

PIDG Project HSES Policies

Health, Safety, Environmental and Social Management System (HSES-MS)

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Glossary of terms

Term	Definition
GIIP	Good International Industry Practice is defined as the exercise of professional skill, diligence, prudence, and foresight that would reasonably be expected from skilled and experienced professionals engaged in the same type of undertaking under the same or similar circumstances globally or regionally. The outcome of such exercise should be that the project employs the most appropriate technologies in the project-specific circumstances.
HSES	Health, Safety, Environment and Social
IFC	International Finance Corporation
PIDG	The Private Infrastructure Development Group
PIDG Companies	PIDG Ltd, The Emerging Africa Infrastructure Fund Limited, GuarantCo Ltd, InfraCo Africa Limited, InfraCo Africa Investment Limited, InfraCo Asia Development Pte. Limited, InfraCo Asia Investments Pte. Limited
PIDG Ltd	The Private Infrastructure Development Group Limited
Projects	The projects in which the PIDG Companies invest into and finance
SDG	United Nations' Sustainability Development Goals

1. Introduction

1.1 General overview

PIDG's purpose is to get infrastructure finance moving and multiplying – accelerating climate action and sustainable development where most urgently needed. For communities new infrastructure means opportunities to improve life. We work with public and private partners to bridge financing gaps, directing capital and expertise into Projects that promote climate resilience and sustainable growth. Working throughout the project lifecycle, we reduce financial risk, transform markets and build local capacity, creating a deep and lasting impact.

Responsible investment requires strong HSES governance. At PIDG, we recognise that to meet our values and be able to deliver the responsible investment that we believe in, we must seek to ensure that there is strong HSES governance across the PIDG Companies and use reasonable endeavours to ensure there is strong HSES governance across the Projects.

Effective management of HSES reduces risk to people, reduces risk to the environment and builds climate resilience. The implementation of good HSES practices is increasingly associated with a wide range of business benefits including access to markets, increased investment opportunities, reduced employee turnover, cost efficiencies, enhanced reputation and provides a social license to operate.

The PIDG Project HSES policies set out the overarching commitments to HSES that through our reasonable endeavours we seek to ensure are implemented in all the Projects.

1.2 Structure of the PIDG Project HSES policies

The PIDG Project HSES policies drive HSES governance across the Projects. Their purpose is to define PIDG's intent with respect to all aspects of HSES management in relation to the Projects.

Developed by PIDG Ltd, they are approved by the HSES committee on behalf of the Board of Directors and cascaded to the other PIDG Companies for implementation. They are then cascaded to the Projects through contractual arrangements between the relevant PIDG Company and the project company.

Where the counterparty is a financial investor the PIDG Company uses reasonable endeavours to ensure the investor cascades the PIDG Project HSES Policies to the projects in which they invest.

The PIDG Project HSES policies are implemented by the Projects, through the development by the project companies of specific policies and HSES management systems appropriate and specific to each Project.

The PIDG Project HSES policies are presented in six distinct documents, covering the governance and management of health and safety, environment, social, security, human rights safeguarding (inclusive of Gender Based Violence and Harassment (GBVH) modern slavery and child labour) and child safeguarding issues.

Fundamental to each is the commitment to:

- Use reasonable endeavours to eliminate or reduce the risks to health, safety, the environment, social and security from its activities to levels which are considered tolerable and, where required, as low as reasonably practical;
- Meet or exceed applicable regulatory and legislative requirements and to meet GIIP; and
- Strive to achieve HSES objectives and improve HSES performance.

1.3 Legislation and GIIP

PIDG uses reasonable endeavours to ensure through its contractual arrangements that the activities of Projects operate to the national legal requirements of the applicable host country and comply with international standards, if higher and practicable, and align with GIIP. This includes the following GIIP:

- IFC Environmental and Social Performance Standards;
- the Principles of the UN Global Compact;
- the Voluntary Principles on Security and Human Rights.

This commitment is reflected in the PIDG Project HSES policies. We map our portfolio against the SDGs which aim to promote prosperity whilst protecting the environment. It is at the core of our business model that we use reasonable endeavours to ensure that the Projects align with these goals and this is supported through the implementation of our PIDG Project HSES policies.

1.4 Scope and applicability

The PIDG Project HSES policies are applicable to Projects. The requirement to align with the PIDG Project HSES policies is included in the contractual arrangements entered into between a PIDG Company and project company in relation to a Project.

1.5 Continual improvement

The PIDG Project HSES policies are reviewed periodically by PIDG Ltd such that they remain relevant to Project activities, and to keep abreast of changes in GIIP and international standards.

2. PIDG Project HSES policies

2.1 Health and safety policy

It is the policy of PIDG to use reasonable endeavours to ensure the implementation of industry leading standards of health and safety are applied to the Projects.

Helping the Projects to seek to prevent and reduce accident rates is a priority for us. Participants in the Projects have a responsibility to help create a healthy and safe working environment by taking ownership of their own safety and through reporting any concerns. PIDG shall use reasonable endeavours to support and empower the people working on Projects to realise this responsibility.

To meet our policy objectives, we at PIDG shall use reasonable endeavours to ensure that the Projects:

- Mandate health and safety considerations into the decision-making process across their activities.
- Continually improve health and safety performance, supported by appropriate resources and strong visible health and safety governance.
- Comply with applicable host country health and safety legislation and align with GIIP, including the IFC Environmental and Social Performance Standards.
- Set health and safety performance objectives and targets and regularly monitor and report their performance both internally and to PIDG.

- Seek to ensure systems are in place to identify, assess, and, to the extent reasonably possible, manage and control all project related health and safety risks.
- Seek to ensure that occupational health and safety rules and programmes are in place to protect, to the extent reasonably possible, the people on the Projects from hazards that may arise in the working environment.
- Seek to ensure that their activities and use reasonable endeavours to ensure those of their contractors, avoid or minimise any adverse impact on the health and safety of the communities in which they operate.
- Foster a culture where accidents, incidents and high potential near misses are promptly reported and investigated and the “lessons learnt” shared both internally and with PIDG.
- Maintain and regularly test contingency and emergency plans.
- Undertake periodic audits, reviews and evaluations for measuring compliance with this health and safety policy.

2.2 Environmental policy

Our concern for the environment is central to our business. It is the policy of PIDG to use reasonable endeavours to ensure our Projects safeguard the environment and sustainably use and manage natural resources. We map our portfolio against the SDGs which aims to promote prosperity whilst reducing the adverse impact to the environment. Sustainable development and poverty reduction are not possible without action on climate adaptation and resilience. Hence, we assess and use reasonable endeavours to mitigate climate risk across Projects and aim to maximise the positive climate resilience building outcomes achieved through our projects.

To meet our policy objectives, we at PIDG shall use reasonable endeavours to ensure that the Projects:

- Mandate environmental considerations into the decision-making processes across their activities.
- Continually improve environmental performance, supported by appropriate resources and strong visible environmental governance.
- Comply with applicable host country environmental legislation and align with GIIP, including the IFC Environmental and Social Performance Standards.
- Communicate environmental responsibilities to applicable Project personnel, providing appropriate support and training to enable them to meet these responsibilities and fulfil their roles.
- Set environmental performance objectives and targets and regularly monitor and report their environmental performance both internally and to PIDG.
- Seek to ensure systems are in place to identify, assess and, to the extent reasonably possible, manage and control Project related environmental impacts, providing appropriate offsets where required.
- Seek to ensure that opportunities to mitigate the impacts of climate change are maximised, the risks presented by climate change are managed, and climate adaptation measures are developed to enable climate resilient developments.
- Seek to ensure that biodiversity impact mitigation and sustainable natural resource management are considered throughout a Project’s lifecycle.
- Seek to ensure environmental pollution control, energy and water use efficiency and conservation measures are considered on all Projects.
- Assess the impact on ecosystem services and, to the extent reasonably possible, maintain community benefits derived from the priority ecosystem services.
- Foster a culture where environmental incidents and near misses are promptly reported and investigated and the ‘lessons learnt’ shared both internally and with PIDG.
- Undertake periodic audits, reviews, and evaluations for measuring compliance with this environmental policy.

2.3 Social policy

The PIDG social policy is to enhance the welfare of Project workers and to use reasonable endeavours to avoid creating adverse social impacts from any of the Projects' activities. We map our portfolio against the SDGs which aims to promote prosperity in a sustainable way. It is at the core of our business model that we shall use reasonable endeavours to ensure that the Projects align with these goals.

To meet our policy objectives, we at PIDG shall use reasonable endeavours to ensure that the Projects:

- Mandate social and sustainable considerations into the decision-making processes across all their activities.
- Continually improve social performance, supported by appropriate resources and strong visible social governance.
- Comply with applicable host country social legislation and align with GIIP, including the IFC Environmental and social performance standards.
- Communicate social responsibilities to applicable Project personnel, providing appropriate support and training to enable them to meet these responsibilities and fulfil their roles.
- Set social objectives and targets and regularly monitor and report their social performance both internally and to PIDG.
- Seek to ensure systems are in place to identify, assess and, to the extent reasonably possible, manage and control Project related social impacts, including the preservation of cultural heritage and providing compensation mechanisms where appropriate and practicable in the circumstances.
- Seek to promote gender equality and broader social inclusion, safeguard women and girls and people with disabilities, and use reasonable endeavours to prevent any form of workplace discrimination, sexual harassment or physical assault.
- Seek to ensure processes are in place for payment of at least the minimum wage to Project workers.
- Undertake engagement and consultation with their stakeholders, including disclosure of information to affected communities in which the Projects operate, and use reasonable endeavours to ensure that vulnerable stakeholders, including women and people with disabilities, are properly represented and consulted.
- Use reasonable endeavours to ensure an appropriate grievance mechanism is in place across the Projects and within the communities in which the Projects operate.
- Avoid or minimise Project induced influx, physical resettlement or economic displacement where reasonably possible and provide processes to minimise adverse impacts including the provision of compensation and livelihood restoration programmes where appropriate and practicable in the circumstances.
- Use reasonable endeavours to support and respect the rights of indigenous communities and vulnerable groups.
- Undertake periodic audits, reviews and evaluations for measuring compliance with this social policy.

2.4 Security policy

It is the policy of PIDG to use reasonable endeavours to seek to ensure the security of the people and assets on the Projects and that the activities of the security provision on the Projects avoid any material adverse impact on the security and fundamental human rights of the communities which host them.

To meet our policy objectives, we at PIDG shall use reasonable endeavours to ensure that the Projects:

- Use reasonable endeavours to ensure a level of security provision appropriate to the perceived threat, supported by appropriate resources and strong visible security governance is delivered at the Projects.
- Comply with applicable host country security legislation, and align with GIIP, including the IFC Environmental and Social Performance Standards, the Principles of the UN Global Compact and the

Voluntary Principles on Security and Human Rights, and will be guided by the principles of proportionality in all aspects of security provision.

- Communicate security responsibilities and guidance to appropriate Project workers, providing appropriate support and training to support them in meeting these responsibilities and fulfilling their roles.
- Set security performance objectives and targets and regularly monitor and report their security performance both internally and to PIDG.
- Ensure systems are in place to identify, assess and, to the extent reasonably possible, manage and control all Project related security risks.
- Use reasonable endeavours to ensure peaceful resolution is prioritised at all times and that the use of firearms is controlled, and only used when necessary with restraint and caution.
- Use reasonable endeavours not to sanction any use of force except where it is for preventive and defensive purposes proportionate to the nature and extent of the threat.
- Use reasonable endeavours to agree the scope and standards of provision when working with public security forces.
- Use reasonable endeavours to communicate security arrangements to the communities that host them and provide an effective grievance mechanism for feedback on these arrangements.
- Foster a culture where security incidents and near misses are promptly reported and investigated, and the “lessons learnt” shared both internally and with PIDG.
- Maintain and regularly test contingency and emergency procedures.
- Undertake periodic audits, reviews and evaluations for measuring compliance with this security policy.

2.5 PIDG safeguarding policy

It is the policy of PIDG to use reasonable endeavours to seek to ensure that the rights, dignity and wellbeing of Project workers are protected, and to use reasonable endeavours to procure the protection of those directly involved in or directly impacted by the Project’s activities. We map our portfolio against the SDGs which aim to promote prosperity whilst seeking to ensure people’s fundamental human rights are protected. We will use reasonable endeavours to seek to ensure Projects are committed to gender equality and non-discrimination in the workplace. and to minimising the risk of Gender Based Violence and Harassment (GBVH), including any form of sexual harassment, exploitation or other form of abuse. We will use reasonable endeavours to seek to ensure the Projects are committed to reducing the risk of modern slavery (inclusive of indebted or bonded labour and trafficking) and child labour in their workplace and supply chains.

To meet our policy objectives, we at PIDG shall use reasonable endeavours to ensure that the Projects:

- Use reasonable endeavours to procure internal and external safeguarding systems supported by appropriate resources and strong visible safeguarding governance on the Projects.
- Demonstrate a positive and inclusive organisational structure and use reasonable endeavours to consider gender equality and inclusivity, and diversity of representation at senior management and board level and where leaders set clear expectations and model respectful behaviour in their interactions at work.
- Comply with applicable national and international legislation and align with GIIP including the IFC Environmental and Social Performance Standards.
- Use reasonable endeavours to communicate PIDG’s safeguarding responsibilities to the Project workers, providing appropriate support to enable their staff to meet these responsibilities and fulfil their roles.
- Set safeguarding objectives and targets and regularly monitor and report safeguarding performance both internally and to PIDG.
- Use reasonable endeavours to ensure systems are in place to identify and assess all Project related safeguarding risks and where reasonably possible implement appropriate management and controls commensurate with the level of risk.

- Use reasonable endeavours to ensure adequate and robust policies are in place which define the Project's commitment to good labour management practices, to gender equality and non-discrimination, to inclusivity and to the prevention of GBVH, modern slavery and child labour.
- Use reasonable endeavours to ensure their employees, contractors, subcontractors and primary suppliers agree to and sign a code of conduct detailing expectations regarding safeguarding and the sanctions for breaching the code.
- Use reasonable endeavours to ensure recruitment processes are in place, which are fair, transparent, documented and free of charge to the applicant, and processes include accompanied interviews, appropriate background checks and child age verification where it is required.
- Use reasonable endeavours to ensure Project workers, including temporary workers, have documented employment terms and conditions which explain their rights including payment of at least the minimum wage and not excessive working hours.
- Seek to ensure processes are in place for preventing forced labour in the Project workplace and use reasonable endeavours to seek to ensure processes are in place to manage the risk of forced labour in their contractors and suppliers.
- Seek to ensure processes are in place to verify that all Project workers are above the age of 16 and that no Project workers under the age of 18 are involved in hazardous work (as defined by ILO c182).
- Use reasonable endeavours to procure that training is provided to all Project workers, such that they understand what constitutes GBVH and how they can contribute to making the workplace a better place for all; such that they understand their employment rights, what behaviours are acceptable to PIDG, and how to report any concerns.
- Use reasonable endeavours to ensure the places of work and accommodation are safe, hygienic and considerate of the Project workers' wellbeing.
- Use reasonable endeavours to ensure Project workers are, subject to the national law, free to form workers associations and to bargain collectively, without retribution. Use reasonable endeavours to procure that women and vulnerable groups are allowed to form committees in working hours and to socialise.
- Use reasonable endeavours to procure that a security management plan is prepared for any security provision, which will include the risk of GBVH to the workforce and host communities.
- Use reasonable endeavours to ensure all community engagement is controlled through a transparent stakeholder engagement plan defining the conduct and processes, including accompanied meetings, of engagement and the reporting of all engagement activities.
- Use reasonable endeavours to ensure an appropriate grievance mechanism is in place across the Project and host communities and that the Project workers have access to a whistle blowing procedure which provides for anonymity and confidentiality and provides appropriate survivor led support mechanisms.
- Undertake periodic audits, reviews and evaluations for measuring compliance with this safeguarding policy.

2.6 PIDG child safeguarding policy

PIDG has a zero-tolerance approach to child exploitation and abuse. PIDG will not knowingly engage –directly or indirectly –anyone who poses a risk to children. PIDG is committed to work to minimise the risks of child exploitation and abuse associated within its direct operations and to staff and partners on their obligations under this policy. PIDG will apply a risk-based approach to the management of child protection in all its activities. PIDG will screen all investments, to identify if the investment will involve potential contact with children, impact on children, or working with children. Where potential involvement is identified, an assessment of child protection risk shall be conducted, and PIDG shall seek to ensure that the project implements the minimum child safeguarding requirements, as set out in this policy.

To meet our policy objectives, PIDG shall use reasonable endeavours to ensure that our projects:

- Undertake a risk assessment to identify, assess and manage risks to children appropriately;
- Regularly monitor the investment for any change in risk;

- Report on the effectiveness of the management of child protection risk;
 - Where a risk is identified, develop and implement a child safeguarding policy, which has a clear commitment to safeguarding children against harm, to having processes in place to assess, manage and monitor the risks to children, and specifically includes a commitment to preventing a person from working with children if they pose an unacceptable risk to children;
 - Develop and implement recruitment screening processes for all personnel in contact with children which include criminal record checks, and verbal referee checks;
 - Develop and implement a documented child safeguarding grievance process for receiving, managing and documenting the concerns or allegations of child exploitation and abuse, that is accessible by children, that respects the rights of both the alleged victim and the alleged offender, and that is made available to project personnel and communities
 - Develop and implement a child safeguarding code of conduct that makes clear the projects standards for acceptable and unacceptable behaviour in relation to children and sets out the sanctions for breach of the code;
 - Provide documented procedure for the regular reporting of grievances raised in regard to child exploitation and abuse, and for any non compliances in regard to the child safeguarding code of conduct and child safeguarding policy
 - Seek to ensure, through training and communication, that all workers are aware of the child safeguarding policy and their responsibilities to protect children, and how to report concerns or allegations about child exploitation and abuse; and
 - Regularly review the child safeguarding policy, at least every two years (or earlier if needed).
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The PIDG Project HSES policies apply to all Projects. Alignment to this set of HSES policies is a contractual requirement for all Projects.

We shall communicate the PIDG HSES Policies to all the Projects. All Projects have a responsibility to understand, promote and actively assist in the implementation of the PIDG Project HSES policies.

Date: August 2025