

# Comprehensive Policy Assessment Report

An Evaluation of Sustainability Performance & Strategic  
Innovation Opportunities

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**Prepared for:** SAMPLE REPORTS

**Institution Code:** 27306January2026

**Contact:** [samplereports@ekonavaimpactpartners.com](mailto:samplereports@ekonavaimpactpartners.com)

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DIGITAL ACCESS

POWERED BY **ESG GLOBAL STANDARDS**

## Policy Assessment Results

Detailed sustainability evaluation

**3** /5

Sustainability Rating



## What Is Senior Management's Commitment Level?

Option: Responds to customer/lender requirements (=2)

Justification: - Reference standards requirement: According to the ESMS guidance (Context: Organizational Capacity and Competency, and Communications/Training sections across the ESMS Handbook excerpts), senior management commitment should be demonstrated through realignment of reporting duties, allocation of time and authority, formation of an ESMS team with cross-functional involvement, and ongoing governance that signals leadership attention to E&S risk management. The standards emphasize that senior management should actively support and resource ESMS activities and publicly communicate commitment, enabling effective implementation, monitoring, and continuous improvement. - Evaluation of assessed documentation: The ESMS documentation demonstrates some level of senior management involvement but is limited in terms of explicit, verifiable commitments from top leadership. Specifically: - Roles and responsibilities show that an ESG Lead and Chief Financial Officer are responsible for implementation and enforcement of the Grievance Policy, and that approvals/signoffs exist (e.g., policy approval by a General Director). This indicates management involvement and governance oversight. - However, there is no explicit evidence of a dedicated ESMS governance structure with clear cross-functional ESMS roles beyond the ESG Lead/CFO, nor documented allocation of time, authority, or budget for ESMS activities. There is no explicit statement of senior management publicly communicating commitment, nor a clearly evidenced ESMS team with cross-departmental representation, training plans, or resource commitments beyond mere policy statements. - The existence of a Grievance Redress Policy and an ESMS Manual indicates awareness and some procedural work, but the documentation lacks concrete evidence of senior management driving continuous improvement (e.g., formal reviews by senior leadership, quantified resources, tied performance indicators, or a public commitment statement). - Gaps relative to the standard: - Missing explicit senior management public commitment statement and adequate resourcing (time, budget, and authority) dedicated to ESMS implementation. - Absence of a formal, cross-functional ESMS governance/participation structure (beyond named roles) that ensures ongoing leadership-driven reviews and improvements. - No documented, routine senior-management-led reviews, performance indicators, or escalation mechanisms tied to E&S risks and ESMS outcomes. - No clear demonstration that top leadership actively supports training, deployment of ESMS responsibilities across departments, or integration of ESMS into daily operations beyond policy references. - Recommendations to reach higher levels: - Establish and document a formal ESMS governance charter that assigns cross-functional ownership (environment, health and safety, operations, procurement, HR, etc.) with a clearly identified ESMS Steering Committee led by senior management. Include defined roles, time allocations, and decision rights. - Articulate and publish a formal senior-management commitment statement to E&S objectives, including allocated budgets and resources for ESMS implementation, training, monitoring, and continuous improvement. - Implement a training and awareness plan with documented responsibilities, frequency, and completion metrics, ensuring buy-in across all levels, including supervisors and frontline workers. - Create a schedule for

periodic senior-management reviews of ESMS performance, including key indicators, risk trends, corrective actions, and verification of closure. Tie these reviews to performance metrics, management compensation or incentives where feasible, and public or lender-facing reporting. - Develop and disclose an ESMS Budget and Resources Annex, with line items for personnel time, training, monitoring, audits, and external support, and track actual versus planned expenditure. - Ensure cross-departmental ESMS teams produce regular, verifiable outputs (risk registers, action plans with owners and due dates, monitoring data, and verification steps) and that these outputs are reviewed by senior management at defined intervals. In sum, the assessed documentation shows basic awareness and some managerial involvement (policy approvals and designated responsible roles), but it does not provide robust, verifiable evidence of senior management publicly communicating commitment, allocating dedicated resources, or leading continuous improvement through an explicit governance/monitoring framework. Elevating to a higher score would require explicit, documented senior-management commitment statements, resource allocations, cross-functional ESMS governance, and regular senior-management reviews with measurable outcomes.

★ ★ Score: 2/5

## How Are Environmental/Social Policies Reviewed?

Option: We periodically review based on regulations and performance (=4)

Justification: Reference standards require that E&S policies and the ESMS be reviewed in a structured, ongoing manner, typically including consideration of regulatory changes, performance outcomes, and GIIP/consistent improvements, with clear procedures and responsibilities for such reviews (as evidenced in the Bank's contextual guidance on ESMS engagement, corrective actions, and continuous improvement). In the assessed ESMS documentation, there is explicit evidence of periodic reviews and continuous improvement mechanisms: e.g., "Gridworks H&S policy is reviewed periodically by Gridworks' ESG Lead such that it is kept relevant to its activities, and to ensure that it reflects changes GIIP and international standards," and sections describing "Continuous Improvement/Review and Update" and "audits, reviews and evaluations for measuring compliance." These indicate that reviews occur on a periodic basis and are linked to performance considerations and evolving GIIP standards. This aligns with option 4, which describes periodic reviews triggered by regulatory or performance drivers to some extent (though not explicitly regulatory reviews themselves). However, there is limited evidence of explicit regulatory-driven review triggers or formal stakeholder-driven policy review processes, and the documentation does not clearly demonstrate a systematic, documented schedule tied to regulatory changes or performance dashboards with defined frequencies, indicators, and responsibilities across all E&S policies (beyond the general periodic review and continuous improvement language). Gaps include: (a) no clearly defined, formal schedule for policy reviews (e.g., annual or biannual), (b) limited evidence of regulatory-driven triggers as a primary driver for review, (c) no explicit involvement of workers or external stakeholders in the policy review process, and (d) lack of a consolidated, documented ESMS-wide policy review protocol with responsibilities, inputs (KPIs), and verification steps. Recommendations to improve toward higher alignment (toward option 5 or a stronger version of 4) include: establish a formal ESMS policy review cadence (e.g., annual), specify regulatory change as a trigger and require documented evidence of regulatory alignment checks, incorporate worker/ stakeholder consultation into review cycles, define clear responsibilities (e.g., ESG Lead, E&S Compliance Officer, Portfolio Managers) and failure/sanction criteria if reviews are not completed, and attach outputs to ESAPs and ESMS updates with version-controlled documentation and archival records. This would strengthen procedural evidence of how reviews are conducted, by whom, with what inputs, and how outcomes feed into corrective actions and ongoing performance monitoring, aligning with the reference standard emphasis on procedural, demonstrable review and continuous improvement.

★ ★ Score: 4/5



## How Are Environmental/Social Policies Communicated?

Option: Distributed to all employees including contractors (=3)

Justification: Reference standards require that an effective environmental and social policy be actively endorsed by senior management and actively communicated to employees at all levels and functions, with good practice extending to external communication (public disclosure, client statements/reports, website, and communication to affected communities and other stakeholders) and, where relevant, verification by stakeholders (GN1). The assessment should demonstrate concrete, verifiable procedures: who communicates, to whom, in what format, how often, in which languages, and how verification or acknowledgement is captured. Evaluating the assessed ESMS documentation, there is clear evidence that Gridworks positions the ESG Lead as responsible for implementation and enforcement across activities, and that the ESG Policy and related commitments are designed to guide engagement with employees, portfolio companies, contractors, suppliers, and communities. The documentation also references externally oriented elements such as access to information and a Grievance Redress Procedure, and it notes that the ESG Policy is provided in Appendix X and underpins engagement with portfolio companies and projects. However, the documentation falls short of explicitly detailing the communications mechanism itself: there is no explicit, verifiable description of how the policy is communicated to all employees (at all levels and functions) and to external stakeholders; there is no explicit mention of language versions, distribution methods, frequency, or verification/acknowledgement processes. The Grievance Policy language outlines who may lodge complaints and where to submit them, but it does not demonstrate the broader policy communication to affected communities or other stakeholders in a structured, verifiable way. While there is a broad statement that the ESG Policy “fosters continuous improvement” and that it applies across employees, portfolio companies, and partners, this does not meet the procedural clarity expected by GN1 regarding active, verifiable communication, including senior management endorsement, multi-channel dissemination, and stakeholder verification. Gaps relative to the standards include: - Absence of a formal communication plan or schedule detailing who communicates, through which channels (intranet, town halls, emails, trainings), and to whom (all employees, contractors, portfolio companies, suppliers, communities). - No explicit indication of communication in all relevant languages or verification steps (read receipts, acknowledgements, or training completion records). - Lack of explicit senior-management endorsement in the form of documented sign-off, public statements, or external disclosures (website/public reports) as evidence of active endorsement. - No clear frequency or update mechanism for policy communication and re-communication after policy changes. Recommendations to improve toward higher alignment with the reference standards: - Develop and implement a formal ESG Policy Communication Plan (CPP) that specifies: channels (intranet, emails, town halls, workshops, training programs), target audiences (employees at all levels, contractors, consultants, portfolio companies, suppliers, and communities), language requirements (versions in relevant languages), frequency (annual refresh and post-significant update), and verification mechanisms (acknowledgement receipts, training completion records, attendance logs). - Obtain and document senior-management endorsement with

explicit sign-off on the policy and, where appropriate, publish public-facing statements or disclosures (website update, summary in annual reports) to meet the external communication dimension described in GN1. - Integrate policy communication with onboarding and ongoing training, including measurable indicators (percent of staff trained, completion timeframes, language-version coverage) and regular internal audits to verify continued awareness and understanding. - Establish a formal external disclosure mechanism for the policy and key commitments, including community engagement materials or stakeholder meeting records, to satisfy the externally communicated policy requirement. - Implement a monitoring process to verify comprehension and effectiveness of communications (e.g., short surveys, targeted interviews with portfolio companies, and grievance data cross-referenced with communication outreach). In summary, the ESMS demonstrates basic breadth of policy coverage and responsibilities, with some elements pointing to broad dissemination. However, the absence of a formal, verifiable communication plan and language/acknowledgement procedures means it aligns best with a 3 rather than a higher score. Implementing the recommended steps will elevate the practice toward full alignment with the referenced GN1 expectations.

★ ★ Score: 3/5

## Which Option Best Describes Community Health/Safety Policies?

Option: Policies align with standards including management systems (=4)

Justification: The reference standards (notably the IFC Performance Standards and related World Bank/UN guidance referenced in the context) require that community health and safety policies be integrated into the ESMS with clear alignment to management systems, defined responsibilities, measurable indicators, and regular review/updates. Specifically, policies should be structured to prevent and respond to community health and safety risks, be supported by documented procedures, include accountability and assignment of responsibilities (e.g., for community risk assessments, mitigation measures, training, grievance handling), and undergo periodic verification and revision as part of the ESMS governance. The assessed ESMS documentation demonstrates a governance framework and several elements that align with this expectation: there is an overarching Health and Safety Policy with a stated responsibility line (ESG Lead, Chief Financial Officer, ESG Associate) and a commitment to integration of E&S considerations into investment processes, plus a Continuous Improvement/Review section indicating periodic updates to reflect GIIP and international standards. The documentation also shows a Grievance Reporting/Grievance Redress policy and a formal ESMS manual that binds policies to implementation, including training, monitoring, and reporting obligations, and a clear chain of accountability within Gridworks' structure. These elements reflect substantial procedural content and evidence of alignment with management-system standards (e.g., defined responsibilities, policy documents, and continuous improvement). However, there are notable gaps relative to full "4" or higher alignment: the materials do not include a stand-alone, explicitly named community health and safety policy with detailed community-level risk assessment procedures, targeted indicators specific to community health/safety outcomes, or community-specific grievance handling workflows that are clearly linked to SEA/GBV risk management as described in the reference standards. The reference standards expect explicit, action-oriented procedures addressing community risks, survivor-centered approaches, and regular, verifiable reviews of community health/safety performance beyond general H&S governance. Gaps observed relative to the standards: - Absence of a dedicated community health and safety policy (versus general H&S policy) with explicit community-facing requirements, performance indicators, and verification steps. - Limited detail on how community health/safety risks (including GBV/SEA-related concerns) are identified, mitigated, monitored, and verified at the community level within the ESMS. - No clearly documented survivor-centered protocols, independent verification, or community grievance handling pathways tied specifically to SEA/GBV risk mitigation. - While continuous improvement is noted, the documentation does not show explicit frequency, methods, or thresholds for community health/safety performance reviews beyond GIIP alignment. Practical recommendations to improve toward higher alignment (based on the referenced standards): - Adopt a dedicated Community Health & Safety Policy that explicitly references IFC PSI-PS8, with clear commitments to preventing harm to communities, safeguarding vulnerable groups, and ensuring survivor-centered approaches where applicable. - Develop and publish explicit community risk assessment procedures, including: data collection methods, frequency (e.g., at baseline and at key project milestones),



roles/responsibilities (who conducts assessments, who approves mitigations), and concrete indicators (e.g., number of community health incidents, response times, number of safety trainings delivered to community stakeholders, availability of safe reporting channels). - Implement detailed survivor-centered grievance mechanisms specific to community health and safety incidents (with defined timelines, escalation paths, confidentiality safeguards, and verification steps), including indicators for grievance intake, resolution rates, and closure within stated timeframes. - Integrate measurable performance indicators for community health and safety into the ESMS dashboard, with regular (e.g., quarterly) reporting to the ESG Lead, Investment Committee, and relevant stakeholders. - Strengthen training and engagement programs: document training curricula, attendance, and effectiveness evaluations for staff, contractors, and community representatives on community health/safety risks and GBV/SEA awareness where applicable. - Establish periodic independent verification or audit of community health/safety performance, with documented corrective actions and follow-up verification. - Ensure that all policies explicitly reference alignment with international standards (IFC Performance Standards and World Bank GBV/SEA guidelines where relevant) and that updates are formally scheduled (e.g., annually) with evidence of the update in revision histories. In summary, the ESMS demonstrates substantial alignment with management-system requirements (policy governance, responsibilities, monitoring, continuous improvement), justifying a score of 4. Enhancing to a 5 would require a stand-alone, explicit community health/safety policy with detailed procedures, indicators, and regular independent reviews specifically focused on community health and GBV/SEA risk management, as outlined above.

★ ★ Score: 4/5

## Which Option Best Describes Labor/Working Conditions Policies?

Option: Policies meet national labor laws (=2)

Justification: Reference standards require: (i) explicit labor/working conditions policies that cover contracts for all workers (GN14), documentation of conditions and terms of employment communicated to workers (GN16-GN17), wage and benefits information with clear payment records (GN18-GN19), and ongoing documentation and monitoring integrated into the management system (PS2/GN15-GN17). In addition, the standard emphasizes integration of these policies into the management system with defined responsibilities and periodic reviews (GN14–GN17; GN2; GN18–GN19; Annex considerations) and alignment with ILO conventions and, at higher levels, ILO management-system alignment (with 3–5 as progressively higher alignment). Assessment against these requirements: - Evidence of labor/working conditions policies: The documentation includes a Health and Safety Policy and an ESMS manual detailing governance, responsibilities (e.g., ESG Lead, CFO), and general commitment to integrating E&S considerations. However, there is no explicit Labor/Working Conditions Policy that documents contracts for all workers, terms of employment, or wage/deduction communications. The Grievance Reporting Policy exists, but it is not a comprehensive labor-conditions policy nor does it establish wage calculations, contract language, or worker-end communications specific to terms of employment. This indicates at most a general E&S governance framework, not a dedicated labor/working conditions policy with the required detail. - Policy content and procedural detail: The referenced materials show responsibilities, ongoing ESMS monitoring, communication to employees/subcontractors, and periodic policy updates. Yet they lack concrete procedural elements tied to labor contracts (e.g., contract creation in workers' language, up-front disclosure of wages, overtime rules, benefits, and deductions), systematic retention of employment records, and documented worker communications about terms (as GN16–GN19 require). The materials do indicate that the ESG Lead/ESG Associate oversee E&S risk and that communications occur, but there is no explicit, verifiable, worker-facing policy detailing terms of employment, wage calculation methodologies, or records specific to labor relations. - Alignment level: The documents state alignment with international standards and IFC expectations (e.g., “alignment with Gridworks' ESG Policy and commitments including IFC Performance Standards”). However, these references are high-level and do not demonstrate concrete ILO-aligned labor policies or an ILO-based management system fully in place. There is no explicit reference to ILO conventions or a formal ILO-aligned labor management system with regular (e.g., annual) reviews of labor conditions. Gaps observed relative to the standards: - No dedicated Labor/Working Conditions Policy documenting employment contracts for all workers, terms of employment, wage/benefits disclosures, or formal employee communication on pay, hours, and deductions (GN14–GN17; PS2). - Absence of wage calculation records, time sheets, pay stubs alignment with local law, and explicit documentation of overtime policies (GN15, GN17, GN18–GN19). - No explicit language on workers' privacy regarding data collection, purpose, consent, and access as outlined in GN18. - Limited evidence of a formal system to ensure workers are informed in their language and that contracts/terms are verifiable and up-to-date;

no explicit monitoring indicators or verification steps for labor-related information. Recommendations to improve toward higher alignment (per the reference standards): - Develop and implement a stand-alone Labor/Working Conditions Policy that explicitly covers: (a) contracts for all workers (direct and through third parties) with terms, wages, benefits, overtime, deductions, and retention; (b) communication of working conditions to workers in a clear, understandable language; (c) wage calculation processes, pay slips, and retention of payroll records; (d) privacy and data protection in line with GN18, including notification, purpose, consent, security, access, and accountability; (e) disciplinary and grievance mechanisms specific to labor terms, with documented procedures and timelines. - Ensure contracts exist for all workers, in their native language where applicable; attach key terms to contracts and provide copies on request (GN15–GN17). - Implement a formal process to document and communicate wages, benefits, hours, overtime, and deductions; maintain payroll records, time sheets, and pay stubs; verify piece-rate or performance pay against minimum wage (GN15–GN17). - Establish a Labor-related monitoring and reporting system integrated into the ESMS: assign clear responsibilities (e.g., HR/ESG Lead), define indicators (percentage of workers with contracts, frequency of wage calculation communications, number of grievances related to pay), and schedule periodic verification and audits (annual or biannual). - Align with IFC Performance Standards and ILO conventions at a formal level by mapping current policies to ILO labor standards and pursuing regular (e.g., annual) reviews of labor policies and practices with evidence of updates (as per GN2 and “Periodic reviews” language in the standards). - Integrate a robust grievance mechanism specifically for labor issues, ensuring timely investigation, documentation, and closure, and include reporting of outcomes to the ESG governance structure. In summary, the assessed ESMS demonstrates general commitment to E&S management with some governance and communication practices but lacks a dedicated, verifiable Labor/Working Conditions Policy and the procedural depth required to meet national labor law requirements and higher ILO/IFC-aligned standards. Interim score 2 reflects that the framework exists and references alignment with international standards, yet the absence of explicit labor-contractual documentation, wage/working-condition disclosures, and worker-facing communications prevents a higher score. Implementing the recommended steps will enable progression toward option 3 or higher (ILO-aligned, with management-system integration and regular reviews).

★ ★ **Score: 2/5**

## Which Option Best Describes Occupational Health/Safety Policies?

Option: Policies meet requirements with management systems (=4)

Justification: Reference standards require that occupational health and safety (OHS) policies are not only written but are integrated into an active management system with defined responsibilities, ongoing monitoring, corrective actions, and regular reviews to drive continuous improvement. The provided reference context (Policy and PS2 guidance) emphasizes that: (i) a written OHS policy aligned with national law and with applicable international guidelines (ILO guidelines, GIIP) should exist; (ii) a formal OHS management system is required, including hazard identification, preventive and protective measures, training, incident documentation, emergency preparedness, and continuous improvement; (iii) there must be audit/closure processes with corrective actions, timelines, responsible personnel, and verification, and (iv) policies should be communicated to workers and contractors, with ongoing review and update. Evaluation against the assessed ESMS documentation: - Evidence of a written OHS policy: The documentation contains a Health and Safety Policy with clearly defined sections (Introduction/Responsibilities/Policy Statements & Commitments/Target/Management System/Continuous Improvement/Communication). This demonstrates a formal written policy rather than mere intent. - Integration with a management system: The policy section references a "Management System," periodic audits, reviews, evaluations, and monitoring of performance. There is an explicit assignment of responsibility (ESG Lead, Chief Financial Officer, ESG Associate) and documented processes for monitoring, reporting, and ensuring alignment with GIIP/international standards. This aligns with the requirement for a defined OHS management system rather than a standalone policy. - Procedures, responsibilities, and monitoring: The ESMS structure includes clear responsibility lines (ESG Lead, ESG Associate, CFO), and there are references to monitoring and reporting of E&S performance, training, and integration into investment processes. There is a stated mechanism for continuous improvement and periodic reviews, with preparation and approval flows (Approval and Signoff, revision history). While the exact frequency of every OHS-specific review isn't enumerated in every sub-section, the policy explicitly states periodic reviews and alignment updates. - Compliance with international guidelines: The ESG Policy mentions alignment with international best practices such as the IFC Performance Standards, and the Health & Safety policy guidance cites OHSAS 18001 and ILO-OSH 2001 as potential frameworks. This indicates the policy is designed to meet recognized international standards, not merely national requirements. - Communication and training: The Health & Safety Policy includes commitment to communicating the policy to all employees and subcontractors, and there is emphasis on training and E&S risk management in the ESMS staffing roles, which aligns with the requirement to educate workers and ensure implementation. - Audit closure and corrective actions: The reference standards emphasize audit findings, corrective actions with timelines, responsible owners, and closure verification. The documentation discusses audits and continuous improvement, but the explicit procedural details for audit closure (e.g., a formal closure statement with a listing of findings and verification of corrective actions) are implied in the policy framework rather than described in granular steps within the policy excerpts

provided. This is a partial but acceptable alignment, given the stated governance and continuous improvement mechanisms. Gaps or weaker details observed: - While there is a stated management system and continuous improvement framework, the documentation lacks explicit, itemized procedures for: (a) hazard identification and risk assessment methods, (b) verification steps for closure of corrective actions with sign-offs, and (c) concrete, quantified performance indicators and targets specifically for OHS (beyond high-level targets in the policy). - The audit-closure mechanics (a formal closure statement with a list of audit findings and verification of corrective actions) are described in the reference standards but are not fully delineated with proven, auditable evidence in the ESMS excerpts (the existence of an audit closure document is implied but not shown in full detail). - The alignment with ILO guidelines and national law is indicated but not demonstrated via explicit cross-referenced mappings or a documented gap analysis in the provided extracts. Recommendations to improve toward higher performance (based on the reference standards): - Formalize hazard identification and risk assessment procedures (methodology, frequency, responsible roles, and criteria for risk prioritization), including documented job hazard analyses and registers, with inputs from workers representatives where applicable. - Establish a detailed audit closure protocol: require a formal closure statement that lists all audit findings, associated corrective actions, assignment of responsibilities, defined timelines, verification steps, and documented closure sign-off by the ESG Lead and relevant senior management. - Develop quantitative OHS performance indicators and targets (e.g., incident rates, near-miss reporting rates, completion rate of corrective actions, training completion rates) with regular (e.g., quarterly) performance reviews by the ESG Lead and Board/owners. - Publish a formal mapping of the OHS policy to the specific standards (ILO-OSH 2001, OHSAS 18001, IFC Performance Standards) with documented evidence of alignment, including any gaps and remediation plans. - Enhance worker engagement mechanisms for OHS: ensure full consultation with workers and representatives on policy updates, and maintain evidence of worker participation in OHS decision-making as a minimum, progressing toward “agreed in full consultation with workers and their representatives” as per higher rating levels. Overall, the assessed ESMS demonstrates a robust, policy-level commitment and management-system integration for Occupational Health & Safety, consistent with option 4. With targeted enhancements in procedural detail, measurable indicators, and formal audit-closure documentation, the organization could progress toward a 5 (full compliance with regular policy reviews and demonstrated evidence of ongoing improvement and verification).

★ ★ Score: 4/5



## Which Option Best Describes The Company's Environmental Policies?

Option: Our policies align with standards including management systems (=4)

Justification: Reference standards require that environmental policies be aligned with established management systems and regularly reviewed to ensure ongoing relevance and effectiveness. According to the referenced standards (IFC Performance Standards as embedded in Gridworks' ESG Policy and Climate Change Policy), policy frameworks should integrate environmental and social considerations into decision-making, be aligned with international best practices, and be subject to continuous improvement and periodic review. The assessed ESMS documentation demonstrates substantial alignment with these expectations. Evidence shows: - An ESG Policy described as a comprehensive framework for integrating environmental, social, health and safety, human rights, and governance considerations into investment processes and portfolio management, explicitly aiming to align with international best practices such as the IFC Performance Standards. This indicates alignment with management-system-level standards and a formal policy structure. - A Climate Change Policy aimed at aligning investments and strategies with global climate action objectives, reducing GHG emissions, and supporting a just transition, which reinforces environmental policy content at the strategic level. - A Health & Safety Policy that is explicitly reviewed periodically by the ESG Lead, indicating a formal cadence for policy upkeep and alignment with GIIIP/ international standards. - An ESMS Manual that provides the overarching framework to integrate E&S considerations into investment processes, policies, procedures, tools, and templates, demonstrating a functioning management-system approach rather than mere policy statements. - Clear role definitions and responsibilities (e.g., ESG Lead, ESG Associate, Chief Financial Officer) and documented mechanisms for monitoring, implementation, and continual improvement, which support a management-system alignment rather than a purely policy-centric stance. - Evidence of policy communication to employees and subcontractors and a framework for continuous improvement and updates, indicating practical dissemination and a commitment to ongoing evolution of the ESMS. Gaps and limitations observed relative to a 5-scale benchmark: - The documentation does not uniformly present a formal, explicit cadence for annual or regular external independent policy reviews (beyond the stated periodic policy reviews for the H&S Policy and the ESMS's continuous improvement approach). While "periodically" and "continuous improvement" are referenced, there is less explicit detail on a mandated, organization-wide policy review cycle with defined frequency, scope, and verification steps across all environmental policies. - There is limited explicit evidence of measurable environmental policy targets and performance indicators issued directly from the environmental policies themselves (beyond general commitments and the ESMS monitoring framework). - The supplier/subcontractor policy content in the reference material emphasizes engagement and monitoring of subcontractors, but the assessed ESMS content primarily focuses on internal governance, with limited explicit evidence of a formal, documented process to ensure constant alignment of environmental policies with supplier performance in a verifiable, auditable manner across the entire supply chain. Recommendations to reach the next level (5) based on the reference



standards: - Formalize and publish a single, organization-wide policy review cadence (e.g., annual policy review by the ESG Governance Committee) that explicitly covers environmental policies, with documented inputs, approvals, evidence of stakeholder consultation, and verification steps. Include a clear link to the ESMS monitoring results and external benchmark alignment. - Extend measurable targets within environmental policies (e.g., explicit GHG reduction targets, resource-use intensity benchmarks, and compliance KPIs) with assigned responsibilities, data collection methods, frequency of measurement, and verification steps. - Strengthen supplier/subcontractor policy integration with a documented, auditable process: require that environmental policy standards and performance expectations be embedded in supplier agreements, include specific monitoring procedures, spot-check regimes, and corrective action plans linked to policy compliance—also include evidence of training for subcontractors and a formal mechanism for reviewing subcontractor performance at regular intervals. - Include explicit validation or independent assurance of policy alignment with recognized frameworks (e.g., IFC Performance Standards, ISO 14001 or equivalent) and publish summary evidence of alignment and gap remediation in annual ESG reports or equivalent governance disclosures. - Ensure the ESMS Manual contains a dedicated section detailing how policies are implemented in practice (roles, responsibilities, data collection, indicators, verification steps, and management review inputs) with concrete examples from operations to demonstrate practical application rather than policy rhetoric alone. In summary, the assessed ESMS shows strong alignment with management-system standards and continuous-improvement commitments, supporting a score of 4. To advance to a 5, the organization should codify explicit, auditor-ready policy review cadences, insert measurable policy targets within the environmental policies, and demonstrate rigorous, auditable supplier-policy integration and independent assurance.

★ ★ Score: 4/5

## Maturity Level



### Policies and procedures meeting standards

Sporadic communication, implementation, and review.

## Recommendations

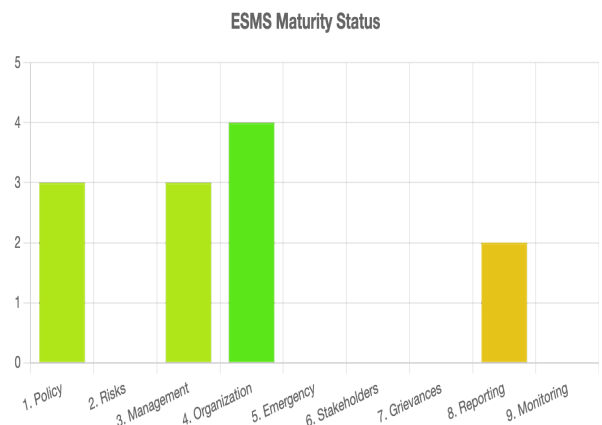
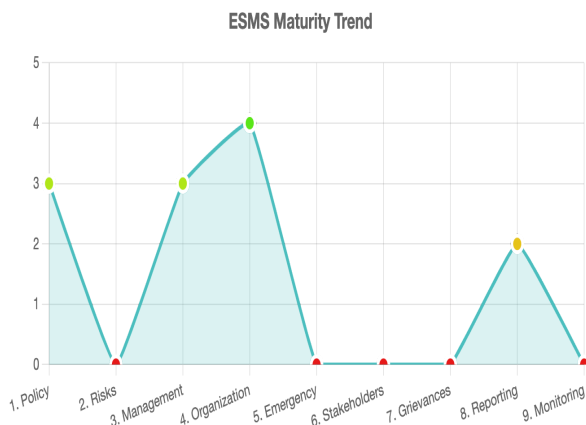


### Communicate to everyone in ALL languages

Set a schedule for management review and updates.

## Performance Visualization

This section illustrates highlights the most current score per element. For complete transparency, any unassessed elements are assigned a score of zero.





# ESG Performance Dashboard

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## DASHBOARD OVERVIEW

This dashboard provides a comprehensive summary of performance across all nine categories of IFC Performance Standard 1 (PS1).

Each chart illustrates the trajectory of scores over time, with a focus on the five most recent assessments for each element.

This visualization is designed to support informed decision-making by highlighting trends, measuring progress, and identifying key areas requiring improvement.

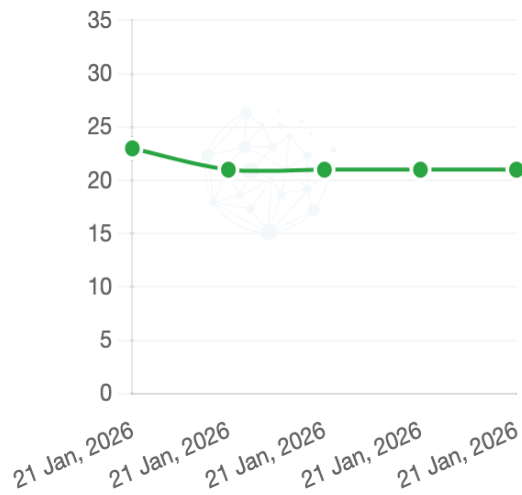
Use this tool to guide continuous enhancement in alignment with IFC's sustainability and risk management framework.

- ❑ **Comprehensive Analysis** - Covers all 9 PS1 categories with detailed scoring
- ❑ **Trend Visualization** - Tracks performance across 5 assessment periods
- ❑ **Gap Identification** - Highlights areas requiring improvement
- ❑ **Actionable Insights** - Supports continuous enhancement of ESG performance



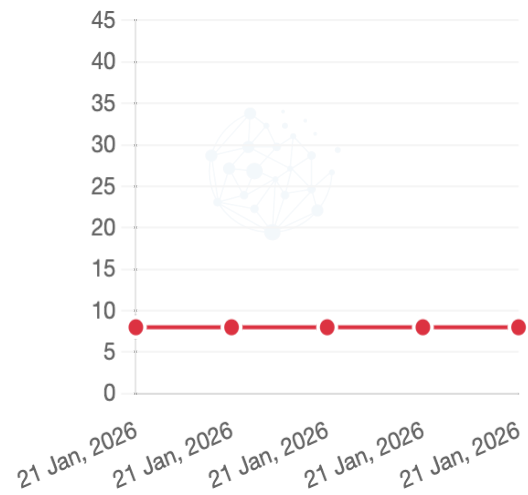
## POLICY SCORE

Current Score: 3/5



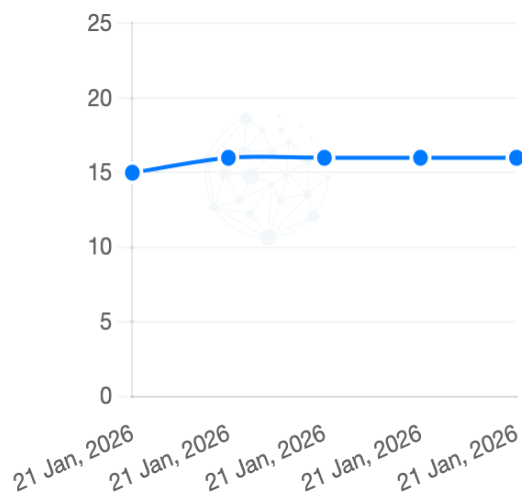
## RISK SCORE

Current Score: 0.89/5



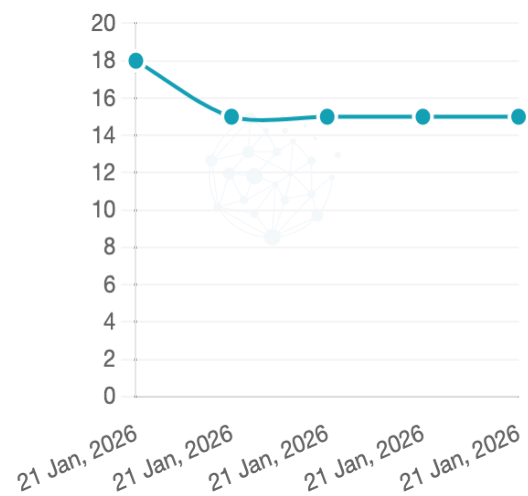
## MANAGEMENT SCORE

Current Score: 3.2/5



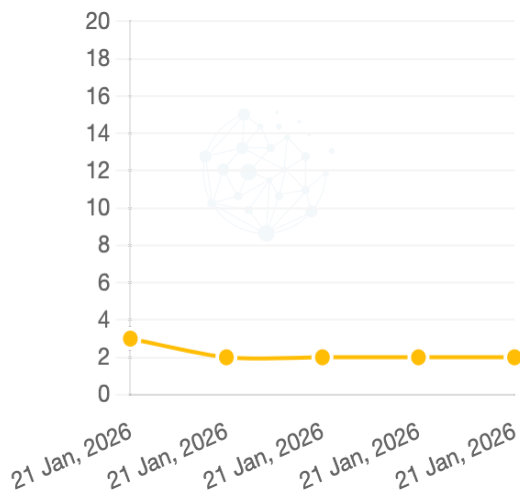
## ORGANIZATION SCORE

Current Score: 3.75/5



### ⚠ EMERGENCY SCORE

Current Score: 0.5/5



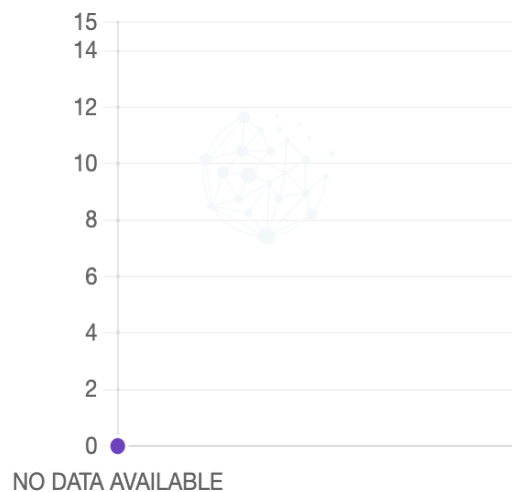
### 👥 STAKEHOLDER SCORE

Current Score: 0/5



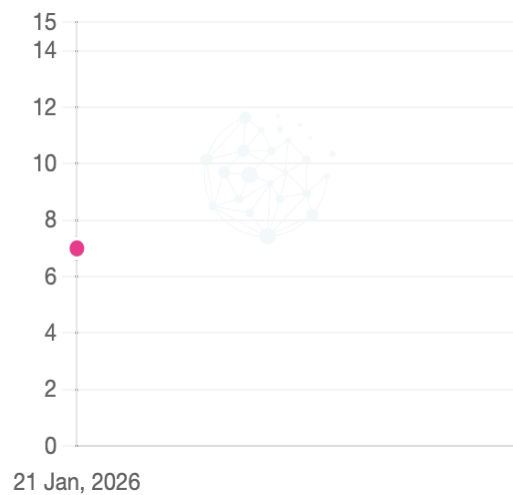
### 💬 GRIEVANCE SCORE

Current Score: 0/5



### 📄 REPORTING SCORE

Current Score: 2.33/5







## MONITORING SCORE

Current Score: 0/5



"*Sustainable leadership* isn't about being perfect—it's about being *accountable* for every step forward."

— PAUL POLMAN, FORMER UNILEVER CEO

"Building a world where we meet our own needs without denying future generations a healthy society is not impossible ... *The question is where societies choose to put their creative efforts.*"

— CHRISTOPHER FLAVIN, WORLDWATCH INSTITUTE