previously existing non-conformances must be addressed. Seek clarification on any findings or issues raised during the audit.</p>
<p>Work with the department managers and supervisors on a corrective action plan that details specific actions to be taken and timelines for their completion.</p>
<p>Go over any outstanding corrective action requests from previous audit reports.</p>
<p>Make sure senior management signs off on the corrective action plan.</p>

10. CONCLUSION

This ESMS provides a robust and comprehensive framework to identify, assess, mitigate, and monitor the environmental and social risks associated with BCC's operations. By integrating these standards into company policies, procedures, and day-to-day practices, the organization strengthens its capacity to implement responsible management, ensure regulatory compliance, and promote sustainable development.

This ESMS also establishes clear roles, processes, and monitoring mechanisms that enable continuous improvement, transparency, and accountability. Its implementation not only enhances the company's operational efficiency and risk management but also fosters positive relationships with stakeholders, protects workers and communities, and safeguards the environment.

Overall, this ESMS positions the company to meet international best practices, improve long-term resilience, and support sustained growth while upholding the principles of environmental stewardship, social responsibility, and good governance.