

Environmental and Social Review Summary (ESRS) Belize Electricity Limited Phase I – BELIZE

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1. General Information of the Project and Overview of Scope of IDB Invest's Review

Belize Electricity Limited (the "Client," the "Company," or "BEL") is the primary distributor of electricity in Belize, Central America. The present operation aims at funding the Client to cover both short-term working capital needs as well as to pay for scheduled capital projects. Phase I of the operation will provide financing for a working capital tranche and capital expenditures ("capex") including equipment, software, system development, infrastructure upgrade works and customer services (the "Project"). Other Phases of the operation will be assessed in the future in terms of their potential environmental and social impacts.

The Environmental and Social Due Diligence ("ESDD") included a series of virtual meetings with the Client and a review, among other information, of the Company's environmental management system, health and safety standards and indicators, human resources policies, and emergency preparedness and response plans.

2. Environmental and Social Categorization and Rationale

The Project has been classified as a Category B operation according to IDB Invest's Environmental and Social Sustainability Policy since the proposed interventions are likely to generate the following impacts: i) solid and liquid waste; ii) noise emissions; iii) dust emissions; iv) occupational health and safety risks; v) traffic disturbances; and vi) community disturbance, among others. These impacts are deemed to be of medium-low intensity and can be managed by means of standard risk and impact mitigation measures and plans.

The Performance Standards ("PS") triggered by the Project's Phase I are: i) PS1: Assessment and Management of Environmental and Social Risks and Impacts; ii) PS2: Labor and Working Conditions; iii) PS3: Resource Efficiency and Pollution Prevention, and iv) PS4: Community Health, Safety, and Security.

3. Environmental and Social Context

3.1 General characteristics of the Project's site

Project interventions will be implemented in existing installations and networks distributed across the country and will not involve any new greenfield projects.

3.2 Contextual risks¹

Belize is a small, tourism-based economy² which also relies heavily on agricultural exports. As such, it is vulnerable to natural disasters (mainly hurricanes, storm surges and heavy rains) that can affect both tourism and agricultural production. Though the country's per capita income places it in an upper middle-income category, a large portion of the population is classified as poor – the poverty rate remains high at 35.7% according to the 2022 Census.³ Rates of poverty are also traditionally higher in rural versus urban areas. Although the private sector generates the bulk of employment, there are constraints regarding credit, low technology adoption, labor skills gaps and a sub-optimal business climate.

According to the World Bank's enterprise survey, in comparison with other countries in the region, Belize has noted a large proportion of companies which identify electricity as a major constraint. ⁴ In recent times, there have been increased rolling blackouts throughout the country due to an insufficient power supply from Mexico which is unable to meet the high energy demand — levels have varied between 85 MW and 125 MW throughout the day, while in country capacity is currently a maximum of 93MW.⁵ Vandalism is also potential risk affecting some of the Client's infrastructure, particularly energy transmission lines and substations.

Despite a downward trend in homicide, other major crime has remained persistently high throughout the last decade (e.g., burglary, robbery and theft). This is also exacerbated by the country's geographic location which places it in the middle of the illicit drug trade between North and South America.⁶

4. Environmental Risks and Impacts and Proposed Mitigation and Compensation Measures

4.1 Assessment and Management of Environmental and Social Risks

4.1.a E&S Assessment and Management System

The Client has prepared an integrated Safety, Health and Environmental Management System ("SHEMS") aligned with ISO 45001 and 14001.⁷ Its intended outcomes include to: i) enhance safety

¹ IDB Group Country Strategy with Belize, 2022-2025

² The United States accounts for 66% of arrivals

³ IMF e-library

⁴ According to the 2010 Enterprise Survey, 36.3% of the companies identified electricity as a major constraint.

^{5 &}lt;u>https://caribbean.loopnews.com/content/belize-load-shedding-woes-after-mexico-power-plant-comes-short</u>

UNDP InfoSegura ; Belize Crime Observatory (BCO)

⁷ ISO 45001 specifies requirements for an Occupational Health and Safety (OHS) management system; and ISO 14000 sets out the criteria for an environmental management system.

health and environment ("SH&E") performance; ii) identify SH&E risks and opportunities for improvement related to activities and operations, and implement operational controls and monitoring and measurement activities to ensure they are being managed effectively; ii) promote safe work practices and injury prevention; iii) promote environmental protection and pollution prevention in balance with socio-economic needs; iv) identify and document the interested parties relevant to the SHEMS, the needs or expectations of these parties and which of these become compliance obligations; and v) enhance the understanding and application of BEL's SH&E due diligence and to meet compliance obligations.

As the SHEMS and associated procedures focuses primarily on health and safety ("H&S") elements, the Client will, therefore, update these documents to include potential social impacts and risks.

4.1.b Policy

The Client has a Corporate Environmental Policy ("CEP") which outlines commitments to: i) meet the requirements of all applicable environmental legislation, regulations and accepted standards of environmental protection; ii) manage its activities in ways that are consistent with industry practices and in ways that meet or exceed the Belize Government's environmental policies; iii) prevent pollution and conserve of natural resources; iv) pursue continual improvement in environmental performance; and v) play a leadership role in community based projects that focus on the environment.

The CEP notes that the Client will: i) regularly monitor and audit its operations and environmental management systems; ii) provide training to employees to enable them to perform in an environmentally responsible manner; iii) set and perform annual reviews of environmental objectives and targets; and iv) make available the policy and knowledge on environmental issues to customers, employees, and the general public.

Additionally, the SHEMS includes an SH&E Policy which includes additional commitments to: i) provide safe and healthy working conditions for the prevention of work-related injury and ill health; ii) be appropriate to the purpose, size and context of the organization, including the defined scope, nature, scale, risks of its activities, products and services; iii) provide a framework for setting objectives; iv) the control of risks using the hierarchy of controls; v) the prevention of injury and illness, protection of the environment, including prevention of pollution and other specific commitment(s) relevant to the context of the organization; vi) fulfil its compliance obligations; vii) participation; and viii) continually improve the SHEMS to enhance SH&E performance. This is supported by a standalone SH&E policy document (ISO aligned) which further highlights the Company's commitment to providing energy solutions to its customers in a manner that prioritizes a safe workplace and protects the environment, while taking into consideration public safety.

4.1.c Identification of Risks and Impacts

Under its SHEMS, the Client's procedure BEL-SHE-PRO-001 (Risk Assessment Process – Hazard and Environmental Aspects), outlines the methodology for identifying hazards and environmental aspects, and assessing the significance of the environmental aspects. The process applies to BEL's operations and activities where hazards may impact the health and safety of employees,

contractors, the public and visitors and the interactions between BEL's activities, products and services and their impacts on the environment. The results of the environmental aspects risk assessment process are documented in the Environmental Aspects Registry managed by the SH&E department. It contains provisions to ensure periodic review of the registries annually.

As social risks are not included as part of the assessment process, the Client will update its procedures to include social risks.

4.1.c.i Direct and indirect impacts and risks

Activities for the Project may potentially generate direct impacts linked to works needed to upgrade some of the Client's infrastructure such as: i) dust emission; ii) solid and liquid waste generation; iii) noise emissions; iv) community disturbance such as damage to street and road infrastructure; and v) occupational health and safety ("OHS") risks. Indirect impacts may potentially include traffic disturbance, temporary access restriction to households and businesses, and interruption of energy provision.

These risks and impacts will be managed through the SHEMS and other existing plans and procedures.

4.1.c.ii Analysis of alternatives

The proposed Project interventions will be carried out in existing Company installations and infrastructure. Therefore, no alternative assessment was carried out.

4.1.c.iii Cumulative impact analysis

The aggregated cumulative effect of past, present and future interventions in the Project area are considered nonmaterial as the foreseen Project activities will be undertaken within the boundaries of the Client's existing installations. Therefore, no cumulative impact mitigation plan is needed.

4.1.c.iv Gender risks

Belize is a diverse Central American country with a population of approximately 405,272,8 of which over 54% live in rural communities. Gaps are therefore noted in labor income by ethnic groups and gender – women and Mayans for example are more likely to be self-employed and poor, indicating a structural difference in employment and poverty outcomes. Though female labor force participation has increased over the years, the gap between men and women is high in comparison to other countries in the region females continue to participate at a much lower rate than males (45.8% versus 71.6 %), with main reasons linked to domestic duties or, caring for a child or elderly

The Belizean population is made up of Mestizo, Afro-Creole, Maya, Garifuna, and Mennonite identities, along with other groups such as East Indian, Lebanese, and Chinese, making the country rich with diverse cultures

⁹ Belize Country Development Challenges

https://genderdata.worldbank.org/en/economies/belize

person. In general, women earn lower average monthly incomes than men with the same level of education, even within the same fields. 11

Despite the country's vast cultural diversity, socio-cultural constructs surrounding femininity and masculinity have led to strong gender-based divergencies resulting in high rates of violence against women. According to the World Health Organization, 70.34% of Belizean women living in rural communities reported experiencing episodes of intimate partner violence. Legislation regarding sexual harassment is also limited to the workplace and institutions — it does not contemplate harassment in public spaces. Overall, crimes affecting women and girls, such as sexual violence and unlawful sexual intercourse, has increased noticeably — between 2021 and 2022, reported instances of rape increased 100%, while unlawful sexual intercourse experienced a 30.4% rise. ¹²

4.1.c.v Gender Programs

Currently the Company has 130 female employees (32% of the total workforce). ¹³ Under its Code of Ethics, the Client declares its commitment to respect the human rights as outlined in the Belizean Constitution and applicable laws, and therefore, not to discriminate on the grounds of gender, race, place of origin, political opinions, color, creed, physical or mental disability.

Within the Respectful Workplace Policy and Procedure which is part of the Company Code of Ethics, the Client notes that it does not tolerate verbal or sexual harassment. Offenders are subject to severe disciplinary actions. The policy also establishes a mechanism to receive complaints from their workforce.

4.1.c.vi Climate change exposure

Belize is highly vulnerable to natural disasters and climate change. Threats include hurricanes and tropical storms (June-November), flooding, sea level rise ("SLR"), coastal erosion, coral bleaching, extreme temperature, and droughts. These impacts are likely to intensify in the future given the expected increase in weather variability, and sea and ambient temperatures. Tourism, agriculture and fisheries are considered highly exposed industries, as they are mostly developed along the coast, in the direct path of hurricanes and tropical storms originating in the Atlantic or Caribbean Sea. In 2019, the country witnessed one of the longest droughts in recent memory, causing losses of more than US\$25 million in crops and livestock (15% of agriculture and forestry production). According to International Monetary Fund ("IMF") ranking, Belize is classified as 3rd at risk for natural disasters, and 5th at risk from climate change among small states.¹⁴

The Client's infrastructure (e.g., transmission lines, substations, power plants and generation units), is therefore particularly vulnerable to several impacts such as hurricanes, flood, SLR, and extreme temperatures. Given this exposure profile, the Project is classified as highly exposed to physical climate-related hazards. The Client has indicated use of proceeds to ensure infrastructural upgrades and its existing response plans (e.g. Hurricane Preparedness Plan) include adequate mitigation and adaptation measures to offset such potential impacts.

Belize Labour Force Survey; Skills to Shape the Future: Employability in Belize

¹² UNDP InfoSegura

¹³ The Leadership Team (LT) and Heads of Department (HOD) has a total 28 persons of which 13 (46%) are male and 15 (54%) are female.

IDB Group Country Strategy with Belize, 2022-2025

The Project is considered Paris Agreement aligned based on the analysis conducted in accordance with the IDB Group Paris Alignment Implementation Approach.

4.1.d Management Programs

Under its SHEMS, the Client has procedures to implement: i) operational controls; ii) communication, consultation and participation; iii) competence, training, and awareness; iv) emergency preparedness and response, v) testing emergency preparedness; vi) monitoring and measuring; vii) contractor management process; viii) management system and compliance auditing; ix) non-conformity and corrective action; and x) management review, among others. Other management plans include a procedure for handling and transferring of transformer oil, the Hurricane Preparedness Plan, and the Draft Restoration Plan.

4.1.e Organizational Capacity and Competency

The Client's SH&E Department has responsibility for the Company's corporate safety, health and environmental system procedures, and action plans. The department currently consists of two (2) staff members. General oversight is via an Acting Manager, Safety, Health and Environment – the post is currently vacant. Further support is provided by the Health and Environment Coordinator (who serves as Acting Manager), and a Safety Coordinator.

4.1.f Emergency Preparedness and Response

The Client has an Emergency Preparedness and Response Procedure designed to respond to hazardous substances spills, fires, and floods. The procedure covers: i) methods for spill response; ii) containment and cleanup equipment for petroleum spills; iii) fire response; iv) flood response; v) reporting requirements; vi) communication requirements; vii) spill response contractors, and viii) containment of hazardous materials.

4.1.g Monitoring and Review

Monitoring and review are covered in the Company's SHEMS via Procedure (BEL-SHE-PRO-010) SHE Performance assessment. The procedure defines the process to determine what needs to be monitored and measured, the methods for monitoring, measurement, analysis and evaluation, when monitoring and measurement will be performed to evaluate safety and environmental performance and determine effectiveness of the SHEMS. The process applies to BEL's operations and activities associated with the identified hazards and significant environmental aspects and related to SH&E performance.

4.1.h Stakeholder Engagement

Under the SHEMS, a specific procedure is outlined to manage communications, both internal and external, and how the Company receives, documents, and responds to communications from external parties. In addition, it presents methods utilized for internal communications.

The Company utilizes several mechanisms to ensure effective communication with interested parties. These include customer newsletters, bill inserts, regulatory reports, proactive media relations, 24/7 App, formal and informal discussions and meetings with regulators, community representatives and local business leaders, and written correspondence. A variety of processes are also used for internal communication on environmentally related matters. The effectiveness of these communication processes is evaluated on an on-going basis through environmental training programs, audits and inspections, and informal discussions.

4.1.i External Communication and Grievance Mechanisms

The mechanisms for external grievance reception and treatment are not yet clearly defined. Therefore, the Client will prepare a specific procedure to receive, treat and respond to external grievances.

4.2 Labor and Working Conditions

4.2.a Working Conditions and Management of Worker Relationships

Currently, the Client has 406 employees, of which 276 (68%) are male and 130 (32%) are female. The Company complies with Belize labor regulations and provides fair working conditions to its employees.

4.2.a.i Human Resources Policies and Procedures

The Company has a Talent Acquisition Policy, as well as a Respectful Workplace Policy, a Code of Ethics, a Business Responsibility, and a Business Ethics Enforcement Policy, which establish the employment conditions, core principles, core values, expected employee behavior, disclosure policy, conflict of interest, fair dealing, and other conditions of employment.

4.2.a.ii Working Conditions and Terms of Employment

The Belizean Labor Act governs the terms and conditions for local employment such as working hours, holidays and rest periods, wages, overtime, OHS, and termination of employment. The Client complies with these regulations.

Under its Talent Acquisition Policy, the Company defines the category and type of positions, employee profiles, potential sources of adequate personnel, conduct for interviews, and preparation of employment packages including salary, benefits, and other conditions. Working hours are from 8:00 am to 5:00 pm, Monday to Friday.

4.2.a.iii Workers' Organizations

The Belize Energy Workers' Union ("BEWU") is the labor union which represents non-management employees. The union is affiliated with the National Trade Union Congress of Belize. BEWU goals

and objectives include job security for its members, better wages, benefits, and safe working conditions. Collective Agreements were signed and represent a comprehensive coverage of labor issues for employees. Its current membership is around 150 workers.

4.2.a.iv Non-discrimination and Equal Opportunity

Non-discrimination is defined in the Client's Code of Ethics, which includes a Respectful Workplace Policy. Under its terms, the Company commits not to discriminate on grounds of gender, race, place of origin, political opinions, color, creed, physical, mental disability, physical characteristics, pregnancy, sexual orientation, marital or family status, source of income, and association or activity.

4.2.a.v Retrenchment

At present there are no plans for collective dismissals.

4.2.a.vi Grievance Mechanism

The Client has not yet established a formal mechanism for the reception, treatment, and response to internal grievances from workers. Existing grievance procedures are specific only to union relations Therefore, it will prepare and adopt such mechanism to include a description on: i) the specific channels for grievance reception; ii) the teams responsible for grievance reception, assessment, and response; iii) the expected timing of response; iv) an anti-reprisal policy; and v) identity protection procedures (i.e., confidentiality, anonymity, sexual harassment, etc.).

4.2.b Protecting the Workforce

4.2.b.i Child Labor

At present, there are no provisions against child labor in the Client's Code of Ethics or in the Talent Acquisition Policy. However, the Client adheres to Belize Labor Law regarding contracting children. ¹⁵ The Client will therefore, revise its Code of Ethics to reflect local labor requirements and include provisions against child labor consistent with International Labor Organization ("ILO") Conventions 138 ¹⁶ Minimum Work Age and 182 ¹⁷ Worst Forms of Child Labor.

4.2.b.ii Forced Labor

Similarly, there are no provisions against forced labor in the Client's Code of Ethics or in the Talent Acquisition Policy. It will, therefore, revise its Code of Ethics to include provisions against forced labor consistent with ILO Conventions 29¹⁸ on Forced Labor.

¹⁵ Chapter 297 section 54

https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C138

https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C182

^{18 &}lt;u>https://www.ilo.org/dyn/normlex/en/f?p=1000:12100:0::NO::P12100_ILO_CODE:C029</u>

4.2.c Occupational Health and Safety

The Client has a Corporate Safety Policy and Standards which covers: i) its vision; ii) a corporate policy statement; iii) statement of principles; iv) its commitment with due diligence; v) H&S performance standards; vi) Safe Work Management Systems; vii) assessments of health and safety management system; and viii) appendices. A draft Transport Policies and Procedures has been developed to improve vehicle fleet maintenance, adequacy which is also expected to minimize risks to drivers and operators.

Further commitments to H&S are reflected in the SHEMS and SH&E Policy document which references: i) hazard identification and assessment; ii) environmental protection; iii) compliance obligations; iv) leadership and engagement; and iv) continual improvement – it applies to all employees and contractors.

There is regular monitoring of OHS statistics with reports and root cause analysis.

4.2.d Provisions for people with disabilities

Belize is a signatory of and has ratified the United Nations Convention on the Rights of Persons with Disabilities. In compliance with the Belizean regulations, the Client under its Code of Ethics, declares its commitment against discrimination on the grounds of physical or mental disability.

4.2.e Workers Engaged by Third Parties

Under the SHEMS, BEL-SHE-PRO-013 (Contractor Management Process) procedure describes the processes used by the Company for outsourcing some activities to contractors. It applies: i) to all contracted work carried out in BEL workplaces, including customer sites where contractors are performing work on behalf of the Company; and ii) all employees responsible for any part of contractor management.

The Client will update this procedure to ensure compliance with the Company's updated Code of Ethics are also stipulated from contractors.

4.2.f Supply Chain

Supply chain is managed through a specific SHEMS Procedure Supplier and Procurement Management Process. This covers Tier 1 contractors. The Project does not involve the acquisition of solar panels.

4.3 Resource Efficiency and Pollution Prevention

4.3.a Resource Efficiency

The Client is the primary distributor of electricity in Belize. According to its 2023 Annual Report, the aggregate energy sold in 2023 was 754 GWh to approximately 110,461 customer base accounts.

BEL's national electricity grid connects all major municipalities in the country through approximately 2,000 miles of transmission and primary distribution lines. The grid is supplied by local Independent Power Producers ("IPP") that produce energy from hydroelectricity, biomass and petroleum. The grid is interconnected with Mexico's national grid allowing BEL to expand its power supply capacity. Renewable sources accounted for 32.53% of locally sourced energy supply in 2023.

Part of the Project's investments aim to promote energy efficiency ("EE"), by means of a Corporate Energy Efficiency Program. This will involve internal energy audits for customers and investments in EE systems (light bulb and air conditioning replacement, automated temperature control systems, use of natural lighting, insulation, etc.).

4.3.a.i Greenhouse Gases

The Project does not involve any significant generation of GHGs. Nonetheless, a Corporate GHG Monitoring, and Management Plan will be prepared by the Client.

4.3.a.ii Water Consumption

The Client does not currently monitor water consumption. However, as part of its SHEMS commitments, A Water Resources Management Plan will be prepared to monitor and report on water usage.

4.3.b Pollution Prevention

4.3.b.i Wastes

Currently the Client does not have documented solid waste and wastewater management procedures. Therefore, it will prepare a Corporate Waste and Wastewater Management Plan ("CWWMP").

4.3.b.ii Hazardous Materials Management

Hazardous wastes¹⁹ are disposed according to the instructions given by the Belize's Department of the Environment. A Handling of Transformer Oil Procedure²⁰ is available for the disposal of transformer oil believed to contain Polychlorinated Biphenyls ("PCBs"). The management of hazardous waste will be covered in the CWWMP.

¹⁹ Materials used in upgrading and maintenance works such as lubricants, oil contaminated cloths, solvent and paint contaminated packaging, batteries, etc.

This procedure was designed to ensure the proper disposal of transformer oil potentially containing PCBs.

4.3.b.iii Pesticide Use and Management

Pesticide use and management will be included in the CWWMP to be developed by the Client.

4.4 Community Health, Safety and Security

4.4.a Community Health and Safety

The interventions considered the Project will not generate significant environmental and social impacts. However, some of these works may generate local small-scale impacts including: i) traffic disturbance; ii) noise; iii) dust; iv) occupational health and safety risks; v) waste and wastewater; vi) traffic disturbance and, vii) damage to existing road infrastructure. These impacts will be managed by intervention-specific Environmental and Social Management Plans ("ESMPs"), alongside existing plans and procedures.

4.4.a.i Infrastructure and Equipment Design and Safety

Project infrastructure, which could be affected by hurricane events, is designed to withstand Category 3 hurricanes²¹ on the coast, and Category 1 inland. The Client has a Hurricane Preparedness Plan which is regularly updated, and a Draft Disaster Restoration Plan currently under internal review. These plans aim to minimize personnel and infrastructure damage during the storm and ensure rapid recovery of damaged infrastructure after the hurricane has passed. Infrastructure is also exposed to floods and SLR which is managed through the Company's Emergency Preparedness and Response Procedures which includes response to floods.

The Client is currently implementing the Energy Resilience for Climate Adaptation Project ("ERCAP") that comprises of a portfolio of activities geared towards the enhancement of the Belize energy sector against adverse weather and the impacts of climate change. It includes a number of activities including consultancy services for an Integrated Vegetation Management Study, an Emergency Response Plan for business continuity, a Rehabilitation Strengthening study for a selected portion of BEL's existing transmission line, Upgrade of the VHF communication system and upgrade of the existing substation and control buildings. ERCAP also includes several other demonstration measures such as construction and upgrade of new and existing stations and lines across Belize.

4.4.a.ii Hazardous Materials Management and Safety

Hazardous materials including solid waste and wastewater will be managed according to the CWWMP.

Saffir-Simpson Hurricane Wind Scale. Category 3 Hurricanes are those with wind velocities in the range 111- 129 mph. Under this category devastating damage will occur: Well-built framed homes may incur major damage or removal of roof decking and gable ends. Many trees will be snapped or uprooted, blocking numerous roads. Electricity and water will be unavailable for several days to weeks after the storm passes. Category I Hurricanes are those with wind velocities in the range of 74-95 mph. Under this category very dangerous winds will produce some damage: Well-constructed frame homes could have damage to roof, shingles, vinyl siding and gutters. Large branches of trees will snap and shallowly rooted trees may be toppled. Extensive damage to power lines and poles likely will result in power outages that could last a few to several days.

4.4.a.iii Ecosystem Services

No impacts on ecosystem services are anticipated during Phase I of the Project.

4.4.a.iv Community Exposure to Disease

The Project will include limited upgrade works of existing infrastructure. However, procedures to manage the potential exposure to communicable disease will be outlined in the updated SHEMS.

4.4.a.v Emergency Preparedness and Response

The Client will implement its Corporate Emergency Preparedness and Response ("ERP") Procedures in case of emergencies. External stakeholders will be informed according to the emergency contacts list, as required in the ERP Procedures.

4.4.b Security Personnel

Security is provided by contractors. The Client will ensure that the security contractor personnel will be duly trained to deal appropriately with the public, by means of the existing Security Handbook to be updated to ensure at minimum:²² i) there are no implications in past abuses; ii) adequate training in the use of force (and where applicable, firearms); iii) appropriate conduct toward workers and communities; and iv) operating within the applicable law. The external grievance mechanism will also include channels for communities to express concerns about the security arrangements and acts of security personnel.

4.5 Land Acquisition and Involuntary Resettlement

The current phase of the project will not require the acquisition of land and will not cause any physical or economic displacement.

4.6 Biodiversity Conservation and Natural Habitats

The Project will generate no material impacts to biodiversity during Phase 1.

4.7 Indigenous Peoples

Project works will not impact any indigenous community.

 $^{^{\}rm 22}$ In line with the requirements of IFC Performance Standard 4

4.8 Cultural Heritage

The Project will not affect any cultural heritage. However, the procedures to be developed to manage social risks and impacts will include guidelines for Chance Finds procedures.

5. Local Access of Project Documentation

The documentation relating to the project can be accessed at the following link: https://www.bel.com.bz