Environmental and Social Study and Action Plan for Project Eden

Final Report

Submitted to:

Submitted by

ESF Consultants
Environmental Management Consultants

East African Regional Office|Laibon Centre.
P.O Box 7745 00100, Nairobi Kenya|
Tel. 254 20 387 6512/237 7121 |
Cellphone. +254 736 100 205/6|

www.esfconsultants.org

Your Environmental Partner

Client:	Sub National Climate Finance Initiative (SCF)
Project:	Environmental Social Study and Action Plan
Project No:	3032026
Report Title:	Environmental and Social Study and Action Plan for Project Eden
Report No:	03
Version:	Final
Date Issued:	22nd May, 2026
Site Visit Date	24th -25th April, 2026
Assessment Cut-Off Date	08th May, 2026
First Draft Issued	12th May,2026
Client Comment Round	Round 1 – 15 May 2026 Round 2 – 01 June 2026
Prepared by:	Peter Kossakowski – E-Mobility Sector Expert Meryl Okeyo – Environmental, Health & Safety Specialist
Approved by:	Duncan Oyaro- Partner and Environment and Social Governance Lead 

This report reflects Project Eden's environmental and social management systems, operational practices and supporting documentation made available to ESF up to the Assessment Cut-Off Date of 08 May 2026. The assessment findings, compliance ratings and ESAP actions are based on information reviewed up to that date. During subsequent review rounds, Project Eden provided updates on actions completed, initiated or planned after the Assessment Cut-Off Date. These updates were reviewed by ESF during report finalisation; however, implementation of post-cut-off actions was not independently verified within the scope of this assignment. Accordingly, findings, compliance ratings and ESAP actions remain based on conditions and evidence available at the Assessment Cut-Off Date unless otherwise explicitly stated in the report. Progress against ESAP commitments should be tracked internally by Project Eden and may be verified through future monitoring or follow-up reviews.

Table of Contents

EXECUTIVE SUMMARY 7
1.0. 1
2.0 4
2.1. Overview 4
2.2. IFC Performance Standards 4
2.4. Gold Standard for the Global Goals 5
2.5. National Legal and Regulatory Framework 5
3.0 ENVIRONMENTAL AND SOCIAL BASELINE 6
3.1. Area of Influence 6
3.2 Environmental Baseline 7
3.2.1 Land Use and Operational Setting 7
3.2.2 Climate, Drainage and Surface Water Setting 8
3.2.3 Utilities and Resource Use 9
3.2.4 Waste Generation and Materials Management 10
3.2.5 Air Quality and Noise Environment 11
3.2.6 Ecological and Biodiversity Context 12
3.3 Social Baseline and Workforce Considerations 12
3.3.1 Workforce Profile and Labour Structure 12
3.3.2 Occupational Health and Safety Setting 13
3.3.3 Community and Stakeholder Setting 14
3.4 Climate Change Risk Screening 15
3.4.1 Physical Climate Risk Considerations 16
3.4.2 Climate Transition Risk Considerations 16
3.5. Ecosystem Services Screening 17
3.6 Scenario-Based Expansion Considerations 18
3.7 Stakeholder Engagement Process Assessment 19
4.0. 21
5.0. 65
5.1 Scope and Approach 65

5.2 Project Eden's Supply Chain Management Framework.....66
5.3 Assessment of Priority International Suppliers.....67
5.3.1 Supplier A — Frame and Chassis Manufacturing.....67
5.3.2 Supplier B — Battery Packs.....68
5.3.3 Supplier C — Metal Components.....69
5.3.4 Supplier D — Electronics and Controllers.....69
5.3.5 Additional International Suppliers with Audit Documentation.....70
5.4 Assessment of National Suppliers.....71
5.5 Supply Chain Key Findings and Recommended Actions.....72
6.0. 74
6.1 Scope and Methodology.....74
6.2 Risk Segmentation by Supplier Category.....75
6.3 Supplier Base Risk Heatmap.....75
6.4 Supplier Audit Scorecard: National Suppliers.....77
6.5 Priority Observations and Recommended Actions.....79
7.0. 81
8.0. CONCLUSIONS AND RECOMMENDATIONS.....99
9.0 APPENDICES.....102

EXECUTIVE SUMMARY

Project Description

Project Eden (Roam Electric), the 'Project' or the 'Company'), is a multi-national technology company founded in 2017 that designs, assembles, and deploys electric vehicles for the African market. The Company is headquartered in an industrial park at a 10,000 sqm manufacturing facility located in the capital city of an East Africa country (Kenya). The park was inaugurated by the President in July 2023 and is described as East Africa's largest electric motorcycle assembly plant, with a stated production capacity of up to 50,000 units per year at full scale. Current output is approximately 300 units per month. In February 2024, the Company raised USD 24 million in equity and debt to expand local manufacturing and scale production at the existing facility. The proposed Catalytic Finance (SCF) investment is the subject of this ESDD.

The activities assessed under this ESDD relate to Project Eden's ongoing electric mobility operations, including motorcycle assembly, battery diagnostics and testing, battery charging and swapping services, after-sales support, and associated rider services. These are established commercial operations with no defined end date and are expected to continue throughout the operational life of the Company. The proposed SCF investment will support the continued operation and scale-up of these activities, including expansion of the charging hub network and deployment of electric mobility solutions. The primary beneficiaries include informal sector riders, last-mile logistics operators, Company employees, customers, and the wider public through improved access to cleaner and lower-emission transport solutions.

The Company operates three product lines: (i) an electric motorcycle, designed for the informal sector (motorcycle taxi) and last-mile logistics sectors, with two chargable and swappable NMC lithium-ion battery packs and approximately 180 km combined range, priced from USD 1,500; (ii) an electric transit bus, assembled with a local partner, currently at pilot scale; and (iii) Company Energy, providing modular solar, inverter, and battery storage solutions. Beyond manufacturing, Company operates 16 charging hubs and a Service Center providing battery-as-a-service, after-sales support, and IoT-based fleet monitoring. The Company employs 227 staff across production, engineering, commercial, and hub operations functions. Total project investment in the SCF transaction has not been confirmed for this draft.

Summary of Stakeholder Engagement Process

The Company has developed a draft stakeholder engagement strategy, built on principles of inclusion, transparency, accountability, non-discrimination and "doing no harm," and managed by its ESG Lead with support from internal staff and external providers. The strategy identifies seven stakeholder groups—end customers and local communities, workers and unions, local government, national authorities, suppliers and SMEs, NGOs and civil society, and financiers and investors—and commits the Company to sharing project information promptly and clearly in both English and relevant local languages, using engagement methods undertaken at defined monthly, quarterly and annual intervals. A grievance redress mechanism aligned with IFC Performance Standard 1 and the GCF guidance note is in place, offering anonymous, multi-channel access (suggestion box, phone, SMS, email, WhatsApp and in person), with complaint acknowledgement within 7 days and resolution within 30 days. A reviewed Q4 2025 consultation on e-mobility solutions in East Africa—properly

notified, minuted and attended by identified stakeholders including an NGO, the local relevant—demonstrates the process working in practice. The overall framework is robust but not yet finalised or fully adopted: there is no union or collective-bargaining representation (though it is not discouraged), no grievances have been received so the mechanism remains untested, a grievance register template was unavailable for review, and an active stakeholder contact register is still being established.

Summary of Key E&S Risks and Impacts

The ESDD identifies the following as the most material E&S risks and impacts across Project Eden's operations, assessed under IFC Performance Standards, Equator Principles, and applicable national law. These are presented in order of severity:

Battery Safety and Fire Risk (PS4 — High): The battery lab is the highest-risk area in the facility. A 2025 lithium-ion thermal runaway incident occurred, triggering G4S evacuation. At the time of the site visit, the Li-ion Battery Safety Procedure remained in draft but was approved meanwhile by Senior Management Team (SMT) while companywide employee training remains outstanding – planned for Q2 2026; smoke detectors were partly absent across the facility (rated High Risk by the October 2025 Fire Safety Audit); fire-rated quarantine doors were observed propped open; the fire alarm pull-station was located 20–30 metres from the battery lab entrance; and no temperature monitoring or HVAC was in place in the battery lab. These gaps collectively represent the most material single risk area and are designated Critical for pre-close resolution.

Waste Management and Hazardous Materials (PS3 — High): Hazardous waste storage in the basement is unlocked, unlabelled, and accessible to all personnel — a direct non-compliance with the Company's own Waste Management Procedure. Paint and solvent containers are stored on open, unmarked shelves, while being in a separate storage room. No MSDS register is available on site. While several recycler related documents have been signed, a formal contract with Enviroserve (battery recycling) has not been executed yet. No consolidated waste volume tracker exists. Spill response is not in place despite the presence of oils, solvents, and paints on site.

Supply Chain EHS Governance (PS1 / PS2 — High): The Company has 40+ Tier-1 suppliers. Third-party quality audits (via Sofeast) exist for some international suppliers but cover quality management only, not EHS criteria; Battery Pack Supplier, Metal Components Supplier, and Electronics Supplier have no audit of any kind on file. Local supplier assessments consist of informal site visit notes and audits with no specific EHS checklist. A strategic supplier that manufactures fiberglass and resin storage tanks generating styrene VOCs, resin dust, and hazardous liquid waste, with no E&S assessment conducted. A supplier base risk heatmap (Section 6.3) shows all Chinese Strategic Tier 1 suppliers carry HIGH inherent E&S risk. The motorcycle frame supplier was changed from an Indian to a new Chinese supplier after the KEBS product certification was issued — a re-assessment is recommended. Conflict minerals reporting template (CMRT) has been obtained at the Supplier B level.

Product Safety — KEBS Re-assessment (PS4 — High): The KEBS Standardization Mark permit (SM#61121, valid to May 2027) was issued for the previous frame design. The Company subsequently changed the motorcycle main frame supplier from an Indian manufacturer to Chinese supplier (Sofeast quality score: 66/100, October 2024). A KEBS written confirmation or re-assessment confirming the new frame design meets KS ISO 13063-2:2022 is recommended.

OHS and PPE Compliance (PS2 — High): Multiple PPE non-compliances were observed on the production floor, including supervisors and managers without safety boots and a grinding operator without goggles. Project Eden restructured its H&S Committee in May 2026, establishing a two-tier structure: a Main H&S Committee (COO as Chair, meeting monthly on the last week of the month; first meeting 27 May 2026) and Departmental H&S Subcommittees (meeting every 3rd week). This exceeds the monthly/bi-monthly requirement and resolves the prior discrepancy. A hazard risk assessment has not been completed on the committed 6-monthly schedule, and near-miss reporting visibility on the production floor remains limited.

Hub Community Safety and External Grievance (PS4 / PS1 — Medium): External grievance contact details are not posted at any hub or the Service Centre. Hub operators lift 20 kg batteries over 70 times per shift without ergonomic aids. One new central fast charger is installed outdoors without weather protection. Hub-level community risk assessments have not been conducted.

Worker Welfare and Labour Conditions (PS2 — Medium): Some workers remain on rolling 1-year shift contracts after 3+ years of service without a formal pathway to permanent FTE status. Anonymous internal grievance channels may not be fully used, suggesting low awareness or trust.

Risk Category (A, B, or C).

Based on the nature and scale of the Company's operations and the findings of the ESDD, the Project has been assessed as a Category B Project in line with IFC Performance Standards and Equator Principles IV.

The Project's environmental and social risks and impacts are considered predominantly site-specific, operationally manageable, and capable of mitigation through implementation of the Environmental and Social Action Plan (ESAP). Key risks relate to lithium-ion battery safety, occupational health and safety, hazardous materials and waste management, supplier oversight, and community health and safety associated with charging hub operations.

ESAP Risk Prioritization

The following prioritisation framework was applied to ESAP actions identified during the ESDD:

Priority Level	Description
Critical Risk	Immediate risk of serious injury, fire, regulatory breach, material lender concern, or significant operational disruption requiring urgent action or pre-close mitigation.
High Risk	Material E&S, operational or compliance risk requiring prioritised corrective action within the ESAP implementation period.
Medium Risk	Moderate operational, procedural or governance gap requiring improvement to align with IFC Performance Standards and good international practice.
Low Risk	Minor procedural, administrative or housekeeping improvement opportunities with limited immediate E&S consequences.

Summary of mitigation measures (ESAP)

The ESDD identified a range of environmental and social risks associated with Project Eden's operations. The Company has already implemented several operational controls and management measures, including an Environmental and Social Management System (ESMS), statutory environmental and occupational safety audits, emergency response procedures, incident reporting systems, worker grievance mechanisms, and battery safety controls. During the ESDD, management further demonstrated responsiveness to identified issues through ongoing implementation of corrective actions relating to fire safety, hazardous waste management, and operational governance improvements.

The Environmental and Social Action Plan (ESAP) developed as part of this ESDD outlines additional mitigation measures required to strengthen alignment with IFC Performance Standards, Equator Principles IV, Gold Standard for the Global Goals (GS4GG), and applicable national regulatory requirements. The mitigation measures are considered achievable within normal operational and management timeframes.

Key mitigation measures are summarized below.

Risk Area	Key Mitigation Measures
Battery Safety & Fire	Implementation of the approved Battery Safety Procedure, employee training, smoke detection improvements and relocation and addition of fire alarms in high-risk areas, battery emergency drills and strengthened quarantine controls.
Occupational Health & Safety	OHS policy updates, display of the OSH Abstract, PPE enforcement, ergonomic risk assessment, Safety Committee governance strengthening, and improved technical training tracking.
Hazardous Materials & Waste	Improved hazardous waste storage, labelling, spill response preparedness, MSDS accessibility and waste tracking controls.
Community Health & Safety	Improved emergency communication, grievance visibility, and charging hub operational risk reviews.
Supplier & Contractor Oversight	Development of supplier E&S screening, monitoring and audit procedures for strategic suppliers.
ESMS & Governance	Formalisation of ESMS review processes, KPI monitoring, corrective action tracking and escalation pathways, develop the EPR 4-year plan with the relevant national authority, Improve document control
Resource Efficiency	Establish targets for resources (water, energy) consumption

1.0. INTRODUCTION

Purpose of the ESDD

The purpose of this Environmental and Social Due Diligence (ESDD) was to assess Project Eden's environmental, social, health and safety (ESHS) performance and management systems in relation to:

- Applicable IFC Performance Standards.
- Equator Principles IV.
- Gold Standard for Global Goals (GS4GG).
- Relevant World Bank Group Environmental, Health and Safety (EHS) Guidelines; and
- Applicable national legal and regulatory requirements.

The assessment was undertaken to:

- Identify material environmental and social risks and impacts associated with Project Eden's operations.
- Evaluate the adequacy of existing management systems and operational controls.
- Assess alignment with applicable lender and international good practice requirements.
- Develop a proportionate Environmental and Social Action Plan (ESAP) to address identified gaps.

Methodology

This Environmental and Social Due Diligence (ESDD) was undertaken through a combination of desktop review, site verification and stakeholder engagement activities. The assessment included review of documentation provided in the virtual data room, site visits to the head office, selected charging hubs and the Service Centre, as well as interviews with management, operational personnel and relevant staff.

The review further included verification of operational controls, physical conditions and ongoing E&S management practices observed during site walkthroughs. Applicable environmental, health and safety, labour and regulatory documentation were also reviewed as part of the assessment process.

The ESDD focused primarily on the following areas:

- Environmental and Social Management Systems (ESMS);
- Labour and working conditions;
- Occupational health and safety;
- Battery safety and emergency preparedness;
- Hazardous materials and waste management;
- Community health and safety;
- Stakeholder engagement and grievance management

- Supplier, contractor and regulatory compliance.

The assessment was undertaken against applicable IFC Performance Standards, Equator Principles IV (EP4), Gold Standard for the Global Goals (GS4GG), relevant World Bank Group Environmental, Health and Safety (EHS) Guidelines, and applicable national legal and regulatory requirements.

The findings presented in this report are based on information made available at the time of the assessment, together with observations and interviews conducted during the ESDD process.

Background of the Project

Project Eden is a East Africa-registered private limited company with multi-national founders. The Company was established in 2017, initially converting internal combustion engine vehicles to electric powertrains, and pivoted to original equipment manufacturing of electric motorcycles and buses from 2021. The Company's primary manufacturing facility was commissioned in 2023 following EIA approval in January 2023. The facility is located in an industrial zone. The facility occupies approximately 10,000 sqm under one roof and is leased from the property owner.

The Company's principal product is an electric motorcycle model, designed specifically for the informal transport sector (motorcycle taxi) and last-mile logistics market. The motorcycle uses swappable NMC (Nickel Manganese Cobalt) lithium-ion battery packs with a combined range of approximately 180 km and is priced from approximately USD 1,500. The Company operates a charging- and battery-as-a-service and buy-back model, with 16 charging and battery rental/swap hubs currently operating in the capital city (expandable to 30 hubs under current plans). The flagship social proposition is reducing the total cost of ownership for riders, increasing rider income, and reducing greenhouse gas emissions and urban air pollution.

In February 2024, the Company raised USD 24 million through a Series A equity round led by Equator Africa and a USD 10 million debt facility. The current SCF investment is the subject of this Environmental and Social Due Diligence study.

Description of Activities

Project Eden's operations span three integrated activity areas:

(i) Manufacturing at the headquarters: An 8-station motorcycle assembly line currently producing approximately 300 units per month (scalable to 50,000 units per year at current footprint), however in 2026 less than 300 bikes have been assembled in total. Assembly is primarily mechanical and electrical — frame fitting, sub-assembly integration, electrical/wiring harness installation, battery bay fitting, QC inspection, and end-of-line testing. A dedicated battery laboratory handles assessment, validation, and State of Health (SoH) testing and basic repairs. A paint booth (basement level, 1–2 times per week) and metal re-work workshop including grinding room and welding stations are also present. The Company's electric bus is assembled at a separate facility with a local production partner, currently at pilot scale. Company Energy (solar, inverter, battery storage) is operational at small scale, while at the headquarters park only components are stored and no other Company Energy activity being performed.

Battery specifications for the bus and Company Energy product lines are confirmed as follows: the bus — LFP chemistry, 255 kWh, 228 AH, 560.28 V; Company Energy systems — LFP chemistry, available in 2.5 kWh and 5.12 kWh configurations, 51.2 V DC. Both product lines use LFP chemistry, which carries a lower thermal runaway risk profile than NMC.

National waste management regulations entered into force on March 14, 2026. The Company has applied with the relevant national authority for registration and holds a membership certificate for a local responsible organisation project. A 4-year plan is yet to be submitted to the relevant national authority and is under development.

(ii) Battery Charging and Rental Network: The Company operates 16 charging hubs across the capital city providing battery charging and rental/swap services. Hub operators manage battery swaps in collaboration with the riders. Project Eden plans to expand the hub network to 30 sites. The battery buy-back scheme enables end-of-life batteries (State of Health below 60%) to be collected, transported to the headquarters, assessed, and recycled through Enviroserve.

(iii) After-Sales and Fleet Services: The national Service Centre handles after-sales support, warranty repairs, and rider onboarding. IoT-connected vehicle data is collected from all motorcycles to support fleet management, maintenance scheduling, and carbon credit / ITMO generation under a rider data-sharing agreement.

Locations, Spatial Footprint, and Key Infrastructure

Primary site — National Headquarters. 10,000 sqm under one roof. Houses assembly lines, battery laboratory, QC lab, Engineering lab, warehousing, distribution, offices, and a canteen. Partly powered by on-site solar PV (Phase 1: 55 kWp). Borehole commissioned January 2025. National workplace registration certificate valid to October 2026.

Hub network: 16 battery charging and swap hubs across the capital city, including a central hub and regional hub (both visited during the site visit, 24 April 2026). Expansion to 30 hubs planned.

National Service Centre: Provides after-sales support, warranty repairs, and rider services. Assessed during site visit (24 April 2026).

Supply chain spatial footprint: Primary international suppliers are in Chinese manufacturing zones (battery packs, frames, motors, controllers, electronics) and in India (being phased out). Primary local suppliers are in the local industrial zone. Battery recycling is handled at the local Enviroserve facility.

2.0 APPLICABLE FRAMEWORKS

2.1. Overview

This ESDD was undertaken against international lender standards, climate finance safeguard requirements and applicable national legal requirements. The assessment applied the IFC Performance Standards as the primary E&S benchmark, supported by Equator Principles IV, Gold Standard for the Global Goals safeguards and relevant national regulatory requirements.

2.2. IFC Performance Standards

Standard	Relevance to Project Eden
PS1: Assessment and Management of E&S Risks and Impacts	Relevant to Project Eden's ESMS, risk identification, incident management, supplier oversight, stakeholder engagement and ESAP implementation.
PS2: Labour and Working Conditions	Relevant to employment terms, worker grievance mechanisms, OHS, PPE, battery handling risks, contractor labour practices and worker welfare.
PS3: Resource Efficiency and Pollution Prevention	Relevant to energy and water use, GHG accounting, hazardous waste, battery recycling, e-waste, chemicals, MSDS, spill response and air/noise monitoring.
PS4: Community Health, Safety and Security	Relevant to battery safety, thermal runaway, charging hub risks, rider/customer safety, emergency response, traffic, security and external grievance mechanisms.
PS5–PS8	Screened as not materially triggered based on current operations, as Project Eden operates on leased industrial premises with no land acquisition, indigenous peoples, cultural heritage or material biodiversity impacts identified.

2.3. Equator Principles IV

Principle	Relevance to Project Eden
EP1: Review and Categorisation	Applied to identify and classify material E&S risks associated with Project Eden's battery operations, manufacturing, hubs and supply chain.
EP2: Environmental and Social Assessment	Applied through the ESDD gap analysis and review of operational, legal and E&S documentation.
EP3: Applicable Standards	Used to benchmark the Company against IFC Performance Standards, WBG EHS Guidelines and national law.
EP4: ESMS and ESAP	Relevant to the Company's ESMS maturity and the development of this ESAP.

EP5–EP6: Stakeholder Engagement and Grievance Mechanism	Relevant to workers, riders, customers, communities and hub-level grievance visibility.
EP9–EP10: Monitoring, Reporting and Transparency	Relevant to E&S KPIs, incident tracking, ESAP monitoring and lender reporting.

2.4. Gold Standard for the Global Goals

GS4GG Theme	Relevance to Project Eden
Sustainable Development Contribution	Relevant to the Company's e-mobility model, avoided emissions, rider income benefits and clean transport transition.
Safeguarding Principles	Relevant to labour, OHS, pollution prevention, community health and safety, grievance management and human rights safeguards.
Stakeholder Inclusivity	Relevant engagement with riders, customers, workers, host communities and public-facing hub users.
Gender Equality and Social Inclusion	Relevant to non-discrimination, GBV/SH prevention, worker welfare and inclusive access to benefits.
Climate and Environmental Integrity	Relevant to GHG accounting, carbon project claims, battery lifecycle management and EPR compliance.

2.5. National Legal and Regulatory Framework

Legal Framework	Relevance to Project Eden
National environmental Regulations and guidelines	Relevant to EIA licensing, annual environmental audits, air quality, waste and pollution control.
Health, safety and subsidiary rules	Relevant to workplace registration, OHS risk assessments, fire safety, noise, PPE, training and incident reporting.
Sustainable Waste Management Act and EPR Regulations	Relevant to battery and e-waste management, EPR registration, recycler arrangements and waste tracking.
Worker Injury Insurance	Relevant to worker injury insurance and occupational incident management.
Energy Act and National Standards	Relevant to charging systems, electrical safety and product certification.
Public Health Act	Relevant to sanitation, welfare facilities, waste handling and community health protection.

3.0 ENVIRONMENTAL AND SOCIAL BASELINE

3.1. Area of Influence

The Area of Influence (AoI) for Project Eden comprises the physical footprint of the Company's assembly, charging, diagnostics and support operations together with the surrounding environmental and social receptors that interact with or may be influenced by these activities.

Project Eden's operational footprint in East Africa is currently centred around three interconnected operational components:

- Headquarters, the main assembly and battery diagnostics facility located within the capital city's industrial corridor;
- A distributed network of charging and battery swap hubs located across the capital city; and
- The National Service Centre supporting diagnostics, repairs, rider onboarding and after-sales services.

The AoI further includes associated logistics corridors, supplier interfaces, waste handling systems, contractors, workers, riders, customers and neighbouring communities linked to these operations.

The AoI definition establishes the boundaries within which environmental and social risks, impacts and management measures are assessed and differentiates between direct operational impacts, indirect impacts associated with contractors and host infrastructure, and supply chain-related impacts associated with imported components, battery systems and waste management interfaces.

The Headquarters are located within an industrial zone in the capital city. The facility occupies approximately 10,000 sqm under a single enclosed operational footprint. The surrounding area forms part of capital city's established industrial corridor characterized predominantly by warehouses, logistics yards, freight transport operations, workshops, light industrial facilities and commercial transport infrastructure.

The operational AoI also includes 16 charging and battery swap hubs distributed across the city's major transport corridors and commercial nodes. Several hubs are integrated within existing TotalEnergies service stations while others operate within mixed-use commercial environments and retail parking areas including supermarket developments. These hubs serve as decentralized rider support and battery exchange points and experience frequent interaction with the informal transport sector's operators, pedestrians, motorists and surrounding commercial activities.

Table 3.1: Key Operational Infrastructure within the Area of Influence

Operational Asset	Location Context	Primary Operational Function
Headquarters	National Industrial Zone	Motorcycle assembly, battery diagnostics, warehousing and engineering

Operational Asset	Location Context	Primary Operational Function
National Service Center	Capital city commercial setting	Diagnostics, servicing, repairs and rider onboarding.
LR Hub	Commercial transport corridor	Battery swapping and charging
WW Hub	TotalEnergies integrated site	Charging and rider support
K Hub	TotalEnergies integrated site	Battery charging and swap operations
ORR Hub	Arterial commercial corridor	Charging and rider support
KSR Hub	Mixed commercial/residential setting	High-capacity charging operations
R Hub	Northern commuter corridor	Rider support and charging
AA Hub	Urban commercial strip	Charging and rider interface
FR Hub	Commercial arterial corridor	Battery charging
QL Hub	Retail integration setting	Charging services
LiR Hub	Commercial transport corridor	Northern route rider support
DC Hub	High-density transport corridor	Rider charging and battery swap services
JR Hub	Urban transport corridor	Battery charging and rider interface
MRL Hub	Industrial transport corridor	Fleet and logistics support

The Company's logistics and supply chain interfaces form an additional component of the AoI. Imported battery systems, frames, electronics and assembly components are transported through the regional logistics corridor linking the port city with the capital city's industrial area. The AoI therefore extends to transport routes, contracted logistics operators, third-party waste handlers and licensed battery management service providers supporting Project Eden's operations.

3.2 Environmental Baseline

3.2.1 Land Use and Operational Setting

The Headquarters are located within a heavily modified industrial environment within an industrial zone. The surrounding land uses are predominantly industrial and commercial in character and include logistics warehouses, vehicle yards, workshops, fuel stations, storage facilities and freight transport operations associated with the city's wider industrial corridor.

The operational footprint itself is fully paved and enclosed with limited remaining natural vegetation. Existing infrastructure within the area includes tarmacked road access, municipal drainage systems, electricity supply, telecommunications infrastructure and sewer connectivity.

The assembly facility consolidates multiple operational functions within one enclosed industrial space including:

- Mechanical and electrical motorcycle assembly;
- Battery diagnostics and testing.
- Warehousing and component storage.
- Engineering and quality control.
- Limited fabrication and re-work activities.
- Administrative functions.
- Worker welfare facilities.

Compared to conventional vehicle manufacturing plants, operations at the Headquarters are relatively low-intensity and primarily assembly-based. The assembly floor is largely hand-tool intensive with limited heavy industrial processing activities.

The charging hub network operates within a distinctly different land-use setting compared to the Headquarters. Most hubs are positioned within high-density urban commercial environments characterized by retail businesses, fuel stations, commuter corridors, mixed residential developments and public transport activity. Several hubs are integrated within existing TotalEnergies service stations and retail parking facilities, enabling use of existing transport access and commercial infrastructure.

The National Service Centre similarly operates within an urban commercial environment and supports diagnostics, maintenance and after-sales functions under a predominantly “ride-in, ride-out” operational model.

is the Headquarters are located within the broader industrial interface bordering the northern boundary of a national park. However, no ecologically sensitive habitats, protected vegetation or critical biodiversity features were identified within the operational footprint during the assessment.

3.2.2 Climate, Drainage and Surface Water Setting

The host city experiences a tropical highland climate with bimodal rainfall patterns characterized by long rains occurring between March and May and short rains occurring between October and December.

The regional industrial corridor experiences periodic localized flooding during heavy rainfall events due to extensive paved surfaces and constrained municipal drainage systems. Surface drainage within the Headquarters operational area is managed through the existing urban stormwater drainage network serving the industrial zone.

Project Eden’s operations are primarily assembly, diagnostics and charging-based and therefore generate minimal industrial process wastewater. Sanitary and kitchen wastewater generated at the Headquarters

is discharged into the city authority sewer network. No industrial effluent discharge points were identified during the assessment. Water use is largely associated with worker welfare, housekeeping and general operational support activities.

The National Service Centre operates primarily as a diagnostics and servicing facility and no evidence of commercial motorcycle washing or significant process wastewater generation was identified during the assessment.

Potential sources of surface water contamination within the operational setting include:

- Minor hydrocarbon leaks from delivery and logistics vehicles.
- Maintenance chemicals and workshop fluids.
- Spill scenarios involving damaged lithium-ion batteries.
- Firewater runoff during emergency incidents.

No natural surface watercourses were identified within the immediate operational footprint of the Headquarters.

3.2.3 Utilities and Resource Use

is the Headquarters are connected to municipal electricity and water supply infrastructure serving the city's industrial area. Water supply is supplemented through a registered borehole commissioned to support operational continuity.

Water demand across operations is relatively low and is associated primarily with:

- Worker sanitation and welfare.
- Kitchen and canteen use.
- Housekeeping.
- General facility maintenance.

Electricity demand is comparatively more significant due to:

- Battery diagnostics and charging activities.
- Assembly operations.
- Engineering and quality control work areas.
- Lighting and ventilation systems.
- Charging hub operations.

Operations rely heavily on national grid infrastructure supplied by national power company, although the Company has integrated rooftop solar photovoltaic systems at the Headquarters and selected charging hub locations to support partial renewable energy use and operational continuity.

A backup diesel generator is utilized during periods of grid instability or outages.

3.2.4 Waste Generation and Materials Management

Waste streams generated across Company operations are generally associated with assembly, diagnostics, charging and maintenance activities.

Waste generated at the Headquarters includes:

- Packaging materials from imported assembly components.
- Scrap metal offcuts.
- Electrical wiring and electronic components.
- General domestic waste.
- Workshop maintenance waste.
- Paint and solvent residues.
- Defective or degraded lithium-ion batteries.

The most environmentally significant waste stream relates to damaged, or end-of-life lithium-ion batteries generated from battery diagnostics, charging and operational return cycles.

Waste segregation practices were observed during the assessment, with separate storage areas identified for general, recyclable and hazardous waste streams. The ESDD identified engagement with licensed third-party waste management and battery handling service providers for management of general waste and battery-related waste streams.

Hazardous materials within the operational setting primarily comprise:

- Lithium-ion battery systems.
- Maintenance chemicals.
- Adhesives and solvents.
- Brake fluids and lubricants.
- Limited paint-related materials.

Battery diagnostics and storage areas represent the most sensitive operational zones due to the potential for thermal runaway events associated with damaged or improperly handled lithium-ion batteries.

Site observations identified opportunities for improvement relating to:

- Hazardous waste labelling.
- Secondary containment arrangements.
- MSDS accessibility.
- Spill preparedness.
- Formalized hazardous materials handling procedures.

3.2.5 Air Quality and Noise Environment

Ambient air quality within the wider operational setting is influenced primarily by heavy traffic activity associated with local main roads and the surrounding industrial corridor.

Project Eden's operations are primarily mechanical and electrical assembly activities and do not involve heavy industrial processing, combustion or large-scale atmospheric emissions.

Potential operational air emission sources include:

- Limited paint booth operations.
- Grinding and welding activities.
- Localized dust generation.
- Freight vehicle movement.
- Diesel generator use during power outages.

The charging hub network itself does not generate direct tailpipe emissions and therefore differs significantly from conventional fuel-based transport infrastructure.

Statutory air quality monitoring undertaken for the facility identified elevated particulate matter concentrations within the painting room relative to occupational thresholds, while other monitored parameters remained within applicable limits.

The wider operational environment surrounding head office is characterized by moderate-to-high background noise levels associated with:

- Freight transport.
- Industrial activity.
- Warehousing operations.
- Commercial traffic movements.

Operational noise sources within the Headquarters include:

- Pneumatic tools.
- Grinding and welding activities.
- Battery charging equipment.
- Motorcycle testing.
- General workshop operations.

Charging hub operations are generally characterized by low direct operational noise levels relative to urban traffic and commercial activity.

3.2.6 Ecological and Biodiversity Context

is the Headquarters are situated within a fully developed urban-industrial environment with limited natural habitat remaining within the operational footprint.

The facility lies within the broader industrial interface adjoining the northern boundary of a national park. However, all assembly, diagnostics and charging activities are conducted within enclosed industrial infrastructure and no direct impacts on wildlife habitats, migration corridors or ecologically sensitive receptors were identified during the assessment.

Given the urban industrial setting, ecological considerations within the AoI relate primarily to:

- Pollution prevention.
- Hazardous materials management.
- Stormwater control.
- Fire preparedness.
- Management of external lighting and operational disturbances.

The operational setting does not trigger the need for detailed ecological field surveys. Given the urban industrial setting, this assessment focuses on screening-level identification of material environmental risks rather than detailed ecological field surveys.

3.3 Social Baseline and Workforce Considerations

3.3.1 Workforce Profile and Labour Structure

The Company employs approximately 227 personnel across assembly operations, engineering, administration, charging hub operations, rider support, diagnostics and management functions.

The Company's workforce structure comprises permanent employees, shift-based workers, fixed-term employees, consultants and contractors distributed across assembly operations, engineering, diagnostics, charging hub operations, administration, rider support and management functions.

Permanent employment arrangements are primarily associated with engineering, supervisory, laboratory, management and core operational functions. Shift-based and fixed-term arrangements are primarily utilized within assembly and hub operations.

Shift workers operate on 8-hour shifts with a mandatory minimum 30-minute rest break. Weekly working hours are capped at 52 hours for day shift personnel and 60 hours for night shift personnel. Shift contracts are renewed annually, with employees progressing automatically to subsequent employment grades and salary increments subject to continued employment.

Recruitment, onboarding and contract issuance processes are managed through the Company's HR function and include identity verification, written employment contracts, induction on workplace policies, occupational health and safety requirements and grievance reporting procedures for employees, consultants and contractors.

Worker welfare infrastructure observed during the assessment included:

- Washrooms and sanitation facilities.
- Drinking water access.
- Kitchen and lunch areas.
- First aid provisions.
- PPE issuance arrangements.

However, housekeeping and sanitation conditions varied across operational areas, with some production washrooms requiring minor refurbishment and improved housekeeping controls. Hub personnel primarily relied on host-site facilities provided within integrated fuel station environments.

The automotive assembly and repair sector in the host country remains predominantly male-dominated. While the Company has initiated efforts to strengthen female participation within engineering and technical functions. At the time of the assessment, the workforce comprised 165 male employees and 62 female employees. Male employees represented the majority of operational and field-based roles, reflecting the broader gender profile commonly observed within the country's automotive assembly and technical repair sector.

The Company does not provide dedicated on-site worker accommodation facilities. Employees commute daily from different parts of the capital city's Metropolitan Area using public and private transport systems.

3.3.2 Occupational Health and Safety Setting

Occupational health and safety considerations within the operational setting are strongly influenced by:

- Lithium-ion battery handling and charging.

- Battery diagnostics activities.
- Electrical systems.
- Mechanical assembly activities.
- Manual handling tasks.
- Grinding and welding operations.
- Public-facing charging infrastructure.

Battery diagnostics laboratories and charging areas represent the most sensitive operational zones due to the potential for electrical hazards, thermal runaway incidents and battery-related fires.

A documented lithium-ion battery thermal runaway incident at the Headquarters in October 2025 further demonstrates the importance of emergency preparedness, fire detection, battery storage management and incident response systems within the operational setting.

The assessment identified existing occupational health and safety controls including PPE use requirements, restricted access to battery-related workspaces, fire detection infrastructure and emergency response arrangements. However, the Gap Analysis identified several improvement areas including inconsistent PPE compliance, incomplete hazardous material labelling, limited spill preparedness in some operational areas and inconsistent visibility of emergency and grievance information at hub locations.

3.3.3 Community and Stakeholder Setting

Project Eden's operations interact directly with multiple stakeholder groups including:

- Informal transport sector riders.
- Customers.
- Fuel station operators.
- Contractors and suppliers.
- Waste service providers.
- Logistics operators;
- Regulators.
- Neighbouring commercial operators and road users.

The charging hub network forms the most visible public-facing component of the Company's operational footprint.

Popular charging hubs experience concentrated rider activity during peak operational periods resulting in:

- Temporary motorcycle clustering.
- Localized parking pressure.
- Increased interaction between riders, customers, motorists and surrounding commercial activities
- Higher traffic activity within surrounding commercial environments.

The transition toward electric mobility also introduces broader social transition considerations within the capital city's transport ecosystem, particularly for informal roadside mechanics traditionally dependent on conventional petrol motorcycle servicing.

The assessment identified several groups with relatively higher vulnerability or exposure to operational risks within the current operational setting. These include shift-based and fixed-term workers with comparatively lower employment security, charging hub personnel involved in repetitive battery handling activities, informal transport sector riders dependent on the charging and battery rental ecosystem, and pedestrians and surrounding commercial users interacting with high-traffic charging hub environments.

No significant community conflicts or material off-site environmental impacts were identified during the assessment. However, opportunities were identified for strengthening:

- Community-facing emergency communication.
- External grievance visibility.
- Public awareness relating to charging hub safety and emergency procedures.

3.4 Climate Change Risk Screening

In line with the Equator Principles Climate Change Risk Guidance and IFC good international industry practice, a preliminary climate change risk screening was undertaken proportionate to the scale and operational nature of Project Eden's activities.

The screening considered both:

- Physical climate-related risks affecting operational continuity and worker safety; and
- Transition risks associated with evolving environmental regulation and low-carbon mobility expectations.

3.4.1 Physical Climate Risk Considerations

Project Eden's operations are primarily located within the capital city's urban industrial and commercial environment along major transport corridors that are periodically affected by heavy rainfall events, localized flooding and traffic disruption during peak rainfall seasons.

Key physical climate-related considerations relevant to the current operational footprint include:

- Localized flooding and stormwater accumulation within the city's industrial transport corridors during periods of intense rainfall.
- Dependence on municipal drainage infrastructure serving local main roads and surrounding commercial hub environments.
- Potential disruption to rider mobility, logistics operations and charging hub accessibility during severe weather events.
- Dependence on stable electricity supply for battery diagnostics, charging infrastructure and operational continuity.
- Increased operational reliance on backup power systems during periods of grid instability.
- Heat exposure affecting workforce comfort and productivity within assembly, workshop and charging environments, particularly where PPE use and battery-handling activities are required.

No major flood vulnerability was identified within the immediate operational footprint of the Headquarters during the assessment. However, the wider city industrial corridor remains vulnerable to localized urban flooding and transport disruption during heavy rainfall events.

3.4.2 Climate Transition Risk Considerations

Project Eden operates within a rapidly evolving electric mobility sector that is expected to experience increasing environmental and regulatory oversight as battery deployment volumes and charging infrastructure expand.

Key transition-related considerations include:

- Evolving regulatory requirements associated with lithium-ion battery handling, extended producer responsibility (EPR), hazardous waste management and electronic waste disposal.
- Increasing stakeholder and lender expectations relating to environmental, occupational health and safety and supply chain management practices.
- Potential future emissions reporting or climate-related disclosure obligations as the county's climate policy framework evolves.
- Increasing operational and reputational expectations relating to battery lifecycle management and recycling infrastructure capacity.

Although direct carbon pricing exposure is currently limited, evolving emissions-related compliance obligations and environmental reporting expectations may increase as the sector matures and operations scale.

The climate risk screening indicates that the Company's most material climate-related risks are associated with operational continuity, electricity reliability, battery lifecycle management and resilience of distributed charging infrastructure within the city's urban transport environment.

3.5. Ecosystem Services Screening

In accordance with IFC Performance Standard 6, a high-level ecosystem services screening was undertaken to identify environmental infrastructure and ecosystem-related dependencies relevant to the Company's current operational footprint.

Given the highly modified urban-industrial setting of the Headquarters and the predominantly commercial setting of the charging hub network, the assessment focused primarily on operational dependencies rather than direct ecosystem impacts.

Key ecosystem service dependencies identified include:

- Dependence on reliable municipal and borehole water supply for worker welfare and operational continuity;
- Dependence on stable electricity infrastructure supplied through the national grid and supplementary solar PV systems;
- Dependence on municipal drainage and sewer infrastructure serving the Headquarters and associated commercial hub locations;
- Dependence on external waste management and battery recycling infrastructure for environmentally sound management of hazardous and electronic waste streams;
- Dependence on transport and logistics infrastructure linking imported operational components through the regional transport corridor.
- Dependence on third-party recycling and waste service providers supporting battery and electronic waste management activities.

The assessment did not identify significant direct dependence on natural ecosystems or ecological extraction activities within the current operational footprint.

However, operational continuity and environmental compliance remain dependent on the reliability and capacity of supporting urban infrastructure systems, particularly electricity supply, waste management services, drainage infrastructure and battery recycling capacity.

As battery deployment volumes and charging infrastructure expand, continued monitoring of battery recycling capacity, waste infrastructure availability and electricity supply resilience will remain important operational considerations.

3.6 Scenario-Based Expansion Considerations

Project Eden's operational footprint continues to evolve in response to growth in electric mobility demand, battery circulation volumes and charging infrastructure deployment.

Potential future operational expansion may include:

- Additional charging hub locations.
- Increased battery charging and swap volumes.
- Expanded rider onboarding.
- Increased assembly throughput.
- Additional logistics and supplier interfaces.
- Growth of electric mobility and energy-storage operations.

Future operational scaling is expected to increase:

- Electricity demand.
- Battery handling volumes.
- Hazardous and electronic waste generation.
- Public interaction with charging infrastructure.
- Contractor management requirements.
- Workforce demands across operational facilities.

Given the predominantly urban-industrial setting of current operations, future expansion is not anticipated to require significant land acquisition or result in direct biodiversity loss. However, future charging hub locations should continue to be screened for:

- Public safety considerations.
- Compatibility with surrounding land uses.
- Emergency access requirements.
- Safe battery handling arrangements.
- Waste management requirements.

- Community interaction considerations.

Future expansion pathways may introduce additional permitting complexity, host-site coordination requirements, increased workforce demands and broader community interface considerations depending on the nature and location of future charging hubs or operational facilities. Expansion into more environmentally or socially sensitive operational settings may also increase the complexity of applicable IFC Performance Standard requirements and associated E&S management expectations.

The environmental and social baseline presented in this section should therefore be considered dynamic and subject to periodic review as the Company's operational footprint and charging infrastructure network continue to expand.

3.7 Stakeholder Engagement Process Assessment

Project Eden has compiled a stakeholder engagement strategy, which is currently in a draft form, and implemented the approach at various levels. The approach is based on key principles that focus on inclusion at all relevant levels and focus on transparency, accountability and non-discrimination, whilst 'doing no harm'. The overall stakeholder engagement system is managed by the ESG Lead and supported at different levels by internal staff and external service providers where necessary.

Identified stakeholder groups include the following:

- End customers and local communities they serve;
- Workers and unions (collective bargaining agents);
- Local government;
- National authorities;
- Suppliers and small and medium enterprises (SMEs);
- Non-governmental Organisations (NGOs) and civil society; and
- Financiers and investors.

The engagement process commits the Company to sharing key project information in a timely manner and in a clearly understandable format, in both English and relevant local languages.

The Company has identified various engagement methods for the different identified stakeholder groups which it commits to undertaking at regular defined intervals, including monthly, quarterly and annually, as may be relevant.

The Company confirmed that there is no union or collective bargaining representation within the workforce, however this is not discouraged by any company policies. The Company maintains an open communication relationship with workers and encourages feedback.

Project Eden has established a grievance redress mechanism for stakeholders that includes the following key components, as required by both IFC PS 1 and the GCF stakeholder engagement guidance note:

- Anonymous and accessible customer/stakeholder feedback mechanism and general grievance system;
- Multiple channels including suggestion box, phone line, SMS, email, WhatsApp, and in person at retail and service outlets;
- Acknowledgement of complaints/grievances within 7 days, and resolution within 30 days;
- Records and tracking of all grievances received.

The overall engagement process is robust however needs to be finalised and adopted fully. A review a recent report detailing a stakeholder consultation process undertaken by Project Eden in the last quarter of 2025, focusing on E-mobility solutions in the host country and mitigation activities illustrates the successful implementation of the stakeholder engagement process as detailed in the reviewed draft document. Prior notification of the meeting was given to relevant stakeholders (including a NGO, the Ministry of Energy, the National Transport and Safety Authority amongst others) reflective of those groups identified by the Company, and the meeting was duly minuted with an attendance register signed by all participants.

The Company confirmed that no stakeholder grievances had been received to date, as such the designed process remains untested. A stakeholder grievance register, template, was not available for review during the diligence assessment. Project Eden is working on establishing and maintaining an active stakeholder contact register. The company provides continuous updates on business activities via its online media centre.

4.0. GAP ANALYSIS

The table below presents the Environmental and Social Due Diligence gap analysis for Project Eden, assessed against IFC Performance Standards (PS1–PS8), the Equator Principles (EP1–10), Gold Standard for the Global Goals safeguards, and applicable national environmental and social legislation. Each checklist item is assigned a Compliance Status code as follows: **C (Compliant)** — available information indicates the project has fulfilled the requirement and/or is aligned with its intended outcome; **P (Partially Compliant)** — the project fulfils some aspects of the requirement but gaps remain that require corrective or enhancement measures; **N (Non-Compliant)** — available information indicates the project has not implemented actions to fulfil the requirement; **I (Insufficient Information)** — there is insufficient information available to make an assessment of the level of compliance; and **N/A (Not Applicable)** — the requirement does not apply to the project at the current time.

In addition to the compliance status assigned to each checklist item, the assessment also considered the materiality of identified environmental and social risks based on the nature of Project Eden's current operations, the environmental and social baseline presented in Section 3, site observations, document review and interviews.

For the purpose of this assessment, findings were reviewed in terms of:

- Severity, including the magnitude and potential consequence of the risk or impact;
- Likelihood, based on current operating conditions and available evidence;
- Duration and reversibility, including whether the impact is short-term, recurring, reversible or potentially persistent; and
- Nature of impact, including whether the risk is direct, indirect, contractor-related or supply chain-related.

The assessment also distinguishes between regulatory compliance issues and international good practice gaps. Regulatory compliance issues relate to national legal, permitting or statutory requirements, while international good practice gaps relate to alignment with IFC Performance Standards, Equator Principles IV, Gold Standard safeguards and World Bank Group EHS Guidelines. This distinction is important because some findings may not constitute a breach of national law but may still require improvement to meet lender expectations and good international industry practice.

The detailed compliance matrix below therefore provides the evidence base for the consolidated risk categorisation, while the Environmental and Social Action Plan translates material gaps into corrective actions, responsibilities and implementation timelines.

		Compliance Status	Comments	Recommendations
PS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS				
1.1	**Presence of an adopted Environmental and Social Management System (ESMS)**			
1.1.1	Is there an adopted Environmental and Social Management System (ESMS) in place for Project Eden's operations?	**C**	Project Eden has established a formally documented Environmental and Social Management System (ESMS) aligned with IFC Performance Standard 1. The ESMS is described in the *Environmental and Social Management System Overview* and consolidates existing E&S policies, procedures, plans, assigned responsibilities, and monitoring protocols into a single structured framework. The ESMS applies to all Company operations, including product development, battery testing, assembly, charging hubs, service centres, logistics, and office-based activities, and is overseen by the Head of Sustainability with ultimate accountability resting with the CEO. Evidence of ESMS implementation was confirmed through site observations (OHS practices, waste segregation, emergency equipment), management interviews and supporting audit evidence.	Periodically review and update the ESMS to reflect operational scale-up (e.g. charging hub expansion and battery operations at scale) and formally record annual ESMS management reviews.
1.1.2	Is the ESMS proportionate to the scale and nature of Company operations (battery testing, storage, charging hubs, service centres)?	**P**	The ESMS is operationally functional and broadly aligned with the Company's current activities; however, several controls remain at varying levels of formalisation and implementation maturity, particularly relating to battery safety governance, hazardous materials management, contractor and supplier EHS oversight, and hub-level community risk management	As operations expand, periodically reassess ESMS proportionality to ensure adequate coverage of hub-level risks and contractor-managed activities.

		Compliance Status	Comments	Recommendations
1.1.3	Does the Facility have approved Environmental and Social policies (including E&S Policy, OHS Policy and Code of Conduct)?	**C**	The Company has approved and management-endorsed E&S policies, including an Environmental Policy, Workplace Health and Safety Policy, and Code of Conduct. These policies are referenced within and underpin the ESMS framework. The Environmental Policy commits the Company to regulatory compliance, IFC Performance Standards alignment, labour rights protection, responsible battery lifecycle management, stakeholder engagement, and continuous improvement. The Code of Conduct establishes the ethical foundation for employee behaviour and supply chain engagement, while OHS commitments are reinforced through annual audits, training programmes, and safety committees. Policies are communicated to staff during induction and through internal communication channels.	Review and update the OHS Policy to reflect current operations at the Headquarters (post-2021 expansion) and formally reference battery-specific and hub-level risks.
1.1.4	Are Environmental and Social policies communicated to all workers, including shift and contract staff?	**C**	Environmental and Social policies are communicated through induction, toolbox talks and internal briefings and are accessible to staff through the company intranet and internal systems.	Continue reinforcing E&S policy awareness through periodic refresher briefings and toolbox talks.
1.1.5	Does the Facility have clearly defined roles, responsibilities and reporting lines for Environmental and Social management?	**P**	Roles and responsibilities for E&S management are defined in practice, with oversight by senior management and day-to-day coordination by the Sustainability function, supported by Operations, HR, and the OHS Committee. This was consistently confirmed through interviews. However, a single consolidated document clearly describing E&S roles, reporting lines, escalation pathways and stop-work authority was not verified.	Formally document E&S roles, responsibilities, reporting lines and escalation pathways within the ESMS governance structure and communicate it across departments.
1.1.6	Who are the designated ESMS/ Environmental and Social focal person responsible for implementation and coordination?	**C**	The Head of Sustainability is the designated ESMS and Environmental and Social focal person responsible for ESMS implementation and coordination, with oversight from the CEO. This role is defined in the Environmental	Formally document the ESMS focal person's authority, including escalation and stop-work powers, within the ESMS governance structure.

		Compliance Status	Comments	Recommendations
			and Social Management System (ESMS) Overview and was consistently confirmed during management interviews. The Sustainability function works in coordination with Operations, HR and the Occupational Health and Safety (OHS) Committee to support implementation across the Headquarters, charging hubs and service centre.	
1.1.7	Has the Facility identified and documented environmental risks associated with battery testing, storage, charging and waste management?	**C**	Environmental risks associated with battery testing, storage, charging activities and waste management have been identified and documented through the ESMS, the relevant national authority approved EIA, annual environmental audits, waste management procedures and the Battery Incident Response planning framework. Identified risks include battery fire and thermal runaway, hazardous and e-waste generation, chemical storage, air emissions from the paint booth and grinding room, and potential impacts from hub operations.	Continue updating risk registers following incidents, audits and operational changes, and ensure hub-level environmental risks are consistently captured as operations.
1.1.8	Does the Facility promote training on E&S matters?	**C**	The Facility promotes training on Environmental and Social matters. This includes structured training on OHS, fire safety, battery safety, emergency response, and general workplace safety. The *[Company] Training Register and Calendar (2025–2026)* demonstrates planned and completed E&S-related training activities across staff categories. Interviews confirmed regular toolbox talks and refresher sessions, including hub operators and operational staff.	Maintain a consolidated E&S training matrix and periodically review training needs as new processes and equipment are introduced.
1.1.9	Does the Facility have set out GRM procedures for Reporting E&S issues & concerns including external stakeholder grievance? Are grievances logged, tracked, resolved and communicated in a timely manner?	**P**	The Company has established a formal External Stakeholders Grievance Procedure, effective 01 January 2026, applicable to customers, suppliers, contractors, community members, business partners, regulators, visitors and members of the public. The procedure covers service/product complaints, contractual or commercial disputes, health, safety and environmental concerns,	Improve site-specific accessibility of the external grievance mechanism by displaying grievance contact details at charging hubs, the Service Center and other public-facing locations. Maintain a consolidated external grievance register showing date received, channel, issue type, responsible department, action

		Compliance Status	Comments	Recommendations
			ethical concerns, community/social impact complaints and data protection concerns. It provides multiple channels for submission, including email, telephone, written letter and in-person reporting, and requires grievances to be logged, acknowledged within 5 working days, investigated, responded to within 14–30 working days, and retained for at least 5 years. The Company communicates grievance and customer support channels to riders through onboarding, customer support lines, email and WhatsApp groups, and contact details are publicly available on the Project Eden website. However, during the site visit, grievance contact details were not consistently displayed at charging hubs and the Service Centre, and a consolidated external grievance log demonstrating tracking, closure and trend analysis was not reviewed during the ESDD. Emergency contacts observed at hubs, including G4S, ambulance, police and fire response contacts, support emergency response but do not in themselves constitute the external grievance mechanism.	taken, closure date and outcome. Periodically review grievance trends as part of ESMS management review.
1.1.10	What are the main E&S issues caused as a result of operations?	**C**	The main environmental and social issues associated with Project Eden's operations include lithium-ion battery fire and thermal runaway risks, occupational health and safety risks in workshops and battery handling areas, hazardous and e-waste generation, and community health and safety risks at public-facing charging hubs. These issues were identified through the ESMS, environmental assessments, site observations and interviews, and are being managed through existing procedures and controls.	Continue monitoring key E&S risk areas as operations scale, particularly battery safety and hub-related community health and safety risks.

		Compliance Status	Comments	Recommendations
1.1.11	Has the Facility undertaken EIA reports previously?	**C**	The Facility has undertaken an Environmental Impact Assessment (EIA) for its national operations, which was approved by relevant national authority in January 2023 and operates under a valid EIA licence. The EIA covers the Headquarters facility and associated activities.	Screen operational changes and expansion plans to confirm whether EIA amendments or additional approvals are required.
1.1.12	Does the Facility undertake Environmental Audits, Assessment or Investigations of its operations?	**C**	The Company undertakes environmental audits in line with national regulatory requirements. Annual environmental audits have been conducted by relevant national authority registered experts, with the most recent audit submitted in May 2025. Supported by specialist assessments including fire audits, OHS risk assessments, air quality monitoring and noise level measurements.	Ensure audit findings and recommendations are consistently tracked and closed out through the ESMS.
1.1.13	Does the Facility have systems in place for Monitoring and Auditing the E&S performance?	**P**	Monitoring and auditing of E&S performance is undertaken through environmental and OHS audits, incident reporting, OHS committee meetings, training records, and management oversight. Project Eden's ESMS Overview spreadsheet functions as a consolidated E&S action and compliance tracking tool across IFC Performance Standards and operational areas. The document also references quarterly E&S metrics reporting to leadership and annual internal reviews of ESMS effectiveness. However, evidence of a formalised ESMS performance monitoring processes with defined KPIs, measurable targets and documented periodic performance review outputs was not fully verified during the ESDD.	Continue strengthening ESMS performance monitoring by formalising measurable E&S indicators, targets and documented periodic management review processes to support ongoing performance evaluation and trend analysis.
1.1.14	Are Environmental and Social risks reviewed and updated periodically or following incidents, near-misses or operational changes?	**P**	E&S risks are reviewed following incidents, audits and operational changes, as evidenced by corrective actions from fire, OHS, air and noise audits and confirmed through interviews and observed corrective actions (e.g. following battery thermal incidents and fire safety audits). However,	Document a formal procedure for periodic review and update of E&S risks, including defined triggers following incidents and operational changes.

		Compliance Status	Comments	Recommendations
			a documented schedule or procedure for periodic E&S risk review was not verified.	
1.1.15	Are site-specific procedures in place for battery handling, charging, testing and emergency response?	**P**	Site-specific procedures for battery handling, charging, testing and emergency response are in place, including battery incident response arrangements and emergency preparedness measures observed on site. During the ESDD process, the Lithium-ion Battery Safety Procedure was under review and pending formal approval. The procedure has since been approved; however, full operational rollout and implementation across all relevant sites remains ongoing	Fully implement and operationalize the approved Lithium-ion Battery Safety Procedure across all relevant operational sites, including personnel awareness, training, and consistent application of battery handling and emergency response requirements.
1.1.16	Does the ESMS address Environmental and Social risks associated with contractors and suppliers?	**P**	The ESMS and Code of Conduct set out expectations for contractor and supplier behaviour, and supplier quality audits are undertaken for key suppliers. However, a systematic process for assessing and monitoring contractor and supplier E&S risks in line with IFC Performance Standards currently remains limited and primarily quality-focused, without systematic IFC-aligned EHS assessment, monitoring, or corrective action tracking for strategic suppliers and outsourced manufacturing activities.	Enhance supplier E&S screening, monitoring and corrective action tracking as part of the ESMS.
1.1.17	Are Environmental and Social incidents, accidents and near-misses recorded and investigated?	**C**	Environmental and Social incidents, accidents and near-misses are recorded using the Company's incident reporting system, including digital reporting tools. Incidents are reviewed by the OHS Committee and investigated, with corrective actions identified where required.	Continue maintaining incident reporting and investigation practices to support continuous improvement.
1.1.18	Are corrective and preventive actions tracked and closed out following incidents or audits?	**P**	Corrective and preventive actions are identified following incidents and audits, including those arising from fire safety and OHS audits. However, a consolidated E&S	Establish a centralized E&S corrective action register to track actions to completion and report on closure status.

		Compliance Status	Comments	Recommendations
			corrective action tracking system demonstrating closure status across departments was not verified.	
1.1.19	Does the Facility have an internal grievance mechanism for workers?	**C**	An internal grievance mechanism for workers is in place and documented within HR and ESMS procedures. Workers can raise grievances through supervisors, HR, and formal multiple reporting channels.	Continue reinforcing worker awareness and confidence in the grievance mechanism.
1.1.20	Are Environmental and Social risks associated with future expansion plans (e.g. charging hub scale-up) considered in planning?	**P**	Environmental and Social risks associated with future expansion, including charging hub scale-up, are recognised by management and have been discussed during planning processes. However, formal documented E&S risk assessments specific to expansion activities were not verified.	Integrate formal E&S risk assessments into planning and approval processes for future expansion and new projects.
1.1.21	Does the Facility assess climate-related risks (flooding, heat, power outages) and cumulative impacts as operations scale?	**P**	Climate-related risks such as power outages and energy availability are considered operationally, as evidenced by backup power solutions and solar PV installation. However, a documented climate risk or resilience assessment addressing heat stress, flooding and cumulative impacts of expansion was not verified.	Undertake a proportionate climate risk and resilience assessment to inform future operational and expansion planning.
PS 2: LABOUR AND WORKING CONDITIONS				
2.1	**Labour and Working Conditions**			
2.1.1	Does the Facility have documented HR policies governing recruitment, employment terms and working conditions?	**C**	Employment terms and working conditions are governed through three documents: (i) a national Employment Contract, (ii) a Shift Policy, and (iii) a Remuneration Framework. The Employment Contract specifies: a probation period of three (3) months, extendable once by a further three (3) months; salaried working time of 40 hours per week, Monday to Friday; monthly salary payment; statutory deductions including PAYE; 21 working days of annual	Review HR policies periodically to ensure continued accuracy as workforce size and operational arrangements evolve.

		Compliance Status	Comments	Recommendations
			leave per year; maternity leave of 90 calendar days; paternity leave of 14 calendar days; and termination notice periods as per national law. The Shift Policy specifies shift-based working conditions, including 8-hour shifts, rest breaks, overtime pay rates, and leave accrual. The Remuneration Framework specifies job grades, salary bands, performance bonus ceilings, and cost-of-living adjustment principles. These documents apply across the Headquarters, the Service Centre, and charging hubs.	
2.1.2	Are employment contracts in place for all workers, including permanent, shift and contract staff?	**C**	All full-time and shift workers are engaged under written employment contracts issued at induction. Each contract specifies the job title, contract duration, working hours, salary, leave entitlements, and termination conditions. Consultants are engaged under written consultancy agreements. Workforce records confirm contract coverage for workers at the Headquarters, the Service Centre, and charging hubs.	Continue periodic internal verification that all active workers have signed contracts on file.
2.1.3	Does the Facility have defined recruitment and onboarding procedures?	**C**	Recruitment and onboarding procedures are defined and implemented through HR processes and supporting policies. Recruitment includes identity verification, reference checks and issuance of written offer letters prior to engagement. Onboarding includes contract signing, induction on company policies, the Code of Conduct, occupational health and safety requirements, and grievance mechanisms. The Performance Management Framework confirms that performance expectations and reporting lines are communicated at the start of employment. These practices were verified through document review and interviews with HR and	Continue using standardised onboarding checklists to ensure consistent induction coverage for all workers, including shift and hub-based staff.

		Compliance Status	Comments	Recommendations
			management, and no gaps in recruitment or onboarding processes were identified.	
2.1.4	Are working hours, overtime and rest periods managed in compliance with national labour law?	**C**	Salaried employees are contracted to work 40 hours per week, Monday to Friday, under all-inclusive salaried contracts. Shift workers work 8-hour shifts. Each shift includes a mandatory minimum rest break of 30 minutes. Weekly working hours for shift workers are capped at 52 hours per week for day shifts and 60 hours per week for night shifts. Overtime is paid at 1.5 times the normal hourly rate for hours worked beyond the weekly cap, and at 2 times the hourly rate for work performed on rest days and public holidays. These limits, break durations and pay rates are explicitly stated in the Shift Policy.	Continue monitoring cumulative weekly hours, particularly for night-shift workers, to manage fatigue.
2.1.5	Are wages, benefits and statutory deductions compliant with legal requirements?	**C**	Wages are paid monthly through payroll. Statutory deductions include PAYE and other legally required contributions. Shift worker pay is structured by job group and grade, with fixed base shift rates and defined overtime multipliers of 1.5× and 2×. The Remuneration Framework commits to market benchmarking. The framework does not include a numerical statutory minimum wage comparison table; however, no cases of delayed payment, unpaid wages, or unlawful deductions were identified.	Maintain documented records demonstrating periodic checks against statutory minimum wage levels.
2.1.6	Does the Facility have policies on Non-Discrimination and Equal Opportunity and fair treatment?	**C**	The Company has a dedicated Non-Harassment and Non-Discrimination Policy applicable to all employees and representatives. The policy explicitly prohibits discrimination on grounds including gender, age, nationality, disability, religion and other protected characteristics, and defines sexual harassment and	Continue annual refresher training and monitoring of policy awareness, particularly for shift and hub-based staff.

		Compliance Status	Comments	Recommendations
			gender-based violence, including examples of prohibited conduct. It establishes a zero-tolerance approach, provides multiple reporting channels (including anonymous options), commits to protection from retaliation, and provides for victim support measures such as counselling and compassion leave. Policy availability during induction and periodic refresher training were confirmed through document review and interviews. No formal GBV or sexual harassment cases were reported to management in the last reporting period.	
2.1.7	Does the Facility have policies explicitly prohibiting child labour and forced labour?	**C**	Employment contracts and the Supplier Code of Conduct explicitly prohibit child labour and forced labour. Recruitment requires presentation of national identification documents. No workers under the age of 18 years were observed at the Headquarters, the Service Centre, or charging hubs.	Maintain age-verification requirements during recruitment and contractor onboarding.
2.1.8	Does the Facility have in place a Gender Based Violence and Sexual Harassment Policy?	**P**	The Company has a formal Non-harassment & Non-discrimination Policy applicable to all employees and company representatives. The policy includes zero-tolerance provisions relating to workplace discrimination and sexual harassment, defines prohibited conduct, establishes reporting and escalation channels (including anonymous reporting), provides non-retaliation protections, and references disciplinary procedures and survivor support measures including counselling services and external referral pathways. Annual refresher training is also under the policy. However, the framework is primarily workplace-focused, and evidence of broader GBV/SH risk management measures relating to contractors, public-facing charging hubs, and external stakeholder interactions was not fully evidenced during the ESDD.	Continue strengthening GBV/SH awareness, reporting and implementation measures, including contractor awareness, training records, and consideration of public-facing operational risks at charging hubs and service centres.

		Compliance Status	Comments	Recommendations
2.1.9	Is there a grievance mechanism available to workers?	P	An internal grievance mechanism is defined within HR policies and the Incident Reporting and Resolution Procedure and is managed by the People Team. Workers can report grievances through supervisors, HR, anonymous comment boxes or online channels. Approximately six grievances were reported in the last year, mainly related to misconduct cases, and were handled through disciplinary procedures. This aligns with the ESMS findings under PS1. However, site observations indicated that grievance contact details were not consistently displayed in all operational areas, particularly at hubs.	Improve physical visibility of grievance contact information at all sites while maintaining existing grievance handling processes.
2.1.10	Are labour practices of contractors and third-party service providers monitored and managed?	P	Contractors and third‑party service providers, including security firms, cleaning services, waste handlers and recyclers such as Enviroserve, are governed through contractual arrangements, the Supplier Code of Conduct and onboarding requirements. These instruments set expectations on labour standards, health and safety, and ethical conduct. While onboarding screening and code‑of‑conduct sign‑off are in place, periodic labour and working‑conditions audits of contractors and third‑party service providers were not consistently evidenced during document review or interviews.	Introduce periodic contractor labour compliance checks and document findings and corrective actions.
2.1.11	Has the Facility provided welfare provisions for workers? Toilets, access to drinking water, first aid	P	At the Headquarters, toilets serving production staff were functional and accessible but were observed to be older and in need of improved housekeeping and minor refurbishment, such as repainting, compared to management facilities. At the National Service Centre and Headquarters offices, sanitation facilities were observed to be clean, modern and well maintained. Charging hubs are located within leased petrol station premises, in	Improve housekeeping and minor refurbishment of toilets at head office, formalise welfare arrangements with host petrol stations and clear signage at hubs.

		Compliance Status	Comments	Recommendations
			practice, workers use the station washrooms, although no signage was present to indicate this arrangement. These observations indicate that welfare facilities exist but are inconsistently maintained and communicated across locations.	
2.2	**Occupational Health and Safety**			
2.2.1	Does the Facility have an Occupational Health and Safety (OHS) policy in place?	**P**	There is a formal Workplace Health, Safety and Working Environment Policy approved by senior management and aligned with ISO 45001, ILO standards and the national law. The policy explicitly commits the company to risk assessment, incident and accident reporting, provision of PPE, fire prevention and response, first aid, machinery safety, ergonomics, sanitation, drinking water, and maintenance of OHS records. It also establishes requirements for a Safety Committee, safety audits, employee training, and emergency procedures. These commitments were verified through policy review and confirmed during interviews with the OHS Committee Chair and management. However, the policy dates to September 2021 and does not explicitly reference battery-specific risks such as thermal runaway, change of batteries, quarantine procedures, or hub-level battery charging operations that now form a material part of the Company's activities.	Update the OHS Policy to explicitly incorporate battery-specific hazards, controls and emergency response procedures reflected in current operations.
2.2.2	Has the Facility conducted OHS risk assessments for battery testing, charging, storage and workshop activities?	**P**	The Company has conducted an OHS Risk Assessment (October 2025) covering production, workshop activities, battery handling, fire risk, noise exposure and ergonomics. Interviews confirmed that battery charging, handling and storage risks were considered within this assessment. In addition, operational battery risks are actively managed at hub and workshop level through defined procedures	Undertake and document a dedicated battery-specific OHS risk assessment covering testing, charging, storage and transport, and formalise a periodic review cycle.

		Compliance Status	Comments	Recommendations
			embedded in training and SOPs, including inspection for swelling, heat, leakage, damaged connectors, charging temperature limits, and quarantine of unsafe batteries. However, no standalone battery-specific risk assessment document was available, and the six-monthly hazard reassessment cycle committed to in the OHS Policy has not been consistently implemented.	
2.2.3	Are workers provided with training on OHS risks, battery safety, fire safety and emergency response?	**C**	Workers receive OHS induction, general fire safety and first aid training, as confirmed through training records and interviews. In addition, the Company has implemented a detailed Battery Operations Training programme (May 2026) for hub operators and battery-handling staff. This training covers battery anatomy, warning signs (heat, smell, swelling, leakage), charging rules, temperature limits, PPE requirements, quarantine procedures, damage classification, emergency escalation, documentation and safe issuing workflows. The training also includes clear instructions on when to stop operations, isolate batteries and contact supervisors or emergency services. Interviews with hub staff confirmed familiarity with these procedures, and the training materials were reviewed. While this demonstrates strong operational training coverage, battery-specific emergency drills (e.g. simulated thermal runaway response) have not been documented.	Maintain regular battery safety training refreshers and introduce documented battery-specific emergency drills to complement existing training.
2.2.4	Has the facility developed an OHS Hierarchy and assigned responsibilities?	**C**	An Occupational Health and Safety Committee is formally established, with defined membership representing facilities, production, quality, warehouse, aftersales and sustainability functions. The committee is chaired by the Facilities Engineering Manager and includes designated representatives and alternates. Roles for fire marshals,	Document the committee's meeting frequency and escalation thresholds in a short terms-of-reference note.

		Compliance Status	Comments	Recommendations
			first aiders and safety champions are defined in the OHS Policy and were confirmed during interviews. This demonstrates a clear hierarchy and assignment of OHS responsibilities.	
2.2.5	Does the facility maintain OHS files and records on site?	**C**	OHS records are maintained, including the OHS Policy, risk assessments, safety committee composition, training records, fire and safety audits, and incident summaries. The OHS Policy commits to maintaining registers and records in line with national regulatory requirements.	Maintain version control and ensure records are consolidated in a single OHS repository.
2.2.6	Does the facility promote OHS awareness and training programs? OHS risks, battery safety, fire safety and emergency response?	**C**	OHS awareness is promoted through induction, toolbox talks, annual fire safety training, visible safety rules, and the Battery Training programme. The Battery Training (May 2026) explicitly reinforces “see something, say something”, PPE use, hazard escalation, quarantine procedures and emergency contacts. Interviews with hub operators confirmed familiarity with these messages.	Introduce short refresher sessions annually for battery safety and emergency response.
2.2.7	Is appropriate Personal Protective Equipment (PPE) provided, maintained and consistently used to safeguard against H&S risks?	**P**	PPE requirements are clearly defined in the OHS Policy and Battery Training, including insulated gloves, safety shoes with steel toes and protective clothing. PPE is provided to workers. However, site observations identified inconsistent use on the production floor and at some workstations and worn PPE in certain areas. Interviews indicated replacement delays can occur.	Improve PPE enforcement by supervisors and shorten PPE replacement turnaround time.
2.2.8	Does the Facility have in place adequate firefighting facilities as well as trained fire marshals? (fire detection, suppression systems and evacuation routes)	**P**	Fire extinguishers are installed and visible, evacuation routes are marked, and fire assembly procedures are defined in the OHS Policy. Fire marshals are designated, and general fire drills have been conducted. The OHS Policy includes detailed fire emergency procedures, reporting and registers. A battery thermal incident in 2025 was managed through evacuation and escalation.	Add battery-specific fire drill simulations to existing fire drill programmes.

		Compliance Status	Comments	Recommendations
			While firefighting infrastructure and trained fire marshals are in place, critical gaps identified in the October 2025 Fire Safety Audit, including absent smoke detectors and battery-lab emergency response limitations remain under corrective implementation	
2.2.9	Does the facility have systems in place for Monitoring and Auditing the OHS performance?	**P**	OHS performance is monitored through safety audits, fire audits, incident reporting, and Safety Committee oversight. Interviews confirmed issues are reviewed at committee level. However, a documented set of OHS performance indicators (e.g. incident rates, training coverage, near misses) was not presented.	Define and track a small set of OHS KPIs for management review.
2.2.10	Does the facility undertake Risk Assessment of their operations?	**C**	Operational risk assessments have been undertaken, including the October 2025 OHS Risk Assessment, covering production, workshop and battery handling risks. Battery risks are operationalised through SOPs and training, including inspection, charging limits and quarantine procedures.	Ensure risk assessments are updated following incidents or operational changes.
2.2.11	Are there records for employee training on H&S?	**C**	Training records are maintained for OHS induction, fire safety, first aid and battery operations. The Battery Training materials and attendance confirmation were reviewed, and interviews confirmed staff participation.	Continue maintaining training registers and refresher tracking.
2.2.12	Does the facility undertake Health and Safety Audits?	**C**	Health and Safety audits have been conducted in line with OSHA requirements and were available for review. Audit findings are discussed internally.	Ensure audit findings are logged into a corrective action tracker.
2.2.13	Does the Facility undertake Fire Audits?	**C**	A Fire Safety Audit was conducted in October 2025. Findings were identified and partially closed out at the time of the site visit.	Track all fire audit corrective actions to documented closure.
2.2.14	Are corrective and preventive actions implemented and tracked to closure following incidents?	**P**	Corrective actions are identified following incidents and audits. However, interviews confirmed that actions are	Introduce a central corrective action register for OHS issues.

		Compliance Status	Comments	Recommendations
			tracked across different documents rather than through a single consolidated tracker. This is particularly important given the significance of the October 2025 battery thermal runaway incident and the need to demonstrate systematic closure of all associated corrective actions.	
2.2.15	Has the facility placed safety signage to notify personnel of potential H&S hazards within the facility?	**P**	Safety signage was observed in production and battery handling areas, including charging rules and warning signs. However, signage was not consistent across all areas and was limited at hubs.	Standardise safety signage across all operational locations.
2.2.16	Does the Facility have a grievance mechanism accessible to all workers?	**C**	A grievance mechanism is in place and accessible through supervisors, HR and anonymous channels, consistent with ESMS findings under PS1 and confirmed during interviews.	Improve visibility of grievance contact details at all sites.
2.2.17	Are workers aware of the grievance mechanism and able to use it without fear of retaliation?	**P**	Permanent staff demonstrated good awareness during interviews. Awareness among shift and hub-based staff was weak	Reinforce grievance awareness during induction and refresher training.
2.2.18	Are grievances logged, tracked and resolved within defined timelines?	**P**	Grievances are logged and handled by HR, but a consolidated grievance register with timelines, and closure status was not reviewed.	Maintain a consolidated grievance register.
2.2.19	Provide copies of certificate of registration of workplace issued under OSH.	**C**	The workplace is registered under OSHA, and registration is referenced in OHS documentation.	National regulatory certificate confirmed — issued 4 October 2025, valid to 4 October 2026
2.2.20	Provide copies of incident/accident recording sheets together with the incident/accident investigation reports.	**C**	Incident summaries and full investigation reports with root cause analysis exist.	Ensure all incidents are supported by documented investigation reports.
2.2.21	Are there any GBV cases reported within the facility?	**C**	No GBV cases were reported to management in the last reporting period, as confirmed through HR interviews and grievance summaries.	Continue confidential reporting and monitoring mechanisms.

		Compliance Status	Comments	Recommendations
PS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION				
3.1	**Resource Efficiency**			
3.1.1	What key natural resources (energy, water) are used across the Facility's operations?	**C**	Grid electricity is the primary energy source, supplemented by on-site solar PV (55 kWp Phase 1). Diesel backup generator used during grid outages. Water is sourced from two metered connections: municipal (NCWSC) and borehole (active since January 2025). Water use is exclusively sanitary. 2024 total electricity consumption: approximately 220,134 kWh (grid 167,304 kWh, solar 44,916 kWh, generator 13,315 kWh equivalent to 4,445 litres diesel). 2024 total water consumption: approximately 2,707 m^3 (municipal supply).	Continue monitoring energy and water consumption on a monthly basis. Include hub-level electricity metering as the hub network expands to 30 sites. Report annual consumption figures to lenders.
3.1.2	Does the Facility monitor energy consumption across the Headquarters, service centres and charging hubs?	**P**	Electricity consumption is monitored monthly at the Headquarters. Records covering 2024, 2025 up to March 2026 are available, tracking grid import, solar consumed, solar produced, and generator usage by month. Hub-level energy monitoring was mentioned during the site visit but documentation was not confirmed.	Share annual electricity consumption data (kWh, grid vs solar split). Confirm whether hub-level meters and monitoring are in place or planned as the hub network expands
3.1.3	What is the current energy demand for the Facility and the main source of energy? (renewable or non-renewable)	**C**	2024 grid import: 167,303 kWh. Using a conservative grid emission factor of 0.40 kgCO2/kWh, Scope 2 for 2024 is approximately 67 tCO2e; using the IEA 2022 country-specific factor of 0.136 kgCO2/kWh (reflecting approximately 90% renewable grid generation) it is approximately 23 tCO2e. Both figures are well below the IFC PS3 threshold of 25,000 tCO2e/year. Diesel Scope 1 for 2024: 4,105 litres → approximately 11 tCO2e. Total Scope 1+2 upper bound: approximately 78 tCO2e/year. From September 2025, electricity consumption declined sharply following e-bus charging cessation at the Headquarters.	Formalise energy consumption monitoring. Document solar Phase 2 timeline as part of an Energy Conservation Plan. Formalise energy consumption monitoring to cover all sites including hubs. Establish a formal GHG accounting process linked to the carbon project/ITMO timeline.

		Compliance Status	Comments	Recommendations
3.1.4	Does the Facility monitor water consumption across its operations?	**C**	Water consumption is monitored via national service provider billing. Monthly records are available from January 2024 to December 2025 (October 2025 bills not available). From January 2025, two metered connections are in use: borehole (primary source January–June 2025) and municipal (primary from July 2025). Water use is exclusively sanitary — no industrial process water. The borehole is registered with the Water Resources Authority; a WRA permit renewal receipt (March 2024, 418,050 paid) is on file.	Continue monthly water consumption monitoring. Maintain WRA borehole registration and keep renewal records on file.
3.1.5	What is the current water demand for the Facility and what is the main source for this water? (per day, month or year)	**C**	Monthly water consumption data is available. 2024 average: approximately 246 m^3/month; peak recorded: 932 m^3 (September 2025). Both municipaland borehole sources are metered. The borehole is WRA-registered (permit renewal confirmed March 2024). October 2025 billing data is not available.	Maintain WRA borehole registration and ensure renewal records are kept current. Continue monitoring and reporting monthly water consumption by source.
3.1.6	Does the Facility have measures in place to promote efficient use of energy and water where feasible?	**P**	LED lighting in place (up to 85% energy savings vs incandescent per national relevant authority audit). Solar PV reduces grid dependence. No formal Energy Conservation Plan or water efficiency targets documented.	Develop an Energy Conservation Plan including solar Phase 2 timeline and efficiency targets. Include water targets in Environmental Policy update.
3.1.7	Are charging hubs designed and operated to minimise energy losses and safety risks?	**P**	Hubs use solar power and dedicated chargers. A new 6 kW fast charger at the WWi hub is installed outdoors without weather protection. Chargers at the WW hub are not permanently fixed to their shelves, creating a fall and damage risk. Preventative maintenance checks are conducted every six months; maintenance records are on file.	Install weather cover over the outdoor fast charger at WW hub. Fix chargers permanently to shelves at all hubs. Continue semi-annual maintenance checks and maintain inspection records for all hub chargers.
3.1.8	Does the Facility have a Resource Conservation/Management Plan?	**P**	No formal Resource Conservation or Energy Conservation Plan is in place. The Environmental Policy does not include	Update Environmental Policy to include measurable resource efficiency targets. Draft an Energy Conservation Plan as an ESAP commitment.

		Compliance Status	Comments	Recommendations
			specific, measurable targets for energy or water reduction.	
3.1.9	How much water does the Facility recycle?	**NA**	No water recycling applicable — assembly process does not use process water. Sanitary water discharged to city sewer.	No action required for current operations.
3.1.10	Does the Facility have an adopted Energy Conservation Plan?	**P**	No formal Energy Conservation Plan in place. Solar Phase 2 is planned but not documented as a formal plan.	Develop and adopt an Energy Conservation Plan as an ESAP commitment covering solar expansion, generator reduction, and efficiency targets.
3.2	**Pollution Prevention**			
3.2.1	Does the Facility have a documented waste management system appropriate to its operations?	**C**	Waste Management Procedure in place. Classifies waste into general, recyclable, manufacturing/assembly, and hazardous streams. Waste hierarchy (reduce, reuse, recycle, recover, dispose) adopted. Disposal Committee established defective items.	Maintain and update procedure as operations scale. Extend waste management framework to hub operations.
3.2.2	Are waste streams identified and classified as hazardous or non-hazardous?	**C**	Waste streams documented: general, recyclable (paper, cardboard, plastics, metals, wood), manufacturing (scrap, defective parts, packaging), hazardous (Li-ion batteries, e-waste, chemicals, oils, industrial residues). Classification framework is adequate.	Maintain classification. Confirm oil/grease and paint-related waste from basement is classified and handled as hazardous.
3.2.3	Does the Facility have in place Procedures for Handling Hazardous Materials and Waste?	**P**	Waste Management Procedure addresses hazardous waste. The Li-ion Battery Safety Procedure has been approved by Senior Management and covers battery handling, storage, testing, and emergency response. Handling procedures for lubricants, oils, solvents, and cleaning agents are still being compiled. Hazardous materials inventory shared; MSDS register absent on site.	Operationalise the recently approved Li-ion Battery Safety Procedure. Finalise handling procedures for solvents and oils. Complete and maintain the MSDS register for all on-site chemicals and post at the point of use; MSDSs are currently being requested from chemical suppliers.
3.2.4	Is waste segregated at source and stored safely at all sites? Has the Facility availed Waste segregation and management equipment?	**P**	Waste segregation at source observed at the Headquarters — labelled bins in place. However, the hazardous waste storage area in the basement is not	Immediately secure and label the hazardous waste storage area. Restrict access to trained personnel. Label all hazardous material containers.

		Compliance Status	Comments	Recommendations
			locked, not restricted, and containers are on open unlabelled shelves — a direct non-compliance with Project Eden's own Waste Management Procedure.	
3.2.5	Types of wastes generated?	**C**	Plastic wraps, organic and domestic waste. Metal scrap sold to scrap dealers. E-waste and Batteries: Enviroserve. Oils/solvents: national authority-certified vendor to be confirmed. Paint waste from basement booth.	Confirm identity of vendor handling oil/solvent/paint waste and verify their relevant national authority certification.
3.2.6	How much waste is generated and how is it managed? (1 year sufficient)	**P**	No consolidated waste volume tracker by category exists. Quarterly metrics monitoring is referenced in the Waste Management Procedure but no records were visible at storage areas during the site visit. The current contract confirms general waste collection once per month (16 bin-liners — indicating low general waste volumes).	Establish and maintain a consolidated quarterly waste tracker by category (type, volume, vendor, destination). Produce first baseline record within 90 days of financial close (ESAP C4).
3.2.7	Are lithium-ion batteries and damaged electrical components handled and stored safely prior to disposal or recycling?	**P**	The Li-ion Battery Safety Procedure has been approved by Senior Management. Outstanding physical gaps: fire-rated quarantine doors observed propped open; no temperature monitoring or HVAC in battery lab; SoC management labelling for stored batteries not confirmed. Emergency eyewash station confirmed present immediately outside battery lab entrance.	Enforce no-propping of fire-rated doors (ESAP A4). Install temperature monitoring in battery lab (ESAP A5). Complete employee training on the approved Battery Safety Procedure (ESAP A1). Implement SoC labelling for stored batteries (ESAP A8).
3.2.8	Are licensed waste handlers and recyclers used for hazardous and non-hazardous waste?	C	General waste service provider: signed contract in place covering general and domestic waste collection (national regulator licensed). Enviroserve Recycling and Services Ltd: national regulator site licence confirmed (valid to June 2026); two national regulator transport licences confirmed (one expired December 2025 — renewal in progress). Enviroserve has completed the Company's full vendor onboarding process, including signed Supplier Code of Conduct, Vendor Registration Form, and Conflict of Interest declaration. No formal service agreement	Execute formal contracts with Enviroserve scope of service, chain-of-custody obligations, E&S performance requirements, and right to audit. Confirm Enviroserve renews expired transport license.

		Compliance Status	Comments	Recommendations
			governing chain-of-custody, E&S performance requirements, or right to audit has been executed,	
3.2.9	Are waste transfer notes, manifests and disposal records maintained?	**P**	General waste contractor disposal records are on file. A disposal certificate from Enviroserve has been received for the current battery batch, which is in storage pending SoH testing to determine the appropriate end-of-life pathway; an updated certificate will be issued once testing is complete. Recycling centre records are absent. No centralised waste manifest file is in place.	Establish a centralised waste manifest file covering all vendors. File the updated Enviroserve disposal certificate once battery testing is complete. Obtain and file recycling centre disposal records and national regulator licence.
3.2.10	Has the Facility obtained the necessary waste management permits/licenses?	**C**	National regulator EIA licence in place and valid. Annual environmental self-audit submitted to the national regulator (May 2025) — full report available. A national regulator audit concludes the facility is largely compliant with national regulations.	Maintain annual national regulator audit submission. Note that the self-audit format has inherent limitations compared to an independent third-party audit — this should be acknowledged for lender reporting.
3.2.11	Does the Facility have arrangements in place for end-of-life battery management and recycling?	**P**	A battery buy-back scheme is documented: batteries with SoH of 60% or above are reinjected into the rental fleet; those below 60% are transferred to Enviroserve for recycling. Enviroserve's process has been confirmed: batteries are received, logged, inspected, sorted by chemistry, tested for second-life suitability, and held in inert storage pending destruction. Certificates of disposal are issued. The current batch of batteries is in storage at Enviroserve awaiting SoH testing to determine the EoL path. A formal service agreement governing the recycling relationship has not yet been executed. Entire volumes processed to date unknown.	Execute a formal service agreement with Enviroserve. Formalise the buy-back scheme rollout for the new battery design. Document a second-life strategy beyond rental fleet reinsertion. Establish quarterly tracking of battery end-of-life volumes processed.
3.2.12	Are chemicals, oils and solvents properly stored, labelled and managed?	**N**	Site observation: paint and solvent containers in the basement stored on open, unlabelled shelves. No written handling procedure observed for paints, thinners, or cleaning agents. This is a direct non-compliance with the	Immediately label and secure solvent/paint storage (ESAP C1). Develop written handling procedures for lubricants, oils, solvents, and cleaning agents. Add spill kit to paint booth and grinding room.

		Compliance Status	Comments	Recommendations
			Company's own Waste Management Procedure and with WBG EHS Guidelines.	
3.2.13	Does the Facility maintain Material Safety Data Sheets (MSDS) of their chemicals?	**P**	A hazardous materials inventory is in place. No MSDS register was available on site during the visit; Project Eden confirms the register is currently being developed, and internal training is planned for relevant staff once established. WBG EHS Guidelines require MSDSs to be accessible to all workers handling hazardous substances.	Complete and maintain the MSDS register for all on-site chemicals. Post MSDSs at the point of use. Prioritise paints, solvents, and cleaning agents.
3.2.14	Does the Facility have spill prevention and response measures in place?	**N**	Spill response was marked N/A in the Company's information request response. However, grease/oils, solvents, and paints are present on site. A basic spill containment and response protocol is required under IFC PS3 and WBG EHS Guidelines. No spill kits were observed in the basement storage or paint booth areas.	Develop a basic spill containment and response procedure for oils and solvents. Procure spill kits for the paint booth and grinding room (ESAP C6).
3.2.15	Are emissions, noise or nuisance impacts identified and managed, particularly at hubs and service centres?	**P**	Paint booth (basement) and metal re-work/grinding workshop are identified sources of VOC, particulate, and noise. Statutory Air Quality Monitoring (May 2025) and Noise Level Measurement (October 2025) reports have been conducted. The May 2025 air quality report recorded PM10 in the painting room at 81 µg/m³, above the occupational exposure limit, while PM2.5 (13 µg/m³) and TSP (136 µg/m³) remained within limits. Local exhaust ventilation is in place in the paint booth. Project Eden has confirmed that all painting operations will be phased out within approximately 4–5 months.	Monitor paint booth PM10 through the phaseout of painting operations. Commission supplementary air quality assessment for battery lab thermal off-gassing if not covered by existing report.
3.2.16	How much emissions do the Facility generate as a result of operations?	**P**	No formal GHG accounting is in place. Indicative figures: Scope 1 (diesel generator) 2024: 4,105 litres → approximately 11 tCO2e; 2025: 2,080 litres → approximately 6 tCO2e (IPCC 2006 Tier 1). Scope 2 (grid electricity) 2024: 167,303 kWh → approximately 67 tCO2e (conservative 0.40 kgCO2/kWh) or approximately 23	Compile indicative Scope 1+2 GHG inventory using electricity consumption data and generator fuel logs to support ongoing environmental performance tracking and investor reporting

		Compliance Status	Comments	Recommendations
			tCO2e (national limit 0.136). Total Scope 1+2 upper bound: approximately 78 tCO2e/year — less than 0.3% of the IFC PS3 25,000 tCO2e threshold.	
3.2.17	Does the Facility have procedures/systems in place for the management of Air & GHG emissions from operations?	**P**	The Company's estimated Scope 1 and Scope 2 emissions are materially below the IFC PS3 threshold requiring annual GHG quantification. Accordingly, the absence of formal annual GHG quantification does not constitute a mandatory IFC PS3 compliance gap at the Company's current operational scale. However, the Company does not yet have a formal GHG accounting process, air emissions management procedure, or documented emission reduction targets. Operational Scope 1 and Scope 2 data can be compiled from generator fuel records and electricity consumption data on request.	Develop a proportionate GHG and air emissions management process as a good-practice enhancement. This should include periodic Scope 1 and Scope 2 estimation, generator fuel-use tracking, and integration of GHG and air quality considerations into the Environmental Policy.
3.2.18	Does the Facility undertake Air Quality Monitoring?	**C**	A Statutory Air Quality Monitoring Report (May 2025) has been conducted. The Air Quality Assessment licence condition is confirmed compliant in the 2025 national authority environmental audit. Annual air quality monitoring is in place.	Integrate air quality monitoring into the regular annual audit cycle. Review findings against permissible limits and confirm coverage of the paint booth and battery lab.
3.2.19	Does the Facility have the required permits for effluent management?	**C**	No industrial effluent is generated (dry assembly process). Sanitary and kitchen wastewater is discharged to the city sewer. No sign of leakage observed during the national authority audit. Compliant with national authority licence conditions per the 2025 environmental audit.	No additional action required for current operations. Maintain sewer connection compliance documentation.
3.2.20	Does the Facility maintain traceability for batteries and hazardous waste through the supply chain?	**P**	The battery end-of-life workflow is documented (buy-back to SoH test to rental fleet or Enviroserve). Enviroserve logs batteries by source, date, weight, and chemistry. A disposal certificate for the current batch has been received. No centralised waste manifest file is in place; recycling centre traceability is absent.	Establish centralised battery and hazardous waste traceability file. File the updated Enviroserve disposal certificate once battery testing is complete. Obtain recycling centre records. Execute service agreements with recyclers that include chain-of-custody requirements.

		Compliance Status	Comments	Recommendations
PS 4: COMMUNITY HEALTH, SAFETY AND SECURITY				
4.1	**Community Health and Safety**			
4.1.1	Has the Facility identified potential risks to surrounding communities arising from its operations?	**P**	EIA (2023) and national authority environmental audit (2025) identify general risks. Battery Incident Response Plan covers on-site thermal events. However, no community-specific risk assessment for hub operations exists and no community emergency notification mechanism is in place at hubs or the Service Centre.	Develop a community risk register covering hub-level fire, electrical, and traffic risks. Establish a community emergency notification mechanism at hubs.
4.1.2	Do site operations pose risks related to fire, traffic or electrical hazards to the public?	**P**	Battery lab fire risk is the primary on-site community risk. Hub chargers not permanently fixed (fall risk at WW hub). New outdoor 6 kW charger at WW hub installed without weather protection. Construction traffic at L hub is an identified community safety concern.	Fix chargers to shelves. Install weather protection over outdoor charger. Address L hub construction traffic management with petrol station management.
4.1.3	Does the Facility have procedures in place to manage community health and safety risks?	**P**	Battery Incident Response Plan in place. Fire Action Plan with emergency contacts in data room. No community emergency communication procedure. No Rider Code of Conduct posted at hubs. External grievance contact details not posted at hubs or Service Centre.	Post external grievance contact details at all hubs and Service Centre (ESAP E3). Develop and post Rider Code of Conduct (ESAP E4). Add community emergency notification procedure at hubs.
4.1.4	What are some of the issues/concerns that the community has raised?	**P**	Riders at Lhub cited long battery swap waiting times as the primary complaint. Rider complaining to hub staff noted. No formal external grievance log visible at hubs. No community consultation records for hub expansion.	Address queue management at hubs. Establish external grievance log. Post Rider Code of Conduct at all hubs (ESAP E4).
4.1.5	Have there been any incidents/accidents within the facility or outside that have affected the community? How many cases?	**P**	A battery thermal runaway incident occurred on 15 October 2025, resulting in a G4S response and facility evacuation. An incident report has been prepared. No community-level injuries or impacts were recorded. Note: this was the single fire-related incident in 2025 — no separate generator or electrical store fire occurred.	Confirm no community-level injuries or impacts (e.g. during the site visit a fatal motorbike accident was mentioned but details not shared) Verify that the incident root cause analysis has been completed and that all corrective actions have been closed out.

		Compliance Status	Comments	Recommendations
4.1.6	Types of incidents/accidents	**P**	50 incidents in 2024, 16 in 2025 at the Headquarters. Battery thermal runaway incident (2025) is the highest-severity recorded event.	Record anonymised incident register extract with near-miss vs injury split, root cause analysis, and corrective action closure status.
4.1.7	Does the facility have in place an early warning system for potential risks that could impact community health?	**N**	No community early warning or notification system is in place at hubs or at the Headquarters. The October 2025 Fire Safety Audit identified absent smoke detectors as a High risk finding (3/3); installation is in progress. Safety patrols are conducted bi-weekly. A February 2026 patrol identified two additional safety issues: sand boxes in the battery lab are not optimally designed for emergency access or mobility; and sections of exposed wiring were observed along the battery lab wall, posing electrical and fire hazards.	Complete smoke detector installation across the facility as a priority (rated High Risk by the October 2025 Fire Safety Audit). Immediately address the exposed wiring identified in the battery lab during the February 2026 safety patrol. Replace sand boxes in the battery lab with lidded, wheeled metallic units. Establish a community emergency notification protocol at hubs.
4.1.8	Are charging hubs designed and operated to minimise risks to customers and the general public?	**P**	Fire extinguishers and smoke detection in place at both hubs visited. Structural integrity adequate. However: charger fixings inadequate at hub; outdoor charger unprotected; no safe battery handling signage visible; queue management issue at hub. Hub operators lift approximately 20 kg batteries over 70 times per shift without ergonomic aids.	Fix chargers. Install weather cover over outdoor charger. Post safe handling signage at all hubs. Provide ergonomic lifting aids (ESAP B7). Address hub queue management.
4.1.9	Are traffic movements and site access managed to reduce safety risks around hubs and service centres?	**P**	Construction traffic risk noted at hub. No formal traffic management plan for hub operations. The Headquarters has defined vehicle access — G4S security present.	Develop a traffic management protocol for hub during the construction phase. Review traffic flow at hub sites as the network expands to 30 hubs.
4.2	**Emergency Preparedness and Response**			
4.2.1	Does the Facility have an Emergency Preparedness and Response Plan covering site and off-site impacts?	**P**	Battery Incident Response Plan in data room. Fire Action Plan with emergency contacts posted. Annual fire drills conducted. However: fire alarm pull-station located 20-30m from battery lab (relocation recommended); smoke detectors	Relocate fire alarm pull-station to battery lab entrance (ESAP A3). Complete smoke detector installation urgently (ESAP A2 — Critical). Conduct battery-specific fire drill and file record (ESAP A7).

		Compliance Status	Comments	Recommendations
			absent — HIGH risk per October 2025 fire audit, installation in progress.	
4.2.2	Are emergency procedures communicated to workers and relevant external stakeholders?	**P**	Fire Action Plan and evacuation map posted on site. Annual fire safety awareness training conducted. A safety briefing sign is in place at reception. No formal visitor OHS briefing video protocol yet in place; a video script has been drafted and deployment is planned before financial close. No community emergency communication at hubs.	Implement visitor OHS briefing protocol at the Headquarters entry (ESAP B3). Add community emergency notification at all hubs (ESAP E3).
4.2.3	Are emergency procedures tested through drills and training?	**P**	Annual fire drills confirmed. Trained fire marshals in place — roles and responsibilities now documented. No battery-specific drill records sighted.	Conduct a battery-specific fire drill and file the record (ESAP A7).
4.2.4	Are roles and responsibilities for emergency response clearly defined?	**P**	Fire marshal roles are formally documented. The Battery Incident Response Plan assigns clear emergency roles. Project Eden restructured its H&S Committee in May 2026: two-tier structure established comprising a Main H&S Committee (COO as Chair, monthly — last week of month; first meeting 27 May 2026) and Departmental H&S Subcommittees (every 3rd week). First Main Committee agenda covers: risk assessment findings, H&S Policy, Incident Reporting Procedure, PPE Policy, Visitor Safety Briefing Protocol, and Employee Onboarding Safety Protocol. This exceeds the monthly/bi-monthly requirement.	Confirm and document stop-work authority in relation to E&S non-compliances (ESAP E1). Confirm first Main H&S Committee meeting minutes on file (ESAP B5).
4.3	**Security Requirements**			
4.3.1	Has the Facility set in place measures to ensure security of assets and people?	**C**	G4S provides professional security at the Headquarters and charging hubs. Security arrangements are appropriate for an industrial and public-facing commercial facility. No significant security incidents reported.	Maintain current security arrangements. Review security coverage as the hub network expands to 30 sites.

		Compliance Status	Comments	Recommendations
4.3.2	Are security arrangements proportionate and respectful of human rights?	**C**	G4S is a professional security provider. No incidents of disproportionate force reported. No human rights concerns identified with current security arrangements.	Confirm G4S staff receive training on appropriate conduct and use of force. Maintain records of any security incidents.
4.3.3	Are security personnel trained on appropriate conduct and use of force, where applicable?	**P**	G4S provides trained security personnel. Specific training records were not verified during the ESDD.	Confirm via the G4S and BM Security service agreements whether use of force and human rights training requirements are included. Obtain written confirmation that all deployed personnel have completed the required training.
4.3.4	Does the Facility have a mechanism for receiving and addressing community complaints or concerns related to security?	**N**	No external grievance contact details are posted at hubs or the Service Centre. No external grievance log visible during hub visits. External harassment of hub staff noted during site visit.	Post external grievance contact details at all public-facing sites (ESAP E3). Establish and maintain an external grievance log. Develop and post a Rider Code of Conduct (ESAP E4).
4.3.5	Is there an external grievance mechanism accessible to communities and customers?	**P**	External Stakeholders Grievance Procedure exists in the data room. Contact details are listed (). However, these details are not posted at hubs or the Service Centre. No evidence of an external grievance log at hub level. Each customer signs the Warranty, Rental and Data Sharing Policy at the point of sale, which serves as the data consent mechanism	Post grievance contact details visibly at all hubs and the Service Centre. Establish and maintain a hub-level external grievance log. Periodically assess rider and community awareness of the grievance mechanism.
PS 5: LAND ACQUISITION AND INVOLUNTARY RESETTLEMENT				
5.1	Has the project involved any land acquisition that resulted in the physical or economic displacement of people?	**NA**	The hub is situated on a pre-existing industrial plot within a gazetted commercial zone. Operations are based on a commercial lease from a private landlord. There is no evidence of informal settlers or livelihood displacement on the site.	Maintain the current commercial lease model. Ensure any future expansion of Hubs or Assembly facilities undergoes a similar "Zero-Displacement" screening prior to site selection.
PS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES				
6.1	Are the operations located in or near sensitive habitats, or do they impact critical biodiversity?	**NA**	The facility is in a "Brownfield" urban industrial area. Site observations confirm the absence of primary forests,	Continue to operate within designated urban industrial zones. Cross-reference to the 2023 EIA Baseline Study

		Compliance Status	Comments	Recommendations
			wetlands, or endangered species. No raw material extraction (mining) occurs on-site.	to formally confirm the "Urban/Modified" habitat status for final reporting.
PS 7: INDIGENOUS PEOPLES				
7.1	Does the project footprint impact any social or cultural groups identified as Indigenous Peoples under the IFC definition?	**NA**	No indigenous communities or traditionally owned ancestral lands are present in the capital city Industrial Area or along the Hub transit corridors.	No further action is required for this standard based on the current project footprint.
PS 8: CULTURAL HERITAGE				
8.1	Is there any risk of the project impacting archaeological, paleontological, or sacred sites?	**NA**	The project operates on modern, developed industrial land. No sacred sites or intangible cultural heritage were identified during the site's walk-through or stakeholder interviews.	Ensure the ESMS includes a "Chance Find Procedure" to be implemented during any future ground-breaking or facility expansion.
EQUATOR PRINCIPLES (EP 1–10)				
EP 1.1	What are the main environmental and social risks associated with the Company's local operations?	**P**	The most material environmental and social risks associated with Project Eden's operations relate to lithium-ion battery safety and thermal runaway, occupational health and safety, hazardous and e-waste management, contractor and supplier EHS oversight, and community health and safety risks associated with charging hub operations. Additional risks include hazardous material handling, fire safety, air emissions from paint and grinding operations, ergonomic risks at charging hubs, and expansion-related operational governance risks.	Continue strengthening the ESMS and operational controls proportionate to battery-related operational risks and planned expansion activities.
EP 1.2	Which of these risks are considered most significant by management, and why?	**P**	Battery safety and thermal runaway as the Company's highest operational risk area, particularly within the battery laboratory, charging operations, and battery transport workflow. This is due to the potential severity of fire, worker injury, operational disruption, and reputational impacts associated with lithium-ion battery	Maintain prioritization of battery safety governance and integrate battery-specific emergency preparedness into routine operational management and Board-level E&S oversight.

		Compliance Status	Comments	Recommendations
			incidents. Management also identified supply chain quality control, charging hub operational safety, and rider adoption risks as strategic priorities as operations scale.	
EP 1.3	How does the Company internally assess and prioritise environmental and social risks?	**P**	Assessed through the ESMS framework, statutory audits, operational inspections, incident reporting systems, safety committee reviews, and management oversight processes. Risk prioritisation is informed by operational severity, regulatory requirements, incident history, and potential business disruption. However, consolidated enterprise-level E&S risk ranking criteria and formalised periodic ESMS review procedures were not fully evidenced during the ESDD.	Formalise a consolidated E&S risk ranking and review framework, including periodic management review and documented escalation criteria.
EP 1.4	Are any activities or operational areas considered high-risk from an E&S perspective?	**P**	The battery laboratory and associated charging, testing, storage and quarantine areas are considered the highest-risk operational areas from an E&S perspective due to lithium-ion thermal runaway and fire risks. Additional higher-risk areas include hazardous waste storage, the paint booth and grinding workshop, and public-facing charging hubs where battery handling and community interface risks occur.	Continue prioritising battery-lab corrective actions, hazardous materials controls, and hub-level safety measures within the ESAP implementation programme.
EP 1.5	Does the Company differentiate between low, medium and high E&S risks when planning operations or expansions?	**P**	The Company operationally differentiates between higher-risk and lower-risk activities through internal operational controls, incident escalation practices, and management oversight. Battery-related operations, hazardous materials, and charging hub activities receive elevated operational attention. However, a formal documented E&S risk categorisation methodology for new projects, suppliers, or expansion activities was not fully evidenced during the ESDD.	Develop a formal E&S risk categorisation framework to support expansion planning, supplier onboarding, and new operational activities.

		Compliance Status	Comments	Recommendations
EP 2.1	Does the Company undertake environmental and social risk assessments for its operations and new activities?	**P**	Environmental and social risk assessments have been undertaken through the regulator-approved EIA, annual environmental audits, OHS risk assessments, fire safety audits, air quality monitoring, and operational reviews. These assessments cover core operational risks at the Headquarters and associated activities. However, dedicated hub-level community risk assessments and formal battery-specific risk assessments remain limited.	Undertake formal battery-specific and charging-hub-specific E&S risk assessments as operations expand.
EP 2.2	Are risks related to battery safety, fire, labour, OHS, waste and community health systematically assessed?	**P**	Risks relating to battery safety, fire, labour conditions, occupational health and safety, waste management, and community health and safety are recognised and partially assessed through existing ESMS procedures, audits, inspections, and operational controls. However, several controls remain at varying levels of maturity, including supplier EHS oversight, spill response preparedness, battery-specific emergency drill testing, and community emergency communication at charging hubs.	Continue strengthening systematic assessment and operational testing of high-risk battery, fire, and community safety scenarios.
EP 2.3	Does the Company document assessment findings and use them to inform operational decisions?	**P**	The Company documents audit findings, incident investigations, operational observations, and corrective actions through audit reports, committee meetings, and operational follow-up processes. Site observations confirmed that findings from fire safety audits and battery incidents have informed corrective actions currently under implementation. However, evidence of a fully consolidated corrective action tracking framework was not verified.	Establish a centralised E&S corrective action tracker covering all audits, incidents, and operational findings.
EP 2.4	Are identified gaps or weaknesses translated into corrective actions?	**P**	Identified E&S gaps are translated into operational corrective actions through management follow-up, audit recommendations, and ESAP commitments. Evidence reviewed during the ESDD confirmed that several corrective actions relating to fire safety, battery procedures, smoke detector installation, and hazardous	Consolidate corrective action monitoring into a formal ESMS-level tracking and closure verification system.

		Compliance Status	Comments	Recommendations
			waste management were already under implementation. However, closure tracking remains decentralised across departments	
EP 3.1	Does the Company identify and track applicable national environmental, labour and OHS legal requirements?	**C**	Project Eden demonstrates awareness of applicable national environmental, labour, and OHS legal requirements through maintenance of regulatory approvals, statutory audits, DOSHS workplace registration, national authority licensing, WRA registration, and related compliance documentation reviewed during the ESDD.	Continue periodic legal compliance reviews to reflect evolving EPR, battery management, and occupational safety requirements.
EP 3.2	Does the Company reference international standards (e.g. IFC Performance Standards, WBG EHS Guidelines)?	**P**	The ESMS and supporting policies reference IFC Performance Standards and international good practice principles. Several operational controls are aligned with IFC PS requirements and WBG EHS Guidelines. However, supplier EHS governance, climate risk assessment, and battery-specific emergency preparedness remain areas requiring further alignment with international lender expectations.	Continue strengthening alignment with IFC Performance Standards and WBG EHS Guidelines as part of ESAP implementation.
EP 4.1	Does the Company have an Environmental and Social Management System appropriate to its operations?	**P**	The Company has established an ESMS framework proportionate to its current operational profile and evolving electric mobility activities. The ESMS incorporates E&S policies, operational procedures, incident reporting systems, training programmes, and audit processes. However, several operational controls remain at varying levels of formalisation and implementation maturity relative to battery-related operational risks and planned expansion activities.	Continue formalising ESMS governance, supplier oversight, and integrated performance monitoring systems.
EP 5.1	Does the Company have procedures for engaging workers, customers and other stakeholders on E&S matters?	**P**	The Company has procedures and channels for engagement with workers, customers and external stakeholders. Worker engagement occurs through induction, toolbox talks, safety committee processes,	Maintain stakeholder engagement records for hubs, customers, riders and affected third parties. Link stakeholder feedback and grievance trends to ESMS review and expansion planning.

		Compliance Status	Comments	Recommendations
			operational briefings and internal grievance channels. Customer and external stakeholder engagement is supported by the External Stakeholders Grievance Procedure, which applies to customers, suppliers, contractors, community members, business partners, regulators, visitors and the public, and covers service/product complaints, H&S/environmental concerns, ethical concerns, community impacts and data protection complaints. However, formal evidence of proactive stakeholder engagement records for charging hub expansion, community-facing operational risks and stakeholder feedback trends was not reviewed.	
EP 6.1	Does the Company have grievance mechanisms accessible to workers and external stakeholders?	**P**	The Company has grievance mechanisms for workers and external stakeholders. The External Stakeholders Grievance Procedure provides formal channels for external complaints, including email, telephone, written letter and in-person reporting, and requires logging, acknowledgement within 5 working days, investigation, response within 14–30 working days, escalation, confidentiality, non-retaliation and 5-year record retention. Emergency contacts posted at hubs support emergency response but do not constitute a grievance mechanism. The main gap is implementation visibility: grievance contacts were not consistently posted at hubs or the Service Centre, and a consolidated external grievance log was not reviewed during the ESDD.	Post grievance contact details visibly at all hubs and the Service Centre. Maintain a consolidated grievance log and periodically review closure timelines, repeat issues and trends.
EP 9.1	Does the Company monitor E&S performance on an ongoing basis (incidents, audits, KPIs)?	**P**	The Company monitors E&S performance through statutory audits, incident reporting, safety committee meetings, operational inspections, and management oversight. However, a consolidated E&S KPI framework and formal ESMS performance review process were not fully evidenced during the assessment.	Develop a formal E&S KPI and management review framework linked to ESMS implementation and Board reporting.

		Compliance Status	Comments	Recommendations
EP 10.1	Does the Company have processes for disclosing relevant E&S information to stakeholders where appropriate?	P	The Company maintains selected E&S documentation including policies, audits, emergency procedures, and grievance mechanisms. Operational stakeholder communication occurs through rider onboarding, service centres, and operational interfaces. However, formalised external disclosure practices relating to E&S performance and community-facing operational risks remain limited.	Develop a proportionate stakeholder communication and disclosure approach for material E&S matters as operations expand.
GOLD STANDARD FOR THE GLOBAL GOALS (GS4GG)				
GS1	Does the Project demonstrate clear contribution toward sustainable development objectives and low-carbon mobility transition?	C	Project Eden's operations contribute positively to low-carbon mobility transition in national through deployment of electric motorcycles, battery swapping infrastructure, local assembly activities, and associated reduction of fossil fuel dependency within the informal transport sector. Additional positive impacts include local employment generation, technical skills development, urban air quality improvement potential, and support for national e-mobility transition objectives.	Continue strengthening SDG impact monitoring, particularly relating to avoided emissions, job creation, and local value addition metrics.
GS2	Does the Company have safeguards in place to prevent or minimise adverse environmental and social impacts?	P	The Company has established operational E&S safeguards through its ESMS, OHS procedures, emergency preparedness measures, statutory compliance audits, grievance mechanisms, and operational controls. However, several safeguards remain at varying levels of maturity, particularly regarding battery-specific emergency preparedness, hazardous material management, supplier EHS governance, spill response preparedness, and community-facing hub safety controls.	Continue strengthening operational safeguards proportionate to lithium-ion battery and expansion-related risks.
GS3	Does the Company demonstrate commitment to human rights, fair treatment and non-discrimination?	P	The Company demonstrates commitment to ethical conduct, worker welfare, non-retaliation, and fair treatment through its HR procedures, Code of Conduct, grievance procedures, and workplace policies. External	Develop formal human rights and supplier screening provisions aligned with IFC PS2 and international good practice.

		Compliance Status	Comments	Recommendations
			grievance procedures include confidentiality, non-retaliation, and escalation provisions. However, formal human rights due diligence and supplier-level human rights screening were not fully evidenced during the ESDD	
GS4	Are labour and working condition risks appropriately managed?	**P**	The Company has operational labour and OHS management systems supported by training, statutory audits, PPE provision, incident reporting, safety committee structures, and worker grievance channels. However, implementation maturity remains uneven in certain operational areas, i.e. battery-specific emergency preparedness training, contractor oversight, and formalised escalation authority documentation.	Continue strengthening implementation consistency and battery-specific operational safety competencies.
GS5	Are community health, safety and security risks associated with charging hubs and battery operations adequately managed?	**P**	The Company has implemented operational controls at charging hubs and service centres, including emergency contact information, fire response arrangements, operational supervision, and incident escalation processes. However, hub-level community risk assessments, formal emergency communication protocols, and public-facing grievance visibility remain inconsistently formalised. Battery thermal runaway and charging-related fire risks remain material operational considerations requiring ongoing strengthening.	Continue strengthening community-facing emergency preparedness, grievance visibility, and battery-related safety communication at all hubs.
GS6	Does the Company engage relevant stakeholders in a transparent and accessible manner?	**P**	The Company engages workers, customers, riders, suppliers, contractors and regulators through operational interactions, grievance channels, onboarding processes, toolbox talks, safety engagements, and operational support structures. The External Stakeholders Grievance Procedure provides formal communication and escalation pathways for external parties. However, formal stakeholder engagement records and documented	Formalise stakeholder engagement documentation and maintain records of external stakeholder concerns, engagement outcomes, and follow-up actions.

		Compliance Status	Comments	Recommendations
			consultation processes relating to charging hub expansion and community-facing operational risks were limited during the ESDD.	
GS7	Does the Company maintain accessible grievance mechanisms for workers and external stakeholders?	**P**	There is a formal worker and external stakeholder grievance procedures. The External Stakeholders Grievance Procedure establishes multiple reporting channels, grievance logging requirements, investigation procedures, escalation pathways, response timelines, confidentiality protections, and non-retaliation commitments. However, grievance visibility at charging hubs and public-facing facilities remains inconsistent, and a consolidated grievance register demonstrating trend analysis and closure tracking was not reviewed during the ESDD.	Maintain consolidated grievance tracking and improve visibility of grievance reporting channels at all public-facing operational locations.
GS8	Are pollution prevention and resource efficiency measures implemented?	**P**	The Company has implemented pollution prevention measures including waste segregation, licensed waste contractors, statutory environmental audits, air quality monitoring, and operational controls for paint and workshop activities. However, hazardous material storage controls, spill response preparedness, hazardous waste labelling, and formal waste tracking systems require further strengthening.	Continue improving hazardous materials management and integrated waste tracking systems.
GS9		**P**	The Company contributes positively toward climate mitigation through electric mobility deployment and reduced fossil fuel dependence. However, formal climate risk and resilience assessments relating to operational continuity, flooding, heat exposure, battery storage conditions, and infrastructure resilience were not fully evidenced during the ESDD.	Undertake a proportionate climate risk and resilience assessment integrated into ESMS review processes.

		Compliance Status	Comments	Recommendations
GS10	Does the Company assess and manage E&S risks associated with suppliers and outsourced manufacturing activities?	**P**	The Company maintains operational supplier oversight focused primarily on quality assurance and technical specifications. However, formal IFC/GS-aligned supplier E&S due diligence, audit procedures, corrective action monitoring, and human rights screening remain limited, particularly for strategic suppliers associated with batteries, frames, and fibreglass components.	Develop a formal supplier E&S governance framework including screening, audit protocols, corrective action tracking, and supplier code of conduct requirements.
GS11	Does the Company monitor E&S performance and implement continuous improvement measures?	**P**	the Company undertakes statutory environmental and OHS audits, operational inspections, incident reviews, safety committee meetings, and corrective action follow-up processes. Evidence reviewed during the ESDD indicates management responsiveness to identified gaps and operational incidents. However, integrated ESMS KPI monitoring and consolidated corrective action tracking remain partially formalised.	Develop a consolidated ESMS monitoring dashboard linked to KPI reporting, audit closure, incident trends, and ESAP implementation tracking.
NATIONAL ENVIRONMENTAL AND SOCIAL REGULATORY COMPLIANCE				
1.1	**Environmental Impact Assessment and Licensing (EMCA, Cap 387)**			
1.1.1	Does the Company hold a valid national authority EIA licence for the national manufacturing facility?	**C**	National authority EIA licence in place (confirmed in data room). Annual self-audit submitted to national authority, May 2025. National authority acknowledgement on file. Facility has operated under a valid EIA licence since 2023.	Maintain annual audit submission to the national authority. Confirm scope of licence covers current operations including battery lab and planned hub expansion.
1.1.2	Is the scope of current operations consistent with the approved ESIA description?	**P**	ESIA (2023) covers EV assembly at the Headquarters. Hub network expansion (from 16 to 30 hubs planned) and battery-as-a-service operations at scale may not be fully covered by the existing EIA. Environmental Audit (2025) notes overall compliance with current licence conditions.	Confirm with the national authority whether hub expansion requires an EIA amendment or new screening. Review EIA licence conditions against current operational scope.

		Compliance Status	Comments	Recommendations
1.1.3	Are annual Environmental Audits conducted and submitted to the national authority as required?	**C**	Annual self-audit submitted May 2025. National authority acknowledgement on file. Self-audit report confirms overall compliance with national regulations.	Continue annual audit submission. Acknowledge inherent limitations of the self-audit format for lender reporting purposes.
1.1.4	Are conditions attached to the EIA licence being complied with?	**C**	Environmental audit (2025) confirms compliance with all national authority licence conditions reviewed, including EIA adherence, environmental management plan implementation, air quality licence, and wastewater management. No major deviations observed.	Maintain compliance record. Confirm Air Quality Assessment licence (Condition 3.0) covers paint booth and metal workshop/grinding room operations.
2.1	**Waste Management Regulations, 2006**			
2.1.1	Are waste streams identified and segregated into hazardous and non-hazardous waste?	**C**	Waste streams identified and segregated (see PS3 3.2.2 above).	
2.1.2	Are lithium-ion batteries and e-waste stored safely prior to recycling or disposal?	**P**	Battery quarantine zone exists. Fire-rated doors propped open (risk). Li-ion Safety Procedure was approved by SMT	Enforce fire-rated door protocol and train staff on new battery procedure.
2.1.3	Are national authority-licensed waste handlers and recyclers engaged?	**P**	General waste contractor: National authority licensed, contract confirmed. Enviroserve: National authority site licence confirmed (June 2026). Recycling centre: no documentation. Formal contracts not executed.	Execute contracts with Enviroserve and recycling centre (ESAP C2).
2.1.4	Are waste transfer notes, manifests and disposal records maintained?	**P**	General waste contractor records in data room. Enviroserve disposal certificates not filed. Recycling centre records absent.	File all disposal records centrally (ESAP C5).
2.1.5	Does the Copany comply with Extended Producer Responsibility (EPR) requirements for batteries?	**P**	The Sustainable Waste Management (Extended Producer Responsibility) Regulations entered into force on 14 March 2026 and identify batteries and accumulators as a regulated product category. The Company triggers EPR obligations as both a manufacturer and importer of batteries. The Company has applied for national authority EPR registration and a national authority confirmation letter is on file. The Company is also a registered member of an approved Producer Responsibility Organisation, and	Submit the required 4-year EPR plan to the national authority following issuance of the EPR registration certificate and maintain evidence of compliance with applicable EPR obligations. Confirm the contribution of the Enviroserve partnership, battery take-back arrangements and PRO membership towards meeting battery collection and recycling obligations. Monitor ongoing regulatory developments and update compliance arrangements as required.

		Compliance Status	Comments	Recommendations
			the membership certificate was reviewed. The principal outstanding requirement is submission of a 4-year EPR plan detailing collection and recycling targets following issuance of the national authority EPR registration certificate. Eco-fee obligations are currently managed through PRO membership. While there are ongoing legal challenges and industry discussions regarding EPR implementation timelines in the country, the regulatory framework remains in force, and the Company is monitoring developments accordingly.	
3.1	**Air Quality Regulations, 2014**			
3.1.1	Are potential sources of air emissions identified (generators, welding, painting, dust)?	**P**	Paint booth, metal re-work workshop, welding and grinding room, and diesel generator are identified emission sources.	Regularly audit air emissions.
3.1.2	Are backup generators operated in compliance with air quality standards?	**P**	Diesel generator present. Run hours not recorded. Generator servicing schedule not confirmed.	Establish generator run-time log. Confirm servicing includes exhaust system maintenance.
3.1.3	Are dust and fumes from workshop activities controlled and mitigated?	**P**	Paint booth has local ventilation, but adequacy unconfirmed. Grinding operator observed without goggles.	Verify paint booth ventilation adequacy. Enforce PPE in metal workshop/grinding room. Assess need for filters.
3.1.4	Has indoor air quality been assessed where relevant (battery lab, workshop)?	**P**	A Statutory Air Quality Monitoring Report (May 2025, DOSH/AQM-00001191) has been conducted covering production areas including the painting zone. Battery lab thermal off-gassing assessment is not confirmed as covered by the existing report.	Review the existing Air Quality Monitoring Report for paint booth and battery lab coverage. Commission a supplementary assessment for battery lab thermal off-gassing if not addressed in the existing report.
3.1.5	Are any air quality monitoring records available, where required?	**P**	A Statutory Air Quality Monitoring Report (May 2025) and a Statutory Noise Level Measurement Report (October 2025) have been conducted. Both cover the Headquarters operations.	Continue annual air quality and noise monitoring. Review findings against permissible limits under OSHA 2007 and Air Quality Regulations 2014.

		Compliance Status	Comments	Recommendations
4.1	**Noise and Excessive Vibration Regulations, 2009**			
4.1.1	Are noise-generating activities identified (machinery, traffic, generators)?	**P**	The metal re-work and grinding workshop is the primary noise source. A Statutory Noise Level Measurement Report (October 2025, ADV/OSH-0001128) has been conducted, covering workshop areas, painting area, stores, and assembly areas. Workers operating noisy machinery are equipped with ear plugs. Audiometric tests are conducted (last: November 2023).	Review the October 2025 Noise Level Measurement Report findings against national Noise Regulations 2009 permissible limits. Post warning signage in high-noise areas per the auditor's recommendation.
4.1.2	Are noise levels managed to comply with permissible limits?	**I**	The October 2025 Statutory Noise Level Measurement Report provides specific findings: the grinding machine recorded 92.7 dB(A) — exceeding the 90 dB(A) occupational exposure limit under the Noise Prevention and Control Rules 2005; the cutting machine recorded 86.7 dB(A), approaching the threshold. Most other workstations recorded levels below the OEL. Workers operating noisy machinery are equipped with ear plugs. The auditor recommends annual audiometric testing for exposed workers and posting of warning signage in high-noise areas.	Address grinding machine noise (92.7 dB(A) exceeds 90 dB(A) OEL): consider engineering controls or enhanced PPE. Post warning signage in high-noise areas. Ensure annual audiometric testing for all exposed workers.
4.1.3	Are complaints related to noise recorded and addressed?	**C**	No noise complaints reported per Project Eden's information request response. No regulator correspondence on noise.	Maintain complaint record. Include noise in the external grievance log.
4.1.4	Are noise mitigation measures implemented at hubs and service centres?	**P**	Hub operations are primarily battery swap/charge — limited noise sources. Generator use at hubs not confirmed.	Confirm noise profile at hubs. Implement mitigation if generator use is planned.
5.1	**Water Act, 2002; Water Quality Regulations, 2006**			
5.1.1	Is water sourced from approved providers (municipal supply, borehole)?	**P**	Water is sourced from both the municipal supply and a borehole active since January 2025. The borehole is registered with the Water Resources Authority; a WRA permit renewal receipt (March 2024) is on file.	Maintain WRA borehole registration and ensure renewal records are kept current on file.

		Compliance Status	Comments	Recommendations
5.1.2	Is wastewater discharged lawfully to sewer and not to the environment?	**C**	All effluent (sanitary/kitchen) discharged to local sewer. No industrial effluent. national authority audit confirms no leakage observed.	Maintain compliance.
5.1.3	Are effluent discharge approvals or confirmations in place?	**C**	No industrial effluent. Sewer connection to national water supplier. Compliant per national authority audit.	Maintain documentation of sewer connection.
5.1.4	Are water efficiency and conservation measures implemented?	**P**	LED lighting for energy. No formal water conservation measures documented.	Include water targets in Environmental Policy update (ESAP C7).
6.1	**Occupational Health and Safety Act, 2007 (OSHA)**			
6.1.1	Is the workplace registered with DOSHS? (provide document)	**C**	DOSHS Certificate confirmed — issued 4 October 2025, valid to 4 October 2026. Nature of work: Production and Assembly of Electric Motorcycles.	Renew before 4 October 2026.
6.1.2	Are OHS risk assessments conducted for battery, electrical and workshop activities?	**P**	OHS Risk Assessment report (October 2025) in data room. Policy commits to 6-monthly hazard assessments — not confirmed as completed on schedule since 2021.	Share most recent hazard risk assessment. Confirm 6-monthly cycle is maintained (ESAP B4).
6.1.3	Are workers trained on electrical safety, fire safety and battery risks?	**P**	Annual fire safety training completed (certified). Training register maintained. Battery Operations Training (May 2026) records confirmed on file for hub operators and battery-handling staff, covering battery anatomy, warning signs, PPE requirements, quarantine procedures, and emergency escalation.	Maintain training records for all OHS and battery safety training. Conduct battery-specific emergency drill to complement existing training (ESAP A7).
6.1.4	Are accidents and incidents recorded and reported as required?	**P**	Incident register exists (50 incidents in 2024, 16 in 2025). Online reporting form via QR code. Full register with root cause analysis not yet shared. OSHA 2007 requires reporting to DOSHS within 24 hours of notifiable incidents.	Share incident register extract. Confirm DOSHS reporting compliance for notifiable incidents.
6.1.5	Are workers covered by WIBA insurance?	**I**	WIBA insurance coverage has been confirmed: all employees are covered under a WIBA policy. The policy validity indicated in the October 2025 OSH Report was 31 December 2025.	Confirm that the WIBA policy has been renewed for 2026 and that coverage extends to all workers including shift staff and hub operators.

		Compliance Status	Comments	Recommendations
7.1	**Public Health Act, Cap 242**			
7.1.1	Are sanitation facilities adequate and hygienic for workers?	**P**	Canteen and drinking water available. Toilet facilities noted as improvable during site visit. First-aid kit at the Service Centre sales hub had a locked box with the key not immediately accessible.	Improve toilet facilities (cleanliness, quality and refill soap regularly). Ensure first-aid kits are unlocked and accessible at all times.
7.1.2	Are solid waste and effluent managed to prevent public health risks?	**C**	Waste management system in place. No industrial effluent. Municipal sewer for sanitary waste. The general waste contractor collects general waste. No public health incidents reported.	Maintain current waste management arrangements and extend to hubs.
7.1.3	Are community health and safety risks (traffic, fire, electrical hazards) identified and managed?	**P**	Battery lab fire and hub electrical risks are the main community health and safety concerns. See PS4 findings above.	See PS4 recommendations above.
8.1	**Electrical Safety and Energy (Energy Act, 2019; KEBS Standards)**			
8.1.1	Are electrical installations compliant with national safety standards?	**P**	Electrical inspections conducted but records not yet formalised per the fire audit corrective actions tracker (April 2026: work in progress).	Formalise electrical inspection records.
8.1.2	Are charging and battery systems installed and operated safely?	**P**	The national standards permit (SM#61121, valid to May 2027) was issued under the previous frame design. The motorcycle main frame supplier was subsequently changed to Supplier A (China). Frame validation and testing reports for the new Supplier A frame have been reviewed. A national standards written confirmation or re-assessment is recommended to formally confirm that the new frame design continues to meet ISO 13063-2:2022 requirements. No changes to technician SOPs are required as a result of the frame change.	Obtain national standards written confirmation or re-assessment confirming the new Supplier A frame design meets ISO 13063-2:2022 before financial close.
8.1.3	Are generators, solar systems and electrical equipment maintained and inspected?	**P**	Electrical inspections are conducted but records are not yet formalised per the fire audit corrective actions tracker.	Formalise electrical inspection records. Confirm with the building landlord that generator maintenance is

		Compliance Status	Comments	Recommendations
			Generator maintenance is managed by the building landlord. Diesel fuel consumption is tracked monthly.	conducted on schedule and obtain relevant maintenance records.

Consolidated E&S Risk Characterisation

Risk Area	Key Basis for Characterisation	Severity	Likelihood	Duration / Reversibility	Nature of Impact	Overall Risk Level
Battery safety and fire risk	Battery diagnostics, charging activities, thermal runaway incident, battery storage and hub operations	Significant	Possible	Potentially acute but reversible if controlled; severe if escalation occurs	Direct and hub-related	Medium-High
Hazardous materials and waste management	Lithium-ion batteries, e-waste, solvents, oils, paint residues, labelling and storage gaps	Moderate	Possible	Recurring operational risk; reversible with improved controls	Direct and third-party waste interface	Medium
Occupational health and safety	Battery handling, grinding, welding, PPE compliance, PM10/noise exposure, manual battery handling at hubs	Moderate	Likely	Recurring; reversible with controls and enforcement	Direct worker impact	Medium
Community health and safety at hubs and Service Center	Public-facing charging hubs, rider interface, traffic/access, external grievance visibility and emergency communication gaps	Moderate	Possible	Recurring during operations; reversible with management controls	Direct and indirect community interface	Medium
Labour and working conditions	Shift contracts, worker grievance awareness, contractor labour oversight, welfare facilities	Moderate	Possible	Recurring; reversible through HR policy and implementation measures	Direct and contractor-related	Medium
Supplier and contractor E&S oversight	Strategic suppliers, battery/component supply chain, local contractor interfaces, recycler arrangements	Significant	Possible	Ongoing; reversible through screening, contracts and monitoring	Supply chain-related	Medium–High
Resource efficiency and climate resilience	Electricity dependence, solar PV, borehole/municipal water, climate risk screening gaps	Moderate	Possible	Ongoing; manageable through planning and monitoring	Direct and indirect infrastructure dependency	Medium
Biodiversity and land-use sensitivity	Urban-industrial setting, leased premises, no land acquisition, national park proximity	Minor	Unlikely	Low direct risk under current operations	Indirect ecological receptor interface	Low

The following risk matrix has been used to determine the overall risk level of each identified risk, as a function of likelihood and severity:

Likelihood	Severity: Negligible	Minor	Moderate	Significant	Severe
Very Likely	Medim-low	Medium	Medium-high	High	High
Likely	Low	Medium-low	Medium	Medium-high	High
Possible	Low	Medium-low	Medium	Medium-high	Medium-high
Unlikely	Low	Medium-low	Medium-low	Medium	Medium-high
Very Unlikely	Low	Low	Medium-low	Medium	Medium

5.0. SUPPLY CHAIN ASSESSMENT – CONTRACT MANUFACTURER ASSESSMENT

5.1 Scope and Approach

This section presents a structured desktop assessment of the most material contract manufacturers and key suppliers in the Project Eden Electric supply chain. The assessment draws on third-party quality and factory audit reports (2021 to 2024) for international suppliers, a Q1 2026 supplier performance scorecard audit and July 2024 operational supplier visit notes for local suppliers, the Supplier Code of Conduct, contractual documentation, and the Conflict Minerals Reporting Template (CMRT).

The Company identified four suppliers as most material to this review in response to information request as part of this assessment: Supplier A (frame and chassis manufacturing, China), Supplier B (battery packs, China), Supplier C (metal components, China), and Supplier D (electronics and controllers, China). These are addressed in Sections 5.3.1 to 5.3.4. Section 5.3.5 covers additional international suppliers for which third-party audit documentation was made available by the Company. Not all of these audited suppliers appear in the current Tier 1 supplier list; those that do not are clearly flagged.

A critical preliminary observation applies to all international suppliers: the available audit documentation consists exclusively of quality and factory evaluation reports (QSA, IFE, and TQA assessments) conducted by Sofeast. These reports assess quality management systems, production capacity, and personal safety indicators only. They are not environmental and social audits against IFC Performance Standards or equivalent international lender standards. This is confirmed in the ESDD Gap Analysis and ESAP actions D2, D3, and D6. The absence of IFC-aligned EHS audit evidence for all international suppliers is a material gap addressed in the recommended actions at Section 5.5.

5.2 Project Eden's Supply Chain Management Framework

The Company has established a structured supplier onboarding and management process. The onboarding sequence comprises: initial contact and supplier identification; sharing of the KYC/Vendor Registration Form, Conflict of Interest declaration, and Supplier Code of Conduct for sign-off; commercial negotiation; system integration; approval decision; and entry into the active procurement cycle with ongoing performance monitoring.

The Supplier Code of Conduct sets out requirements across six domains: legal compliance and ethical business conduct; labour standards and human rights (prohibiting forced and child labour and supporting freedom of association); health and safety; environmental responsibilities; subcontracting controls; and record-keeping obligations. Contract templates, both local and international, embed E&S and labour compliance clauses and include audit access rights. Accountability for supply chain ESG sits with the Director of Supply Chain, as confirmed through the ESDD interview process and reflected in ESAP action D1.

Performance monitoring is conducted through a weighted scorecard applied to eight national-based suppliers, audited in Q1 2026 by the Company's Supply Chain team. The scorecard covers six categories: Quality (30%), Delivery (20%), Cost Competitiveness (15%), Compliance (15%), Capacity and Capability (10%), and Risk and Sustainability (10%). No equivalent performance monitoring system exists for international suppliers, who collectively represent the highest inherent E&S risk and highest procurement value in the supply chain.

The Company has developed a Supplier EHS Audit and Onboarding Checklist (IFC PS1-aligned), covering four domains: Management Systems and Compliance; Occupational Health and Safety; Environmental Management; and Labour and Social Practices. The checklist exists in the data room as a blank template and has not been completed for any local or international supplier. It does not appear in Project Eden's formal supplier

onboarding process (KE-OPS-PL-TMP-0005), which covers KYC, Conflict of Interest, Code of Conduct sign-off, and commercial negotiation but makes no reference to EHS screening. The Company has a fit-for-purpose EHS screening tool available but has not operationalised it, either at onboarding or for periodic audits. ESAP actions D1 and D2 are designed to address this gap.

5.3 Assessment of Priority International Suppliers

The below summary is based on available documentation to the consultants as provided by the Company in the dataroom for the top 4 suppliers. The sub-sections below elaborate on each supplier further.

Element	Supplier A (Frame)	Supplier B (Battery)	Supplier C (Metal)	Supplier D (Electronics)
Code of Conduct signed	Yes	Yes	Yes	Yes
E&S clauses in contract	Yes	Yes	Yes	Yes
Audit rights established contractually	Yes	Yes	Yes	Yes
Quality/factory audit conducted	Yes (IFE Oct 2024, 66/100)	No	No	No
E&S audit conducted (IFC PS-aligned)	No	No	No	No
Performance scorecard in use	No	No	No	No
Corrective action plan in place	No	No	No	No
CMRT/conflict minerals documented	N/A	Yes	N/A	N/A
Supplier EHS Checklist completed	No	No	No	No

5.3.1 Supplier A — Frame and Chassis Manufacturing

- Supplier type: Strategic

- Location: China
- Products supplied: motorcycle frames, suspension, and structural components
- Audit evidence available: Initial Factory Evaluation (IFE) by Sofeast, October 2024 (score: 66/100, Average)

Supplier A is the current primary frame supplier following a change from an Indian manufacturer. This change was made after the Standardisation Mark permit (SM#61121, valid to May 2027) was issued for the previous frame design. The ESDD report recommends that Project Eden obtain a written confirmation or product re-assessment confirming the new Supplier A frame meets ISO 13063-2:2022 before financial close.

Key observations from the IFE report relevant to this E&S assessment: the factory operates with significant welding capacity (17 robotic welders, 16 manual welders); some materials and products in the workshop were not placed neatly or in an orderly manner; regular maintenance of main production equipment is provided by the equipment supplier, but some smaller equipment lacks maintenance records; and surface spraying of some products is outsourced and not monitored by Supplier A.

The IFE report does not cover environmental compliance, waste management, air emissions from welding fume and surface treatment operations, chemical handling, working hours, wage compliance, freedom of association, or grievance mechanisms. These dimensions are unassessed and represent a material gap for a Strategic supplier in a hazardous manufacturing environment.

5.3.2 Supplier B — Battery Packs

- Supplier type: Strategic
- Location: China
- Products supplied: NMC lithium-ion battery packs for the Project Eden Air motorcycle
- Audit evidence available: none on file

Supplier B is the most material supplier in the Project Eden supply chain from an E&S perspective. Battery pack manufacturing involves thermal runaway risk, handling of hazardous chemical compounds including electrolytes and solvents, significant waste streams from cell reject management, energy-intensive production, and downstream risks associated with end-of-life battery packs.

Supplier B sources battery cells from Global Battery Supplier (GBS). A Conflict Minerals Reporting Template (CMRT v6.5) has been obtained from Supplier B, confirming the upstream minerals due diligence pathway through GBS's Responsible Sourcing Policy and Responsible Minerals Initiative (RMI) third-party auditing. The CMRT is on file.

Supplier B itself, as the battery pack integrator, has not been subject to an EHS audit against IFC Performance Standards or equivalent. No quality or factory evaluation audit report is available in the data room. The assessment of Supplier B's manufacturing environment, OHS management, hazardous waste practices, and labour conditions is based solely on Supplier Code of Conduct sign-off and contractual commitments. This is a priority gap addressed in ESAP actions D2 and D6.

On end-of-life battery management: Project Eden has established a relationship with Enviroserve for battery recycling, with a buy-back scheme documented (batteries below 60% State of Health directed to Enviroserve). Enviroserve has completed Project Eden's full vendor onboarding process. A national authority site licence and two transport licences have been confirmed, of which one transport licence expired December 2025 with renewal in progress. A formal service agreement governing chain-of-custody and E&S performance requirements has not yet been executed, as confirmed in the ESDD (gap row 3.2.8, ESAP C2).

5.3.3 Supplier C — Metal Components

- Supplier type: Strategic
- Location: China
- Products supplied: metal structural components
- Audit evidence available: none on file

No factory audit report of any kind is available for Supplier C, and no site visit or document request has been conducted beyond supplier onboarding. The available evidence base is limited to the Supplier Code of Conduct sign-off and the international supply agreement. No substantiated assessment of Supplier C's E&S risk profile, management systems, labour conditions, or environmental compliance can be made at this stage. This is a straightforward information gap. Supplier C should be prioritised in Project Eden's supplier audit programme, and a quality system evaluation extended to cover EHS criteria should be commissioned as a first step.

5.3.4 Supplier D — Electronics and Controllers

- Supplier type: Strategic
- Location: Taizhou, China
- Products supplied: electronic control systems and components

- Audit evidence available: none on file

No audit report of any kind is available in the data room. The international supply agreement template includes standard E&S and labour compliance clauses and audit rights, but these have not been exercised. Electronics manufacturing involves hazardous materials including solvents, flux chemicals, and PCB production, alongside high labour intensity, which warrant explicit E&S verification. The absence of any audit documentation is a gap that should be addressed within 12 months of financial close.

5.3.5 Additional International Suppliers with Audit Documentation

Seven quality system audits (QSA, IFE, TQA) have been conducted by Sofeast for international suppliers and made available in the data room. These are quality audits only and do not constitute E&S assessments. They are presented here to provide a complete picture of audit coverage in the data room and to identify any E&S-relevant observations from the available documentation.

An important clarification on Tier 1 list status: Some suppliers do not appear in the current Tier 1 supplier list (verified against Project Eden Tier 1 Suppliers.pdf). They seem to be assessed as candidate suppliers but it needs clarification by Project Eden. Audit evidence for non-Tier-1 candidates does not substitute for assessment of current active suppliers.

Supplier	Location	Main Products	Audit Type	Date	Score	Tier 1 List Status	Key E&S-Relevant Observations
A-Technology Co. Ltd	Dazu, Chongqing	Motorcycle frame, suspension	IFE	Oct 2024	66/100 (Average)	Strategic — current frame supplier	Outsourced spraying not monitored by Supplier A; workshop materials not placed neatly; some small equipment lacks maintenance records
Mechanical Dev. Co. Ltd	Jiangjin, Chongqing	Frame, fork, main stand, pedal	QSA	Mar 2024	78/100 (Average)	NOT in Tier 1 list	Workshop slightly dirty; production site slightly underlit; most painting outsourced; 158 workers; 1 shift, 6 days/week; max 36 hours overtime/month

Supplier	Location	Main Products	Audit Type	Date	Score	Tier 1 List Status	Key E&S-Relevant Observations
Machinery Mfg. Co. Ltd	Jiulongpo, Chongqing	Front and rear shock absorbers	IFE	Nov 2023	41/100 (Poor)	NOT in Tier 1 list	Workshop dirty and disorganised; machines not maintained with no maintenance records; supplier refused to provide purchase order information to auditors; no OQC recorded; no conform samples available to workers or QC staff
Vehicle Parts Co., Ltd	Foshan, Guangdong	Wheel hubs (metal parts)	QSA	Sep 2024	50/100 (Poor)	Bottleneck Tier 1 — listed as Foshan Caobian Nanhai	Poor quality system overall; no management system certifications present; no export licence on file
B-Technology Co., Ltd	Shenzhen, Guangdong	Battery packs	TQA	Jan 2022	76/100 (Average)	NOT in Tier 1 list	BMS assembly operator did not wear antistatic wrist strap; cells and finished goods stored in same area; temperature and humidity not recorded in cell storage; no backup power generator
C-Technology Co., Ltd	Dongguan, Guangdong	Battery packs	TQA	Dec 2021	82/100 (Good)	Strategic Tier 1 supplier	Personal safety rated 8/10; fire extinguishers accessible; PPE use inconsistent at some stations (mask not worn per audit photos); PCBAs in trays without ESD protection; temperature and humidity not recorded in cell storage
D-Technology Co., Ltd	Zaozhuang, Shandong	Lithium battery	QSA	Apr 2024	80/100 (Good)	NOT in Tier 1	Personal safety rated 8/10; fire retardants and extinguishers in place; operators wearing gloves, masks, and glasses; good housekeeping observed

5.4 Assessment of National Suppliers

National supplier, East-African, assessments have been conducted through two distinct exercises at different times, which should not be conflated.

The first exercise comprised operational site visits carried out by Project Eden's procurement team in July 2024, covering seven suppliers: Supplier E, Supplier F, Supplier G, Supplier H, Supplier I, Supplier J, and Supplier K. These visits focused on manufacturing capability, capacity, and product fit for the e-motorcycle localisation programme and were not E&S audits. Of the seven, Supplier K was assessed as not having sufficient capacity or defined quality control processes for e-motorcycle parts.

The second exercise was a formal supplier performance scorecard audit conducted in Q1 2026 by Project Eden's Supply Chain team, covering eight strategic and bottleneck suppliers: Supplier L, Supplier M, Supplier N, Supplier O, Supplier P, Supplier Q, Supplier R, and Supplier S. Audit dates ranged from 9 February to 17 March 2026, as recorded in the scorecard spreadsheet. Supplier L is the only supplier that appears in both exercises.

Neither exercise constitutes a formal IFC-aligned EHS assessment, as confirmed in the ESDD (gap row 1.1.16, ESAP D2). A formal IFC PS-aligned EHS audit programme for both local and international priority suppliers is required as an ESAP commitment, as detailed in ESAP D2 and Section 5.5.

Supplier O is identified in the ESDD as the highest inherent EHS risk in the local supply base, due to fibreglass and resin component manufacturing that generates styrene VOC emissions, resin dust, and hazardous liquid waste. No E&S assessment has been conducted. The Q1 2026 scorecard rates it lowest overall (2.75/3.85), with a 6.5% defect rate and capacity at 50% of current requirements.

Supplier G, visited in July 2024, operates an electroplating process. Electroplating involves chemical baths that may contain heavy metals and require specific chemical waste controls; these were not assessed during that visit. MCI/Megh Cushion Industries uses adhesives and foam processing chemicals with occupational health implications not assessed to date.

5.5 Supply Chain Key Findings and Recommended Actions

The following key findings and recommended actions consolidate the contract manufacturer assessment findings. They are cross-referenced to ESAP actions D1–D9 and should be read alongside Section 6.5 (supplier base risk heatmap findings).

Finding 1 (HIGH — ESAP D2, D3, D6): No E&S audit has been conducted for any international supplier against IFC PS or ILO conventions. Quality audits do not substitute for E&S due diligence. Recommended action: Commission IFC PS-aligned E&S assessments for Suppliers A-D, prioritising

Supplier A given battery manufacturing hazards. Phase 1 within 6 months: Suppliers A-C. Phase 2 within 12 months: Supplier D and C-Technology Co., Ltd. Apply the Supplier EHS Audit and Onboarding Checklist as minimum standard. Responsible party: Director of Supply Chain.

Finding 2 (HIGH — ESAP D1, D2): No performance scorecard or monitoring mechanism exists for international suppliers. Compliance monitoring relies solely on Code of Conduct sign-off. Recommended action: Extend the supplier performance scorecard to cover the four priority international suppliers with E&S performance indicators and quarterly reporting cadence. Operationalise the Supplier EHS Audit and Onboarding Checklist as a mandatory onboarding requirement for all new strategic and bottleneck suppliers. Timeline: 6 months of close.

Finding 3 (HIGH — ESAP C2): The Enviroserve battery recycling relationship has no formal contract. One transport licence expired December 2025. NEMA site licence valid to June 2026. Recommended action: Execute a formal service agreement with Enviroserve covering scope of service, chain-of-custody obligations, E&S performance requirements, and right to audit. Confirm renewal of expired transport licence. Timeline: 90 days of close.

Finding 4 (MEDIUM — ESAP D3): Vehicle Parts Co., Ltd (Bottleneck Tier 1, wheel hubs) scored 50/100 (Poor) in the Sofeast QSA, with no management system certifications and no export licence on file. Recommended action: Commission an updated quality and EHS assessment. Verify regulatory standing and certifications before any volume expansion. Timeline: 6 months of close.

Finding 5 (HIGH — ESAP D2): Supplier Q is the highest inherent EHS risk in the local supply base, generating styrene VOCs, resin dust, and hazardous liquid waste. No E&S assessment has been conducted. Lowest overall scorecard score (2.75/3.85). Recommended action: Conduct an IFC PS-aligned EHS audit of Supplier Q as the first priority in the local supplier audit programme. Do not increase volumes until EHS assessment is complete. Timeline: 6 months of close.

Finding 6 (MEDIUM): Supplier G operates an electroplating process involving chemical baths not assessed during the July 2024 visit. Recommended action: Before any volume increase from Supplier G, conduct a targeted EHS assessment covering electroplating chemicals, wastewater management, and worker chemical exposure controls. Timeline: Prior to any volume increase.

Finding 7 (MEDIUM — ESAP D5): Supplier Q has the lowest compliance score in the national supplier cohort (2/5; 85% ESG adherence), a 4.33% defect rate, and 60% on-time delivery. Specific compliance gaps are not documented. Recommended action: Issue a formal corrective action notice identifying specific ESG compliance gaps. Require a remediation plan within 90 days. Monitor at next quarterly scorecard review. Timeline: 3 months of close.

6.0. SUPPLY CHAIN ASSESSMENT – SUPPLIER BASE SCREENING & RISK HEATMAP

6.1 Scope and Methodology

Project Eden's Tier 1 supplier base comprises approximately 65 active suppliers spanning China, India and national. This section presents a desktop risk screening of the most significant suppliers, producing a heatmap that segments suppliers by inherent E&S risk. The screening applies four risk dimensions: Labour and Working Conditions Risk; Hazardous Materials and Waste Risk; Environmental Compliance Risk; and Supply Chain Governance Risk. An overall inherent risk rating (HIGH, MEDIUM, or LOW) is assigned based on the combination of these dimensions.

The screening methodology draws on: the Tier 1 Supplier List (Project Eden data room, used as the authoritative source for supplier classification); supplier category and geographic location as primary risk proxies; Sofeast quality audit findings where available; the Q1 2026 Supplier Audit scorecard for national suppliers; and July 2024 supplier visit notes. Risk ratings reflect inherent risk before application of Project Eden's supplier management controls and should be updated as E&S-specific audit evidence becomes available.

Note on scope: two suppliers included in the heatmap for completeness do not appear in the current Tier 1 supplier list provided by Project Eden but have quality audit documentation available in the data room. They are clearly flagged in the heatmap as not being current Tier 1 suppliers.

Risk ratings are defined as follows:

- HIGH: Significant potential for material E&S impacts requiring active management and verification. Typically associated with hazardous manufacturing processes, high labour intensity, or absence of verified management systems.
- MEDIUM: Moderate E&S risk requiring ongoing monitoring and periodic verification. Impacts are manageable with appropriate controls in place.
- LOW: Limited inherent E&S risk based on supplier category, location, and available evidence. Standard onboarding controls are sufficient.

6.2 Risk Segmentation by Supplier Category

Supplier Category	Key E&S Risk Drivers	Inherent Risk Level
Batteries and Battery Pack Manufacturing (China)	Lithium-ion cell chemistry: electrolyte solvents, thermal runaway hazard; cell reject and hazardous waste streams; energy-intensive production; upstream mineral supply chain risks (cobalt, lithium); end-of-life management obligations	HIGH
Electronic Components and Motors (China and India)	Chemical hazards in PCB production and soldering (flux, solvents, lead-free solder); high labour intensity; potential for informal subcontracting	HIGH
Metal Fabrication: Frame, Chassis and Structural Components (China)	Welding fume and noise exposure; surface treatment chemicals (shot blasting, spray painting); high labour intensity; variable OHS compliance at smaller suppliers	HIGH
Metal Fabrication and Engineering (National)	Welding fume; powder coating chemicals; sandblasting dust; smaller workforce; OHS regulation applicable but compliance variable	MEDIUM
Tyres and Rubber Products (China)	Chemical inputs in vulcanisation; carbon black emissions; generally more regulated at large manufacturers	MEDIUM
Fibre, Plastics and Electronics Assembly (National)	Chemical adhesives; plastics processing; OHS risk from cutting and assembly; elevated for fibreglass and resin operations (styrene VOCs, hazardous liquid waste)	MEDIUM to HIGH
Waste Handling and Recycling (National)	Battery and e-waste handling; heavy metals exposure; inadequate disposal risk if controls fail; environmental licence and reporting obligations	HIGH
Logistics, IT Services and Non-manufacturing Supplies (National)	Primarily labour and road safety risks; low environmental hazard	LOW

6.3 Supplier Base Risk Heatmap

The heatmap below presents inherent E&S risk ratings for the most significant Tier 1 suppliers. An Audit on File column directly address the question of which suppliers have any documented audit evidence and which have none. Green = audit available for a current Tier

1 supplier; Grey = supplier is NOT in the current Tier 1 list but has audit evidence included for reference; Red = no audit evidence available for this supplier.

Supplier Name	Country	Category	Tier 1 Type	Audit on File	Labour Risk	Haz. Mat. Risk	Env. Risk	Gov. Risk	OVERALL RISK
Supplier B	China	Batteries	Strategic	No audit	HIGH	HIGH	HIGH	MEDIUM	HIGH
Supplier A	China	Metal/Rubber (frame)	Strategic	IFE (Oct 2024)	HIGH	MEDIUM	MEDIUM	MEDIUM	HIGH
Supplier C	China	Metal/Rubber	Strategic	No audit	HIGH	MEDIUM	MEDIUM	MEDIUM	HIGH
Supplier Motors	China	Electronics (motor)	Strategic	No audit	HIGH	MEDIUM	MEDIUM	MEDIUM	HIGH
C-Technology Co., Ltd.	China	Batteries	Strategic	TQA (Dec 2021)	HIGH	HIGH	HIGH	MEDIUM	HIGH
Supplier Batteries	China	Batteries	Strategic	No audit	HIGH	HIGH	HIGH	MEDIUM	HIGH
Supplier Electronics	China	Electronics	Strategic	No audit	HIGH	MEDIUM	MEDIUM	MEDIUM	HIGH
Supplier Tyres	China	Metal/Rubber (tyres)	Strategic	No audit	HIGH	MEDIUM	MEDIUM	LOW	MEDIUM
Suppler Metal/Rubber	India	Metal/Rubber	Strategic	No audit	HIGH	MEDIUM	MEDIUM	MEDIUM	HIGH
Supplier Plastics	India	Electronics/Plastics	Bottleneck	No audit	HIGH	MEDIUM	MEDIUM	MEDIUM	HIGH
Vehicle Parts Co., Ltd	China	Metal/Rubber (wheel hub)	Bottleneck	QSA (Sep 2024)	HIGH	MEDIUM	MEDIUM	LOW	MEDIUM
B-Technology Co., Ltd	China	Batteries	NOT in Tier 1 list	TQA (Jan 2022)	HIGH	HIGH	HIGH	MEDIUM	HIGH
EnergyD- Technology Co., Ltd	China	Batteries	NOT in Tier 1 list	QSA (Apr 2024)	HIGH	HIGH	HIGH	MEDIUM	HIGH

Supplier Name	Country	Category	Tier 1 Type	Audit on File	Labour Risk	Haz. Mat. Risk	Env. Risk	Gov. Risk	OVERALL RISK
Supplier E	National	Metal/Rubber	Strategic	Q1 2026 audit	MEDIUM	MEDIUM	MEDIUM	MEDIUM	MEDIUM
Supplier M	National	Metal/Rubber	Strategic	Q1 2026 audit	MEDIUM	MEDIUM	LOW	MEDIUM	MEDIUM
Supplier N	National	Fibre/Plastics/Electronics	Strategic	Q1 2026 audit	MEDIUM	MEDIUM	LOW	MEDIUM	MEDIUM
Supplier O	National	Fibre/Plastics/Electronics	Strategic	Q1 2026 audit	MEDIUM	LOW	LOW	MEDIUM	MEDIUM
Supplier P	National	Fibre/Plastics/Electronics	Strategic	Q1 2026 audit	MEDIUM	HIGH	HIGH	MEDIUM	HIGH
Supplier Q	National	Metal/Rubber	Strategic	Q1 2026 audit	MEDIUM	LOW	LOW	MEDIUM	LOW
Supplier R	National	Fibre/Plastics/Electronics	Bottleneck	Q1 2026 audit	MEDIUM	LOW	LOW	MEDIUM	MEDIUM
Supplier S	National	Metal/Rubber	Bottleneck	Q1 2026 audit	MEDIUM	LOW	LOW	MEDIUM	MEDIUM
Enviroserve (battery recycler)	National	Waste and Recycling	Strategic	No audit	MEDIUM	HIGH	HIGH	MEDIUM	HIGH

Risk ratings: RED = HIGH | ORANGE = MEDIUM | GREEN = LOW. Audit on File column: GREEN = audit available (current Tier 1 supplier) | GREY = not in current Tier 1 list (audit included for reference) | RED = no audit on file.

Key Note**: All inherent risk ratings are based on supplier category, geographic location, and available audit evidence, and reflect the risk profile before application of Project Eden's supplier management controls (Code of Conduct, contracts, audit rights**). Ratings should be updated as E&S-specific audit evidence becomes available.

6.4 Supplier Audit Scorecard: National Suppliers

The table below summarises results from Project Eden's Q1 2026 supplier performance audits, conducted by Project Eden's Supply Chain team. All eight audits were completed between 9 February and 17 March 2026. Data is drawn directly from the supplier scorecard spreadsheet (Supplier_Audit.xlsx). Scores are on a scale of 1 to 5 per category. The overall weighted score denominator

varies by supplier because the maximum possible weighted score differs across scorecard sheets. All suppliers report 95% ESG adherence based on self-reporting, with the exception of Supplier S (85%).

Supplier	Category	Type	Onboarding Date	Audit Date (Q1 2026)	Quality (30%)	Delivery (20%)	Cost (15%)	Compliance (15%)	Capacity (10%)	Risk and Sust. (10%)	Weighted Score	Key E&S Notes
Supplier E	Metal and Rubber	Strategic	1 July 2024	1 March 2026	4/5	4/5	1/5	3/5	3/5	3/5	3.20/4.20	75% on-time delivery; awaiting 2026 Environmental Assessment Report; frequent price fluctuations; non-negotiable 30-day payment terms
Supplier M	Metal and Rubber	Strategic	1 September 2025	17 March 2026	4/5	4/5	4/5	3/5	4/5	4/5	3.85/4.85	0% defect rate; 100% on-time delivery; lowest cost locally; payment terms negotiation pending
Supplier N	Fibre, Plastics and Electronics	Strategic	1 May 2025	24 February 2026	3/5	4/5	3/5	3/5	4/5	3/5	3.30/4.30	7.75% defect rate; production processes require tightening; price negotiation needed
Supplier O	Fibre, Plastics and Electronics	Strategic	Not recorded	27 February 2026	4/5	4/5	4/5	3/5	3/5	4/5	3.75/4.75	0.63% defect rate; 80% on-time delivery; design change timelines to improve
Supplier R	Fibre, Plastics and Electronics	Bottleneck	1 August 2024	18 February 2026	4/5	4/5	4/5	3/5	3/5	1/5	3.45/4.45	0% defect rate; 100% on-time delivery; fair prices; rigid on credit terms
Supplier P	Fibre, Plastics and Electronics	Strategic	1 July 2024	3 March 2026	2/5	3/5	4/5	3/5	2/5	3/5	2.75/3.85	6.5% defect rate; capacity at 50% of requirement; fibreglass and resin operations generate styrene VOCs and hazardous liquid waste — highest EHS risk in local supply base per ESDD
Supplier Q	Metal and Rubber	Strategic	1 August 2025	9 February 2026	4/5	2/5	4/5	3/5	1/5	3/5	3.05/4.05	0% defect rate; lowest cost locally; very low capacity (26.7% of requirement); on-time delivery data incomplete in audit
Supplier S	Metal and Rubber	Bottleneck	1 September 2024	17 March 2026	3/5	3/5	2/5	2/5	3/5	1/5	2.50/3.50	4.33% defect rate; 60% on-time delivery; 85% ESG adherence (lowest in cohort); rigid on credit terms

The Compliance scores reflect partial compliance (3/5 or below) across all suppliers, driven by reliance on self-reported ESG adherence without independent EHS verification. Project Eden is advised to disaggregate E&S performance indicators within the scorecard by adding at minimum: valid environmental permit or OHS registration status; reported OHS incidents in the period; and evidence of waste management practices. Supplier O has no onboarding date recorded in the scorecard spreadsheet.

6.5 Priority Observations and Recommended Actions

The following six priority observations and recommended actions consolidate the supplier base risk heatmap findings. They are cross-referenced to ESAP actions D1–D9 and should be read alongside Section 5.5 (contract manufacturer findings).

Observation 1 (HIGH — ESAP D2, D3, D6): All Chinese Strategic and Bottleneck Tier 1 suppliers carry HIGH inherent risk. Seven Sofeast quality audits are available but none cover EHS criteria. The four priority suppliers (Suppliers A-D) have the most material gaps. Vehicle Parts Co Ltd scored Poor (50/100). Recommended action: Develop a phased E&S supplier audit programme for all current active suppliers. Phase 1 (6 months): Supplier B (no audit), Supplier A (quality audit only), Supplier C (no audit). Phase 2 (12 months): Supplier D, C-Technology Co., Ltd (quality audit available but no EHS assessment), Vehicle Parts Co Ltd. (follow-up on poor score). Apply the Supplier EHS Checklist as the minimum standard. Responsible party: Director of Supply Chain.

Observation 2 (HIGH — ESAP D2): Supplier P carries HIGH inherent environmental and hazardous materials risk. Styrene VOC emissions, hazardous resin waste, lowest overall scorecard score (2.75/3.85), and capacity at 50% of requirements. Confirmed as highest EHS risk in local supply base. Recommended action: Prioritise Specialised Fibreglass for the first IFC PS-aligned EHS audit in the local supplier programme. Do not increase volumes until EHS assessment is complete. If transition to metal equivalents is planned (ESAP D4), document timeline and interim controls. Timeline: 6 months of close.

Observation 3 (HIGH — ESAP C2): Enviroserve (battery recycler, Strategic) carries HIGH inherent risk with no formal recycling contract. One transport licence expired December 2025. The national authority issued site licence is valid to June 2026. Recommended action: Execute formal recycling contract covering chain-of-custody, E&S performance requirements, and right to audit. Verify the national authority issued licence renewals. Conduct an E&S site assessment of Enviroserve's facility before committing significant battery return volumes. Timeline: 90 days of close.

Observation 4 (MEDIUM — ESAP D8): India-based suppliers (Supplier Metal/Rubber and Supplier Plastics) carry HIGH inherent risk with no audit documentation. Both are active Tier 1 suppliers not covered by any prior ESAP action. Recommended action: Include Indian suppliers in the

phased E&S audit programme. Request self-assessment questionnaires and verify Code of Conduct sign-off status as a first step. Timeline: 9 months of close.

Observation 5 (MEDIUM — ESAP D9): Supplier scorecard has no disaggregated E&S indicators. Compliance is a composite score based on self-reported ESG adherence. Recommended action: Add at minimum three E&S-specific indicators to the scorecard for all strategic and bottleneck suppliers: valid environmental permit or OHS registration; reported OHS incidents in the period; and evidence of waste management practices. Timeline: 6 months of close.

Observation 6 (MEDIUM — ESAP D1, D5): Supplier EHS Audit and Onboarding Checklist has never been used and is not embedded in KE-OPS-PL-TMP-0005. Scorecard assessments cover 8 national suppliers but EHS checklist has never been applied. Recommended action: Complete scorecard assessments for all national strategic and bottleneck suppliers. Embed the Supplier EHS Audit and Onboarding Checklist into KE-OPS-PL-TMP-0005 as a mandatory onboarding step. Ensure KYC and Code of Conduct sign-off is on file for all active suppliers. Timeline: 6 months of close.

7.0. ACTION PLAN

Index	Performance Standard	Subtopic	Issue	Mitigation	Prioritisation	Responsibility	Completion Indicator	Completion Deadline	Estimated Cost	Estimated Time
	A. Battery Safety and Fire (PS4 — Critical Priority)									
A1	PS4	Battery Safety Procedure	The Li-ion Battery Safety Procedure has been approved by Senior Management and is on file. Company-wide employee training is outstanding; planned for June 2026 (week of 8 June).	Complete company-wide employee training and operational rollout of the approved Battery Safety Procedure, including visibility within the battery laboratory and relevant operational areas.	**High**	CEO	Company-wide Battery Safety Procedure training completed; training records and attendance sheets on file Note: Company-wide employee Battery Safety Procedure has been approved. Company-wide employee training and operational rollout are scheduled for June 2026 in accordance with the training Register.	30 days of close	Low (internal)	0–2 weeks
A2	PS4	Smoke Detection	Smoke detectors absent across facility — rated HIGH RISK (3/3) by October 2025 Fire Safety Audit. Installation confirmed as work in progress in April 2026 corrective actions tracker.	Complete smoke detector installation across the entire facility. Prioritise battery lab detector.	**High**	HSE	Smoke detectors installed and inspection certificate on file	30 days of close	Medium (equipment)	2–4 weeks

Index	Performance Standard	Subtopic	Issue	Mitigation	Prioritisation	Responsibility	Completion Indicator	Completion Deadline	Estimated Cost	Estimated Time
A3	PS4	Fire Alarm — Battery Lab	Fire alarm pull-station located 20–30m from the battery lab entrance — inadequate response time in a thermal event.	Relocate fire alarm pull-station to the battery lab entrance.	**High**	HSE	Pull-station repositioned at lab entry; fire warden verification	30 days of close	Low	1–2 weeks
A4	PS4	Fire-rated Doors	Fire-rated doors to battery quarantine area observed propped open, negating their fire-rating function.	install fire-rated door	**Medium**	HSE	Installed fire rated doors	30 days of close	Medium	1 week
A5	PS4	Battery Lab Temperature	No temperature monitoring or HVAC in battery lab — thermal risk during cycle testing.	Install thermometer or HVAC cooling in battery lab.	**High**	Chief Operations Officer	Temperature log or HVAC installation certificate on file	60 days of close	Medium	4–6 weeks
A6	PS4	Soldering Fume Control	Soldering station (Assembly Station 3) lacks a dedicated fume extractor.	Procure and install mobile fume extractor at soldering station.	**Low**	Chief Operations Officer	Extractor installed and operational	30 days of close	Low	2–3 weeks

Index	Performance Standard	Subtopic	Issue	Mitigation	Prioritisation	Responsibility	Completion Indicator	Completion Deadline	Estimated Cost	Estimated Time
A7	PS4	Battery Emergency Drills	No battery-specific fire drill or thermal runaway simulation drill has been conducted to date. General fire drills are conducted annually (2023, 2024 and 2026 records on file), and battery handling staff receive annual internal training. A battery-specific drill is planned but had not yet been implemented during the ESDD.	Conduct battery-specific thermal runaway and emergency response drills for battery lab and hub staff and integrate battery-specific scenarios into the annual drill programme.	Medium	Chief Operations	Drill records, attendance lists and corrective action reports filed	90 days of close	Low–Medium	2–4 weeks
A8	PS4	Battery SoC Management	State-of-charge management labelling and controls for stored batteries not confirmed on site.	Implement SoC management labelling and control procedure for battery storage.	Medium	Chief Operations Officer	SoC labels visible on stored batteries; procedure documented	60 days of close	Low	2 weeks
	B. OHS, PPE and Worker Safety (PS2 / PS4)									
B1	PS2	PPE Compliance	Multiple PPE non-compliances observed: supervisors/managers on production floor without safety boots; grinding operator without goggles; worn out PPE in paint booth.	Enforce 100% PPE compliance for all persons on the production floor regardless of seniority. Immediate disciplinary consequence for non-compliance in line with the Disciplinary Procedure.	High	Chief People Officer	Zero PPE violations observed in follow-up; disciplinary log maintained	Immediate — pre-close	Low	0 weeks

Index	Performance Standard	Subtopic	Issue	Mitigation	Prioritisation	Responsibility	Completion Indicator	Completion Deadline	Estimated Cost	Estimated Time
B2	PS2	PPE Stock	1-week lag for replacing damaged PPE creates a compliance gap.	Establish a basic on-site PPE store to eliminate the replacement lag.	Medium	Chief People Officer	PPE inventory maintained; replacement within 24 hours	30 days of close	Low–Medium	2–3 weeks
B3	PS4	Visitor OHS Briefing	No formal visitor OHS briefing video protocol in place. A safety briefing sign is in place at reception. A visitor safety briefing video script has been drafted; filming and deployment planned before financial close.	Implement mandatory visitor OHS briefing at headquarters entry.	Low	Head of Sustainability	Briefing protocol posted; visitor log signed Deployment of the drafted video briefing script	30 days of close	Low	1 week
B4	PS2	Hazard Assessment	The H&S Policy commits to hazard assessments at least every six months. This cycle has not been maintained since the policy was last revised in 2021. No written hazard assessment procedure is currently in place; a designated chemical storage area is being established with an estimated 3-month completion timeline.	Complete the hazard risk assessment and formalise a 6-monthly review schedule. Finalise designated chemical storage area as part of the hazard assessment process. Review the H&S Policy from 2021	Medium	Head of Sustainability	Hazard assessment report filed; next date scheduled. H&S Policy reviewed	90 days of close	Low (internal)	3–4 weeks
B5	PS2	Safety Committee Frequency	Safety Committee was operating quarterly, representing a regression from the monthly frequency	File first meeting minutes from the Main H&S Committee (27 May 2026) to confirm the	Medium	Head of Sustainability	First Main H&S Committee meeting minutes filed (27 May 2026); ongoing	Immediate	Low (governance)	0 weeks

Index	Performance Standard	Subtopic	Issue	Mitigation	Prioritisation	Responsibility	Completion Indicator	Completion Deadline	Estimated Cost	Estimated Time
			committed in the H&S Policy. Project Eden restructured in May 2026: two-tier structure now in place exceeding original requirement (see gap row 4.2.4). Substantially addressed pending first meeting minutes. Main H&S Committee meets monthly (COO as Chair); Departmental Subcommittees meet every 3rd week. First Main Committee meeting: 27 May 2026.	restructured cadence is operational. Maintain monthly Main Committee and 3rd-week subcommittee schedule going forward. Minutes from the restructured monthly (COO as Chair); Departmental Subcommittees meet every 3rd week meetings			monthly cadence confirmed			
B6	PS2	5S to 6S Upgrade	Operational 5S housekeeping practices and standalone H&S controls are in place. Opportunities exist to further strengthen visual safety integration through improved walkway markings, zone labelling and incorporation of safety considerations within housekeeping audits.	Strengthen visual safety management through enhanced walkway markings, zone labelling and integration of safety considerations within operational housekeeping audits.	**Low**	Chief Operations Officer	Updated housekeeping/safety audit checklist implemented; visible walkway markings and operational zone labelling completed.	90 days of close	Low	4–6 weeks

Index	Performance Standard	Subtopic	Issue	Mitigation	Prioritisation	Responsibility	Completion Indicator	Completion Deadline	Estimated Cost	Estimated Time
B7	PS4	Hub Manual Handling	Hub operators lift ~20 kg batteries 70+ times per shift without ergonomic aids. Task rotation controls are in place; however, repetitive strain and dropped-battery risks remain.	Conduct ergonomic assessment for hub battery exchange activities and strengthen controls where required, including task rotation optimization, ergonomic aids or workstation improvements.	Medium	Chief People's Officer	Ergonomic assessment completed; operator controls implemented where required	90 days of close	Medium	4–8 weeks
B8	PS2	Near-Miss Reporting	No near-miss reporting poster visible on production floor.	Install visible near-miss reporting mechanism on production floor.	Low	Head of Sustainability	Poster installed; near-miss reports logged	30 days of close	Low	1 week
B9	PS2	DOSHS Abstract Posting	DOSHS Abstract and OHS Policy posters not confirmed as posted (mandatory under OSHA 2007).	Post DOSHS Abstract and National OHS Policy posters on production floor.	Low	Chief People's officer & Head of Sustainability	Posters visible on production floor	— pre-close	Low	1 day
	C. Waste, Hazardous Materials and Environmental Compliance (PS3)									
C1	PS3	Hazardous Waste Storage	Hazardous waste area in basement: unlocked, unlabelled, unrestricted access. Paints and solvents on open shelves. Non-compliant with Project Eden's own Waste Management Procedure.	Immediately secure and properly label the hazardous waste storage area. Restrict access to trained personnel. Label all containers.	High	Chief Operations Officer	Locked storage with access log; all containers labelled	30 days of close	Low	1-2 weeks
C2	PS3	Recycler Contracts	Enviroserve has completed Project Eden's vendor onboarding (Supplier	Execute a formal service agreement with Enviroserve covering scope of	Medium	Chief Operations Officer	Signed contracts and national authority	90 days of close	Low (legal)	3–4 weeks

Index	Performance Standard	Subtopic	Issue	Mitigation	Prioritisation	Responsibility	Completion Indicator	Completion Deadline	Estimated Cost	Estimated Time
			Code of Conduct, Vendor Registration Form, and Conflict of Interest signed; national authority licence and recycling process confirmed). No formal service agreement governing chain-of-custody, E&S performance requirements, or right to audit has been executed. No documentation received from recycling centre.	service, chain-of-custody obligations, E&S performance requirements, and right to audit. Confirm renewal of the expired Enviroserve transport licence. Obtain recycling centre national authority documentation and execute an equivalent service agreement.			licences filed in data room			
C3	PS3	MSDS Register	No MSDS register was available on site during the visit; Project Eden confirms the register is currently being developed and internal training is planned for relevant staff once established. WBG EHS Guidelines require MSDSs to be accessible to all workers handling hazardous substances.	Establish full MSDS register for all on-site chemicals. Post MSDSs at point of use.	**High**	Chief Operations Officer	MSDS register filed; MSDSs posted at point of use and staff trained/informed	90 days of close	Low	2–3 weeks
C4	PS3	Waste Volume Tracker	No consolidated quarterly waste tracker by category exists.	Produce consolidated quarterly waste tracker (type,	**Low**	Chief Operations Officer	First quarterly tracker produced; regular cadence established	90 days of close	Low	Ongoing

Index	Performance Standard	Subtopic	Issue	Mitigation	Prioritisation	Responsibility	Completion Indicator	Completion Deadline	Estimated Cost	Estimated Time
				volume, vendor, destination).						
C5	PS3	Disposal Records	Enviroserve disposal certificates not filed. No centralised manifest file.	File all disposal records centrally. Obtain Enviroserve certificates of disposal for all collections to date.	**Low**	Chief Operations Officer	Centralised manifest file with records for all vendors	90 days of close	Low	2–3 weeks
C6	PS3	Spill Response	Spill response marked N/A by Project Eden. Oils, solvents, and paints present on site. No spill kits observed in basement.	Develop basic spill containment and response procedure. Procure spill kits for paint booth and grinding room.	**Low**	Chief Operations Officer	Spill procedure documented; kits at relevant areas	60 days of close	Low	2–3 weeks
C7	PS1	Environmental Policy Targets	Environmental targets are being developed through a standalone Environmental Targets Register linked to the high-level Environmental Policy, following establishment of baseline environmental performance data to support data-driven and operationally meaningful target setting.	Implement the phased environmental targets approach by establishing structured environmental performance data collection systems and developing a standalone Environmental Targets Register linked to the Environmental Policy.	**Low**	Head of Sustainability	Environmental performance data collection system established; Environmental Targets Register developed and linked to the Environmental Policy.	6 months of close	Low	phased implement ation
C8	PS3	Energy Conservation Plan	Project Eden has implemented proportionate resource-efficiency measures, including	Consolidate existing resource-efficiency initiatives and operational energy	**Low**	Head of Sustainability	Documented Energy Conservation Plan developed, incorporating	6 months of close	Low	4–6 weeks

Index	Performance Standard	Subtopic	Issue	Mitigation	Prioritisation	Responsibility	Completion Indicator	Completion Deadline	Estimated Cost	Estimated Time
			solar PV installation and operational energy-efficiency practices. Formalisation of these initiatives within a documented Energy Conservation Plan represents an opportunity to further strengthen resource-efficiency tracking and management documentation.	management practices within a documented Energy Conservation Plan to support ongoing monitoring and demonstration of resource-efficiency performance			existing solar PV and operational resource-efficiency initiatives.			
C9	PS1	GHG Accounting	Formal Scope 1 and Scope 2 GHG accounting processes have not yet been formalised, though Project Eden's operational emissions are materially below the IFC PS3 annual quantification threshold and indicative emissions data can be compiled from existing electricity and generator fuel records.	Establish a proportionate Scope 1 and Scope 2 GHG accounting process to support investor reporting, environmental performance tracking and ongoing climate-related management documentation.	**Low**	Head of Sustainability	Indicative Scope 1 and Scope 2 GHG inventory compiled and internal accounting methodology documented	6 months of close	Low	2–3 months
C10	PS3 / Legal	EPR Registration — Batteries	The Sustainable Waste Management (EPR) Regulations entered into force on March 14, 2026 and list batteries and accumulators as a regulated product	Finalise and submit the required 4-year EPR plan to the national authority in line with evolving EPR regulatory requirements and timelines	**Medium**	Head of Sustainability	National authority EPR registration certificate on file required; EPR planning documentation submitted in	In line with gazetted EPR implementation timelines	Low (admin/legal)	Subject to EPR implementation timeline

Index	Performance Standard	Subtopic	Issue	Mitigation	Prioritisation	Responsibility	Completion Indicator	Completion Deadline	Estimated Cost	Estimated Time
			category. Project Eden has applied with the relevant national authority for EPR registration (Authority confirmation letter on file) and holds a PRO membership certificate. Outstanding item: a 4-year EPR plan detailing collection and recycling targets has not yet been submitted to the national authority (Project Eden confirms this will follow once the national authority certificate is issued). Eco-fee obligations are managed through PRO membership.	certificate. Confirm that the Enviroserve partnership and battery buy-back scheme contribute to meeting EPR recycling obligations. File the national authority certificate once issued.			accordance with applicable regulatory timelines; PRO membership maintained.			
	D. Supply Chain (PS1 / PS2)									
D1	PS1	EHS in Supplier Onboarding	EHS criteria not embedded in supplier onboarding process KE-OPS-PL-TMP-0005, despite a Supplier EHS Audit and Onboarding Checklist being available in the data room (see Section 5.2). Accountability for supply chain ESG sits with the Director of Supply Chain.	Director of Supply Chain to formalise EHS criteria as a mandatory element of the supplier onboarding checklist, with accountability sitting within the Supply Chain function.	Medium	Director Supply Chain	EHS criteria embedded in supplier onboarding checklist; process documented in KE-OPS-PL-TMP-0005	60 days of close	Low	2–3 weeks

Index	Performance Standard	Subtopic	Issue	Mitigation	Prioritisation	Responsibility	Completion Indicator	Completion Deadline	Estimated Cost	Estimated Time
D2	PS1	Supplier EHS Audit Programme	Existing supplier onboarding, Code of Conduct sign-off and EHS screening processes are in place; however, structured periodic supplier E&S audits aligned with IFC PS1/PS2 requirements have not yet been formalised. Local supplier assessments are currently undertaken through informal site visits and operational engagement. Chinese strategic Tier 1 suppliers identified through the supply chain risk heatmap carry elevated inherent E&S risk profiles, particularly Supplier P within the local supplier base. Labour standards verification currently relies primarily on supplier declarations and contractual commitments, with limited independent verification for higher-risk suppliers.	Implement a phased IFC PS-aligned supplier E&S assessment programme using the Supplier EHS Audit and Onboarding Checklist, prioritising higher-risk strategic Tier 1 suppliers identified through the supply chain risk heatmap. Phase 1 (within 6 months of close): conduct structured E&S assessments for Suppliers A-C including verification of labour standards management practices and review of any existing third-party certifications or audit reports (e.g. SMETA, ISO 45001 or equivalent). Phase 2 (within 12 months): extend assessments to Supplier P, Supplier D, C-Technology Co., Ltd, Vehicle Parts Co Ltd and other strategic or bottleneck suppliers, subject	Medium	Director Supply Chain	. Phase 1 supplier E&S assessment reports completed for Suppliers A-C, including labour standards verification and review of available third-party audit/certification evidence; Phase 2 supplier assessment programme initiated. Findings from supplier E&S assessments are incorporated into ongoing procurement, material selection and supplier engagement decisions, where applicable.	6 months of close	Medium	8–10 weeks

Index	Performance Standard	Subtopic	Issue	Mitigation	Prioritisation	Responsibility	Completion Indicator	Completion Deadline	Estimated Cost	Estimated Time
				to budget and supplier access considerations. Findings from supplier E&S assessments should inform ongoing procurement, material selection and supplier engagement decisions on a risk-based basis.						
D3	PS1	Supplier A EHS Audit + KEBS	Sofeast quality audit (Oct 2024, 66/100) covers quality only — no EHS criteria. Key E&S-relevant observations from IFE include: outsourced surface spraying not monitored by Supplier B; workshop housekeeping issues; some equipment lacking maintenance records (see Section 5.3.1). Standards permit SM#61121 issued under previous (Indian) frame design; written confirmation required before financial close that Supplier B frame meets ISO 13063-2:2022.	Conduct IFC PS1/PS2-aligned EHS audit of Supplier B. Obtain national standards written confirmation that the Supplier B frame meets ISO 13063-2:2022.	Medium	Director Supply Chain	Supplier B EHS audit report on file; National Standards confirmation received	6 months of close	Medium (travel/resource)	6–8 weeks

Index	Performance Standard	Subtopic	Issue	Mitigation	Prioritisation	Responsibility	Completion Indicator	Completion Deadline	Estimated Cost	Estimated Time
D4	PS1	Supplier CAP Tracker	No centralised corrective action tracker for supplier audit findings.	Establish centralised CAP tracker for all supplier audit findings.	**Low**	Director Supply Chain	Tracker in use with findings from next audit cycle logged	90 days of close	Low	2–3 weeks
D5	PS1	India Supplier EHS Audit	India-based Tier 1 supplier Supplier Plastics carries elevated inherent E&S risk exposure within the supply chain. Supplier Code of Conduct commitments are in place; however, structured supplier self-assessment documentation and periodic E&S verification processes have not yet been consistently formalised.	Request supplier self-assessment questionnaires from Supplier Plastics and maintain documented Supplier Code of Conduct confirmation within the supplier repository. Integrate the supplier into the phased supplier E&S assessment programme on a risk-based basis.	**Medium**	Director Supply Chain	Self-assessment questionnaires received and reviewed Code of Conduct sign-off confirmed on file	9 months of close	Low	4–6 weeks
D6	PS1	Supplier Scorecard E&S Indicators	Supplier performance scorecards currently measure E&S compliance primarily through composite ESG scoring and supplier self-reporting, without disaggregated E&S performance indicators or independent verification metrics. Limited supplier-specific E&S indicators are	Incorporate additional E&S-specific indicators into the supplier performance scorecard for priority strategic and bottleneck suppliers, including: (1) valid environmental permit or OHS registration status; (2) reported OHS incidents during	**Medium**	Director Supply Chain	Updated supplier scorecard incorporating disaggregated E&S indicators implemented for priority strategic and bottleneck suppliers.	6 months of close	Low (internal)	4–6 weeks

Index	Performance Standard	Subtopic	Issue	Mitigation	Prioritisation	Responsibility	Completion Indicator	Completion Deadline	Estimated Cost	Estimated Time
			currently tracked for strategic and bottleneck suppliers.	the reporting period; and (3) evidence of waste management practices. Implement the enhanced scorecard progressively across priority suppliers on a risk-based basis.						
	E. Governance, Grievance and Stakeholder (PS1 / PS2)									
E1	PS1	Stop-Work Authority	Stop-work authority in relation to E&S non-compliances is not formally documented. Authority should sit with the COO, with the Head of Sustainability having a direct escalation pathway to the COO and CEO.	Confirm and document that stop-work authority in relation to E&S non-compliances sits with the COO, and that the Head of Sustainability has a direct escalation pathway to the COO and CEO.	High	Chief of Operations	Stop-work authority documented in ESMS; COO accountability and Head of Sustainability escalation pathway confirmed in writing	60 days of close	Low (governance)	2 weeks
E2	PS1	Document Version Control	Some printed shop-floor SOPs and testing instructions lack formal version control and sign-offs. However, new versions have a version control structure in place: each SOP includes a	Implement and complete formal document version control for all SOPs and testing instructions. Confirm that all current SOPs are enrolled in the register with	Medium	Chief of Operations	Version history visible on all SOPs; sign-off records maintained	90 days of close	Low	3–4 weeks

Index	Performance Standard	Subtopic	Issue	Mitigation	Prioritisation	Responsibility	Completion Indicator	Completion Deadline	Estimated Cost	Estimated Time
			date reviewed, version number, and sign-offs from both the Production Representative and Quality Representative (for example, Front Fork (Custom) Assembly SOP, Version 1.0, reviewed March 2026, signed by production and quality representatives). A centralised document version control register covering all SOPs is under development.	version history, approval records, and review dates						
E3	PS4 / PS1	External Grievance Visibility	Project Eden has established a formal external grievance mechanism and communicates grievance channels through customer onboarding, customer support platforms and publicly available contact information. Opportunities exist to further strengthen visibility and site-level accessibility of the grievance mechanism at public-facing operational locations, including charging	Enhance visibility of the external grievance mechanism by displaying grievance contact information at charging hubs, the Service Centre and other public-facing operational locations. Continue maintaining and periodically reviewing grievance records as part of ESMS implementation.	**Low**	Regional Sales Operations Manager	Grievance contact information displayed at public-facing operational locations and grievance records maintained as part of the grievance management process.	30 days of close	Low	1–2 weeks

Index	Performance Standard	Subtopic	Issue	Mitigation	Prioritisation	Responsibility	Completion Indicator	Completion Deadline	Estimated Cost	Estimated Time
			hubs and the Service Centre.							
E4	PS4	Customer and Community Interaction Management	Behavioural and conduct-related concerns involving rider interactions with hub staff were noted at public-facing operational locations. While Project Eden communicates rider expectations through onboarding and customer documentation, documented training on managing difficult customer interactions and de-escalation techniques had not been consistently formalised across hub operations.	Provide documented training for hub staff on conflict management, de-escalation techniques and management of difficult customer interactions. Continue communicating rider conduct expectations through onboarding materials, warranty documentation and other customer communication channels.	**Medium**	Human Resource Officer	Training records demonstrating completion of de-escalation and customer interaction training for hub staff; rider conduct expectations incorporated into onboarding and customer communication materials.	90 days of close	Low	3–4 weeks
E5	PS2	Shift-to-FTE Policy	Project Eden employs shift workers under fixed-term contracts, including a number of workers with more than three years of continuous service through successive contract renewals. While these arrangements are permitted under national labour law and workers may access grade progression and	Develop and communicate a workforce progression framework for shift workers, including criteria for contract renewal, career development opportunities and consideration for longer-term employment arrangements where	**Low**	Human Resource Officer	Workforce progression framework documented and communicated; criteria for contract renewal and career development formally established.	6 months of close	Low (HR policy)	4–6 weeks

Index	Performance Standard	Subtopic	Issue	Mitigation	Prioritisation	Responsibility	Completion Indicator	Completion Deadline	Estimated Cost	Estimated Time
			salary increments, a documented framework outlining contract continuity considerations, career progression opportunities and pathways to longer-term employment has not been formalised.	operationally appropriate.						
E6	PS2	Grievance Channel Awareness	Project Eden has multiple worker grievance channels in place, including supervisor, HR and anonymous reporting channels. While use of anonymous channels appears limited, no evidence was reviewed to confirm whether this reflects low awareness, preference for other reporting channels, or limited grievances. Continued awareness reinforcement would support accessibility and worker confidence in the grievance mechanism.	Continue reinforcing worker awareness of available grievance channels during induction, refresher briefings and toolbox talks, including confidentiality and non-retaliation protections.	**Low**	Human Resource Officer	Grievance mechanism awareness included in induction/refresher records; grievance channel usage monitored periodically.	90 days of close	Low	4–6 weeks
E7	PS1	E&S Reporting to Board	Two monthly SMT meetings cover E&S: (1) monthly standard reporting covering OHS/people KPIs; (2)	Confirm review of Board/SMT papers in data room showing E&S as agenda items. Mark	**Low**	Head of Sustainability	E&S agenda items confirmed in Board minutes; KPI	Substantially closed — pending data room	Low	1–2 weeks

Index	Performance Standard	Subtopic	Issue	Mitigation	Prioritisation	Responsibility	Completion Indicator	Completion Deadline	Estimated Cost	Estimated Time
			OKR tracker meeting. Board-level ESG reporting occurs twice per year with ESG as a line agenda item. Documents added to Senior Management/Board folder in data room. Incidents escalated to Board via standard escalation channels. Substantially closed pending document review.	as closed once documents confirmed. Maintain biannual Board ESG agenda item going forward.			dashboard shared	document review		
E8	PS4	Stakeholder Engagement	Stakeholder Engagement Plan is in draft form and yet to be fully adopted and implemented.	Finalise the draft document and implement across operations. Compile and maintain a register of identified stakeholders with names and contact details.	Low	Head of Sustainability	Final Stakeholder Engagement Plan and associated contact and grievance/complaints register.	90 Days of close	None	1 week

8.0. CONCLUSIONS AND RECOMMENDATIONS

The following conclusions and recommendations draw from the Environmental and Social Due Diligence assessment undertaken for Project Eden, with particular focus on resource efficiency and pollution prevention (IFC PS3), community health, safety and security (IFC PS4), and supply chain due diligence (IFC PS1/PS2). This assessment is based on documentary review, the site visit conducted on 23–24 April 2026, and interviews with Project Eden management and staff across eleven sessions.

1. Battery Safety and Fire — Most Material Risk Requiring Pre-Close Action

The battery laboratory at the headquarters is assessed as the highest-risk area in the facility and the highest operational risk area identified during the ESDD from an IFC PS4 and lender perspective. The Li-ion Battery Safety Procedure has been approved by SMT; company-wide employee training remains outstanding and is planned for June 2026 (within 30 days of financial close, per ESAP A1). Smoke detectors are absent across the entire facility and were rated High Risk by the independent October 2025 Fire Safety Audit. Fire-rated quarantine doors were observed propped open, negating their fire-rating function. A battery thermal runaway incident occurred in 2025 with incident report on file. It is strongly recommended that completion of smoke detector installation, relocation of the fire alarm pull-station to the battery lab entrance, and enforcement of fire-rated door protocols are treated as pre-close conditions for the SCF investment. Battery Safety Procedure company-wide training is designated 30 days post-close (ESAP A1).

2. Waste Management and Hazardous Materials — Systemic Gaps, Remediable Pre-Close

Project Eden has a documented waste management framework that is broadly aligned with IFC PS3 and supported by annual national authority environmental audits. The May 2025 national authority Annual Environmental Audit assessed the facility as largely compliant with applicable national environmental requirements. During the ESDD, opportunities for improvement were identified relating to hazardous waste and chemical management, including strengthening internal labelling and segregation within dedicated storage areas, formalising waste contractor arrangements and improving hazardous materials documentation. At the time of the assessment, a spill response procedure had been drafted but had not yet been formally approved and implemented. Formal contractual arrangements with Enviroserve for battery recycling were also pending execution, although Enviroserve's process and NEMA licence had been verified. The identified actions are readily achievable through implementation of the ESAP and represent management system and operational control enhancements rather than fundamental deficiencies in the waste management framework.

3. Supply Chain — International Audits Adequate in Scope; Local Supplier EHS Assessment Materially Insufficient

A detailed supply chain assessment is presented in Sections 5 and 6 of this report, covering contract manufacturer assessments and supplier base risk screening. The following summarises the key conclusions. Third-party quality audits (Sofeast, 2021–2024) provide a reasonable quality management baseline for some international suppliers but cover quality only, not EHS criteria. Supplier A (battery packs,

no audit of any kind on file), Supplier B (metal components, no audit), and Supplier C (electronics, no audit) represent the most material international gaps. The full heatmap in Section 6.3 shows all Chinese Strategic Tier 1 suppliers carry HIGH inherent E&S risk. Local supplier assessments are informal and insufficient for IFC PS1/PS2. Supplier P, a strategic local supplier, produces fibreglass and resin components generating styrene VOC emissions, resin dust, and hazardous liquid waste with no E&S assessment conducted to date — the highest inherent EHS risk in the local supply base. Supplier S has the lowest compliance score in the national cohort (85% ESG adherence, 60% on-time delivery). A Conflict Minerals Reporting Template (CMRT) has been received from Supplier A and is on file; the conflict minerals gap at cell supplier level is closed. A phased IFC PS-aligned EHS audit programme for priority international suppliers should be implemented within 6–12 months of financial close, with Supplier B as first priority. Supplier P should be first priority in the local supplier programme. The Enviroserve battery recycling relationship requires formalisation through a formal service agreement within 90 days of financial close (ESAP C2). The Supplier EHS Audit and Onboarding Checklist should be operationalised as a mandatory onboarding tool embedded in KE-OPS-PL-TMP-0005. These actions are addressed in ESAP D1 through D9. See Sections 5.5 and 6.5 for full recommended actions.

4. National Standards Product Certification — Re-Assessment Recommended

Project Eden holds a valid National Standards Standardization Mark permit (SM#61121, valid to May 2027) for the e-motorcycle against ISO 13063-2:2022 (Electrically Propelled Motorcycles — Vehicle Operational Safety). However, the permit was issued for the previous frame design. The motorcycle main frame supplier was subsequently changed from an Indian manufacturer to Supplier A in China. While Project Eden indicates that the resulting design changes were minor, the ESDD did not independently verify whether the revised frame configuration falls within the scope of the existing national standards certification. While the Sofeast quality audit of Supplier A (October 2024, 66/100 — Average) provides some quality assurance, it does not cover safety validation of the new frame design against the national standard. It is recommended that Project Eden obtain written confirmation from National Standards, either during the next permit renewal process or earlier if considered appropriate, that the current certification remains applicable following the frame supplier change. Relevant validation and testing documentation for the revised frame configuration should be maintained and made available to lenders upon request.

5. Environmental Compliance — National Baseline Met; International Standards Require Incremental Improvement

Project Eden's operational environmental compliance under national law is assessed as substantially adequate. The national authority EIA licence is valid, the annual self-audit has been submitted (May 2025), and the facility is assessed as broadly compliant with national regulation. The DOSHS workplace registration is current (valid to October 2026). The General Waste Service Provider waste collection contract is in place. The WRA borehole registration is confirmed via renewal receipt (March 2024). These are positive indicators for a company at Project Eden's stage of development.

Statutory air quality monitoring (May 2025) and noise level measurement (October 2025) have been conducted at the headquarters. The air quality assessment recorded PM10 in the painting room at 81 µg/m³, above the occupational exposure limit, while PM2.5 and TSP remained within limits. Project Eden has confirmed that painting operations will be phased out within approximately 4–5 months, which will eliminate this exceedance. The noise assessment found that most workstation levels comply with the 90 dB(A) occupational exposure limit; however, the grinding machine recorded 92.7 dB(A), exceeding the OEL, and the cutting machine recorded 86.7 dB(A), approaching the threshold. Engineering controls or enhanced hearing protection for workers operating these machines is recommended, alongside annual audiometric testing and posting of warning signage in high-noise areas.

The remaining environmental actions relate primarily to formalisation and documentation enhancements rather than regulatory or IFC PS3 compliance deficiencies. These include development of a structured GHG accounting process and documentation of resource-efficiency planning measures to support lender reporting expectations and alignment with Good International Industry Practice (GIIP). Both actions are achievable within the ESAP timeline (ESAP C9 and C8 respectively) and should not prevent financial close, provided Project Eden maintains its commitment to implementation. On Extended Producer Responsibility: National Sustainable Waste Management (EPR) Regulations 2024 entered into force in March 2026, and list batteries and accumulators as a regulated product category. Project Eden triggers obligations as both a manufacturer and importer of batteries. Project Eden has applied with the national authority for EPR registration — a national authority confirmation letter is on file — and holds a PRO (Producer Responsibility Organisation) membership certificate. The sole outstanding item is submission of the 4-year EPR plan to the national authority, which Project Eden confirms will follow once the national authority registration certificate is issued. Eco-fee obligations are managed through PRO membership. There are ongoing legal challenges and industry disputes regarding EPR enforcement timelines nationally; however, the regulatory obligation remains in force and Project Eden is monitoring developments closely. This is addressed in the ESAP as a Medium Risk item (ESAP C10).

6. Overall Assessment and Path to Close

Project Eden demonstrates a generally established and functional Environmental and Social (E&S) management framework appropriate to its current scale, operational profile and stage of organisational maturity. The Company has established key management systems, governance structures and compliance processes, and has demonstrated a proactive and constructive approach throughout the due diligence process.

The assessment identified a limited number of material gaps requiring corrective action, primarily relating to battery safety operationalisation, hazardous waste management documentation and vendor formalisation, supply-chain EHS due diligence, and operational safety enforcement. While certain battery safety and fire risk controls require prioritised attention due to the potential severity of consequences, the majority of the identified actions involve strengthening, formalising or expanding existing management systems rather than establishing entirely new systems.

The identified gaps are considered remediable through implementation of the ESAP and do not indicate fundamental weaknesses in management commitment, organisational capacity or overall E&S performance. Subject to timely implementation of the priority ESAP actions, Project Eden is considered capable of achieving alignment with applicable lender requirements and international good practice expectations.

9.0 APPENDICES

- Interview Guides
- Observation Checklist
- Photos
- Stakeholder Engagement and Communication Plan
- Stakeholder Consultation Report

Interview Guides —Project Eden Electric ESDD Site Visit

Project Eden

Prepared by: ESF Consultants & Peter Kossakowski | April 2026

How to use these guides

One guide per session (11 sessions, aligned with Stakeholder Engagement Plan Rev 5). Questions are grouped by topic and written in bullet form — they are a structured question bank, not a script. Adapt order and depth to the conversation; skip anything already covered by a document review. Notes space is provided at the end of each guide for the note-taker.

Every question is designed to probe either (a) how a documented policy operates in practice, (b) a specific ESAP candidate, or (c) a data point flagged in the populated Information Request List. Documents named in each session are listed in the "to collect" box — add to the shared Document Evidence Log as they come in.

SESSION 1 — SENIOR MANAGEMENT / OPERATIONS LEADERSHIP

Time	Day 1, 09:00 – 10:00 (60 min)
Focal points	CEO, COO, CFO, Head of Sustainability & Carbon Finance
Standards	IFC PS1 · EP4 Principles 2, 3, 4, 10 · GS4GG P.1 Human Rights · EMCA
Format	Roundtable discussion
Objective	Establish the governance, strategic context and risk appetite within which Project Eden's ESMS operates; agree likely ESAP direction.

Opening

Thank you for the time this morning. The goal of this first session is to understand how Project Eden approaches E&S at the strategic level — governance, growth plans and the risks you see — so that the rest of the visit can be calibrated against that. Everything we hear is treated confidentially and findings are aggregated in the ESDD report.

Questions

Strategy and scale

1. Current production at headquarters is ~300 units/month with 30,000 units/year capacity. What is the realistic run-rate you're planning for over the next 12–24 months, and what are the key bottlenecks to scaling toward 150,000 units/year by 2029?
2. How does the Project Eden bus assembly (separate facility, local partner ?) and Project Eden's Energy business relate to the headquarters operationally, and how are its E&S risks currently covered?
3. Charging network: what's the rollout sequence from 600 to 7,200 slots by 2030, and what fraction will be Project Eden-owned versus operated by third parties?

Governance and accountability

4. Walk us through how an E&S issue escalates from the shop floor to the C-suite. Where does the Sustainability Lead report in, and what authority does she have to halt production or change a supplier?
5. , and what are the standing KPIs?

6. Are there any decisions currently being taken at the C-suite level where E&S considerations are material but the framework is not yet clear (e.g. new supplier = new battery chemistry)?

Risk appetite and contextual risks

7. The ESMS Overview flags fire, factory accidents, security incidents and natural disasters as the main contextual risks. Which of these keeps you up at night, and why?
8. The Sep 2021 H&S Policy predates the move to the headquarters and the scale-up of battery operations. Is there an update planned?
9. How do you see Project Eden's risk profile evolving as the hub network expands into areas with a less controlled physical environment than head office?

Investor and lender alignment

10. How do you interpret the E&S expectations from the SCF investment relative to what Project Eden already has in place? Where do you see the biggest gaps to close?
11. The Equator ESG Action Plan 2025 status is in the data room — which items are proving straightforward and which are proving hard?
12. Climate risk and formal GHG accounting are currently not in place. Given the carbon project and ITMO pathway, what's the plan for Scope 1 and 2 accounting and over what timeline? As a first sanity check, has Project Eden done any indicative calculation of aggregate Scope 1+2 emissions (the EP4 Principle 10 and IFC PS3 thresholds of 100,000 / 25,000 tCO2e/yr respectively are relevant here)?

Human rights and disclosure

13. EP4 Principle 2 (2020) expects all projects to conduct an assessment of potential adverse human rights impacts in line with the UN Guiding Principles on Business and Human Rights (UNGPs). Has Project Eden conducted, or does it plan to conduct, a structured human rights impact screen? If so, what did it cover (own operations, supply chain, customer interface)?

Documents / evidence to collect during or after this session

- Latest SMT / Board papers where E&S appears as an agenda item (last 12 months, summary level)
- Status of the Equator ESG Action Plan 2025 beyond what's in the data room
- Any recent internal memos on battery / fire risk at scale
- Copy or summary of any investor-side E&S commitments made in the Feb 2024 round

Notes

Liability vs influence

- Onboarding of drivers is done and regular communication

Auditing homes before home charger installed. Same home charger is used in the Company charging hubs.

Generally the policies are regularly updated, staff is informed, and training logs created. Mostly there is a push to update the documents from investors.
Question: Double check for training logs?

Future plans for ISO 9001 and 140001 implementation

Project Eden's charging network (service and charging hubs) will grow from 16 to 30 in the capital city, but the headquarters will not grow, hence the ESG related impact will more grow outside from the headquarter business.

Project Eden is planning a internal academy (training of service technicians, staff) and work with partner garages to service motorbikes

Project Eden has a carbon project ongoing to sell carbon credits (related to the offsetting of the motorcycles) but does not know their operational carbon foot print

Electric bus is not a focus currently, more pilot phase but could be seen as ESG risk if the not used busses are not well maintained or properly discarded.

Project Eden is a vertical integrated company
Battery is sold to customer, hence responsibility on battery disposal is put onto the driver but the Company has take-back scheme which is currently being implemented with the new battery design

Incident forms are available online/through QR codes and once filled out they go to H&S committee to be review or directly reported to line managers.

Follow up:

- KPI: reporting in monthly management meetings and board meetings to be requested

- HS Policy language is “pledging”, “shall be implemented” but from 2021 before the headquarters was opened. Recommendation is to review and update it.

SESSION 2 — EHS / HSE AND OHS

Time	Day 1, 10:00 – 11:00 (60 min)
Focal points	OHS Committee Chair, Facility Manager, Head of Sustainability & Carbon Finance, head of charging/energy, business development for service
Standards	IFC PS1–PS4 · WBG EHS · OSHA 2007 · EMCA
Format	Structured interview; request sight of key documents
Objective	Verify the maturity of OHS systems against battery operations at scale; assess battery-fire preparedness; identify ESAP items.

Opening (read aloud or paraphrase)

The focus of this session is the practical operation of the OHS and environmental management systems at the headquarters, particularly around battery risk. We'll aim to see the key documents as we discuss them.

Questions

OHS management system

14. Walk us through the structure of the Safety Committee — the H&S Policy requires a minimum 5 members (CEO or delegate, middle manager, fire champion, 2 first aiders). Who currently fills each role, and how often does the committee meet?
15. The policy commits to hazard assessments at least every 6 months. When was the last one completed, and what were the top three findings?
16. How do you verify that the incident reporting system is actually trusted by workers — what proportion of reported incidents are near-misses versus injuries?

Incident trends

17. Of the moderate incidents, how many were battery-related (battery fires, thermal events, shock, burns)?
18. What has changed since 2024 to explain the reduced count, and what has been formally captured as a lesson learned?

Battery risk management

19. Where are damaged / suspect batteries quarantined physically, and what separation distance and fire-suppression provision is in place?

20. How is battery fire risk covered in training, and how often are drills run specifically for a battery thermal event (as opposed to a general fire drill)?

Environmental monitoring and permits

21. National Authority audit and acknowledgement 2025 are in the data room — were any corrective actions raised, and what's the close-out status?
22. Electricity summary shows 2024 total ~220 MWh with ~19% solar fraction, plus backup diesel genset use. What drives genset use (grid outages, peak shaving) and is there a plan to reduce it?
23. Water is sourced from municipal supply plus a borehole active since Jan 2025. What triggered the borehole installation, and is it registered / permitted under WRA?
24. Fire Safety Audit Oct 2025 — what were the findings and what's the close-out status? The Fire Action Plan with emergency contacts was recently added to PS2_OHS — is that now fully distributed and trained on?

Resource efficiency

25. Does the Company have an Energy Conservation Plan that goes beyond the 55 kWp solar PV installation — e.g. lighting efficiency, equipment standby management, production-line energy optimisation? If not, is one planned?
26. Water: is any of the 2024 ~2,700 m^3 recycled or reused (e.g. for sanitation, gardening, dust suppression)? Are there water-efficiency measures in place or being considered given the borehole reliance?

Air emissions, noise and effluent

27. Manufacturing at the headquarters includes "modification and painting" per the activity list. Is there a paint booth? If so, what VOC / particulate extraction and filtration is in place, and has any stack or ambient air-quality measurement been done?
28. Has the Company quantified operational emissions (Scope 1: diesel genset, any welding / painting; indirect Scope 2 via KPLC grid)? Even an indicative number would be useful — this connects to the EP4 Principle 10 threshold discussion in Session 1.
29. Noise: are there any measurements on the production line or at the facility boundary? If not, is it subjectively assessed against OSHA and neighbour-impact thresholds?
30. Does the Company have any effluent discharge permit requirement from the national authority, even at the sanitary-wastewater level, and is the current position documented?

Hazardous materials

31. Spill response was marked N/A (Ref 4.7). Given oils and solvents on site, how is a spill currently handled if one occurs?
32. Are Material Safety Data Sheets (MSDS) maintained for the chemicals on site (paints, solvents, cleaning agents, battery electrolyte if applicable)? Where are they kept and who can access them?

Documents / evidence to collect during or after this session

- Draft Lithium-ion Battery Safety Procedure
- Safety Committee composition and meeting minutes (last 12 months)
- Latest hazard assessment report
- Incident register (anonymised) — extract covering last 24 months
- Fire Safety Audit Oct 2025 report and close-out tracker
- Draft hazmat inventory and handling procedures (if available)
- Any battery-specific drill records
- Energy Conservation Plan
- MSDS binder / chemical inventory
- Any air-quality, stack-emission or noise measurement reports

Fire report from battery thermal runway

Notes

Safety Committee:

- Chair of the committee named
- Meeting shifted from monthly to now quarterly meeting
- Ask for safety committee meeting notes/records and exact members per departments
- Communication done in meetings, Google chats, through line managers
- Incident report form as main input tool
- Conducting regular Safety patrol (COO, + various team members), every two weeks, different >> safety patrol minutes to be asked for

Fire:

- Fire marshals trained, sufficient fire extinguishers and specifically for li-ion batteries available
- Fire alarm from battery area too far away
- Ask for fire incident reports, e.g. “recent” battery thermal runaway event

Hazard Assessment

- every 6 month, not done, but pledged to be done in 2021 HS policy
- List of hazard materials shared
- No MSDS list available >> gap to be filled

Task: double check incident form entries (near miss vs. Incidents, corrective actions from incidents, etc.)

Battery Safety Procedure:

- Still under review, more generic and to be in place soon across the company, training to be done once approved across all staff members

National Authority Audit done last May 2025

- Task: Double check the report/recommendations as we only have Acknowledgement on file
- OSH October
- Fire Marshal training done regularly

Risk areas for Noise/Air pollution

- Paint booth and metal rework (noise)
- Flammable goods (paint)
- Painting – basement, used only 1-2 per week, extractor existing (but to be verified if it works well)
- Grinding room in basement (PPE was not used week)
- Generator

Water, Power, Resource efficiency

- Solar phase 1 done (see shared power consumption/generation)
- Solar Phase 2 will be done once finances are available with the target to have 80-90% power generated from solar for the head office
- Diesel Generator sometimes in use
- Using borehole and national water
- Switch off power/sockets emphasis to reduce electricity
- Water, using internal purification system for drinking water, national standards approved, 500L/h capacity
- Environmental Policy is missing clear targets for resource efficiency on power, water, waste >> needs a policy update with targets and Resource Efficiency/Conservation Action Plan

SESSION 3 — PRODUCTION, ENGINEERING & QUALITY CONTROL (COMBINED WALKTHROUGH)

Time	Day 1, 11:15 – 12:30 (75 min)
Focal points	COO, VP of Engineering, Quality Lead
Standards	IFC PS2, PS3 · WBG EHS (Manufacturing) · GS4GG Env.
Format	Walkthrough on the line; observation checklist in parallel
Objective	Observe the assembly process end-to-end; identify exposure points and controls; confirm QC and defect-handling maturity.

Opening (read aloud or paraphrase)

We'd like to walk the line from frame prep through to final test, with stops at the battery lab and the QC station. We have an observation checklist we'll complete in parallel so we don't slow you down.

Questions

Process flow and scale

33. You've described the line as approximately 8 stations staffed by 2–3 fitters each — can you confirm that configuration and walk us through each station's function?
34. What's the current take time per unit, and where are the bottlenecks?
35. Which parts of the process are outsourced to local contract manufacturers (frames, plastics, sub-assemblies), and how is their output inspected on receipt?

Worker exposure

36. At which stations do workers handle live electrical components, and what lock-out/tag-out procedure applies?
37. Is any welding, soldering, gluing, or chemical bonding used on the line — including battery pack spot welding? If so, what fume extraction or ventilation is in place?
38. What's the noise level on the line and have formal measurements been taken? The Safety Wear SOP assigns gloves and safety boots to Production but not hearing protection — is that right?

Battery lab and testing

39. Walk us through the cell-to-pack assembly sequence: how are cells sourced (Supplier-B pre-assembled or loose), how are they arranged, what's the BMS integration method?

40. Testing protocol: cycle testing, thermal testing, end-of-line SoH test. What proportion of packs fail at each stage and what happens to rejects?
41. Battery chemistry for e-motorcycle is NMC. Can you confirm the chemistry, format, voltage and kWh for the Project Eden bus and Project Eden Energy products?
42. Where in the lab are suspect / damaged cells quarantined, and what's the physical separation from the main lab?

Quality control and defect handling

43. For a defect identified on the line, what's the decision process? How does the Sustainable Waste Disposal workflow for defective items work in practice?
44. Has Project Eden ever had to issue a product recall, and if so what was the process and lesson learned?
45. How are QC failure trends shared upstream to engineering and to suppliers?

Documents / evidence to collect during or after this session

- Detailed process flow diagram (beyond the floor plan)
- Battery lab testing protocol document
- QC pass/fail rates by station (latest quarter)
- Any recall or major defect case studies from the last 24 months

Notes

Observed:

- Thorough incoming quality check
- 8 assembly stations with final quality check
- In assembly line they have a soldering station which needs additional safety instruction and a mobile fume extractor would be recommended

Recommendation:

- Upgrade 5S system to 6S (including safety)

Session 4 — Human Resources / Labour & Working Conditions

Time	Day 1, 13:30 – 14:30 (60 min)
Focal points	HR Director, Chief People Officer, as available
Standards	IFC PS2 · ILO Core Conv. · Employment Act 2007 · GS4GG P.2 Gender, P.6 Economic/Labour
Format	Structured interview; document review
Objective	Verify labour practices match documented policy; assess grievance system maturity; confirm training coverage.

Opening

This session focuses on how the HR policies are operating in practice. We already have the policy suite — the questions are about implementation, trends, and any areas where Project Eden has identified tensions between policy and operational reality.

Questions

Workforce profile and contracts

46. Headquarters is 115 FTE + 33 shift + 5 consultants; Service Centre is 1 FTE + 24 shift; hubs carry 49 shift. Can you confirm these numbers, and share a breakdown by department?
47. Gender split is 50M/33F on FTE and 105M/29F on shift. Does the company have a target on female representation, and where are the strongest and weakest departments on this?
48. 206 nationals, 12 non-nationals (4 other African, 7 European, 1 North American). Do the non-nationals staff hold work permits in order, and what's the plan as expat numbers change?

Working hours, pay and benefits

49. The Shift Policy sets 8-hour shifts, max 7.5 shifts/week, with a 7% overtime allowance baked into shift pay (1,700 → 1,819). Is that the current base shift rate and does it sit at or above the national sector minimum?
50. The Allowances policy defines FTE working hours as 40 per week not to exceed 45, and replaces paid overtime with flex time. How is flex time tracked, and are there departments where flex time is consistently accruing beyond the one-month use-it-or-lose-it rule?

51. Medical insurance covers up to 4 dependents for shift workers; outpatient cover was raised to 75,000/family. Is there parity in medical coverage between FTE and shift workers?

covered

Grievances and conduct

52. Approximately 6 grievances in the last 12 months, mostly supervisor-raised misconduct cases. Can you talk us through how those were resolved — disciplinary warnings, dismissal, coaching?
53. The Disciplinary Procedure distinguishes verbal / written / final warnings / suspension / summary dismissal. How many of each were issued in the last 12 months?
54. The Non-Harassment Policy names locked comment boxes and an online anonymous form. How many anonymous submissions have been received in the last 12 months, and how do you validate them?
55. How are victims of harassment supported in practice beyond the policy language (counselling, compassion leave)?

Training and culture

56. Training register and calendar are in the data room. Can you walk us through the induction content for a new shift worker — what H&S training is mandatory and when?
57. Annual refresher training on non-harassment is committed to in the policy. What format does it take, and what's the attendance rate?
58. Battery handling and fire-safety training — who receives it, with what frequency, and how is competency assessed?

Contractor labour

59. Who are the main on-site contractors () and how is their compliance with Project Eden's labour standards monitored?

Documents / evidence to collect during or after this session

- Anonymised grievance register extract (last 12 months)
- Disciplinary actions count by type (last 12 months)
- Workforce breakdown by department, gender, national/expat, contract type
- Induction / training matrix and attendance records
- Any active work permits summary for non-national staff

Notes

Workforce:

- FTE and Shift works have similiar rights and benefits, only consultants are treated differently but no consultant working in assembly or service operations
- Generally following national labour law regarding age, leave days, working hours, discrimination etc.
- Senior management more imbalanced regarding Gender but diverse in regards to country of origin
- General gender target of 50/50
- Job grades exists and shared with everyone in the company, benchmarking is done across the region/industry and self-reported to be above minimum/average
- Overtime handles as per national labour law
- Shift workers are renewed after 1 year but no clear direction when turned into FTE
- Grievance/misconduct are reported in Monthly workforce mgmt report
    - Ask: should be get recent reports?
- Through insurance provider workers are supported with mental health/counselling every 6 months

Training

- Regular refresher training done for core policies and procedures
- Performance and appraisal training done recently
- Idea/recommendation: keep online training recordings to have training content accessible

Contractor:

- On site contractor: Security company - is being monitored and applies Project Eden code of conduct
- Garbage collector is other contractor with access to site

Onboarding

- PPE, two sets provided during onboarding
- Onboarding procedure differs depending on hired position

SESSION 5 — WORKERS & TECHNICIANS (OPERATIONAL REALITY CHECK FOCUS GROUP)

Time	Day 1, 14:30 – 15:30 (60 min)
Participants	6–8 workers: mix of FTE and shift; balanced gender where feasible; assembly, battery technicians, maintenance
Facilitator	Duncan facilitates; Meryl takes notes. HR and line managers are NOT present.
Standards	IFC PS2, PS4 · GS4GG P2
Format	Structured focus group — see separate FGD facilitation pack
Objective	Triangulate worker experience against documented policy — particularly on PPE, training, grievances, and safety culture.

Opening

See the separate FGD Materials pack for the full facilitation script, consent language, ice-breaker, and discussion questions. This page is the short-form question list for quick reference during the session.

Questions

Working conditions (quick prompts)

60. What's a typical day on the line / in the battery lab?
61. What PPE do you wear, and does it arrive when you need it?
62. What's one thing about your job you'd change if you could?

Safety (quick prompts)

63. Have you seen or experienced a near-miss in the last 3 months? What happened next?
64. If a battery got hot or smelled funny, what would you do first?
65. What training did you receive before starting the job, and did it feel sufficient?

Voice and fairness (quick prompts)

66. If something wasn't right at work, who would you tell? Would you feel comfortable telling them?
67. Have you or someone you know raised a complaint? What happened?
68. Do you know the anonymous reporting options (comment boxes, online form)?

Notes

Participants 12(6F, 6M)

- Facility, Production, Product control, ..other departments
- Note: session was too big for people to fully open up, a smaller FGD group size of 6-8 would have been preferred as requested

Typical Day

- F1 Arrive, change to safety gear, do stand up meeting, being assigned to station, 8.00am start
- Sometimes tnternet is down when clock in via app in the morning, but without data /internet it's difficult or waisting time
- 10.10.15 tea break, 12.30 1h lunch, 15.00-15.15 tea break
- working 8.00 to 16.30, 1.5hr break overall

Safety

- M1 (production) near misses/incident happen but first aid kit is there, knows to inform supervisor accordingly
- M4 PPE is getting replaced for everyone but no storage available, so sometimes it can be 1 week turnaround to get new PPE
- Near miss explanation (Swahili ?)
- All confirmed PPE should be worn by supervisor/managers (but our observation show different)

Issues

- F2 for issues talks to supervisor/line manager in case something appears
- F3 suggestion box was used and issues was responded to
- M2 mentioned anonymous form (everyone confirmed that it's available through email and everyone can access it)

Training

- Last training was done in March on Shift policy
- All confirmed regular training are done

Improvement

- N/A
- One employee raised concerned that Shift worker only have 1 year contracts and sometimes even after 3 years are still on 1 year contracts and not becoming FTE

Session 6 — Facility Support, Security & Waste Management

Time	Day 1, 15:30 – 16:15 (45 min)
Focal points	Waste Management focal, facilities, Security supervisor (G4S / BM Security on duty), Cleaning supervisor
Standards	IFC PS3, PS4 · EMCA Waste Regs 2006
Format	Mixed: short interviews + walkthrough of waste storage and security gate
Objective	Verify waste flow from source to vendor; observe storage conditions; understand site access controls.

Opening (read aloud or paraphrase)

We'd like to see the waste storage areas and understand the segregation, vendor handoff, and hazardous-waste documentation end-to-end. Security access is included here because of the visitor / contractor interface.

Questions

Waste categorisation and segregation

69. Walk us through how each waste category under the Waste Management Procedure (general, recyclable, manufacturing/assembly, hazardous) is segregated at source — can we see the labelled bins in the production area?
70. How is the quarterly waste metric reviewed under section G of the procedure? Who sees the metrics and what gets actioned?
71. Are there waste streams that are difficult to classify in practice (e.g. mixed packaging, e-waste with embedded batteries)?

Hazardous waste and vendor handoff

72. Certified-vendor criteria: the procedure names national authority-licensed waste handlers. Can we see vendor licences on file for Enviroserve, recycling centre and general waste contractor?
73. Waste manifests are being compiled (Ref 4.6) — what's the timeline to pull a clean 12-month record, and what's the current documentation flow from bin to vendor to certificate of disposal?
74. 4.10 / 7.8 — there's no formal written agreement with Enviroserve or recycling centre. What's the commercial basis (PO per pickup? Handshake?) and is there a plan to formalise?

75. For oils, solvents and cleaning agents: who picks them up and what chain-of-custody documentation exists?

Battery end-of-life

76. Once a battery fails the SoH threshold and is earmarked for recycling, how long does it sit on site before Enviroserve pickup, and where is it stored?
77. Do you have approximate numbers on batteries processed through the end-of-life pathway in the last 12 months?
78. Does Enviroserve provide any disposition certificate or report back on recovery rates?

Security and site access

79. What's the visitor and contractor sign-in process at the gate, and how is it reconciled with the people on site at end of day?
80. For after-hours access (e.g. 3-shift hubs), what's the escalation if a battery alarm or fire alarm triggers at 02:00?

Documents / evidence to collect during or after this session

- National authority licences for Enviroserve, general waste contractor (copies)
- Waste manifests — sample of last 3 months (pending compilation)
- Any commercial agreement or MoU language with recycling vendors
- Visitor / contractor sign-in log — sample day
- After-hours emergency contact tree for hubs

Notes

Tracking of waste metrics

- Tracked in different places/by different teams – no consolidated waste tracker
- Organic waste not tracked but the waste company segregates and provides organic waste to biogas company
- e-waste and battery waste handled through Enviroserve, certificates are issued/available, hence tracked
- Working in packaging redesign to reduce packaging weight
- Hazardous goods/waste like empty paint containers are difficult to be classified or managed, currently picked up by waste company who also collects general waste

Waste companies

- Signing Project Eden’s code of conduct and have commercial contract (to be confirmed)

- Enviroserve provides waste certificate and reports back on findings from battery testing

Follow up:

- National authority licence for Enviroserve and general waste contractor
- Recent delivery note and waste certificate for items picked by Enviroserve from 22nd April

Security:

- Site access well organised with third party
- Planning to put biometrics in place

SESSION 7 — SUPPLY CHAIN, CONTRACTORS & ESG/ESMS CLOSE-OUT (DAY 1)

Time	Day 1, 16:15 – 17:00 (45 min)
Focal points	Director of Supply Chain, Head of Sustainability & Carbon Finance
Standards	IFC PS1, PS2 §§27–29, PS3 · GS4GG P.6 Economic/Labour · EP4 P.3, P.8
Format	Structured interview + close-out wrap of Day 1 observations
Objective	Verify supplier governance framework and practice; assess primary-supply-chain labour due diligence; confirm ESMS maturity; agree priorities for Day 2.

Opening (read aloud or paraphrase)

Two things in this session: first, supply chain — how the Supplier Code of Conduct translates into real audits and actions, including the upstream labour due diligence IFC PS2 §§27–29 expects for battery cell supply. Second, a short wrap of Day 1 to flag anything unexpected before we head to the hubs tomorrow.

Questions

Supplier onboarding and monitoring

81. KYC / Vendor Registration is the entry gate, and Supplier Code of Conduct sign-off is mandatory. What proportion of active suppliers have a signed Code on file today, and how are non-signers handled?
82. Quarterly risk assessments and annual site visits — who performs them, what format is the output, and do we have access to the last 12 months of scorecards?
83. Strategic suppliers are identified via classification. How many are on the list, and what additional oversight do they get?
84. 7.6 — supplier audit reports and CAPs are being compiled. What's the scope (which suppliers, period) and the timeline to deliver?

Chinese

Material suppliers

85. The top material suppliers are Supplier A-D. Can you walk us through what each supplies and what the E&S risk view is on each?

86. Supplier B → Global Battery Supplier upstream: GBS has a responsible sourcing policy covering conflict minerals. Does Project Eden receive or request evidence of GBS RMI audits, or is this taken as read given GBS's size?
87. For local contract manufacturers producing — what's the oversight regime, and have there been any findings around working conditions, PPE or underage workers at these sites?

Primary supply chain — labour risk upstream [V2]

88. IFC PS2 paragraphs 27–29 asks clients to identify child / forced labour risks where the primary supply chain is in a sector known for such risks. Battery cells fall into that category — cobalt (DRC artisanal mining), lithium, and mica are documented upstream risk areas. Has Project Eden's view on Supplier B and its upstream (GBS and beyond) been informed by anything more than the GBS public responsible-sourcing policy — e.g. have you requested Supplier B's own due diligence, or audited against any specific risk (cobalt, forced labour in Xinjiang polysilicon, mica)?
89. What evidence does Project Eden retain on file for the primary supply chain? (GBS RMI audit summaries, Supplier B supplier-declaration letters, any third-party audit reports.)
90. If Supplier B or another primary supplier were to fail a future audit on labour conduct or environmental grounds, what's the contractual pathway — corrective action period, termination clause, fallback supplier?

Traceability and record-keeping

91. Beyond supplier onboarding, how is downstream traceability maintained for batteries and hazardous components through sale → rental → buy-back → recycling? Are serial numbers tracked from cell to pack to bike to end-of-life handler?
92. For an external reviewer or lender audit: could Project Eden today produce, in a day or two, the full E&S record set — policies, incident register, training records, waste manifests, supplier CoCs, grievance log, environmental audits? Are these centrally filed or spread across systems?

ESMS framework close-out

93. The ESMS Overview is the backbone document. What's its review cycle, and when was the last substantive update?
94. Monitoring, reporting and KPIs: which E&S metrics make it into the monthly workforce report to SMT? Are there metrics you'd like to add but haven't yet?

Documents / evidence to collect during or after this session

- Supplier onboarding KYC / Vendor Registration template
- Recent quarterly supplier risk assessment scorecards (anonymised)
- Tier-1 supplier list with classification

- Supplier audit reports — as and when compiled
- ESMS Overview version history / review log
- Any Supplier B / GBS due diligence evidence retained on file
- Battery serial-number traceability / buy-back linkage evidence

Notes

Battery (Supplier B) , motor controller, frame

4 supplier categories

- strategic supplier / Tier 1
- Bottleneck (high value but can change)
- Leverage (low value, easy to change)
- Non critical item
- >> Vendor Management Tool (doc request?), Supplier onboarding process (doc request), audit template/checklist which is related to contract/code of conduct

Supplier national authority, national revenue authority

- Working on tank supplier (SFG)

Looking at metal tank, fiber tank production is biggest external risk

30/70

Supplier performance management, audit

Warranty proccess,

SESSION 8 — PROJECT EDEN HUB W (OPERATIONS, FIRE & COMMUNITY INTERFACE)

Time	Day 2, 09:15 – 10:30 (75 min)
Focal points	Country Manager, Regional Sales Operations Manager, Director of Charging, on-duty hub operator(s)
Standards	IFC PS3, PS4 · WBG EHS · EMCA
Format	Walkthrough + short interview with operator; observation checklist in parallel
Objective	Observe hub operations and fire readiness; understand community / rider interface; test the grievance system from the outside-in.

Opening (read aloud or paraphrase)

We'd like to see the hub in operation, understand the shift pattern and customer flow, and talk to the operator about any incidents or near-misses. The observation checklist will cover the physical environment in parallel.

Questions

Hub operations

95. What's the shift pattern at this hub (1, 2, or 3 shifts) and current daily throughput — riders served, swaps, charges?
96. Who is the on-duty operator's line manager, and how often does that person visit the hub?
97. What maintenance is done on site versus sent back to head office, and what's the escalation for a charger fault?

Electrical safety and fire risk

98. Walk us through the charging station layout — separation between charging bays, ventilation, fire-suppression equipment.
99. How is the Battery Incident Response Plan operationalised here? Where's the nearest extinguisher rated for Class D / lithium fires, and is the operator trained to use it?
100. Has there been any thermal event, smoke, or abnormal battery behaviour at this hub in the last 12 months?
101. Fire Action Plan — are the emergency contact numbers (fire service, Headquarters OHS) posted visibly at the hub?

Waste and housekeeping

102. How is waste handled at hub level — damaged batteries, broken chargers, packaging, e-waste?
103. Who picks up waste from this hub, with what frequency, and is there a licence on file?

Community and rider interface

104. What's the neighbourhood profile — residential, commercial, industrial? Any noise, traffic or access complaints from neighbours in the last 12 months?
105. How do riders queue, and is there shelter / sanitation access for them?
106. What are the posted channels for a rider or community member to raise a concern?
107. Are women riders a visible minority at this hub, and has anything been done to make the hub safer or more welcoming for them?
108. In the event of a fire or battery thermal event at this hub — which sits in an area with foot traffic and adjacent buildings — what's the community notification / early-warning mechanism? How are neighbours and bystanders alerted or evacuated? [V2]
109. Does the hub manage traffic and vehicle access (entry, exit, rider drop-off) in a way that minimises risk to pedestrians and nearby businesses? Any incidents of this type? [V2]

Documents / evidence to collect during or after this session

- Hub SOP / operator handbook
- Fire-extinguisher inspection log
- Any hub-level incident log
- Waste pickup vendor and licence reference
- Visible posting of grievance contact channels (photo evidence)
- Any community notification / early-warning procedure for the hub [V2]

Notes

Project Eden Hubs

- Follow standard design and mostly placed at Total Petrol stations following their standard procedures/code of conduct which are even higher standards than Project Eden's
- Good security, little waste, good customer care
- All equipped with 10kWp solar which generates up to 50kWh per day but the hub consumes around 250kWh
- Working on fast chargers and improved battery rack design to improve handling

Observed concerns:

- operators lifting 70x batteries per shift, each is 20kg, no ergonomic chairs
- Waiting time for riders as batteries charging takes time
- Chargers not permanently fixed, can lead to falling down of chargers

SESSION 9 — PROJECT EDEN – NATIONAL SERVICE CENTRE (SALES, AFTER-SALES & CUSTOMER INTERFACE)

Time	Day 2, 11:00 – 12:30 (90 min)
Focal points	Country Manager, Regional Sales Operations Manager, Business Operations Director, Aftersales focal, on-duty sales and warranty staff
Standards	IFC PS1, PS4 · GS4GG Stakeholder
Format	Tour + structured interview + customer document review
Objective	Understand customer journey end-to-end; verify end-of-life battery flow; test external grievance channels.

Opening (read aloud or paraphrase)

This is the main customer-facing site. We'd like to understand the sales, warranty, rental and after-sales flows, with a particular focus on the end-of-life battery pathway, the data-sharing policy, and how riders actually use the grievance channels.

Questions

Site and staffing

110. 1 FTE + 24 shift staff, operating hours Mon–Fri 07:00–18:30, Sat 07:00–16:00. Who are the shift workers here (role mix), and how is handover between shifts managed?
111. What services are performed on site versus routed back to the Headquarters — minor repairs, battery swaps, warranty claims?

Customer onboarding and warranty

112. Walk us through a new rider's onboarding — what do they sign, what's explained, what consent is captured?
113. The Warranty, Rental and Data Sharing Policy (01.11.2025) covers 12 months / 30,000 km on the motor and electricals; 24 months / 800 cycles on battery. How often is a warranty claim disputed, and how's it resolved?
114. Rental battery policy: non-payment disables the bike; damaged battery return bears repair cost to the rider. How does that play out in practice — are there affordability or fairness complaints?

115. Data-sharing: riders acknowledge usage data collection for carbon credits and ITMOs. How is this explained at signup, in what language, and is informed consent verified?

End-of-life battery flow

116. Walk us through the buy-back pathway: rider brings battery to Hub / Centre → sales agreement signed → transport to Headquarters → visual inspection → 10,000 payment → SoH assessment → rental fleet re-injection (≥60% SoH) or Enviroserve recycling (<60% or failed inspection).
117. 2–3 year pricing is 20,000; 3–4 year pricing is 10,000. How are these values calibrated against the actual residual value of the battery?
118. Approximate volumes processed through this pathway in the last 12 months, and any patterns (seasonal, geographic, rider type)?
119. A battery that fails visual inspection is not purchased and is recycled — how is this communicated to the rider, and is there any recourse if they disagree?

Customer grievance and communication

120. Channels are phone, email, WhatsApp rider groups, and in-person. Which is most used, and what's the typical response time?
121. The External Grievance Procedure commits to acknowledgement within 5 working days and resolution within 14–30. How is this tracked, and what's the current SLA performance?
122. Approximately how many external grievances were received in the last 12 months, and what were the main themes?
123. Have you had any grievances related to safety (battery fires, incidents) or data privacy? How were they handled?

Product defect escalation

124. If a rider reports a product defect at this site, what's the escalation path back to QC / Engineering? Has that loop closed any actual design changes?

Documents / evidence to collect during or after this session

- Standard rider contract / warranty acknowledgement
- External grievance log extract (last 12 months)
- Month-level data on battery buy-backs processed
- Any customer satisfaction survey data
- Example rider communication on data-sharing / carbon credits

Notes

Service Hub

- Well organised, secure, clean, workers have PPE, separated storage room, waiting area for waiting riders

Observations

- Waste segregation not done well (mixed paper with scrap metal)
- First aid kit was locked with lock and key not available/in sight

SESSION 10 — PROJECT EDEN HUB L (END-USER ENGAGEMENT)

Time	Day 2, 13:30 – 14:45 (75 min)
Focal points	On-duty hub operator(s); informal transport sector riders / end-customers (informal short interviews)
Standards	IFC PS4 · GS4GG P.3 Community H&S, Stakeholder & GRM requirements
Format	Short structured interviews with 4–6 riders; PS4 community interface verification
Objective	Hear directly from riders about product, safety, grievance channels and value proposition.

Opening (read aloud or paraphrase)

We'd like to speak with 4–6 riders while they're charging / swapping, 5–10 minutes each. Voluntary and anonymous; we won't record names. This is partly to triangulate what we've heard from the company.

Questions

Rider experience

125. How long have you ridden a Project Eden bike? What made you switch from ICE (if you did)?
126. How much time a day do you spend charging / swapping, and is it usually here or at home?
127. What's the best thing about the bike, and what's the most frustrating?

Safety and incidents

128. Have you ever had a battery issue — heat, smoke, failure to charge? What did you do?
129. What safety gear do you use (helmet, gloves, etc.)? Did Project Eden emphasise this at sign-up?
130. Any near-miss or accident in the last 12 months? Was it related to the bike or the road?

Grievances and voice

131. If you had a problem with the bike or the service, how would you raise it? Phone, WhatsApp, in person?

132. Have you ever raised a complaint? What happened — how long did it take, were you satisfied?
133. Do you feel heard by Project Eden, or does it feel like a one-way relationship?

Affordability and finance

134. How did you finance the bike — cash, loan, rental? Is the payment plan comfortable?
135. Are you aware you can sell the battery back to Project Eden after 2–3 years for 20,000?

Gender-specific (if female rider available)

136. Do you feel safe at this hub? Are there any design or behaviour changes that would make hubs better for women riders?

Notes

SESSION 11 — CLOSE-OUT DEBRIEF WITH ESG/ESMS LEADS & SENIOR MANAGEMENT

Time	Day 2, 15:15 – 16:15 (60 min)
Focal points	Head of Sustainability & Carbon Finance; other senior management as available
Standards	IFC PS1 (close-out) · EP4 Principles 8, 9, 10 · GS4GG (aggregate)
Format	Structured feedback session; document requests consolidated
Objective	Share preliminary observations; align on ESAP direction; confirm outstanding documents and next-step timelines.

Opening (read aloud or paraphrase)

Thank you for the two days. This is a preliminary, not final, readback — subject to full document review and the ESDD report. We'll cover: what we observed, where we see likely ESAP items, what documents are still outstanding, and the next-step timeline.

Questions

Preliminary observations — what's working

137. Summary of documented systems that are mature (ESMS structure, HR policy suite, waste framework, worker grievance mechanism, NEMA compliance).

Preliminary observations — gaps or areas to develop

138. H&S Policy currency (Sep 2021) and Draft Lithium-ion Battery Safety Procedure — both to be updated / approved.
139. Formal GHG accounting and climate risk assessment — not currently in place.
140. Formal written agreements with recyclers (Enviroserve, recycling centre) — not currently in place.
141. Items being compiled: hazmat inventory, waste manifests, supplier audit reports — timeline to deliver.
142. Any observations from the worker focus group that warrant flagging at SMT level (themes only, no attribution).

Likely ESAP direction

143. Preliminary ESAP candidates and suggested timeline — agreement on which should sit pre-close vs. post-close of the SCF transaction.
144. Any items Project Eden would want to push back on or reframe?

Next steps and communication

145. Consolidated outstanding-documents list handed over to Head of Sustainability and Carbon Finance.
146. Indicative ESDD report delivery timeline and Q&A process.
147. Single Project Eden-side contact for follow-up.

Documents / evidence to collect during or after this session

- Final list of outstanding documents (consolidated from Sessions 1–10)
- Agreed ESDD timeline and Q&A process note (to follow from ESF)

Notes

Observation Checklists (V2)—Project Eden ESDD Site Visit

Project Eden

Prepared by: ESF Consultants | April 2026

How to use these checklists

Five checklists cover the physical areas of the visit: production floor, battery house / lab / quarantine, waste storage, charging hubs (W and L — same checklist used at both), and the Service Center. Complete Y / N / N/A during the walkthrough; use the Evidence / notes column for brief detail and photo references.

Items are grounded in Project Eden's documented policies and procedures (Safety Wear SOPs, Waste Management Procedure, Battery Incident Response Plan, Fire Action Plan, External Grievance Procedure). Any "No" or ambiguous result is a candidate for follow-up question in the close-out session (Session 11) or an ESAP item.

CHECKLIST 1 — PRODUCTION FLOOR WALKTHROUGH (HEADQUARTERS)

Used in	Day 1 Session 3 (11:15 – 12:30)
Observer	Consultants
Date	23 April 2026
Escort (Project Eden-side)	Staff

Complete during the production walkthrough. Mark each item Yes / No / N/A. Any "No" or ambiguous answer goes in Evidence / notes with detail. Photo reference = filename or photo number from the day's photo log (where photography is permitted).

Item	Y	N	N/A	Evidence / notes
A. Site access and visitor protocol				
Visitors signed in at gate with time and purpose recorded	☐	☐	☐	Yes, sign-in book at gate with security company
Hi-vis and any other PPE issued to visitors on arrival	☐	☐	☐	Hi-vis provided but no other PPE issued
Visitor OHS briefing delivered before entering production floor	☐	☐	☐	No Recommendation: Provide quick briefing including walk way, do's/dont's
Photography rules communicated and respected	☐	☐	☐	Somewhat, we had permission to take pictures as we conducted the audit
Clear visitor escort assigned and present throughout	☐	☐	☐	Yes/partially

Item	Y	N	N/A	Evidence / notes
				They escorted us through the warehouse area which requires helmet use and didn't always respect the designated walk-ways
B. Facility and layout				
Floor plan matches the one in PS2_OHS (zones: assembly, warehouse, battery house, QC lab)	☐	☐	☐	Yes But floor plan needs more details, e.g. battery lab highlighted and needs better infographic design printed on the entry and strategic places around the facility
Walkways clearly marked; no obstructions on main pedestrian routes	☐	☐	☐	Yes, partially Marked with tape but not labelled/names as walkways – not clear distinguished between walkways and working areas
Designated forklift / trolley routes separated from pedestrian routes where relevant	☐	☐	☐	Partially, can be improved
Emergency exits visibly signed and unobstructed	☐	☐	☐	yes
Assembly points externally signed and accessible	☐	☐	☐	Yes However assembly point in parking area blocked by cars
Fire extinguishers visible, unobstructed, inspection tags current (check last date)	☐	☐	☐	yes

Item	Y	N	N/A	Evidence / notes
First-aid stations visible and stocked; trained first aider identified on shift	☐	☐	☐	yes
Safety signage (noise, electrical, chemical, battery) prominently displayed	☐	☐	☐	Yes with some room for improvements, e.g. - Soldering station in sub-assembly - Specific use of gloves in assembly station 4 where operators uses grease (sign too small)
C. Assembly line — stations and worker exposure				
Line configuration matches 8-station layout described in documentation	☐	☐	☐	yes
Lock-out / tag-out equipment visible at stations with live-electrical exposure	☐	☐	☐	yes
Machine guarding in place on any moving-part equipment	☐	☐	☐	yes
No visible spillage of oils / solvents on floor	☐	☐	☐	yes
Ergonomic aids visible at repetitive-motion stations (lifting aids, adjustable benches) where relevant	☐	☐	☐	Partially
Welding / soldering / bonding operations (if present): fume extraction in place	☐	☐	☐	No fume extraction in place at sub-assembly station where soldering is used
Noise levels subjectively low or hearing protection worn where elevated	☐	☐	☐	yes
D. PPE compliance (per Safety Wear SOP)				

Item	Y	N	N/A	Evidence / notes
Production staff: full engineer suit, safety boots, gloves — all worn	☐	☐	☐	No/Partial Assembly staff wore boots/suit but gloves not always worn Assembly/Production Manager did not wear safety boots Painting booth was not in operations and not observed At Grinding booth the operator did not wear safety goggles
Hardware & Battery team: full engineer suit, safety boots, gloves, respiratory masks available	☐	☐	☐	Couldn't verify as battery staff was not in the lab (at a training) but person who toured us around battery lab did not wear safety boots
Quality staff: full engineer suit, safety boots, gloves — worn	☐	☐	☐	No/Partial Inspection staff which handled batteries and other heavy components did not wear safety boots
Warehouse staff: full engineer suit, dust coat, safety shoes, gloves	☐	☐	☐	Yes, including wearing of helmets However, visitors were guided through warehouse and no helmet provided

Item	Y	N	N/A	Evidence / notes
PPE in reasonable condition — no visibly torn gloves, damaged goggles, broken boots	☐	☐	☐	Yes Only concern about PPE in safety booth, it looked worn and not sure how frequently the dust mask filters are changed
PPE issue and return log observed or referenced	☐	☐	☐	N/A
E. Electrical and battery handling (pre-battery-house)				
Charging / testing stations segregated or clearly marked	☐	☐	☐	yes
Electrical panels labelled, closed, and not blocked	☐	☐	☐	yes
Battery handling at assembly stations appears controlled (no dropped cells observed; handling with gloves)	☐	☐	☐	N/A
F. Incident reporting and visibility				
Incident reporting form / poster visible on the floor	☐	☐	☐	No However workers are aware and can access it online/QR code nearby the production manager office
Hazard identification cards or near-miss reporting mechanism visible	☐	☐	☐	No

Item	Y	N	N/A	Evidence / notes
Evidence that recent safety communication reaches the floor (posters, toolbox talk record, etc.)	☐	☐	☐	No
G. Worker welfare provisions				
Clean, maintained toilet facilities for production staff (segregated male / female)	☐	☐	☐	Partially, Toilet facilities can be improved
Drinking water accessible on the production floor (dispensers, water points, or equivalent)	☐	☐	☐	yes
First-aid kit visible, stocked, with named first-aider identified on shift	☐	☐	☐	yes
Designated break / rest area with seating	☐	☐	☐	Yes (cantine)
Canteen or eating area separate from production environment	☐	☐	☐	Yes (upstairs)
Hand-washing facilities with soap at key points (toilets, eating areas)	☐	☐	☐	Yes
H. Paint booth / surface treatment area (if present)				
Paint booth physically enclosed or area designated for painting / spraying	☐	☐	☐	yes
Local extraction / ventilation visibly operational during painting	☐	☐	☐	Yes but unclear of extraction is strong/sufficient enough
Filters or scrubbers present on extraction system; maintenance log referenced	☐	☐	☐	No

Item	Y	N	N/A	Evidence / notes
Paint / solvent storage within paint area is labelled, closed, and compliant with fire separation	☐	☐	☐	No Only one open shelf which was not labelled, not organised
Workers in paint area wearing respiratory masks and chemical-resistant gloves	☐	☐	☐	N/A not able to observe Missing clearly labelled and closed PPE storage for painting booth
No visible overspray accumulation outside the designated area	☐	☐	☐	N/A

CHECKLIST 2 — BATTERY LAB / QUARANTINE AREA

Used in	Day 1 Session 2 (OHS discussion) and Session 3 (walkthrough)
Observer	
Date	
Escort (Project Eden-side)	Staff/ battery lab lead

Battery house is the highest-risk area under IFC PS3/PS4. Complete observations while on the walkthrough; take additional time here if the schedule allows.

Item	Y	N	N/A	Evidence / notes
A. Physical environment				
Battery lab / house is a dedicated, separable area (not co-located with general assembly)	☐	☐	☐	yes
Fire-rated walls / doors separating the battery area from adjacent areas	☐	☐	☐	yes
Ventilation in place and operational (extraction visibly working; no battery odour)	☐	☐	☐	Yes but could be verified by experts if it's sufficient
Ambient temperature controlled or monitored (visible thermometer / HVAC)	☐	☐	☐	No AC system in place as far as observed
Water ingress controls (roof, bunding) in place where relevant	☐	☐	☐	yes
B. Battery storage				
Racking / shelving is non-combustible and stable	☐	☐	☐	yes

Item	Y	N	N/A	Evidence / notes
Cells / packs stored with appropriate vertical and horizontal spacing	☐	☐	☐	yes
No cells stored directly on the floor	☐	☐	☐	yes
State-of-charge management visible (partial charge for storage; labels or controlled area)	☐	☐	☐	N/A Wasn't observed and could be listed for improvement
Segregation between new / tested / quarantined units clearly marked	☐	☐	☐	yes
C. Quarantine area for damaged / suspect batteries				
Dedicated, physically separated quarantine zone exists	☐	☐	☐	?
Quarantine zone is outside the main lab or separated by fire-rated barrier	☐	☐	☐	Yes, partially (it's outside) but door was open
Quarantined units are individually contained (sand bucket, fire-rated box, or equivalent)	☐	☐	☐	yes
Clear labelling: reason for quarantine, date, owner	☐	☐	☐	N/A as no quarantined batteries available
Disposal / Enviroserve handover log visible for quarantined units	☐	☐	☐	Yes, recent Enviroserve pick up note available but no general log visible
D. Fire suppression and emergency response				

Item	Y	N	N/A	Evidence / notes
Appropriate extinguishers for lithium-battery fires available (Class D or specialty powder, not just CO2 / foam / water)	☐	☐	☐	yes
Fire extinguisher inspection tags current	☐	☐	☐	yes
Fire-suppression sprinkler or gas-flood system present (document type)	☐	☐	☐	Not sure
Battery Incident Response Plan posted or accessible to staff	☐	☐	☐	Not posted, but stated to be accessible
Fire Action Plan with emergency contacts posted visibly	☐	☐	☐	Yes Note: Fire alarm too far away
Evacuation route from battery house is clearly marked and unobstructed	☐	☐	☐	yes
Emergency shower / eyewash in reasonable proximity (for electrolyte exposure)	☐	☐	☐	Not sure
E. PPE for battery work				
Respiratory masks available and worn during pack assembly / testing	☐	☐	☐	N/A could not observe
Insulated gloves available and worn when handling live packs	☐	☐	☐	N/A could not observe
Safety goggles / face shields worn during cell work	☐	☐	☐	N/A could not observe

Item	Y	N	N/A	Evidence / notes
PPE storage / issue point within or near the battery area	☐	☐	☐	N/A could not observe
F. Testing and documentation				
SoH testing equipment visible and in use	☐	☐	☐	Yes but not in use as staff not available
Test records / logbook visible for recent units processed	☐	☐	☐	No. But staff was not available
Draft Lithium-ion Battery Safety Procedure referenced or visible (even if pending SMT approval)	☐	☐	☐	No
Training records / certifications for battery-handling staff referenced	☐	☐	☐	Partially during the discussion, mentioned that records are available but not visible at site

CHECKLIST 3 — WASTE STORAGE AND SEGREGATION

Used in	Day 1 Session 6 (15:30 – 16:15)
Observer	
Date	
Escort (Project Eden-side)	Staff

Observe the waste storage areas in turn — general / recyclable / manufacturing / hazardous. Verify against the Waste Management Procedure (Section A: waste categories; Section E: handling requirements).

Item	Y	N	N/A	Evidence / notes
A. General and recyclable waste				
Clearly labelled bins at source (production, offices, canteen)	☐	☐	☐	yes
Segregation visibly followed (no hazardous waste in general bins)	☐	☐	☐	yes
Recyclable waste (paper, cardboard, plastics, metals, wood) stored to prevent contamination	☐	☐	☐	yes
Storage area tidy, covered or weatherproof where outdoors	☐	☐	☐	yes
B. Manufacturing and assembly waste				
Scrap / defective parts area visible and accessible	☐	☐	☐	yes
Sustainable Waste Disposal workflow for defective items evidenced (tracked disposition: return / sell / repurpose / donate / recycle / landfill)	☐	☐	☐	???

Item	Y	N	N/A	Evidence / notes
Disposal Committee records referenced (cross-functional committee membership confirmed)	☐	☐	☐	???
C. Hazardous waste storage (per Waste Management Procedure)				
Hazardous waste storage is a dedicated, secure area	☐	☐	☐	No Empty paint or thinner containers are binned separately but not clearly labelled Wooden bins/shelves for batteries in open accessible basement area, not well secured
Storage area is ventilated (open-air roofed, or mechanical ventilation)	☐	☐	☐	No, all stored in basement and ventilation needs verification
Storage area is bunded or has spill containment under liquid-waste containers	☐	☐	☐	N/A
All hazardous waste containers are labelled (type, hazard class, date filled)	☐	☐	☐	N/A couldn't be observed as containers in storage areas not available
Fire-rated separation between hazardous waste storage and combustible storage	☐	☐	☐	N/A
No evidence of leaks, damaged containers, or overfilled drums	☐	☐	☐	Yes or N/A

Item	Y	N	N/A	Evidence / notes
Access controlled (locked, or access-restricted to trained personnel)	☐	☐	☐	No, relatively open access
D. Lithium-ion batteries (waste)				
Battery waste storage is separate from oil / solvent / chemical storage	☐	☐	☐	N/A but likely no
Storage area for end-of-life batteries is ventilated	☐	☐	☐	?
Containers or racking are non-combustible	☐	☐	☐	?
Clear segregation between functional vs. failed / damaged batteries	☐	☐	☐	N/A
Enviroserve /recycling centre pickup schedule or log visible	☐	☐	☐	No
E. Documentation at the waste storage				
Waste tracking log / periodic log visible (type, approximate volume, vendor, destination)	☐	☐	☐	No, needs to be requested
Vendor certificates of disposal / chain-of-custody documentation filed centrally	☐	☐	☐	Yes but double checking all documents
NEMA licences for vendors on file or available	☐	☐	☐	Yes but double checking all documents
Disposal certificates retained for a reasonable period (1–2 years)	☐	☐	☐	Yes but double checking all documents

CHECKLIST 4 — CHARGING HUB (USED AT PROJECT EDEN HUB W AND HUB L)

Used in	Day 2 Session 8 (09:15 – 10:30) and Session 10 (13:30 – 14:45)
Observer	Consultants
Date / hub	24 April 2026
Escort (Project Eden-side)	Staff / on-duty operator

Use the same checklist at both hubs and note any material differences. If either hub is closed or unstaffed at the time of visit, note so and capture what can be observed externally.

Item	Y	N	N/A	Evidence / notes
A. Hub environment				
Hub location, site conditions noted (street address / landmarks)	☐	☐	☐	yes
Building / structure in good condition; no visible damage affecting safety	☐	☐	☐	yes
Public access area vs. staff-only area clearly demarcated	☐	☐	☐	yes
Electrical installation looks professional (no trailing cables, visible panels closed)	☐	☐	☐	yes
B. Charger bays and cabling				
Charging positions are clearly marked and numbered	☐	☐	☐	No

Item	Y	N	N/A	Evidence / notes
				Chargers could be better secured on the shelf
Cables are in good condition (no fraying, exposed conductors)	☐	☐	☐	Yes
Charger maintenance log / tags visible	☐	☐	☐	No
Rain / weather protection over charging positions if outdoor	☐	☐	☐	No, new 6kW charger outside is not covered
Adequate spacing between batteries on charge (no over-stacking)	☐	☐	☐	yes
C. Fire and battery safety				
Fire extinguishers visible, unobstructed, in date	☐	☐	☐	yes
Extinguisher type appropriate for lithium / electrical fires (note class on tag)	☐	☐	☐	yes
First-aid kit present and stocked	☐	☐	☐	yes
Battery Incident Response Plan available on site (poster or binder)	☐	☐	☐	???
Fire Action Plan emergency contact numbers posted visibly	☐	☐	☐	yes
Smoke / heat detection visible	☐	☐	☐	yes
Damaged / quarantined batteries (if any) separated and labelled	☐	☐	☐	N/A

Item	Y	N	N/A	Evidence / notes
Operator has been trained on battery thermal event response (verbal confirmation)	☐	☐	☐	Not confirmed/not asked??
D. Operator and working conditions				
Shift pattern as documented (1 / 2 / 3 shifts — note which)	☐	☐	☐	yes
Operator has valid Project Eden ID / uniform	☐	☐	☐	yes
Break / rest facility available on site	☐	☐	☐	Not sure
Drinking water / basic sanitation available	☐	☐	☐	yes
Lone-worker protocol in place (e.g. check-in with hub lead)	☐	☐	☐	Not sure
PPE for operator: as applicable (gloves, closed-toe shoes)	☐	☐	☐	yes
E. Waste management at hub				
Waste bins present and segregated (general / recyclable / e-waste / battery)	☐	☐	☐	Yes but only one simple bin, however not much waste beeing created at the site
Damaged battery storage on site is secure and separate	☐	☐	☐	N/A
Vendor pickup schedule referenced / visible	☐	☐	☐	N/A
No visible accumulation of broken chargers or packaging	☐	☐	☐	yes
F. Customer / community interface				

Item	Y	N	N/A	Evidence / notes
External grievance contact channels posted visibly	☐	☐	☐	No ??
Queue management visible; no safety issue at peak times	☐	☐	☐	At L it seemed to be an issue
Rider shelter / seating available	☐	☐	☐	No
Signage on safe battery handling / behaviour on site	☐	☐	☐	No
Any visible neighbour impact (noise, traffic, pedestrian flow disruption) noted	☐	☐	☐	At L construction was ongoing, otherwise at W traffic could be a impact of cars driving by
Visible or referenced community notification / early-warning mechanism for incidents (e.g. siren, posted procedure, neighbour contact list)	☐	☐	☐	No or N/A
Vehicle / rider entry and exit managed in a way that minimises pedestrian risk on adjacent streets	☐	☐	☐	Yes at W No at L due to ongoing external construction
G. Rider engagement (qualitative)				
At least 4 informal rider interviews completed at this hub (Session 10 only)	☐	☐	☐	No
Any red-flag themes noted (battery issues, safety, service complaints, affordability)	☐	☐	☐	Complains about long waiting times for batteries
Any positive themes worth capturing (productivity, earnings, satisfaction)	☐	☐	☐	?

CHECKLIST 5 — PROJECT EDEN – NATIONAL SERVICE CENTRE

Used in	Day 2 Session 9 (11:00 – 12:30)
Observer	Consultants
Date	24 April 2026
Escort (Project Eden-side)	Staff

The Service Centre combines sales, after-sales, minor repairs and charging. Focus on the customer interface, end-of-life battery handoff, and the working environment for the 25-person team.

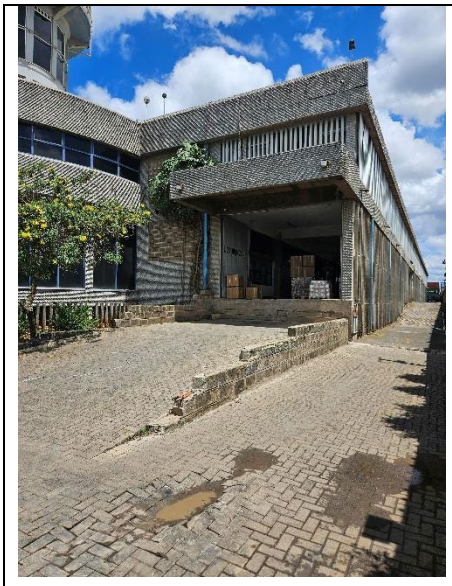
Item	Y	N	N/A	Evidence / notes
A. Site and environment				
Clean, tidy, professional public-facing area	☐	☐	☐	yes
Workshop / service area separated from customer area	☐	☐	☐	Yes/Partially, could be improved
Clear signage (sales desk, after-sales, battery handoff, washrooms)	☐	☐	☐	yes
Operating-hours sign visible and accurate (Mon–Fri 07:00–18:30, Sat 07:00–16:00)	☐	☐	☐	No??
B. Customer-facing processes				
Warranty, Rental and Data-Sharing Policy document visible / available for riders	☐	☐	☐	No?
Customer consent form / signature process observed or referenced	☐	☐	☐	N/A ??

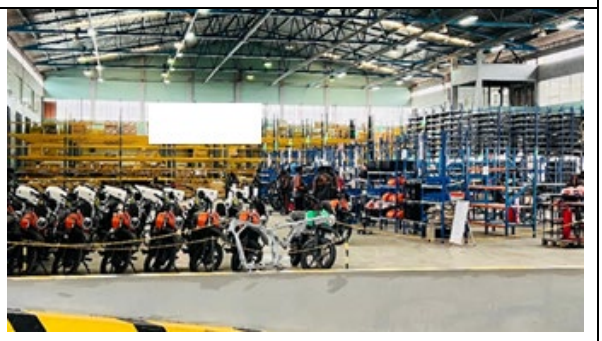
Item	Y	N	N/A	Evidence / notes
Warranty claim process visibly signposted	☐	☐	☐	No?
Minor repair bay in use; work orders tracked	☐	☐	☐	yes
Battery buy-back handoff point identifiable (Hub → Centre → Park pathway)	☐	☐	☐	N/A as buy back not yet in place
C. External grievance mechanism				
External Grievance Procedure contact channels visibly posted	☐	☐	☐	No ??
In-person grievance recording mechanism in place	☐	☐	☐	Yes, mentioned that service desk is recording complaints
Staff can describe how a customer complaint is logged and escalated	☐	☐	☐	Yes?
D. Working environment for staff				
PPE per Safety Wear SOP (After-Sales: full engineer suit, safety boots, riding gear, gloves) worn	☐	☐	☐	yes
Rest area / break facilities available	☐	☐	☐	Not sure for staff (maybe they use the upstairs area)?
Clear shift handover practice	☐	☐	☐	Not sure
Fire extinguishers, first aid kit, emergency exits all present and current	☐	☐	☐	Yes for service hub but.. No at sales hub (upstairs) as first aid kit

Item	Y	N	N/A	Evidence / notes
				was locked and key not immediately available
E. Minor repair and waste				
Used oils / solvents storage is bunded and segregated	☐	☐	☐	N/A no oils handled
Rags / contaminated waste in labelled containers	☐	☐	☐	N/A no contaminated waste
Damaged parts / e-waste storage separated from general waste	☐	☐	☐	No (observed missing separated bin and in the bin scrap and packaging materials were mixed)
Battery buy-back handoff area: receipt / acknowledgement process observed	☐	☐	☐	N/A not yet applicable
F. Data-sharing and consent				
Evidence that riders are informed about vehicle-data collection at signup (language used, format)	☐	☐	☐	?
Any consent form or acknowledgement retained on file	☐	☐	☐	?
Rider can opt out of non-essential data use where possible	☐	☐	☐	?

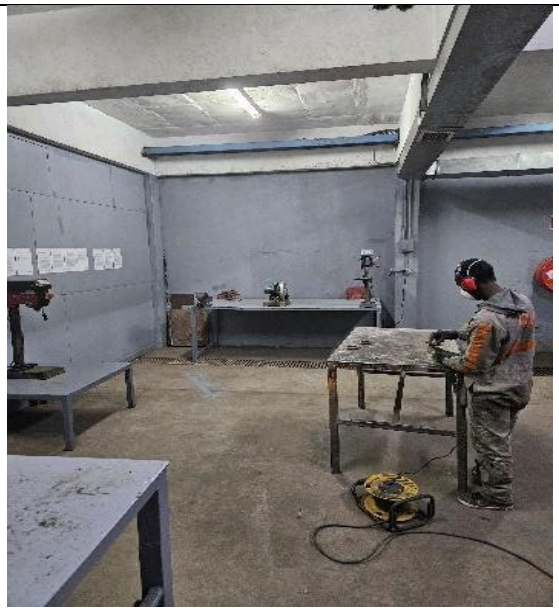
Project Eden SITE PHOTOS

a). Assembly & Production Area



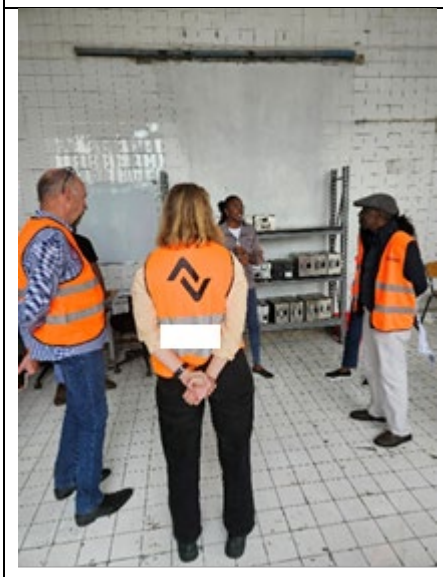


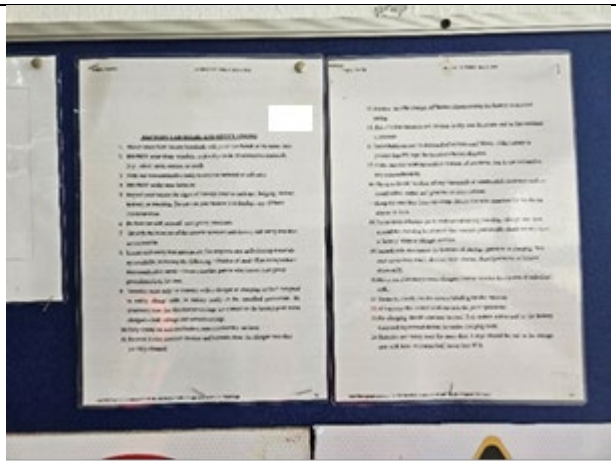
Fabrication Room



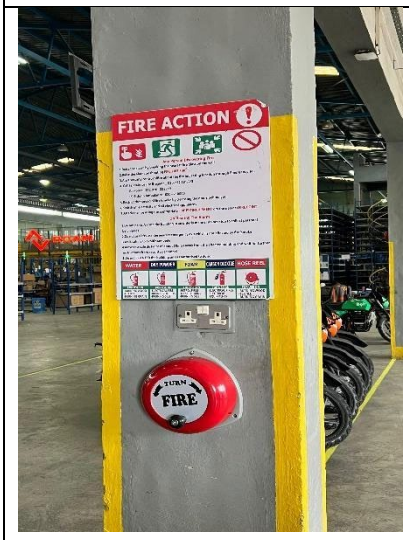
Welding Room

b). Battery Laboratory & Fire Safety

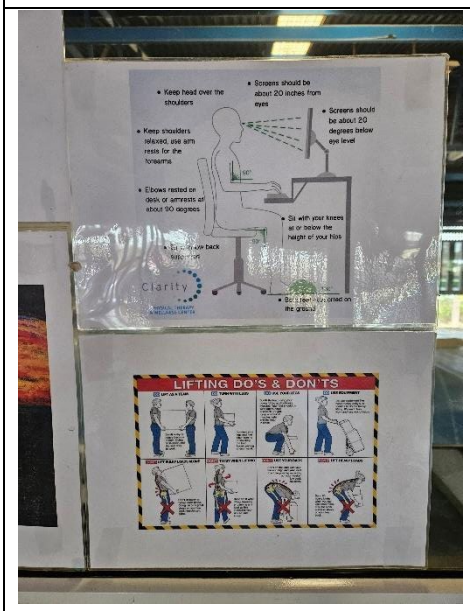





Fire action
if you discover a fire
Raise the alarm by breaking the nearest fire glass on the wall.
Call the Fire Brigade by dialling:
0717 712 712 / 0711 042 200/
0711 042 000 / 020 698 2000 / 999
use the nearest emergency exit which is not affected by fire/smoke
Move to the fire assembly point and wait for instructions from security personnel.
Vacate the building in an orderly manner do not stop to collect personal belongings
Do not RE-ENTER the building unless authorised to do so
RCAM


FIRE ACTION
FIRE

c). Occupational Health & Safety & Welfare

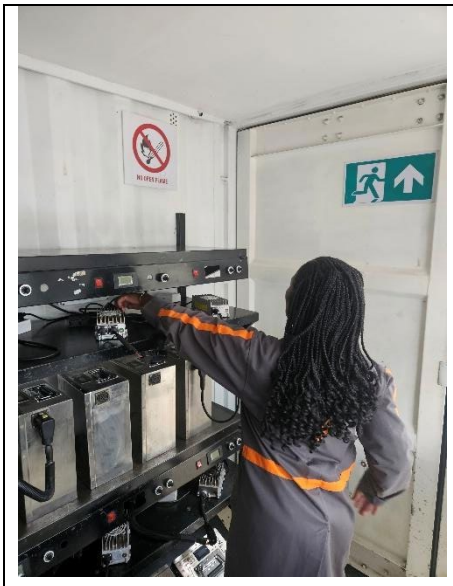
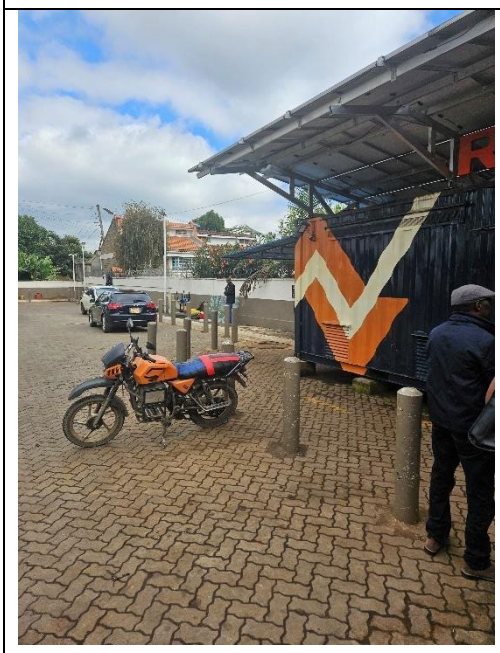



DOOR TO REMAIN
CLOSED AT ALL TIMES

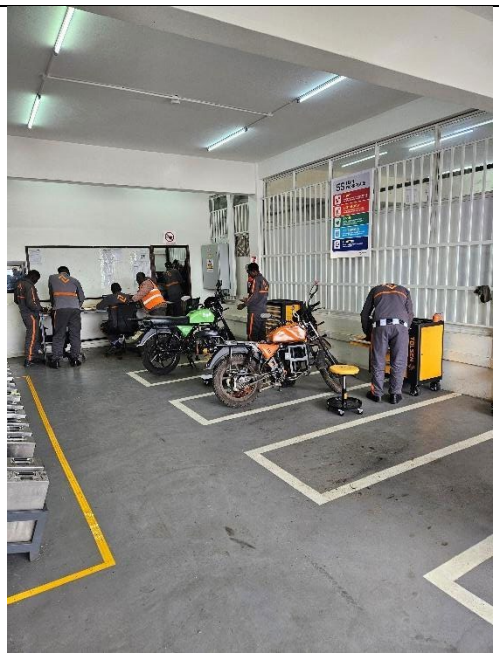

WELCOME TO
SAFETY IS THE HIGHEST PRIORITY HERE
Always wear a helmet when riding a motorcycle
Always charge batteries in designated charging stations
Max riding speed indoors is 10 km/h
Familiarize yourself with the emergency escape plan
No smoking or combustion engine vehicles allowed
Always wear designated safety equipment and follow signage
No photography without prior consent
DON'T DO ANYTHING THAT WORRIES YOUR PARENTS.
WE WANT YOU TO LEAVE THE SAME WAY AS YOU CAME.

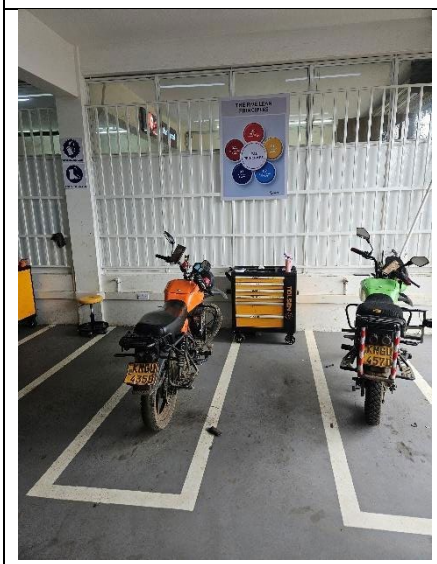

KIDDE

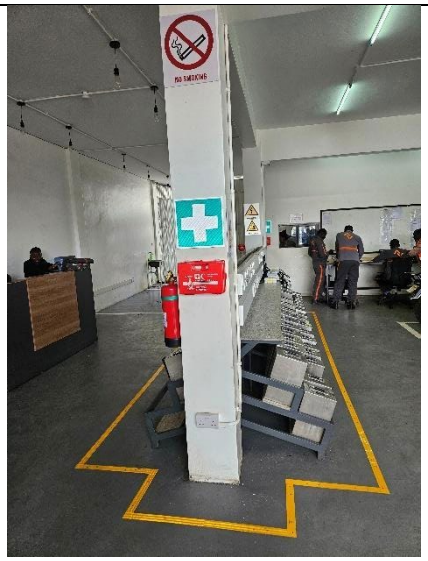
d). Charging Hubs & Community Interface

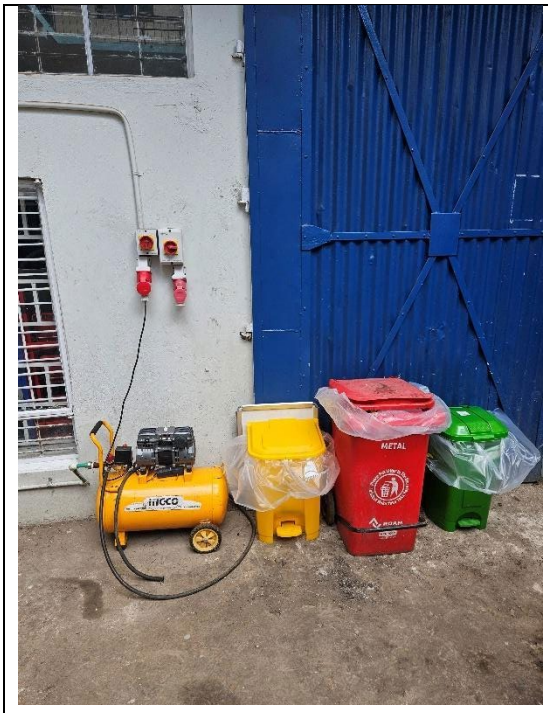
e). Service Centre

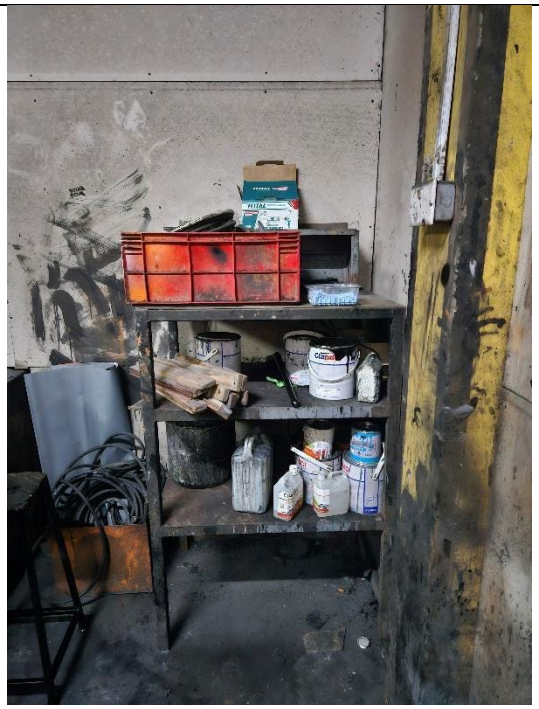






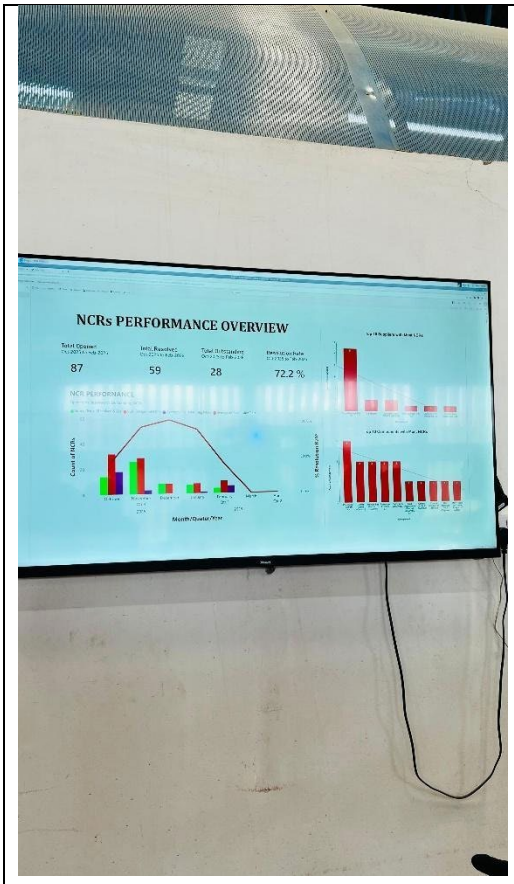
f). Hazardous Materials & Waste Management

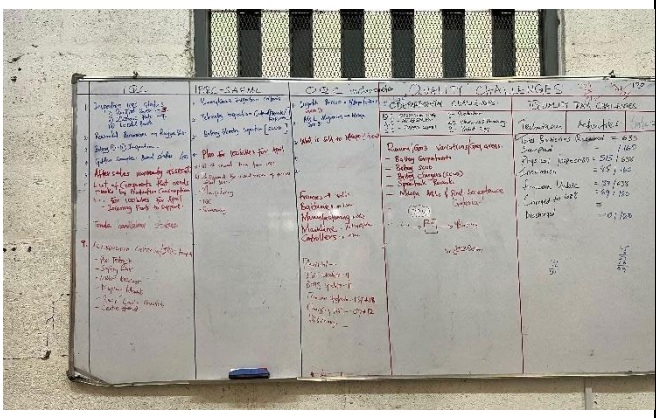




 RECYCLE BIN	

g). Quality Control & Testing





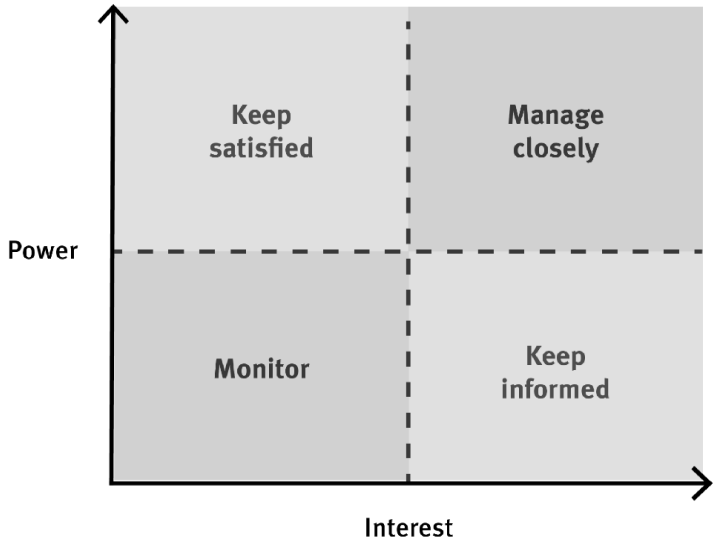
Project Eden Stakeholder Engagement and Communication Plan

1. Purpose & Principles

To ensure early, continuous, and meaningful engagement with stakeholders, in alignment with IFC PS1 and good international industry practice. This plan aims to build trust, reduce risk, and improve project outcomes through inclusive, culturally appropriate communication and responsive engagement mechanisms.

2. Stakeholder Identification & Analysis

Objective: Identify individuals, groups, and institutions potentially affected by the project or with influence over it, using the following standard stakeholder mapping and analysis methodology.



Stakeholder Group	Description	Level of Influence	Level of Interest	Engagement Priority
End customers and the local communities they serve	Users and beneficiaries of lighting products and services	Medium	High	High
Workers & Unions	Current and future employees	Medium-high	High	High
Local government	Municipal/regional regulators	Medium	Medium-high	Medium

3. Information Disclosure

Minimum Commitment:

- Share key project information early and in a format understandable to each stakeholder group.
- Languages: English and any applicable local language(s).
- Channels: Community meetings, printed materials, email updates, website, WhatsApp broadcasts.

Topics:

- Project scope, schedule, location
- Environmental and social risks and mitigation
- Grievance mechanism
- Hiring and procurement policies

4. Engagement Methods

Stakeholder Group	**Engagement Approach**	**Frequency**
End customers and the local communities they serve	Product demonstrations, community info sessions, WhatsApp groups	Quarterly
Workers	Staff briefings, anonymous feedback surveys	Monthly
Authorities	Formal consultations, compliance updates	Biannual or as required
NGOs / CSOs	Dialogue meetings, joint workshops	Annually or as needed
Investors	Reports, investor calls	Quarterly

5. Grievance Redress Mechanism (GRM)

- Anonymous and accessible customer feedback mechanisms and general grievance system
- Multiple channels including suggestion box, phone line, SMS, email, whatsapp, and in person at retail and service outlets
- Acknowledgment within 7 days; resolution within 30 days
- Documentation and tracking of all grievances

6. Monitoring & Review

- Annual review of engagement effectiveness
- Tracking metrics: number of engagements, grievances received/resolved, satisfaction surveys
- Adjust plan based on stakeholder feedback and project stage

7. Responsibility & Resources

- Stakeholder Engagement Lead: Field Operations Manager
- Community Liaison Officer: Policy Manager
- Budget: Allocated within Field Operations and Customer Engagement budgets