



Annex 6

Environmental and Social Management Framework

GCF's investment into the Global Green Bond Initiative (GGBI)*)¹

*previously known as Green and Resilience Debt Platform (GRDP)

¹ The GCF's investment into the Global Green Bond Initiative (GGBI) consists of a GCF equity investment into GGBI that was called **Green and Resilience Debt Platform (GRDP)** during the project preparation stage



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ACRONYMS

DNSH	Do No Significant Harm
EIB	European Investment Bank
E&S	Environmental and Social
ESG	Environmental, Social and Governance
ESR	Environmental and Social Requirement
ESIA	Environmental and Social Impact Assessment
ESMF	Environmental and Social Management Framework
ESMS	Environmental and Social Management System
ESS	Environmental and Social Standards
FPIC	Free Prior Informed Consent
GCF	Green Climate Fund
IFC	International Finance Corporation
NAP	National Adaptation Plan
NDC	Nationally Determined Contribution
NAP	National Adaptation Plan
SES	Social and Environmental Standards
TA	technical assistance



Corporate Use

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3. EXECUTIVE SUMMARY

The Environmental and Social Management Framework (ESMF) is designed to support the GCF's investment to the Global Green Bond Initiative (GGBI) 's commitment to implement robust environmental and social safeguards ensuring that its investments not only contribute to climate mitigation and adaptation but also promote sustainable development. By adhering to stringent E&S standards and engaging stakeholders effectively, the GCF's investment into the GGBI aims to achieve positive environmental and social outcomes, mitigate risks and impacts, and foster resilience in the target countries. The GCF's investment to the Global Green Bond Initiative (GGBI) consists of a GCF equity investment into GGBI that **was called Green and Resilience Debt Platform (GRDP) during the project preparation stage. Now for consistency, it has been renamed to GCF's investment into the Global Green Bond Initiative (GGBI) or GCF's investment into the GGBI in short.**

Objectives of the GCF's investment into the GGBI

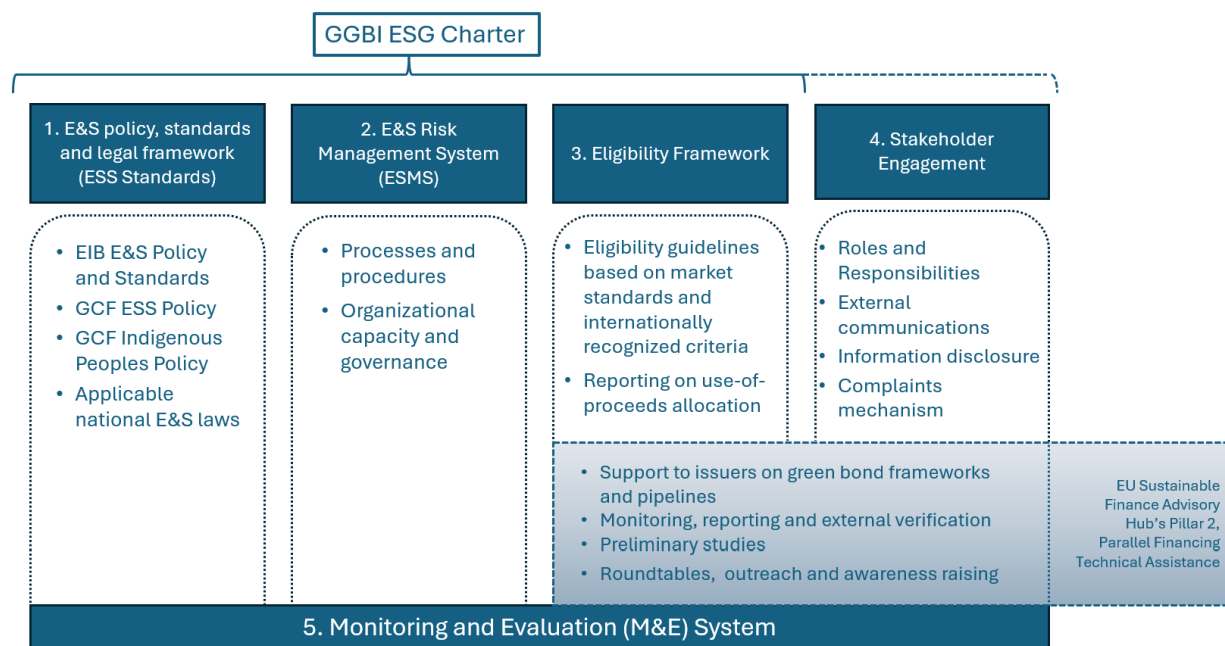
The GCF's investment into the GGBI aims to invest in bonds in climate action, with a specific focus on climate change adaptation. This project is part of the broader (GGBI, facilitated by a consortium of Development Finance Institutions (DFIs) and backed by the European Commission.

The GCF's investment into the GGBI aims at channelling €200 million of GCF equity investment as well as catalysing additional EUR 400m into the GGBI, which targets to raise €2-3 billion in total capital. This initiative will target green bond issuances in developing countries, including Kenya, Côte d'Ivoire, Namibia, Senegal, Angola, Cameroon, Uganda, Egypt, Brazil, and Bangladesh.

Scope of the ESMF

The ESMF ensures that the GCF's investment into the GGBI exclusively supports projects for which the environmental and social (E&S) risk and impacts have been adequately identified, assessed, managed, mitigated and monitored. It includes procedures to prevent investments in projects with significant unmitigated E&S risks and impacts and to ensure that the projects supported by green bond issuances comply with internationally recognised E&S standards.

Key Components of the ESMF defined in the GGBI ESG Charter





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Please note key components of standard GCF ESMF have been embedded in the GGBI ESG Charter. Institutional arrangement and emergency preparedness are considered under 2. E&S Risk Management System (ESMS). EIB will mobilize Technical Assistance under the EU Sustainable Finance Advisory Hub's Pillar 2 to support the implementation of the ESMF as described in the relevant sections.

E&S Policies and Standards

The goal of the ESMF is to ensure that projects supported by GCF's investment into the GGBI are implemented in alignment with GCF's Policy, ESS standards and Indigenous Peoples Policy, and support sustainable development. To achieve that, the GGBI's, through its ESG charter, will integrate the EIB's E&S standards as part of their investment decision making process.

By means of GCF's assessment for accreditation, it was concluded that EIB's E&S standards, policies and capacities are robust and adequate to ensure that the funded activities effectively comply with GCF's ESS including for the highest risk E&S categories, i.e., category A or Intermediation-1.

E&S Risk Management System

Processes and Procedures implemented by the Fund Manager

In terms of process, the GCF's investment into the GGBI's ESMF relies on the implementation of the GGBI's ESG Charter by means of the Environmental and Social Management System (ESMS) that the Fund Manager will establish, which relies on the following pillars:

- Risk and impacts identification and assessment: The fund manager employs a comprehensive E&S risk and impact assessment and management system. This includes issuer-level and issuance-level assessments to evaluate the E&S performance and practices of green bond issuers and the potential projects to be financed by the issuances. The assessments ensure that only projects with acceptable E&S risks and impacts are selected.
- Integration of Standards to manage and mitigate E&S risks and impacts: The fund manager integrates the European Investment Bank's (EIB) Environmental and Social Standards into their investment process so as to ensure the identified ECS risks and impacts are adequately managed, mitigated and monitored. EIB's ECS standards are recognized for their robust, systematic, and transparent approach and they cover a wide range of E&S aspects, including stakeholder engagement, resource efficiency, biodiversity, climate change, and social impacts.
- 1. Monitoring and reporting: The GCF's investment into the GGBI implements a robust monitoring and reporting framework to track the ESMF implementation. This includes post-issuance monitoring to ensure that green bond issuers report on the allocation and impact of proceeds. Regular reviews and updates of the E&S performance of issuers and projects are conducted to maintain compliance with the GGBI ESG Charter (which will include ESMS implementation and monitoring).
- Complaints mechanism available both at the fund and at the issuer level, as part of the ESS Standards requirements.

Eligibility Framework

The eligibility framework establishes the criteria for the selection of green bonds and the associated green use-of-proceeds for climate mitigation and adaptation and other environmental objectives. The minimum investment criteria include ICMA-aligned green bond frameworks, with additional conditions specifying green use of proceeds criteria. It also includes granular reporting practices to monitor the allocation of the use-of-proceeds invested by GGBI and to measure impact in a harmonized way. The GGBI exclusion criteria further specify limitations on which activities can be financed through green bonds purchased, and notably provide safeguards for ensuring Paris alignment of all activities financed by the fund.

Parallel financed TA activities under the EU Sustainable Finance Advisory Hub's Pillar 2, offering capacity-building and transaction-based support to help target country regulators, governments, issuers, and investors overcome barriers to scaling up green bond issuance. Activities include designing capacity-building programs, conducting preliminary studies, assisting in developing sustainability strategies and green bond frameworks, and supporting the identification of green eligible pipelines aligning with GCF



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investment criteria and supporting specific adaptation investment pipelines. Additionally, efforts will be made to enhance the attractiveness of green bonds to investors, provide monitoring and reporting support, and assist with conventional aspects of bond issuance.

Stakeholder Engagement

The GGBI stakeholder engagement process emphasizes external communications and information disclosure, ensuring transparency and accountability. For the GCF's investment a specific stakeholder engagement plan is in place for the ten participating countries. The Fund Manager will regularly report on investment performance. External communication mechanisms, including a grievance redress system, will be maintained. Information will be disclosed through various channels, including websites, press releases, and stakeholder meetings. The GGBI is committed to providing clear, timely, accurate, and accessible information to all stakeholders.

Parallel financed TA activities will be designed to support the implementation of the stakeholder engagement plan.

M&E System

The M&E system ensures effective implementation of the ESMF by tracking compliance with relevant environmental and social safeguards, monitoring the effectiveness of mitigation measures, providing actionable data for adaptive management and promoting transparency through regular reporting. The M&E System is compliant with the GCF Integrated Results Measurement Framework as outlined in the Funding Proposal document.



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4. INTRODUCTION

The GCF's investment into the GGBI will facilitate a €200 million GCF equity investment as well as catalyse further €400m into the Global Green Bond Initiative (GGBI), which is a European Commission initiative to raise €750-800 million in equity capital for the vehicle from a consortium of DFIs, backed by a guarantee from the EU's European Fund for Sustainable Development Plus (EFSD+). The GGBI Fund will also issue debt notes in the capital markets to crowd in private investors at the GGBI Fund level, further increasing its leverage effect. The total capitalization of the GGBI Fund is expected to reach approximately €2-3 billion, including the GCF equity investment.

The GCF's investment into the GGBI aims to support bonds that finance green, resilient and blue projects to catalyse private investment in climate action, notably for adaptation in Kenya, Cote d'Ivoire, Namibia, Senegal, Angola, Cameroon, Uganda, Egypt, Brazil, and Bangladesh.

EIB as the accredited entity of the GCF programme, shall be responsible for the overall management, implementation and supervision of each Funded Activity in line with its own internal rules, policies and procedures, including administering and managing the use of GCF Proceeds, as well as the monitoring, evaluation and reporting responsibilities as set forth in the relevant Funding Proposal and FAA. The Fund Manager of GGBI, will be the executing entity of the equity component of the GCF's investment into the GGBI. The Accredited Entity (EIB) shall monitor and supervise the implementation of the Funded Activity by the Executing Entity (the Fund Manager), and ensure that the Executing Entity will carry out the Funded Activity, with due diligence and efficiency and in conformity with appropriate financial, economic, social, environmental and administrative practices, and shall provide, promptly as needed, the funds, facilities, services and other resources required for the Funded Activity.

The GCF's investment into the GGBI will invest in the same areas as the overall GGBI, which will be guided by the GGBI's eligibility criteria and derogations (see section on the eligibility framework and Appendixes 1 and 2 for more details). Within this overall framework, the GCF's investment into the GGBI investments will have additional eligibility criteria to ensure that the investments of the GCF's investment into the GGBI meet the GCF's investment mandate. This has been specified under Funding Proposal section - B.3. Project/programme description: Table 6: Allocation of GGBI Fund investments to the Sub-Fund.

Since none of the future investment projects that will be supported by bond issuances in the target countries has yet been identified, there is currently no specific information available on their geographical focus, the type of projects they will focus on (size and technology), and their risks and impacts (negative and positive) on land, ecosystems, local communities, etc. Appendix 13 of this document contains a sample of the type of risks that the issuers are expected to manage adequately.

The ESMF, therefore, can only stipulate a set of standards and procedures to ensure that the use of proceeds of the GCF's investment into the GGBI will not support projects with potentially significant environmental and social (E&S) risks and adverse impacts and that the supported green bond issuers have the appropriate E&S risk management capacity commensurate to the E&S risks of the underlying sectors/operations. Furthermore, the ESMF ensures that transparency and accountability are integrated at the core of GCF's investment into the GGBI's activities.

Such standards and procedures are described in the following sections:

- GGBI's ESG Charter
 - Applicable E&S policies, standards and legal framework (together ESS standards).
 - Fund Manager's Environmental & Social Risk Management System (ESMS).
 - Green Eligibility Framework
- Stakeholder Engagement, which includes external communications and information disclosure



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In terms of capacity for the implementation of the ESMF, the Fund Manager has a team of ESG experts to manage the ESMF of the equity component of the GCF's investment into the GGBI under the overall ESG charter of GGBI.



5. THE GGBI ESG CHARTER

INTRODUCTION

The ESG charter is a set of guidelines that formally outlines the responsibilities, objectives and limitations of the fund manager in managing the Environmental Climate and Social (ECS) risks and impacts related to the investment fund, both adverse impacts and positive outcomes. It serves as a governing framework and ensures accountability to investors.

Since the GCF's investment into the GGBI will effectively operate as a GGBI-nested initiative, it will follow the GGBI's ESG Charter that, among other things, integrates the requirements of EIB's E&S standards into the Fund Manager's ESMS.

The Fund Manager's ESMS is the tool that will enable an effective implementation of the ESG Charter, by integrating the standards and procedures required for adequately managing the ECS risks and impacts.

As part of the overall E&S requirements included in the ESG Charter, the Fund Manager will:

- comply with the applicable environmental and social laws;
- not support Green Bond issuances whose use of proceeds includes any of the Excluded or Restricted Activities (see Appendix IV).
- establish and maintain an Environmental and Social Management System (ESMS).

The exact modalities of the ESMS set up by the Fund Manager shall be agreed with investors and further detailed in the overall ESG Charter of the Fund. However, the ESMS will contain the following key elements:

1. **Screening and assessment process** at the issuer and issuance levels. This screening will be conducted by Fund Manager's GSS bond analysts. This will be based on the following:
 - **Specific environmental and social exclusion criteria**, including Paris-alignment exclusions, as well as issuer-level exclusion criteria;
 - **An analysis at the issuer- and issuance-level** based on Fund Manager internal standards to ensure compliance with best market practices;
 - **A customized GGBI issuer-level screening** to ensure that the ESS standards are applied for the investments financed by the Green or Sustainability Bonds;
2. **Monitoring process** throughout the life of the fund to ensure Fund Manager identifies issuers that become involved in controversial activities or allegations of misconduct.
3. **Complaints mechanism both at the fund and at the issuer level.**

In parallel, the Eligibility Framework defines

1. Criteria for the selection of green use-of-proceeds for climate mitigation and adaptation, and other environmental objectives.
2. **High-quality and granular reporting practices** to monitor the allocation of the use-of-proceeds invested by GGBI and to measure impact in a harmonized way.

The following sections include a detailed description of the pillars of the GGBI ESG Charter.

3.1. E&S POLICY, STANDARDS AND LEGAL FRAMEWORK (ESS STANDARDS)

The GGBI's ESG Charter relies on the basic premise that the projects supported by the issuances need to be implemented in line with EIB's Environmental and Social Standards (E&S Standards) and the applicable national E&S laws. During EIB's accreditation by the GCF, the EIB's E&S Standards were deemed as robust and adequate to ensure that the funded activities effectively comply with GCF's ESS including for



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the highest risk E&S categories, i.e., category A or Intermediation-1². EIB initially became an Accredited Entity of the GCF in 2016. The 2022 EIB's E&S Standard 7 addresses vulnerable groups, with a specific focus on indigenous peoples, recognizing their distinct cultural, social, and economic characteristics, as well as their unique relationship with land, territories, and natural resources.

The EIB E&S Standards were revised and updated in February 2022. The revised Standards address the assessment and management of risks and impacts linked with new global environmental, climate and social challenges, strengthening its integrated risk and rights-based approach as well as the environmental and social outcomes and contribution to the SDGs. The Standards were reviewed to ensure consistency in definitions and requirements leading to greater convergence with other MDB peers as well as to clarify the clients' requirements. Good international practices and key legal requirements are now formally stated. In addition, the Standards were restructured to clarify the requirements that apply to projects depending on their location.

The EIB's E&S Standards establish the requirements that the promoter and the project must meet throughout the EIB project life cycle. Considering that the specific projects to be supported by the issuances purchased by the GGBI are not identified at the time of purchase, the fund manager will assess the capacity of the issuer to apply the principles of EIB's E&S standards on the projects financed with the issuance. The issuer is expected to have policies, procedures, and/or mechanisms in place to ensure that, for the investments financed by the Green Bonds, are in line with the following principles:

E&S Standards	<u>Key obligations</u>
E&S Impact/risk assessment and management EIB E&S Standard 1 – Environmental and Social Impacts and Risks	<p>The issuer of the Green Bond should ensure that all projects are screened and those that are likely to involve significant (material) environmental and social impacts and risks are subject to an Environmental and/or Social Impact Assessment (ESIA) process, which may be coordinated with and/or complemented by any applicable requirements and/or assessments/studies pertaining to specific topics such as biodiversity and ecosystem services, climate change, cultural heritage, gender, social impacts, as relevant. The ESIA process may involve some or all of the following steps: (i) the identification, assessment of E&S risks and impacts (ii) the scope and level of details of the assessment; (iii) the determination of the need for an ESIA report; and (iii) the preparation of an Environmental and Social Management Plan (ESMP).</p> <p>The screening process should consider – amongst others - the risks of major accidents and/or disasters, including those caused by climate change. Where such risks have been identified, the ESIA report should include, inter alia, also a description of the expected significant environmental, climate and/or social adverse effects deriving from the vulnerability of the project to risks of major accidents and/or disasters that are relevant to the project concerned, including those caused by climate change.</p>
Stakeholder Engagement EIB E&S Standard 2 – Stakeholder Engagement	<p>Whenever the project may cause potentially significant adverse impacts on communities or people, the issuer of the Green Bond should ensure that projects include the proper public consultation and meaningful stakeholder engagement as an integral part of the ESIA process, and more generally throughout the lifecycle of the project. Stakeholder engagement is essential for the effective assessment, management and monitoring of environmental, climate and social impacts and risks and to</p>

² See Annex 4 of the Accreditation Master Agreement between the GCF and the EIB: [ama-eib.pdf \(greenclimate.fund\)](https://ama-eib.pdf.greenclimate.fund)

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	ensure projects are sustainable and deliver better outcomes. The issuer of the Green Bond should provide the project stakeholders and the public with effective means to raise grievances and access to remedies.
Resource Efficiency and Pollution Prevention EIB E&S Standard 3 – Resource Efficiency and Pollution Prevention	<p>When its relevance is determined during the ESIA process, the issuer of the Green Bond should identify, design and use the appropriate technologies, processes and services to achieve environmental quality objectives by: (i) promoting the sustainable use of resources, including energy, water, and raw materials; (ii) to avoid or minimise adverse impacts on human health and the environment by avoiding or minimising pollution from activities, (iii) to avoid or minimise project-related emissions of short- and long-lived climate pollutants; (iv) to avoid or minimise generation of hazardous and non-hazardous waste and to minimise and manage the risks and impacts associated with pesticide use. The issuers of the Green Bond should have in place effective management policies for resource management, pollution prevention and control, avoidance and minimisation of greenhouse gas emissions, resource recovery creating or deriving usable and valuable products from certain waste materials, all built on the mitigation hierarchy. The issuers should also have policies requiring project promoters to set-up effective management systems and implementing control measures for ensuring prevention, preparedness and adequate response to major pollution-related accidents in line with the applicable legal framework (and international good practices).</p>
Biodiversity and Ecosystems EIB E&S Standard 4 – Biodiversity and Ecosystems	<p>When its relevance is determined during the ESIA process, the issuer of Green Bonds should identify, assess, manage and monitor the impacts and risks affecting biodiversity and ecosystems that result from the projects financed with the issuance. The biodiversity assessment should be based on the mitigation hierarchy to avoid, or where unavoidable, minimise further losses, restore and, as a last resort, compensate for any residual impacts on biodiversity and ecosystems. Where significant impacts on critical habitats have been identified such operations will be excluded. The assessment should take into account the views, roles and rights of groups, including Indigenous Peoples groups, NGOs and local communities, affected by the projects involving natural habitats and to involve such people to the extent possible in the management of the site.</p>
Climate Change EIB E&S Standard 5 – Climate Change	<p>In all cases, the issuer of Green Bonds should assess GHG emissions at the project level and the project's alignment with pathways to limit global warming to 1.5oC above pre-industrial levels and options to reduce transition risks.</p> <p>The issuer of the Green Bond should review whether the projects are exposed and sensitive to the changing climatic conditions that may occur during their lifetime under the SSP3-7.0 or SSP5-8.5 scenario.</p> <p>Where a project is determined to be at risk from physical climate hazards, it should undertake a Climate Risk and Vulnerability Assessment (see appendix 9 for more details) to (i) assess how climate change may affect the project and the system in which the project takes place, including the natural environment and the people potentially affected, and (ii) identify commensurate adaptation measures to reduce the risks posed by climate change to the project and the system in which it takes place.</p>



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<p>Displacement</p> <p>EIB E&S Standard 6 – Involuntary Resettlement</p>	<p>When its relevance is determined during the ESIA process, the issuer of the Green Bond should ensure that all the projects which entail involuntary physical and/or economic displacement, are undertaken in accordance with a Resettlement Policy Framework (RPF) and/or Resettlement Action Plan(s) (RAP) and/or, when relevant, Livelihood Restoration Plans (LRP). The resettlement planning, including measures for mitigating impacts, should be integrated in the overall ESIA process. All the documentation, and consultation processes carried out, should be clearly recorded by the issuer of the Green Bond.</p>
<p>Vulnerable Groups</p> <p>EIB E&S Standard 7 – Vulnerable Groups, Indigenous Peoples and Gender</p>	<p>When its relevance is determined during the ESIA process, the issuer of the Green Bond should ensure that projects respect the rights and interests of vulnerable, marginalised or discriminated-against persons and groups, women, and Indigenous Peoples, by: (i) identifying and assessing the type, scope, nature and significance of both positive and negative project impacts on these persons and/or groups; and, (ii) identifying appropriate measures needed to avoid, minimise, mitigate or remedy negative impacts and, as appropriate, to reinforce positive effects. The promoter should include new and/or additional differentiated measures targeting these persons and/or groups in the environmental and/or social management plans.</p>
<p>Indigenous Peoples</p> <p>EIB E&S Standard 7 – Vulnerable Groups, Indigenous Peoples and Gender</p>	<p>For projects affecting indigenous peoples, as recognised in the United Nations Declaration on the Rights of Indigenous Peoples, the issuer of the Green Bond is responsible to engage with Indigenous Peoples in a process of informed consultation and participation to assess the potential project impacts, both cultural and physical, on these groups and gather their views regarding the project. In certain circumstances, the issuer is required to implement the free, prior, and informed consent (FPIC) process.</p>
<p>Labour Standards</p> <p>EIB E&S Standard 8 – Labour Rights</p>	<p>For all projects, especially when the ESIA process reveals significant labour-associated risks, the issuer of the Green Bond should: (i) identify labour risks including in the supply chain; (ii) develop and/or maintain written labour management policies and procedures that are commensurate to its size and workforce, which should be non-discriminatory and shall observe equal opportunities; (iii) promote fair working conditions in compliance with national legislation and any collective agreements undertaken with workers' organisations; (iv) not employ, use or benefit from child labour and/or forced or compulsory labour; (v) identify the employment of migrant project workers and shall ensure their treatment is not less favourable than that of non-migrant project workers undertaking similar functions; (vi) conduct regular monitoring and reviews of the project's workforce to be able to identify any labour risks or violation of labour standards. These measures should be applicable to all project's workers, whether concerning workers directly contracted by the issuer and/or workers contracted by primary contractors and/or first-tier suppliers.</p>
<p>Occupational and Public Health, Safety and Security</p>	<p>For all projects, especially when the ESIA process reveals significant occupational and public health, safety and security risks or impacts associated to the project, the issuer of the Green Bond should implement the necessary actions to mitigate them as an integral part of the issuer's overall environmental and social management system (ESMS) and/or project specific environmental social management plan (ESMP), health</p>



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EIB E&S Standard 9 – Health, Safety and Security	and safety management plan (HSMP) or equivalent in order to comply with the applicable national legislation and any obligations deriving from the relevant international conventions and multilateral agreements. The issuer of the Green Bond should design and operate the project in alignment with international good practices, such as those established by the International Labour Organization (ILO). Before project construction and operation, the issuer of the Green Bond should establish project level procedures and systems for investigating, recording and reporting any type of accident and incident including those causing harm to people.
Cultural Heritage EIB E&S Standard 10 – Cultural Heritage	When its relevance is determined during the ESIA process, the issuer of the Green Bond should ensure that the project's location and design avoids significant adverse impacts on cultural and/or natural heritage. When impacts cannot be avoided, the issuer of the Green Bond should adequately assess, as part of the ESIA process, if any cultural and/or natural heritage is likely to be significantly affected by the project by considering the views of key relevant stakeholders and engaging professionals with appropriate expertise, experience and qualifications in cultural heritage to assist in the preparation of the assessment. The assessment should include a cultural heritage management plan, as part of the issuer's overall ESMP, to ensure that the necessary mitigation measures are properly implemented, and that the cultural heritage asset is preserved in the desired state.

Additional details related to the implementation of the ESMF based on the requirements of the ESS Standards are provided on the appendices in relation to the following topics:

- Guidance on Climate Risk and Vulnerability Assessment, see appendix 8
- Indigenous People Planning Framework, see appendix 9
- Sexual Exploitation and Harassment, see appendix 10
- Resettlement Policy Framework, see appendix 11
- Conflict sensitivity analysis, see appendix 12
- Typology of likely E&S risks, see appendix 13

3.2. E&S RISK MANAGEMENT SYSTEM (ESMS)

The GGBI will identify, assess, properly manage and monitor the ECS risks and impacts through the Fund's ESMS. The specific approaches that will be used in to implement these processes are currently being defined. The following information must, therefore, be read and treated as a work in progress that will further evolve and is subject to change.

As part of the ESMS, the Fund Manager will notably ensure through appropriate due diligence, and monitoring that issuers and projects financed by the green bond (and end-borrowers and their projects in case of FIs) comply with applicable E&S laws and the fund's E&S requirements, which include alignment with EIB E&S standards. The fund manager is responsible to ensure that issuers:

- have adopted and apply environmental and social policies and/or standards as well as procedures (together considered as E&S processes), that substantially align with EIB E&S standards; and
- have appropriate capacity and resources to implement the E&S processes to adequately evaluate and manage the E&S risks and impacts associated with the use of proceeds of any issuance.

To achieve that, the Fund Manager will implement assessments both at the issuer-level and the issuance-level as well as post-issuance verifications and monitoring. Finally, clear reporting requirements are established in order to provide transparency and accountability to investors.



1. INSTITUTIONAL ARRANGEMENTS

3.2.1.1 Overview of Project/Programme Implementation Structure

The implementation structure for the Green Climate Fund (GCF) investment to the Global Green Bond Initiative (GGBI) involves a multi-tiered system of legal, contractual, institutional, and financial arrangements among the GCF, the Accredited Entity (AE) – the European Investment Bank (EIB), Executing Entities (EEs) and third parties. The structure is designed to ensure the effective use, management, and monitoring of GCF Proceeds in alignment with established agreements and frameworks.

3.2.1.2 Key Roles and Responsibilities

European Investment Bank (EIB):

- Acts as the Accredited Entity (AE) for the GCF's investment to the GGBI.
- Contracts Executing Entities (EEs) for the implementation of Funded Activities and ensures that GCF Proceeds are utilized in accordance with the terms of the subsidiary agreements.
- Provides monitoring, evaluation, and guidance to the Executing Entity regarding the implementation of the Funded Activities.
- Oversees the overall management, implementation, and supervision of each Funded Activity, adhering to its internal rules, policies, and procedures, and the provisions of the relevant Funding Proposal and Funded Activity Agreement (FAA).
- Coordinates systematically with the Directorate General for International Partnerships (DG INTPA), Directorate General for Neighbourhood and Enlargement Negotiations (DG NEAR), and relevant EU Delegations, leveraging its role as a Sustainable Finance Advisory Hub (SFAH) implementation partner

Fund Manager of GGBI:

- Serves as the Executing Entity for the equity component of the GCF's investment to the GGBI.
- Manages the Environmental and Social Management Framework (ESMF) for the equity component under the GGBI ESG charter, ensuring alignment with GCF-specific requirements where applicable.

3.2.1.3 Governance Structure

Governance of the GCF's investment to GGBI operates under the broader governance framework of the GGBI and includes:

1. **Limited Partners Advisory Committee (LPAC):**
 - Comprises the Consortium DFIs (including EIB), GCF (represented by EIB as AE), and other shareholders (e.g., Luxembourg).
 - Advises on strategic matters, including changes to Investment Guidelines or other policy documents, in a non-executive capacity.
 - Includes the European Commission as an observer.
2. **Technical ESG Sub-Committee:**
 - Advises on environmental and social governance (ESG) risks that arise during implementation.
 - Recommends mitigation actions, operating in a non-executive capacity.
3. **Shareholders Assembly (AGM):**
 - Includes all equity shareholders of the GGBI Fund, with GCF represented by EIB as AE.
 - The European Commission participates as an observer.

**Environmental and Social Management Framework (ESMF) Oversight**

- Managed by the Fund Manager's team of ESG experts and dedicated Green, Social, and Sustainability (GSS) bond analysts.
- Operates under the GGBI ESG charter while addressing any differences between the GGBI ESG charter and the GCF-specific ESMF requirements. Close coordination with EU institutions and alignment with EIB's oversight mechanisms ensure systematic application of the ESMF.

Governance

In terms of governance, the Fund Manager will establish a **Scientific Committee** that will advise the GGBI fund on translating programme objectives into investment objectives, identifying new areas of development for climate development objectives and other development goals pursued by the fund. The committee will be composed of ESG and social fixed income experts and will ensure that the fund manager puts forward ESG best practices for implementing its strategy and the Technical Assistance Facility. During the life of the Sub-Fund, the Scientific Committee's role will be to adapt the Eligibility Guidelines when needed, and oversee the implementation of the Eligibility guidelines by the Sub-Fund in its various dimensions: green eligibility due diligence at purchase, ex-post monitoring during the life of the asset, impact reporting, etc.

3.2.2. RISK SCREENING PROCESSES AND PROCEDURES**3.2.2.1. Screening and Assessment:*****Exclusions***

As a general principle, the Sub-Fund will be Paris-aligned following the logic in Annex 2 of the EIB Climate Bank Roadmap. To reflect this principle, specific Paris alignment exclusions have been included in the ESG Charter as part of the Excluded Activities List (see Appendix 3 for additional details).

Issuer level assessments

The first step is to ensure that the country and the issuer are not excluded based on the Fund Manager's exclusion policy dedicated to GGBI. The GGBI's strategy will not invest in:

- a) Any issuer designated by the EU as subject to restrictive measures in the lists provided at www.sanctionsmap.eu (the "EU Restrictive Measures")
- b) Countries and entities under sanctions/embargo as per Credit Agricole Group Policy
- c) Any sovereign (and associated non-commercial sub-sovereign as defined in the NDICI Regulation³) in debt distress or default situation by IMF
- d) Any issuer located in the EU list of non-cooperative jurisdictions for tax purposes (NCJ)⁴

As part of its ESMS, the Fund Manager will assess the issuers' policies, procedures and capacity for implement and operating the projects in alignment with the applicable E&S laws and the principles of EIB E&S standards. For this purpose, the Fund Manager will employ a due diligence questionnaire designed to gather information from the issuer. Please note that the questionnaire in Appendix 5 is an illustrative questionnaire and that a specific due diligence questionnaire will be developed for the GGBI fund.

As explained in section 4.2, it is possible that full alignment with EIB's E&S Standards cannot be verified at the time of purchase of the bonds, due to the lack of information on the specific projects.

³ Available at [NDICI Regulation](http://ndici.europa.eu)

⁴ [EU list of non-cooperative jurisdictions for tax purposes - Consilium \(europa.eu\)](http://europa.eu)

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In such a case, the Fund Manager is allowed to invest in such instruments and should engage as soon as possible with the issuer to obtain and verify information necessary to confirm that proceeds are eligible and are not allocated to excluded activities on an ex-post basis.

If the information necessary to confirm that proceeds are eligible has not been provided within the first allocation report, and in any case no later than one month following the first allocation report of the bond, the Fund Manager should present its engagement results and evidenced assessment of the E&S reputational risk to the GGBI and its investors. In instances where the assessment lacking in terms of justification and evidence quality, the Fund Manager shall present a revised assessment within 3 months. In instances whereby the assessment by the Fund Manager concludes that there is no serious environmental and social reputational risk to the GGBI and its investors, the Fund Manager will continue to monitor the relevant bond's allocation reports and undertake its best efforts to obtain the required information that confirms that the relevant green bond's proceeds are not financing excluded activities. In the instances whereby the assessment by the Fund Manager concludes that a serious E&S reputational risk to the GGBI and its investors exists, the Fund Manager should divest within 3 months following the conclusion of the assessment.

In addition, the Fund Manager will apply its proprietary Environmental Social and Governance (ESG) risk assessment and management approach based on selecting the issuers with the best ESG practices within each sector. For this purpose, the Fund Manager has established an ESG scoring methodology that determines a rating or score for the investments using 38 quantifiable ESG criteria and weights. The This internal rating is then combined with the ESG scores obtained from external data providers. Furthermore, the bond issuers are also screened for their alignment with industry standards or certifications as well as for ESG controversies. The methodology includes a specific approach for corporate issuers and for sovereign issuers. Further details on the specific approaches can be found in Appendix 7.

The table below demonstrates a general breakdown of the various environmental, social, and governance risks the Fund Manager has identified at the issuer level, the approach used to assess them, and the data providers used to assess and monitor these risks. The risks can have several types of consequences, including, but not limited to, reputational risks, impairment of asset value, litigation and portfolio underperformance.

Identified risk	Description	Fund Manager's assessment	Data provider used
Environmental risks	Result from the way in which an issuer controls its direct and indirect environmental impact: energy consumption, reduction of greenhouse gas emissions, fight against the depletion of resources and protection of biodiversity, etc.	Proprietary rating from A to G, established on the basis of an analysis framework (criteria and weights) of the risks and opportunities linked to the "Environment" pillar, specific to each business sector. A G rating indicates the highest risk	MSCI, Moody's ESG Solutions, ISS ESG, Sustainalytics
Social risks	Result from the way in which an issuer manages its human capital and its stakeholders (other than shareholders). This covers several concepts: the social aspect linked to human capital (accident prevention, employee training, respect for employees' rights, etc.), those linked to human rights in general, and responsibilities towards stakeholders.	Proprietary rating from A to G, established on the basis of an analysis framework (criteria and weights) of the risks and opportunities linked to the "Social" pillar, specific to each business sector. A G rating indicates the highest risk.	MSCI, Moody's ESG Solutions, ISS ESG, Sustainalytics
Governance risks	Result from the way in which the issuer manages its development or result from the way in which the company organises its operations and its management bodies. This may give rise to unfair commercial practices,	Proprietary rating from A to G, established on the basis of an analysis framework (criteria and weights) of the risks and opportunities linked to the "Governance" pillar, specific to each business sector.	MSCI, Moody's ESG Solutions, ISS ESG, Sustainalytics

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	fraud or corruption, nondiversified boards of directors, excessive remuneration, etc.	A G rating indicates the highest risk	
Risks of controversy	Possibility that an issuer or investment may become involved in controversy, litigation or events that could damage its reputation or ability to generate profits. May include contested business practices, violations of law, financial scandals, environmental or social problems, or other difficulties that could compromise the issuer's credibility or sustainability.	Proprietary methodology combining a quantitative filter to define the universe to be subjected to a qualitative evaluation. This results in a rating on a scale of 0 to 5 (5 being the worst). Controversies with a score of 3 or more are considered serious.	RepRisk, MSCI, Sustainalytics
Physical risks	Related to adaptation to climate change Result from damage caused by extreme weather and climate events	Exposure score to the physical risks of 7 extreme weather events (fire, cold wave, heat wave, water stress, coastal flooding, hurricane, flooding) on a scale of 0 to 100. The higher the score, the greater the risk	Trucost / IPCC
Transition risks	Related to mitigating the impact of climate change on the business model Result from the difference between the adjustments made to the company's activity with a view to reducing carbon emissions and a scenario consistent with limiting the rise in temperature to 1.5°C compared with pre-industrial levels. This also covers unforeseen or sudden changes.	<ul style="list-style-type: none"> • Metrics on carbon emissions • Metric on the brown share of a company's activity (negative contribution to mitigation objectives) • Metric on carbon reduction targets • Proprietary energy transition rating • Temperature alignment 	<ul style="list-style-type: none"> • Trucost • MSCI / Trucost • CDP/ SBTi • MSCI, Moody' ESG Solutions, ISS ESG, MSCI, Sustainalytics • Iceberg/CDP/Trucost
	Related to the contribution to the transition Result from the company's ability to offer goods and services that are compatible with a trajectory towards low greenhouse gas emissions and development that is resilient to climate change	Metric on the green share of a company's activity (positive contribution to the objectives of the Paris Agreement)	MSCI / Trucost / FTRussell
	Related to the inclusive transition Result from the transformation of the business model by integrating the social aspects of the energy and ecological transition	Proprietary rating of Just Transition on a scale from A to G A G rating represents the highest risk	MSCI/Moodys ESG/ Sustainalytics/ISS-ESG
Biodiversity risks	Result from climate change, soil degradation and habitat destruction, exploitation of unsustainable resources and pollution	"Biodiversity and pollution" rating criterion integrated into the assessment of the Environment pillar. Proprietary rating on a scale from A to G*. A G rating represents the highest risk	MSCI, Moody's ESG Solutions, ISS ESG, MSCI, Sustainalytics
		Biodiversity metric	Carbon4 Finance
Litigation or liability risk related to environmental factors	Arises from the possibility that the entity may become involved in litigation that could damage its reputation or its ability to deliver performance. May include contested business practices, violations of laws, environmental damage or other events that could compromise the entity's credibility or sustainability	In its risk mapping, the Fund Manager's operational risks include the legal risk arising from the Fund Manager's exposure to civil, administrative or criminal proceedings, the risk of noncompliance arising from failure to comply with the regulatory and legislative provisions or ethical standards that govern its activities, and the reputational risk that may arise.	

* This metric assesses how issuers are maximising the positive impacts and minimising the negative impacts of the transition to a low-carbon economy in their sectors and industries

These assessments support the internal decision-making process on E&S matters. The Fund Manager proposes a strict exclusion policy for the worst ESG-rated companies and specific sectoral



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exclusions of controversial industries. The exclusion criteria will prevent the GGBI from investing in any:

- Issuers or affiliates under debarment⁵
- 2. Issuers excluded as part of the Fund Manager's Exclusion Policy included in their Responsible Investment Policy
- Issuers rated G on The Fund Manager's ESG rating scale⁶, as they are considered non-compliant with the Fund Manager's Responsible Investment policy.
- 3. Issuers that lack the E&S standards commensurate to the E&S risks of the underlying sectors or type of projects to be financed by the issuance, and where use-of-proceeds serve projects with high reputational or E&S risk

Issuance level E&S assessments

In addition to issuer-level screening, the Fund Manager will undertake issuance-level E&S assessments. The first step is a screening at the issuance level to ensure that the issuance should not be excluded based on

- GGBI's list of excluded activities includes the Exclusion Policy in the Fund Manager's Global Responsible Investment Policy and it will be complemented by other investors' required exclusions.
- Any activities listed in the GGBI's Excluded Activities List (see Appendix 3)
- Any activities that are part of the "Not Supported" list of activities as per the Paris Alignment Framework in the EIB's Climate Bank Roadmap Annex 2

The Fund Manager plans to carefully screen the bond issuance for their:

- Alignment with the issuer's overall sustainability strategy (i.e., verifying the ESG rating of the issuer)
- Green/Social Funding rationale
- Project analysis and alignment to industry standards
- Transparency assessment

In addition to the internal ESG rating of the issuer, the Fund Manager systematically checks:

- For the presence of a second party opinion or other certification, (e.g., Climate Bond (CBI) certificates)
- If the projects to be financed by the GSS bond contribute to the overall ESG strategy of the issuer to favor the energy and/or environmental transition and to generate social benefits.

If this first screening is not satisfactory, then the Fund Manager will decline the investment.

Once the green bond issuer has undergone an initial screening, the Fund Manager GSS bonds team conducts a comprehensive analysis of the GSS bond and its issuer across four dimensions:

⁵ Debarred by the European Investment Bank (EIB), the European Bank for Reconstruction and Development (EBRD), the Kreditanstalt für Wiederaufbau (KfW), Agencia Española de Cooperación Internacional para el Desarrollo (AECID), Agence Française de Développement (AFD)/ Proparco and Cassa de Depositi e Prestiti (CDP).

⁶ The Fund Manager's ESG rating scale goes from A for best practices to G for the worst ones.



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1	Project analysis	– Assessment of the asset level impact. This is done by <u>analysing</u> the degree of environmental contribution of the project's expected impact, as well as the expected impact relative to the asset's geographical location.
2	Issuer analysis	– Assessment of the GSS bond issuer's overall strategy. This is done by understanding how the GSS bond is linked to the issuer's sustainability strategy and to the issuer's key performance indicators (KPIs).
3	Green/sustainable funding rationale	– Assessment of the rationale for financing green/sustainable projects through GSS Bonds. This is done by assessing the alignment between GSS bonds and green/sustainable assets in terms of purpose and size.
4	Transparency	– Assessment of the level of disclosure that the GSS bond issuer has published or is committed to. For instance, the amount of information available on funded projects, impact data and potential verification.

Moreover, the Fund Manager has developed an internal GSS bond scoring to rate each bond across the aforementioned dimensions.

This **scoring** is applied across labelled bonds from all types of issuers (corporates and sovereigns), with different weights depending on the label (Green, Social or Sustainability Bonds). The Fund Manager scores all new issuances and annually reviews the score when the bond's Allocation & Impact reports are released. The GSS Score results in different shades ranging from very dark (strong) to very light (weak).

In addition, the scoring includes an orange shade that captures bonds that are in the Fund Manager's watch list (meaning the issuer/issuance has issues that are viewed as severe and are escalated) and a red shade that refers to the GSS+ bonds that are not eligible under the Fund Manager's GSS Bond criteria.

If the analysis concludes that the GSS bond is not investable under the Fund Manager's eligibility criteria, portfolio managers are not allowed to buy the bond for inclusion in their portfolios.

3.2.2.2. **Monitoring and Reporting**

Post-issuance monitoring and reporting is a key process for the implementation of the ESMS, as it allows to ensure that the ECS performance of the issuers aligns with the commitments in their green bond frameworks, including providing reports on annual allocation and impact data. It also allows the Fund Manager to collect issuer and project data, which in turn feeds the Fund Manager's GSS bond database.

Once the investment is made, the Fund Manager will perform the following actions for each bond:

1. **Use of proceeds:** For bonds for which the Fund Manager has not been able to verify full compliance against the Eligibility Criteria or bonds not fully compliant with the Eligibility Criteria, the Fund Manager needs to ensure that the share of proceeds that can fall outside the Eligibility Criteria may not exceed 20% of the bond value within one month of the publication of the first allocation report. If the share of proceeds allocated to non-eligible activities exceeds 20% of the bond value for the full duration of two reporting years, the Fund Manager will be required to sell the bond within 3 months after the end of the two reporting years. If the share is less than 20% of the bond value, the Fund Manager will follow up annually with the issuer to assess until full allocation of bond proceeds. After that, the Fund Manager will no longer be required to annually monitor the allocation reports and engage with the issuer. The Limited Partner Advisory Committee ("LPAC") can be consulted on an ad-hoc basis to evaluate potential adjustments to the green eligibility framework.



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2. **ESG controversies screening:** On a daily basis, the Fund Manager will screen potential controversies (sectors, issuers, geographic areas, etc.) and existing controversies in order for ESG Research analysts to initiate engagement on the issue. The Fund Manager's controversy tracking system relies on three data providers (RepRisk, MSCI and Sustainalytics) to systematically track controversies and their level of severity. his quantitative approach is then enriched with an in-depth qualitative assessment⁷ of the controversy, led by ESG Research analysts, and updated quarterly to identify any issuers with involved in controversies. ESG analysts conduct a qualitative review of the controversy, based on its degree of severity, the existence of persisting material risks, whether corrective action is being taken, whether the issue is systemic or localized, among others. This leads to the attribution of a controversy score, ranging from 1 to 5, where 5 is the most severe controversy score and 1 the least severe. If the controversy is deemed material, the Fund Manager will engage with the respective issuer and the latter will be given a reasonable amount of time to propose an appropriate remediation plan. Upon inadequate response from the issuer, the Fund Manager will divest.
3. **Review of the issuer's environmental performance:** On a regular basis, the Fund Manager shall review the issuer's E&S performance to ensure that it is on track or improving and not lagging. If it is the latter, the analysis is updated to reflect these changes. The Fund Manager's internal laggard list is used and is updated once a year by the whole ESG Research Team. The Fund Manager will run a specific engagement process for medium-risk issuers on the areas where the issuer is deemed to be below industry standards. The Fund Manager will engage with issuers to encourage them to integrate better ESG practices: including setting targets for their ESG strategy, improve their E&S policies, get details from the issuer on the remediation plan set to address a controversy.
4. **Allocation and impact reporting:** One year after the issuance, the Fund Manager will check the availability of the allocation and impact report of the green bonds. If the Fund Manager is unable to find it or there are discrepancies in the impact data, the Fund Manager will engage with the issuer to clarify and improve information at the bond level. Some engagement actions may include understanding calculation methodology of problematic data, promoting ICMA harmonised framework for impact reporting, promoting Life Cycle Assessment (LCA) considerations, alignment with the EU Taxonomy, etc.

All of the information or data collected in the above-mentioned actions are gathered into an internal proprietary GSS bond database that allows the Fund Manager to monitor the investable GSS bond universe. All bonds are reviewed once a year to reflect changes in the data. This internal database allows us to feed issuer and issuance level data at the fund level, which allows for a better understating of the allocation and impact of the fund.

To implement its reporting duties, the Fund Manager will convene a regular (at least once a year or whenever a GGBI investor calls such a meeting) E&S committee, where the fund's E&S performance and impact/quality of reporting will be presented and discussed. Furthermore, the Fund Manager will make available to GGBI investors any additional information, which is in their possession or they can reasonably obtain and that the GGBI investors may reasonably request, concerning environmental or social matters related to the investments.

⁷ The qualitative assessment of controversy, include frequency, magnitude and extent of the controversy (s), response provided by the company and any corrective measures taken by the company, potential business impact or impact on stakeholders, source (quality and visibility), duration and relevance.



3.2.3 EMERGENCY PREPAREDNESS

The ESMF includes robust provisions for accidents and emergency preparedness to mitigate potential risks during the implementation of funded activities based on the EIB ESS requirements – see section 3.1 for details.

The environment and social management systems of the issuers of Green Bonds are systematically assessed by the Fund Manager. Such assessments will take into consideration whether promoters of the projects: a) have in place major accident prevention policy and the safety management system with control measures for ensuring prevention, preparedness and adequate response to major accidents in line with the applicable legal framework and international good practices; and b) whether the risks of major accidents are systematically identified within the screening or ESIA processes. Where relevant, such measures may include, inter alia, also:

- Regular training and capacity building for stakeholders to ensure preparedness for unforeseen incidents.
- Coordination with local authorities, host country governments, and relevant international agencies to enable rapid and effective response.
- Monitoring and evaluation mechanisms to ensure lessons learned from emergency responses are incorporated into future planning and risk management.
- Reporting of any major accidents to the project sponsors (including the issuers of respective Green Bonds used).



6. ELIGIBILITY FRAMEWORK

6.1. Introduction

The eligibility framework consists of a structured set of criteria and guidelines used to evaluate and select green bonds that align with the GGBI's sustainability objectives. This framework guides how the Fund Manager identifies, assesses, and selects bonds for the fund, ensuring they align with investors' expectations for green impact while maintaining financial performance. The bonds included in the portfolio should meet the predefined the different categories of criteria presented below.

6.2. Compliance with market standards

- a. Alignment with ICMA standards: The Sub-Fund will only invest in Green and Sustainability Bonds that comply with the relevant best practices under the Secretariat of the International Capital Market Association (ICMA). For Green Bonds, this relates to the Green Bond Principles (GBP); for sustainability bonds, this relates to the Sustainability Bond Guidelines (SBG).
- b. Reporting commitment: The Fund will only invest in Green and Sustainability Bonds for which there is a commitment to appropriate reporting from the issuer. For green bonds and sustainability bonds this relates to an annual assessment of the use-of-proceeds' allocation.
- c. External reviews: The Fund will focus on investing in green bonds with external reviews to confirm a bond's integrity and its alignment with the issuer's chosen framework, which must be acceptable to the GGBI. Part of the GGBI's mission is to foster the development of Green Bond ecosystems in Target Countries, including the creation of local External Reviewers, including Second Opinion Providers. Therefore, the quality and integrity of the External Reviewer will be for the Portfolio Manager to determine as part of its investment screening process. The Fund may invest in Green and/or Sustainable Bonds without an external review only under exceptional circumstances, i.e. in the case where an issuer is based in a lower income country where reputable financial consulting companies conducting external reviews and certifying second opinions are not operating within the remits of reasonable commercial terms and conditions at the time of issuance. In all cases, this should not represent more than 5% of the total exposure of the portfolio.

6.3. Portfolio Manager's Green and Sustainability Bond analysis

Once the issuer has undergone an initial screening of complying with market standards, the Portfolio Manager conducts a comprehensive analysis of the green or sustainability bond and its issuer across four dimensions:

- a. Project Analysis: this consists in analysing the degree of environmental or social investment of the project's expected impact;
- b. Issuer's Sustainability Strategy Analysis: this consists in assessing the issuer's overall strategy and understanding how the green or sustainability bond is linked to the issuer's ESG strategy and the issuer's sustainability targets;
- c. Green Funding Rationale: this consists in analyzing the rationale for financing green projects with green/sustainability bonds by assessing the alignment between the bonds and the assets in terms of purpose and size;
- d. Transparency Analysis: this consists in assessing the level of disclosure that the issuer has demonstrated or has committed to.



6.4. Green Eligibility Framework

On top of the standard green and sustainability bond analysis conducting by the Portfolio Manager, the below criteria shall be applied for Green Bonds and for green use of proceeds contained in Sustainability Bonds:

Bonds will be considered eligible for investment if, at the time of investment, the activities financed (or to be financed) by the proceeds of those bonds meet one or several of the criteria for climate change mitigation and adaptation or for other environmental objectives as follows:

Eligible Green Use of Proceeds

Eligibility criteria for climate change mitigation and adaptation⁸:

- The MDB/IDFC Common Principles for [Climate Change Mitigation](#) and [Adaptation](#) Tracking; **or**
- The ‘Substantial Contribution’ criteria of the [EU Taxonomy](#) for sustainable activities as per the Climate Delegated Acts⁹. For eligibility purposes, it is not required to show alignment with the ‘Do No Significant Harm’ criteria nor the Minimum Safeguards under the Taxonomy, in as far as they are not covered by the ESS standards.

Eligibility criteria for other environmental objectives¹⁰:

- The [IFC Reference Guide for Biodiversity Finance](#); **or**
- The [IFC Guidelines for Blue Finance](#); **or**
- The ‘Substantial Contribution’ criteria of the [EU Taxonomy](#) for sustainable activities as per the Environment Delegated Act¹¹. For eligibility purposes, it is not required to show alignment with the ‘Do No Significant Harm’ criteria nor the Minimum Safeguards under the Taxonomy, in as far as they are not covered by the ESS standards.

6.6

6.7. Eligibility Derogation

The Portfolio Manager may request the following derogations from the Eligible Green Use of Proceeds (each, a "**Derogation**") for Green Bonds or green use of proceeds contained in Sustainability Bonds where:

- 1) the Portfolio Manager is unable to verify full compliance against the Eligible Green Use of Proceeds requirements; **or**
- 2) the Portfolio Manager determines that the Green Bonds or the Sustainability Bonds are not fully compliant with the Eligible Green Use of Proceeds requirements.

The Portfolio Manager may only request a Derogation for a Green Bond or Sustainability Bond that complies with all other eligibility criteria set out in the Investment Policy, notably the Excluded Activities.

Requests for Derogations must be addressed by the Portfolio Manager to the Advisory Board which will approve or disapprove the request.

⁸ See Appendix 1 for the list of sectors and activities that meet EIB's criteria for substantial contributions to climate mitigation and adaptation

⁹ (Commission Delegated Regulation (EU) 2021/2139, Commission Delegated Regulation (EU) 2022/1214, Commission Delegated Regulation (EU) 2023/2485)

¹⁰ See Appendix 2 for the list of sectors and activities that meet IFC and EU Taxonomy criteria for substantial contributions to other environmental objectives

¹¹ Commission Delegated Regulation (EU) 2023/2485



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The Derogation may be exercised at the Pre-Purchase Stage or the Post-Purchase Stage as follows:

Pre-Purchase Stage:

To qualify for a Derogation, a Green Bond or Sustainability Bond must satisfy either or both criteria:

- 1) the Portfolio Manager must engage with the issuer to determine the prospective share of the Green Bond's or Sustainability Bond's proceeds that fall outside the Eligible Green Use of Proceeds requirements and which would therefore be subject to the Derogation. This share may not exceed 20% of the total proceeds of the Green Bond or Sustainability Bond; and/or
- 2) the number of asset categories that qualify for the Derogation does not represent more than 20% of the total asset categories of the categories listed in the Eligible Green Use of Proceeds framework.

Post-Purchase Stage:

For those Green Bonds or Sustainability Bonds that have been purchased using the Derogation, the Portfolio Manager shall carry out the two following actions:

- 1) monitor the post-issuance allocation reports of the issuer to determine and keep record of the amount of proceeds allocated to activities outside the Eligible Green Use of Proceeds criteria ("**Derogation Share**"). If the Derogation Share exceeds the limit of 20% of the value of total proceeds of the Green Bond or Sustainability Bond for the full duration of two reporting years, the Portfolio Manager will be required to sell the Green Bond or Sustainability Bond no later than three (3) months after the end of the aforementioned two reporting years¹²; and
- 2) annually review the annual allocation reports (and, if necessary, engage with the issuer) to be satisfied that the Derogation Share is less than 20% of the value of the total proceeds of the bond. Once, following a full allocation of bond proceeds, the Portfolio Manager confirms that the issuer has met the 20% threshold, the Portfolio Manager will no longer be required to annually monitor the allocation reports and enter into issuer engagement to ensure that the Derogation Share is less than 20% of the value of the total proceeds of the bond.

7. STAKEHOLDER ENGAGEMENT

Overall, the stakeholder engagement process will follow the GGBI stakeholder engagement process that, considering the nature of the initiative, boils down to external communications and information disclosure.

For GCF's investment into the GGBI, there is a specific stakeholder engagement plan designed for the 10 GCF's investment to the GGBI countries. Appendix 7 provides additional details on the Stakeholder Engagement Plan.

The GGBI is committed to maintaining transparency and accountability in all its operations. As part of this commitment, the GGBI ensures that all relevant stakeholders are adequately informed about the progress, achievements, and challenges of its initiatives, including for the GCF's investment to the GGBI.

¹² In certain circumstances the Portfolio Manager may be unable to sell the bond in a period of three months, due to various factors including without limitation, the illiquidity of the assets, the frequency and timing of any rebalancing with the Sub-Fund's investment strategy and/or the unavailability of counterparties or brokers. In such a situation, the Portfolio Manager will present to the Advisory Board the action plan elaborated in the best interest of the investors to solve this situation.



7.1. ROLES AND RESPONSIBILITIES

The Fund Manager (GGBI Fund): The Fund Manager will regularly communicate investment performance, strategy, and outcomes through regular reports to GCF and other equity investors in the Fund. This includes quarterly and annual reports, press releases, and updates on significant milestones.

7.2. EXTERNAL COMMUNICATIONS

Grievances redress or complaints mechanism: As part of its ESMS, the Fund Manager is required to maintain an external communication mechanism, with clear procedures and timelines, providing publicly available and easily accessible channels to receive communications, grievances and/or queries from the public or concerned stakeholders affected by the Fund's activities/operations. More details are provided below on the Fund Manager's complaints mechanism.

The Portfolio Manager will maintain an external communication mechanism to provide easily accessible channels to receive communications, grievances and/or queries from the public or concerned stakeholders affected by the Fund's activities/operations. The contact address will be available on GGBI's website and queries will be redirected to a dedicated team at Fund Manager in charge of addressing these grievances.

Website: The GGBI (or EIB) should maintain a dedicated section on its website for the GCF's investment to the GGBI. This section will include key documents, progress reports, news updates, and contact information for stakeholder inquiries.

Press Releases and Media Engagement: Regular press releases will be issued to inform the public and stakeholders about significant developments, partnerships, and milestones achieved. Media engagements and interviews will be conducted to enhance visibility and transparency.

Stakeholder Meetings and Workshops: Periodic stakeholder meetings and workshops will be organized by EIB to provide updates, gather feedback, and foster collaborative efforts. These events will be an opportunity for stakeholders to engage directly with the project team and Fund Manager.

Reports and Publications: Comprehensive annual reports detailing financial performance, project impact, and future plans will be published and made available to all stakeholders. Interim reports and publications on specific aspects of the programme will also be released as necessary.

Social Media and Newsletters: Active engagement on social media platforms and through newsletters will ensure continuous and widespread dissemination of information. These channels will be used to share real-time updates, success stories, and important announcements.

7.3. INFORMATION DISCLOSURE

The GGBI is dedicated to upholding the highest standards of information disclosure. The following principles will guide our disclosure practices:

- **Transparency:** Clear and accessible information will be provided to all stakeholders, ensuring an understanding of the programme's objectives, activities, and outcomes.
- **Timeliness:** Information will be disclosed promptly to keep stakeholders informed of the latest developments and to enable timely decision-making.
- **Accuracy:** All disclosed information will be accurate, comprehensive, and verifiable, ensuring stakeholders have a reliable basis for their engagements and decisions.
- **Accessibility:** Efforts will be made to ensure that information is easily accessible to all stakeholders, including through multiple languages and formats where necessary.



7.4. COMPLAINTS MECHANISM

A dedicated process will be set up for GGBI (including use of a specific mailbox to be used by the public or concerned stakeholders), in line with the Fund Manager's complaints handling policy and requirements as per EIB's E&S Standards (as specified in Appendix 4). The GCF's investment to the GGBI's Grievance Redress Mechanism will be one and the same as the GGBI's Complaints Mechanism.

As an overarching policy, the Group to which the Fund Manager belongs to has already developed some guidelines for handling complaints. The complaint handling system allows bad commercial practices or deficiencies to be detected.

As part of the guidelines, it is highlighted the importance to accurately inform customers of the means at their disposal to file complaints and to determine the review and handling process for complaints, in particular if several Group Entities are involved. Regulators usually closely monitor how companies handle complaints.

Usually, a statement expressing dissatisfaction from a client, whether justified or not, filed against a Group Entity, can be identified as a complaint. This approach must be analysed in the light of the local regulations applicable to the customer by the Entity in charge of customer or commercial relations, which receives the complaint, which may then rely on other Entities of the Group to handle the complaint.

In order to be processed and to receive an appropriate response, a complaint must therefore clearly state the subject of the complaint's dissatisfaction and contain factual elements relating to a product or service offered by a Group Entity. This usually involves assessing and analysing the complaints received in order to address customer dissatisfaction, written in a "reasonable" form and tone and with an unambiguous intention.

Each Group Entity must set up an internal process for receiving, handling and monitoring complaints, and inform customers that, if no satisfactory solution is found, a mediation procedure (where applicable) is available to them, free of charge.



8. MONITORING AND EVALUATION (M&E) SYSTEM

The M&E system ensures effective implementation of the ESMF by tracking environmental and social safeguards and compliance with relevant standards. Objectives:

- Ensure compliance with environmental and social safeguards.
- Monitor and evaluate the effectiveness of mitigation measures.
- Provide actionable data for adaptive management.
- Promote transparency through regular reporting.

8.1 Key Roles and Responsibilities

European Investment Bank (EIB):

- Oversee the M&E system's alignment with international standards.
- Validate reports submitted by Executing Entity, oversight and ensuring reports are met with EIB and GCF ESS policy.
- Coordinate technical assistance to:
 - Facilitate data collection and analysis.
 - Support issuers in developing frameworks, pipelines, and sustainability strategies with consideration of GCF's eligibility specificities.

Executing Entity:

- Monitor issuers' ESG compliance and post-issuance commitments.
- Screen for ESG controversies and engage issuers to address material issues.
- Verify allocation and impact reporting, ensuring alignment with frameworks like ICMA and the EU Taxonomy.
- Consolidate data into an internal database for fund-level monitoring.
- Convene an annual E&S committee to review performance and address investor concerns.

8.2 Reporting Mechanisms

- **Internal Reporting:** Regular updates from Executing Entity.
- **External Reporting:** Annual reports to funding entities on compliance and impact.
- **Community Reporting:** Accessible summaries to enhance stakeholder transparency.

8.3 Adaptive Management and Grievance Integration

- Use M&E findings to adjust safeguards and project strategies.
- Analyze grievance data to identify and resolve recurring issues.



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Appendix 1. List of sectors and activities that meet EIB's criteria for climate change mitigation finance

Sector	Activity	Source of Criteria	Source Number	Notes
Forestry	Afforestation	EU Taxonomy Delegated Act	1.1	See note above on greenhouse gas assessment.
	Rehabilitation and restoration of forests, including reforestation and natural forest regeneration after an extreme event		1.2	
	Forest management		1.3	
	Conservation forestry		1.4	
Environmental protection and restoration activities	Restoration of wetlands	EU Taxonomy Delegated Act	2.1	
Agriculture, Land Use and Fisheries	Reduction in energy consumption in operations	MDB/IDFC Common Principles	Table 5, Activity 1	
	Agricultural projects that contribute to increasing the carbon stock in the soil or avoiding loss of soil		Table 5, Activity 2	
	carbon through erosion control measures			
	Reduction of non-CO ₂ greenhouse gas emissions from agricultural practices or technologies		Table 5, Activity 3	
	Projects that reduce methane or other greenhouse gas emissions from livestock		Table 5, Activity 4	
	Livestock projects that improve carbon sequestration through rangeland management		Table 5, Activity 5	
	Projects that reduce greenhouse gas emissions from the degradation of marine ecosystems or other water-based ecosystems		Table 5, Activity 7	

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	Projects that reduce CO ₂ e intensity in fisheries or aquaculture		Table 5, Activity 8	
	Projects that reduce food losses or waste or promote lower-carbon diets		Table 5, Activity 9	
	Projects that contribute to reduction of greenhouse gas emissions through production of biomaterials		Table 5, Activity 10	
	Greening of urban areas		Table 9, Activity 3	
Manufacturing	Manufacture of renewable energy technologies	EU Taxonomy Delegated Act	3.1	
	Manufacture of equipment for the production and use of hydrogen		3.2	
	Manufacture of lowcarbon technologies for transport		3.3	
	Manufacture of batteries		3.4	
	Manufacture of energy efficiency equipment for buildings		3.5	
	Manufacture of other lowcarbon technologies		3.6	See note above on greenhouse gas assessment.
	Manufacture of cement		3.7	
	Manufacture of aluminium		3.8	
	Manufacture of iron and steel		3.9	
	Manufacture of hydrogen		3.10	See note above on greenhouse gas assessment.
	Manufacture of carbon black		3.11	
	Manufacture of soda ash		3.12	
	Manufacture of chlorine		3.13	
	Manufacture of organic basic chemicals		3.14	
	Manufacture of anhydrous ammonia		3.15	

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Sector	Activity	Source of Criteria	Source Number	Notes
	Manufacture of nitric acid		3.16	
	Manufacture of plastics in primary form		3.17	
	Highly efficient or low carbon greenfield manufacturing facilities or greenfield supplementary equipment or production lines at an existing manufacturing facility	MDB/IDFC Common Principles	Table 4, Activity 3	These categories apply for manufacturing activities not covered by the EU Taxonomy Delegated Act.
	Brownfield industrial energy efficiency improvement		Table 4, Activity 1	
	Brownfield replacement of equipment or processes based on fossil fuels with electrical equipment or processes components		Table 4, Activity 4	
	Retrofit of existing industrial infrastructure resulting in avoidance of industrial greenhouse gases, a switch to industrial greenhouse gases with lower global warming potential, or implementation of technologies or practices that minimise leakages		Table 4, Activity 6	
	Improvements to existing industrial processes, new processes or advanced manufacturing technology solutions, leading to a reduction in consumption of non-energy primary resources through changes in processes or process inputs		Table 4, Activity 7	
Energy	Electricity generation using solar photovoltaic technology	EU Taxonomy Delegated Act	4.1	

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	Electricity generation using concentrated solar power technology	EU Taxonomy Delegated Act	4.2	
	Electricity generation from wind power	EU Taxonomy Delegated Act	4.3	
	Electricity generation from ocean energy technologies	EU Taxonomy Delegated Act	4.4	
	Electricity generation from hydropower	EU Taxonomy Delegated Act	4.5	See note above on greenhouse gas assessment.
	Electricity generation from geothermal energy	EU Taxonomy Delegated Act	4.6	See note above on greenhouse gas assessment.
	Electricity generation from renewable non-fossil gaseous and liquid fuels	EU Taxonomy Delegated Act	4.7	See note above on greenhouse gas assessment.
	Electricity generation from bioenergy	EU Taxonomy Delegated Act	4.8	
	Production of electricity and/or heating/cooling from gaseous fuels	MDB/IDFC Common Principles	Table 2, Activity 2	The threshold applied is that facilities must operate at life cycle emissions lower than 100 g CO ₂ e/kWh output.
	Transmission and distribution of electricity	EU Taxonomy Delegated Act /	4.9 / Table 2, Activity 10	The EU taxonomy and MDB/IDFC Common Principles are used according to applicability in particular geographic areas.

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	MDB/IDFC Common Principles		
Storage of electricity	EU Taxonomy Delegated Act / MDB/IDFC Common Principles	4.10 / Table 2, Activity 9	The EU taxonomy and MDB/IDFC Common Principles are used according to applicability in particular geographic areas.
Storage of thermal energy	EU Taxonomy Delegated Act	4.11	
Storage of hydrogen	EU Taxonomy Delegated Act	4.12	
Storage of (other) low carbon gases	MDB/IDFC Common Principles	Table 2, Activity 9	
Manufacture of biogas, biofuels and bioliquids	EU Taxonomy Delegated Act	4.13	
Transmission and distribution networks for renewable and low-carbon gases	EU Taxonomy Delegated Act	4.14	
District heating/cooling distribution	EU Taxonomy Delegated Act	4.15	

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	Installation and operation of electric heat pumps	EU Taxonomy Delegated Act	4.16	
	Cogeneration of heating/cooling and power from solar energy	EU Taxonomy Delegated Act	4.17	
	Cogeneration of heating/cooling and power from geothermal energy	EU Taxonomy Delegated Act	4.18	See note above on greenhouse gas assessment.
	Cogeneration of heating/cooling and power from renewable non-fossil gaseous and liquid fuels	EU Taxonomy Delegated Act	4.19	See note above on greenhouse gas assessment.
		Act		
	Cogeneration of heating/cooling and power from bioenergy	EU Taxonomy Delegated Act	4.20	
	Production of heating/cooling from solar thermal heating	EU Taxonomy Delegated Act	4.21	
	Production of heating/cooling from geothermal energy	EU Taxonomy Delegated Act	4.22	See note above on greenhouse gas assessment.
	Production of heating/cooling from renewable non-fossil gaseous and liquid fuels	EU Taxonomy Delegated Act	4.23	See note above on greenhouse gas assessment.
	Production of heating/cooling from bioenergy	EU Taxonomy	4.24	

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		Delegated Act		
	Production heating/cooling waste heat of using	EU Taxonomy Delegated Act	4.25	
	Energy efficient street lighting	MDB/IDFC Common Principles	Table 9, Activity 3	
Water supply, sewerage, waste management and remediation	Construction, extension and operation of water collection, treatment and supply systems	EU Taxonomy Delegated Act	5.1	
	Renewal of water collection, treatment and supply systems	EU Taxonomy Delegated Act	5.2	
	Construction, extension and operation of waste water collection and treatment	EU Taxonomy Delegated Act	5.3	
	Energy efficiency and demand management in water supply (considered as greenfield activities). Energy efficiency in sewerage systems	MDB/IDFC Common Principles	Table 6, Activities 3 and 4	
	Wastewater reuse	MDB/IDFC Common Principles	Table 6, Activity 8	
	Renewal of waste water collection and treatment	EU Taxonomy Delegated Act	5.4	

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	Collection and transport of waste in source segregated fractions	EU Taxonomy Delegated Act & MDB/IDFC Common Principles	5.5 Table 7, Activity 1	The EIB scope includes hazardous waste collection, which is an eligible activity in the MDB/IDFC Common Principles. Although it is not within the scope of Section 5.5 of the EU Taxonomy Delegated Act, it is mentioned in the Technical Expert Group's taxonomy report as an activity for future consideration in the taxonomy where it enables material recovery.
	Anaerobic digestion of sewage sludge	EU Taxonomy Delegated Act	5.6	
	Anaerobic digestion of bio-waste	EU Taxonomy Delegated Act	5.7	
	Composting of bio-waste	EU Taxonomy Delegated Act	5.8	
	Material recovery from waste	EU Taxonomy Delegated Act & MDB/IDFC Common Principles	5.9 Table 7, Activity 5	The EIB scope includes material recovery from hazardous waste, such as waste electrical and electronic equipment, since it is an eligible activity in the MDB/IDFC Common Principles. Although it is not within the scope of Section 5.9 of the EU Taxonomy Delegated Act, hazardous waste treatment recovery is mentioned in the Technical Expert Group's taxonomy report as an activity for future consideration in the taxonomy where it enables material recovery.
	Landfill gas capture and utilisation	EU Taxonomy Delegated Act	5.10	
	Other types of recovery and valorisation of biowaste	MDB/IDFC Common	Table 7, Activity 8	

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		Principles		
	Material recovery from separately collected or pre-sorted waste involving processes other than mechanical processes	MDB/IDFC Common Principles	Table 7, Activity 5	The Delegated Act Activity 5.5 specifies mechanical recycling only. The EIB scope also includes chemical recycling of plastics, since it is recognised in Section 3.17 of the EU Taxonomy Delegated Act as an eligible source of secondary material for the manufacture of primary plastics. The same applies for material recovery of hazardous waste streams using physicochemical, chemical and thermochemical processes (see further justification above).
	Carbon Capture of CO ₂	MDB/IDFC Common Principles	Table 2, Activity 8; Table 4, Activity 5	This category complements the EU Taxonomy Delegated Act's separate activities "Transport of CO ₂ " and "Underground permanent geological storage of CO ₂ ," to cover full carbon capture and storage chains. It provides criteria for the carbon capture component of carbon capture and storage projects that are not otherwise covered by the wider economic activities of the EU Taxonomy Delegated Act.
	Transport of CO ₂	EU Taxonomy Delegated Act	5.11	
	Underground permanent geological storage of CO ₂	EU Taxonomy Delegated Act	5.12	
Transport	Passenger interurban rail transport	EU Taxonomy Delegated Act	6.1	
	Freight rail transport	EU Taxonomy Delegated Act	6.2	

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	Act		
Urban and suburban transport, road passenger transport	EU Taxonomy Delegated Act	6.3	
Operation of personal mobility devices, cycle logistics	EU Taxonomy Delegated Act	6.4	
Transport by motorbikes, passenger cars and light commercial vehicles	EU Taxonomy Delegated Act	6.5	
Freight transport services by road	EU Taxonomy Delegated Act	6.6	
Inland passenger water transport	EU Taxonomy Delegated Act	6.7	
Inland freight water transport	EU Taxonomy Delegated Act	6.8	
Retrofitting of inland water passenger and freight transport	EU Taxonomy Delegated Act	6.9	
Sea and coastal freight water transport, vessels for port operations and auxiliary activities	EU Taxonomy Delegated Act	6.10	

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	Sea and coastal passenger water transport	EU Taxonomy Delegated Act	6.11	
	Retrofitting of sea and coastal freight and passenger water transport	EU Taxonomy Delegated Act	6.12	
	Infrastructure for personal mobility, cycle logistics	EU Taxonomy Delegated Act	6.13	
	Infrastructure for rail transport	EU Taxonomy Delegated Act	6.14	For criteria related to the need for a plan for electrification, a longer timescale may be defined for some developing countries, where justified in exceptional circumstances.
	Infrastructure enabling low-carbon road transport and public transport	EU Taxonomy Delegated	6.15	
		Act		
	Infrastructure enabling low-carbon water transport	EU Taxonomy Delegated Act	6.16	
	Other water transport infrastructure projects	MDB/IDFC Common Principles	Table 8, Activity 5	This category covers elements not covered in 6.16 of the EU Taxonomy Delegated Act, in particular modal shift, which is an area identified in Recital 34 of the Delegated Act as requiring further consideration.
	Low-carbon airport infrastructure	EU Taxonomy Delegated Act	6.17	
	Transport demand management policy or	MDB/IDFC Common	Table 8, Activity 8	

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	associated intelligent transport systems	Principles		
	Efficient air traffic management	MDB/IDFC Common Principles	Table 8, Activity 10	
Construction and real estate activities	Construction of new buildings	EU Taxonomy Delegated Act	7.1	<p>For outside the European Union, adoption of best energy standards is required as compared to a baseline which is defined on a case-by-case basis. For example,</p> <p>internationally recognised certification schemes with an energy baseline defined through a transparent, practical method (IFC Edge certification, LEED, BREEAM, etc.), and achievement of energy levels 20% below the baseline.</p> <p>Criteria relating to disclosure on airtightness and thermal integrity for buildings over 5000 m² will be applied to new EU projects from 2022. Projects for which the preliminary information note was approved before 2022 are exempt from applying criterion 2, subject to Board approval of the operation by the end of 2022.</p> <p>The EIB is working during 2022 to establish guidance for the implementation of criteria on life cycle global warming potential.</p>
	Renovation of existing buildings	EU Taxonomy Delegated Act	7.2	<p>An alternative approach to major renovation is applied, where the projects outside the EU adopt best energy standards as compared to a different baseline, for example internationally recognised green building certification standards, while retaining the threshold of at least 30% energy reduction. In specific cases outside the</p> <p>European Union where the split of renewable energy is not possible or</p>

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				if the certification schemes used do not implement such split, reductions in net primary energy demand through renewable energy sources may be taken into account.
	Installation, maintenance and repair of energy efficiency equipment	EU Taxonomy Delegated Act	7.3	
	Installation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings)	EU Taxonomy Delegated Act	7.4	
	Installation, maintenance and repair of instruments and devices for measuring, regulation and controlling energy performance of buildings	EU Taxonomy Delegated Act	7.5	
	Installation, maintenance and repair of renewable energy technologies	EU Taxonomy Delegated Act	7.6	
Information and communication	Data processing, hosting and related activities	EU Taxonomy Delegated Act	8.1	
	Data-driven solutions for greenhouse gas emissions reductions	EU Taxonomy Delegated Act	8.2	See note above on greenhouse gas assessment.
	Telecommunications networks with energy efficiency levels that meet best international practices	MDB/IDFC Common Principles	Table 10, Activity 3	
	Digitisation of service delivery or internal operations, leading to a substantial reduction in travel or material use	MDB/IDFC Common Principles	Table 12, Activity 3	

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Professional, scientific and technical activities	Close to market research, development and innovation (RDI)	EU Taxonomy Delegated Act	9.1	See note above on greenhouse gas assessment.
	Research, development and innovation for direct air capture of CO ₂	EU Taxonomy Delegated Act	9.2	See note above on greenhouse gas assessment.
	Other RDI	MDB/IDFC Common Principles	Table 11	To cover early-stage RDI, and RDI in climate change mitigation activities not covered by the EU Taxonomy Climate Delegated Act.
	Professional services related to energy performance of buildings	EU Taxonomy Delegated Act	9.3	
Cross-sectoral	New or replacement stand-alone energy efficient appliances or equipment	MDB/IDFC Common Principles	Table 9, Activity 5	For activities not covered elsewhere.
	Policy action, technical assistance and programmes in support of the eligible activities	MDB/IDFC Common Principles	Introductory text	

EIB criteria for substantial contributions to climate change adaptation

	Sector	Activity	Source of criteria
Adapted activities	Sectors covered by the EU taxonomy	Activities in sectors covered by the EU taxonomy	EU Taxonomy Delegated Act MDB joint methodology for tracking climate change adaptation finance
	Sectors not covered by the EU taxonomy	Activities in sectors not covered by the EU taxonomy	MDB joint methodology for tracking climate

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			change adaptation finance
Activities enabling adaptation	FORESTRY	Afforestation Rehabilitation and restoration of forests Reforestation Forest management Conservation forestry Restoration of wetlands	EU Taxonomy Delegated Act

	INFORMATION AND COMMUNICATION	Programming and broadcasting activities dedicated to climate risk, impacts and adaptation	EU Taxonomy Delegated Act
	ARTS, ENTERTAINMENT AND RECREATION	Creative, arts and entertainment activities Motion picture, video and television programme production, sound recording and music publishing activities	EU Taxonomy Delegated Act
	PROFESSIONAL, SCIENTIFIC AND TECHNICAL ACTIVITIES	Engineering activities and related technical consultancy dedicated to adaptation to climate change	EU Taxonomy Delegated Act
		Research, development and innovation	EU Taxonomy Delegated Act
	FINANCIAL AND INSURANCE ACTIVITIES	Non-life insurance: underwriting of climate related perils	EU Taxonomy Delegated Act
		Reinsurance	EU Taxonomy Delegated Act
	SECTORS NOT COVERED BY THE EU TAXONOMY	Activities not covered by the EU taxonomy	Technical expert group's final report

Appendix 2. List of sectors and activities that meet IFC and EU Taxonomy criteria for substantial contributions to other environmental objectives tagged against GCF IRMF

Under the Eligibility criteria aspect, the MDB/IDFC Common Principles for Climate Mitigation provided a detailed list of activities that are eligible for mitigation investment, a table summary is provided below.

https://www.eib.org/attachments/documents/mdb_idfc_mitigation_common_principles_en.pdf

Potential eligible investment activities for mitigation

Sector	Potential Investment Activities (non-exhaustive list)	Tag to GCF IRMF
Agriculture	<ul style="list-style-type: none"> Investment in agricultural practices that reduce greenhouse gas emissions, such as precision agriculture, agroforestry, and organic farming. Support for methane capture and utilization technologies in livestock farming operations 	MRA 4: Forests and land use
Buildings	<ul style="list-style-type: none"> Investment in energy-efficient building retrofits including insulation, HVAC systems, and energy-efficient appliances. Support for the adoption of renewable energy systems such as rooftop solar panels and solar water heaters. 	MRA 3: Buildings, cities, industries and appliances
Industrial Energy & Processes	<ul style="list-style-type: none"> Investment in energy-efficient technologies and equipment for industrial processes to reduce fuel consumption and emissions. Support for the adoption of cleaner fuels and technologies such as biomass, biogas, or hydrogen for industrial heating and power generation. Funding for industrial process optimization and waste heat recovery systems to improve energy efficiency. Support for the adoption of low-carbon alternatives in industrial manufacturing such as green cement production methods. 	MRA 3: Buildings, cities, industries and appliances
Power Industry	<ul style="list-style-type: none"> Investment in renewable energy projects such as solar, wind, mini-hydro, biomass, biogas, and geothermal power plants. Funding for energy storage technologies to support the integration of intermittent renewable energy sources. 	MRA 1: Energy generation and access
Transport	<ul style="list-style-type: none"> Investment in electric vehicle (EV) infrastructure including charging stations and battery swapping facilities. 	MRA 2: Low-emission transport

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	<ul style="list-style-type: none"> Support for the adoption of alternative cleaner fuels such as biofuels, hydrogen, and synthetic fuels for transportation. Investment in “green” public transportation systems including buses, trains, and electric mobility solutions. 	
Waste	<ul style="list-style-type: none"> Investment in waste-to-energy projects such as anaerobic digestion, landfill gas capture, and waste incineration with energy recovery. Support for recycling infrastructure and waste management systems to reduce landfill emissions. 	<p>MRA 1: Energy generation and access</p> <p>MRA 4: Forests and land use</p>

The MDB/IDFC Common Principles for Climate Adaptation did not provide such eligible adaptation activities. Therefore, the following table is prepared to replicate the list of activities that are eligible for mitigation investment, aligning to GCF result areas:

GCF results area	Potential Investment Activities	Related climate hazards/impacts
Ecosystems & Ecosystem Services	Afforestation and reforestation as adaptation opportunity	Flooding Drought Extreme Temperature Water scarcity
Ecosystems & Ecosystem Services	Restoration and management of coastal wetlands	Sea Level Rise Drought Storms Flooding
Ecosystems & Ecosystem Services	Groynes and breakwaters	Sea Level Rise Storms Flooding
Ecosystems & Ecosystem Services	Beach and shoreface nourishment	Sea Level Rise Storms Flooding
Ecosystems & Ecosystem Services	Water sensitive forest management	Water Scarcity Storms Droughts Flooding
Ecosystems & Ecosystem Services	Dune construction and strengthening	Sea Level Rise Flooding
Health, Food & Water Security	Improvement of irrigation efficiency	Droughts Water scarcity
Health, Food & Water Security	Rehabilitation and restoration of rivers and floodplains	Droughts Storms Flooding Sea Level Rise

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Health, Food & Water Security	Adaptation of drought and water conservation plans	Water Scarcity Droughts
Health, Food & Water Security	Water recycling	Water Scarcity Droughts
Health, Food & Water Security	Establishment and restoration of riparian buffers	Droughts Storms Water scarcity Flooding Sea Level Rise
Health, Food & Water Security	Improved water retention in agricultural areas	Droughts Water scarcity Flooding
Health, Food & Water Security	Use of adapted crops and varieties	Extreme Temperatures Water scarcity Droughts
Health, Food & Water Security	Conservation agriculture	Water Scarcity Droughts
Health, Food & Water Security	Desalinization	Droughts Water scarcity
Health, Food & Water Security	Adaptation of groundwater management	Droughts Sea Level Rise Water scarcity
Infrastructure & Built Environment	Climate proofed road design, construction and maintenance	Ice and Snow Storms Extreme Temperatures Flooding
Infrastructure & Built Environment	Adaptation options for hydropower plants	Droughts Flooding Water scarcity
Infrastructure & Built Environment	Adaptation options for electricity transmission and distribution networks and infrastructure	Storms Ice and Snow Extreme Temperatures
Infrastructure & Built Environment	Climate proofing of buildings against excessive heat	Extreme Temperatures
Infrastructure & Built Environment	Storm surge gates / flood barriers	Sea Level Rise Storms Flooding
Infrastructure & Built Environment	Floating and amphibious housing	Flooding Sea Level Rise Storms

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Infrastructure & Built Environment	Adaptation or improvement of dikes and dams	Sea Level Rise Storms Flooding
Multiple areas	adaptation Raising coastal land	Flooding Sea Level Rise Storms
Multiple areas	adaptation Cliff strengthening and stabilization	Sea Level Rise Storms
Multiple areas	adaptation Seawalls and jetties	Sea Level Rise Storms Flooding
Multiple areas	adaptation Green spaces and corridors in urban areas	Extreme Temperatures Flooding Water scarcity
Multiple areas	adaptation Agro-forestry and crop diversification	Flooding Extreme Temperatures Droughts
Multiple areas	adaptation Water sensitive urban and building design	Flooding Water scarcity Droughts
Multiple areas	adaptation Adaptation of integrated coastal management plans	Sea Level Rise Storms Flooding
Multiple areas	adaptation Adaptation of fire management plans	Droughts Extreme temperatures
Multiple areas	adaptation Establishment of early warning systems	Water Scarcity Storms Droughts Flooding Ice and snow Extreme temperatures Landslides/ Mud flows Glacial lake outburst floods



Appendix 3. GGBI's List of Excluded or Restricted Activities

The following list of excluded activities is preliminary and serves to inform the members of the GGBI consortium on the state of play of negotiations.

General conditions:

Where the information included in green bond or sustainability-bond frameworks is insufficient to conclude whether specific exclusion criteria – such as energy performance thresholds for certain financed activities – have been met, the Fund Manager may in good faith rely on information that comes directly from the issuer or on other sources of information providing reasonable assurance (such as second-party opinions, audited reporting, existing national sectoral legal requirements) to assess compliance with the exclusion criteria.

Ex-post verification

In the event that information to verify the inclusion or exclusion of the projects is not readily available at the time of issuance, ex-post verification would be set up for certain activities, under specific conditions that will be further elaborated in the final ESG Charter of the Fund.

Excluded activities

1. Projects which result in limiting people's individual rights and freedom, or violation of human rights, including the production or use or trade in, or activities involving, harmful or exploitative forms of forced labour /harmful child labour , as defined by ILO Fundamental Labour Conventions.
2. Production or trade in any product or activity deemed illegal under host country laws or regulations or international conventions and agreements, or subject to international phase-out or bans such as:
 - a. Production of or use of or trade in products containing PCBs .
 - b. Production, placing on the market and use of asbestos fibres, and of articles and mixtures containing these fibres added intentionally .
 - c. Production, use of or trade in ozone-depleting substances and substances which are subject to international phase-outs or bans, including pharmaceuticals, pesticides/herbicides and chemicals .
 - d. Production or use of or trade in persistent organic pollutants .
 - e. Production or trade in wildlife or wildlife products regulated under the Convention on International Trade in Endangered Species or Wild Fauna and Flora (CITES).
 - f. Transboundary movements of waste prohibited under public international law .
3. Activities prohibited by host country legislation or international conventions relating to the protection of biodiversity resources, to projects significantly impacting on protected areas, or to cultural heritage sites (including UNESCO World Heritage Site, Alliance for Zero Extinction



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(AZE)13 Site, and legally protected areas IUCN categories14) without appropriate mitigation/compensation.

4. Any activities involving significant degradation, conversion or destruction¹⁵ of Critical Habitats¹⁶.
5. Sex trade and any related infrastructure, services and media.
6. Unsustainable fishing methods (e.g. drift net fishing in the marine environment using nets in excess of 2.5 km in length, blast fishing, and electric shocks).
7. Production and distribution of racist, anti-democratic and/or neo-Nazi media.
8. Tobacco (production, manufacturing, processing and distribution).
9. Live animals for scientific and experimental purposes, including the breeding of these animals, unless in compliance with the EU Directive 2010/63/EU as amended by Regulation (EU) 2019/1010 of the European Parliament and of the Council on the protection of animals used for scientific purpose
10. Ammunition and weapons, military/police equipment or infrastructure, correctional facilities, prisons.
11. Alcoholic beverages (apart from wine and beer)
12. Gambling, casinos and equivalent enterprises and related equipment, or hotels hosting such facilities.
13. Any use of proceeds that finance political or religious activities.

¹³ Unless the area of influence of the funded activities and their associated facilities does not encroach on zones that effectively meet the criteria for being designated as an AZE site – <https://zeroextinction.org/site-identification/aze-site-criteria/>

¹⁴ Unless the financing aims to conserve or restore these areas or complies with the management and spatial planning arrangements for the latter, such as those formalised in plans with international standards relating to the activities being financed – categories I-VI in World Database on Protected Areas | IUCN

¹⁵ Destruction means the (1) elimination or severe diminution of the integrity of an area caused by a major, long-term change in land or water use or (2) modification of a habitat in such a way that the area's ability to maintain its role is lost. For avoidance of doubt – destruction of critical habitat does not take into consideration mitigation and compensatory measures.

¹⁶ Critical habitat is a subset of both natural and modified habitat that deserves particular attention. Critical habitat includes areas with high biodiversity value that meet the criteria of the World Conservation Union ("IUCN") classification, including habitat required for the survival of critically endangered, endangered or vulnerable species as defined by the IUCN Red List of Threatened Species or as defined in any national legislation; areas having special significance for endemic or restricted-range species; sites that are critical for the survival of migratory species; areas supporting globally significant concentrations or numbers of individuals of congregatory species; areas with unique assemblages of species or which are associated with key evolutionary processes or provide key ecosystem services; and areas having biodiversity of significant social, economic or cultural importance to local communities. Primary Forest or forests of High Conservation Value shall be considered Critical Habitat. For the purposes of this Agreement, the ESG Policies and Procedures attached hereto as Schedule B are understood and agreed to provide reasonable and satisfactory assurance of the avoidance of destruction of critical habitat. Critical Habitat includes species under strict protection in accordance with Art. 12-16 of the Habitats Directive.



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14. Commercial concessions over, and logging on tropical and/or primary natural forest; Conversion of natural forest to a plantation.
15. Purchase of logging equipment for use in tropical natural forests or high nature value forest in all regions; activities that lead to clear cutting and/or degradation of tropical and/or primary natural forests or high nature value forest.
16. Irrigated forests¹⁷.
17. New palm oil plantations
18. Any activities relating to the deliberate release of Genetically Modified Organism (GMO), unless in compliance with EU Directive 2001/18/EC and EU Directive 2009/41/EC and related country acquis, as further amended.
19. Animal cloning, in particular livestock activities
20. Activities involving live animals for scientific and experimental purposes, including the breeding of these animals, unless in compliance with the EU Directive 2010/63/EU as amended by Regulation (EU) 2019/1010 of the European Parliament and of the Council on the protection of animals used for scientific purposes.
21. Activities relating to gene editing in research animals, unless in compliance with Directive 2010/63/EU and Directive 2001/18/EC as further amended, where relevant
22. Any activity that leads to forced evictions¹⁸ unless the evictions are carried out in accordance with national law and in full compliance with the provisions of international human rights treaties¹⁹;
23. Any actions that amount to retaliation in its operations.
24. Any gender-based violence and harassment in the context of the Projects it finances
25. Extraction, mining of conflict minerals and metals
26. Nuclear energy and manufacturing within the nuclear industry (such as processing of nuclear fuel, uranium enrichment, irradiated fuel reprocessing)
27. Hydropower plants with a capacity of over 50MW are excluded. Any other greenfield hydropower projects associated with potentially significant environmental and social risks and impacts are also excluded, unless these risks are managed in line with international good practice²⁰. An

¹⁷ Exception for temporary watering in the first 3 years after planting is allowed in order for the seedlings to develop deep rooting systems to ensure high survival rates.

¹⁸ Forced eviction: an eviction that is done without the provision of, and access to, appropriate forms of legal or other protection.

¹⁹ Including the procedural protections against forced evictions as outlined in UN Committee on Economic, Social and Cultural Rights (CESCR), General Comment No.7 (the right to adequate housing (Art.11.1): forced evictions, 20 May 1997, E/1998/22) - <http://www.refworld.org/docid/47a70799d.html>; and, the UN Basic Principles and Guidelines for Development-based Evictions and Displacement - <https://www.ohchr.org/EN/Issues/Housing/Pages/ForcedEvictions.aspx>

²⁰ International good practice means adherence to either of the following guidelines: [EIB Environmental, Climate and Social Guidelines on Hydropower Development](#); [IFC Environmental, Health and Safety Approaches for Hydropower Projects](#) in conjunction with the applicable [IFC Performance Standards 1-8](#); EBRD Environmental and Social Guidance Note for Hydropower Projects; [CBI Hydropower Criteria](#) and associated ESG Gap Analysis.



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exception to this general exclusion is if the relevant project to be financed by green use of proceeds has been approved for direct financing by a Multilateral Development Bank, and the relevant institution has applied one of the following environmental and social policy standards during their due diligence:

- World Bank Environmental and Social Framework (2016 or later).
- Asian Development Bank Environmental and Social Framework (2024 or later).
- European Bank for Reconstruction and Development Environmental and Social Policy (2024 or later).
- International Finance Corporation Standards on Environmental and Social Sustainability (2012 or later).
- European Investment Bank Environmental and Social Standards (2022 or later).

28. Waste incineration, to the extent that alignment to the Green Eligibility Framework cannot be verified.
29. Manufacturing: coke oven products and refined petroleum products.
30. Energy-intensive industrial manufacturing activities²¹ associated with significant CO₂ emissions, to the extent that alignment to the Green Eligibility Framework cannot be verified.
31. Activities that, based on the assessment of the fund or the issuer, bear significant environmental and social risks/impacts, significant physical or economic resettlement, or displacement (including due to environmental degradation) involuntary resettlement of indigenous peoples or local traditional communities and/or use of customary traditional or ancestral land/resources, impacts on critical habitats or on critical cultural heritage (both tangible and intangible) sites, and/or traditions or in general activities which are planned to be carried out in sensitive locations or are likely to have a perceptible impact on such locations, even if the project does not require an ESIA.
32. Activities involving force-feeding of ducks and geese.
33. The keeping of animals for the primary purpose of fur production or any activities involving fur production.
34. The manufacture, trade, export or import of mercury and mercury compounds, and the manufacture, trade, export and import of a large range of mercury added products (Regulation (EU) 2017/852 of the European Parliament and of the Council of 17 May 2017 on mercury).

Additional excluded activities under Paris Agreement alignment:

ENERGY

- Coal mining, processing, transport and storage.
- Oil exploration and production, refining, transmission, distribution and storage.
- Natural gas exploration and production, liquefaction, regasification, transmission, distribution and storage.

²¹ E.g. cement, aluminium, iron and steel, basic chemicals, fertilizers, plastics.



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- Large-scale heat production for district heating based on unabated oil, natural gas, coal or peat, with the exceptions shown in heating and cooling above.
- Coal/peat/oil/ natural gas used for industrial heat production.
- Energy generation from unabated fossil fuels (including the energy network connection thereof)
- Power generation from geothermal exceeding a performance threshold of 250 gCO₂/kWh_e,
- Hydro-power plants (including the energy network connection thereof), exceeding a performance threshold of 250 gCO₂/kWh_e or an energy density of under 5W/m².
- Biogas/biomass energy generation without certified proof of sustainable feedstock sourcing (i.e., environmental and social impact assessment or internationally accepted sustainability certification issued by a third party).

INDUSTRY

- Greenfield or substantial expansions of EII production predominantly based on traditional high-carbon processes without accompanying abatement technology such as CCS or recourse to renewable energy sources. This would include investments in e.g. greenfield conventional coke-based blast furnace (BF/BOF) primary steel production, fully fossil-based production of chemicals and plastics, fossil-based nitrogen fertiliser synthesis, production of ordinary Portland cement clinker unless the project includes a suitable decarbonisation technology (such as CCS or CCU).
- Research, Development and Innovation, and associated manufacturing:
 - Products dedicated exclusively to the coal, oil and gas sectors including transport/exploration/use/storage.
 - Internal combustion engine (ICE) passenger vehicles, ICE powertrains for passenger cars and dedicated components.
 - Ships and conventional aircraft using carbon-intensive fuels (i.e. HFO, MDO, MGO, kerosene) and dedicated components.
 - Fossil-based power generation, and associated components.

TRANSPORT

- Vehicles and infrastructure dedicated to the transport and storage of fossil fuels (dedicated vessels and railcars, coal and oil terminals, LNG bulk breaking facilities, etc.). Dedicated is defined as built and acquired with the explicit intention to predominantly transport or store fossil fuels over the life of the project.
- Maritime vessels using conventional fuels (i.e. HFO, MDO, MGO)
- Conventionally-fuelled aircraft
- Airport capacity expansion.
- Mobile assets (e.g. passenger vehicles, busses, heavy vehicles, trains) to the extent that alignment to the Green Eligibility Framework cannot be verified.
- Large new road capacity infrastructure (dual carriageway and larger).



BUILDINGS

- Buildings associated with the extraction, storage, transportation or production of fossil fuels.
- New buildings that do not fall into the top 15% of the national or regional building stock expressed as operational Primary Energy Demand, or new buildings that do not use or comply with a national or international green building certification.

BIOECONOMY

- AFOLU/LULUCF investments and/or other projects that aim to produce or make use of agricultural or forestry products associated with unsustainable expansion of agricultural activity into land that had the status of high carbon stock and high biodiversity areas (i.e. primary and secondary forest, peatlands, wetlands, and natural grasslands) on 1 January 2008 or thereafter.
- Biomaterials and biofuel production that make use of feedstocks that can compromise food security.
- Export-oriented agribusiness models that focus on long-haul air cargo for commercialisation (i.e. investments dependent on the long-haul, intercontinental air-cargo shipment of fresh, perishable agricultural goods).
- Meat and dairy industries based on production systems that involve unsustainable animal rearing and/or lead to increased GHG emissions as compared to best industry, low-carbon standards/benchmarks.

WATER AND WASTE

- Waste incineration (power) plants, exceeding a performance threshold of 250 gCO₂/kWh.
- Desalination, if associated power generation exceeds a performance threshold of 250 gCO₂/kWh.
- New sanitary landfills or landfill cells that do not include landfill gas abatement and control systems, and that are not included as part of an integrated waste management project.

ICT

- Any new, or substantial expansions of hyper-scale data centres (>5,000 servers or >10,000 square feet or >20MW) in non-EU countries (countries with non-aligned power systems), with electricity not sourced in line with the Bank's Emission Performance Standard (EPS), i.e. 250gCO₂/kWh

HUMAN CAPITAL

- Public research activities or supporting equipment and infrastructure that are directly and exclusively related to unabated fossil fuels.



Appendix 4. GCF's investment into the GGBI's Grievance Redress Mechanism

The GCF's investment into the GGBI's Grievance Redress Mechanism will be one and the same as the GGBI Grievance Mechanism, which is based on the following requirements as per EIB's E&S Standards:

As early as possible, the promoter shall establish an effective project-level grievance mechanism to receive and facilitate redress for concerns and grievances of stakeholders throughout the EIB project cycle. This mechanism shall cover aspects related to all Standards, except for employer-workforce relations including occupational health, safety and security aspects, as a separate grievance structure is dedicated to this purpose in line with requirements in Standards 8 and 9. The grievance mechanism sets out a clear step-by-step process with indicative timeframes, outcomes, defined monitoring and performance indicators, and reporting requirements.

The project-level grievance mechanism may use any existing formal or informal mechanisms, provided they are properly designed and implemented, and suitable for project purposes. If deemed necessary by the EIB, these may be supplemented with project-specific arrangements. The mechanism should: (i) address concerns promptly and effectively; (ii) be free from intimidation, coercion and reprisals; and (iii) be inclusive.

The mechanism shall also be gender inclusive and responsive, and address potential access barriers to men and women, non-binary or gender non-conforming persons, young persons and the elderly, illiterate persons, or otherwise vulnerable, marginalised and discriminated-against groups, as appropriate. It should guarantee the privacy of individuals and include the anonymity option. The information about the access to the project's grievance mechanism process should be publicly available in relevant languages and via suitable channels.

The project-level grievance mechanism shall document and address concerns in a timely manner, through dialogue and engagement, using an understandable, fair and transparent process that is culturally appropriate, rights-compatible and readily accessible to all stakeholders at no cost and without retribution. The mechanism shall include appeals options and it shall not impede, or purport to impede, complainants' access to alternative judicial or administrative channels for lodging complaints, such as the EIB Group's Complaints Mechanism.²²

²² [Any natural or legal person who alleges a case of maladministration by the EIB Group in its decisions, actions and/or omissions can lodge a complaint with the EIB's Complaints Mechanism. More information can be found here: https://www.eib.org/en/about/accountability/complaints/index.htm.](https://www.eib.org/en/about/accountability/complaints/index.htm)

Appendix 5. E&S due diligence questionnaire

I. General ESG Questionnaire

Exclusion Policies

- 1 Do you have **exclusion policies** in place?

*If Yes, can you **list activities that you exclude** (you can add activities where cells are blank or override existing ones)?*

Coal	<input type="text"/>	Tobacco	<input type="text"/>
Other fossil fuels	<input type="text"/>	Weapons	<input type="text"/>
Deforestation	<input type="text"/>	Ozone Depleting Substances	<input type="text"/>
Palm oil cultivation	<input type="text"/>	Radioactive materials and asbestos	<input type="text"/>
Unsustainable fishing methods	<input type="text"/>		<input type="text"/>
Gambling	<input type="text"/>		<input type="text"/>
Child / forced labour	<input type="text"/>		<input type="text"/>

*Do you follow the **IFC exclusion list** ?*

 [Link](#)

*Do you follow the **EIB exclusion list** ?*

 [Link](#)

- 2 Do you apply these exclusions on your **lending activities** ?

- 3 Do you apply these exclusions on your **capital market activities** ?

- 4 For **coal**, do you have a **phase out plan** in place ?

Target
Year

e.g. 2030

Which activities are encompassed?



0/450

*If you do not have a phase out plan in place, can you elaborate on the **reason** why?*

0/900

- 5 What is your **current exposure** (in amount and in % of your total lending activities) on **Coal/Other fossil Fuels/ Deforestation**?

	Coal	Other Fossil Fuels	Deforestation
<i>Amount (in USD equiv)</i>	<input type="text"/>	<input type="text"/>	<input type="text"/>
<i>Percentage of your total Lending Activities</i>	<input type="text"/>	<input type="text"/>	<input type="text"/>

- 6 Any **other exclusion policy** you would like to highlight or comment you would like to make?

0/900

Carbon Footprint

- 7 Do you assess your **carbon footprint**?

Scope 1	<input type="text"/>	Scope 2	<input type="text"/>	Scope 3	<input type="text"/>	Own Operations	<input type="text"/>
Lending Activities	<input type="text"/>	Capital Activities	<input type="text"/>	Market	<input type="text"/>	% of activities Covered	<input type="text"/>

*If Yes, which **tool / international standard** do you use for this assessment?*

0/600

- 8 Do you have **decarbonisation targets** for your activities? If you have a Net Zero strategy, please go directly to the question 10

If Yes, can you provide details on the targets:



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Target Year Baseline % Reduction target Scope 1/2

Target Year Baseline % Reduction target Scope 3

What would be your **main steps** to achieve your decarbonisation targets within the timeframe?

0/900

If Yes, has your pathway been **validated by an external organisation** (auditor, consultant ...)?

 Which verifier:

Additional comments related to decarbonisation if needed

0/900

Net Zero

9 Have you issued a **Net Zero pledge**?

If yes, can you detail your targets and the scope covered?

	<i>Interim target % reduction</i>	<i>Target Year</i>	<i>% Covered</i>	<i>Comment (if any)</i>
<i>Scope 1 & 2</i>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
<i>Scope 3</i>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
	<i>Long term target % reduction</i>	<i>Target Year</i>	<i>% Covered</i>	<i>Comment (if any)</i>
<i>Scope 1 & 2</i>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
<i>Scope 3</i>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>

10 Is your target aligned with **Paris Agreement**?



11 Is your target **Science Based**?

If yes, under which **standard**?

0/900

12 Is the executive management **remuneration linked to the NZ targets or other key ESG objectives**?

Remuneration %

*Board supervision
of NZ policy?*

If yes, how are you **tracking the progress**?

0/900

Physical Risk Assessment

13 Are you performing a **Physical Risk Assessment** of your Loan Portfolio and/or Investments?

	<i>Physical Assessment</i>	<i>Risk Frequency</i>	<i>Other</i>
<i>Loan Portfolio</i>	<input type="text"/>	<input type="text"/>	<input type="text"/>
<i>Investments</i>	<input type="text"/>	<input type="text"/>	<input type="text"/>

If yes, do you use IPCC scenario to assess the physical risk of your assets?

If yes, how do you assess this risk (e.g. exposure analysis, scenario analysis, stress testing,...)? Can you please elaborate?

0/900

14 Do you have **policies and procedures** for effective management of climate-related financial risk?

Source Link:



- 15 Do you have an **audit process** in place to verify that those policies / procedures are effectively applied? If yes, under what frequency are they done?

<input type="text"/>	<i>Frequency</i>	<input type="text"/>	<i>Other</i>	<input type="text"/>
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- 16 How do you integrate **climate-related risks/opportunities** in your business operations?

<input type="text"/>
0/900

- 17 What **procedure** do you apply to assets that are deemed to have a **High Physical Risk**?

<input type="text"/>
0/900

[Link to
IIGCC](#)

For reference :

II. Specific Sustainable Financing Questionnaire

a) Rationale for the Sustainable Framework

- 1 Do you have a target on the % or amount of **new business that you would like to dedicate to sustainable lending** ?

<i>Percentage</i>	<input type="text"/>	<i>Amount (USD equiv)</i>	<input type="text"/>	<i>Target Year</i>	<input type="text" value="20..."/>
-------------------	----------------------	-----------------------------------	----------------------	------------------------	------------------------------------

- 2 What is the % of **sustainable financing** of your total lending portfolio over the last three years?

<i>###</i>	<i>###</i>	<i>###</i>
<input type="text"/>	<input type="text"/>	<input type="text"/>

- 3 Do you have a **sustainable product offering**? (Such as discount rate for green loans; better affordability for asset renovation / debt staggering for low-income borrowers).

<input type="text"/>



If yes, please detail

0/900

b) Environmental and Social Risk Assessment of projects financed

We would like to have a better view on your project selection process and how you assess the environmental and social risks of the projects you finance (i.e. not financing a project that could be detrimental to environment, local population ...).

Identification of Risks and Impacts

- 4 Are you using any performance standards or principles to assess the E&S risks and impact of the projects you finance ?

If yes, are you aligned with International FI standards such as the IFC, EBRD or EIB standards ?

IFC

EBRD

EIB

Other

- 5 Do you have an Environmental and Social Management System (ESMS) in place?

Source Link:

If yes, can you describe how you assess the potential adverse effect of the projects you finance on the environment (pollution, water, biodiversity, climate change...) or society (local communities)?

0/1200

- 6 Do you categorize your lending assets according their E&S impacts/risks (using IFC/IUCN categories or internal ones)?

[Link IUCN](#)

[Link IFC](#)

- 7 In case of risky lending, do you set an Environmental and Social Management Plan (ESMP) to mitigate the risk?



8 Are you an Equator Principles signatory?

9 Do you use external certification to ensure that the projects you finance have no negative externalities? If yes, please elaborate

0/900

10 More specifically, do you cover the following E&S risks either through national laws or internal policies when financing a new project?

Labor and Working Conditions	<input type="text"/>	Indigenous Peoples	<input type="text"/>
Resource Efficiency and Pollution Prevention	<input type="text"/>	Cultural Heritage	<input type="text"/>
Community Health, Safety, and Security	<input type="text"/>	Climate Change	<input type="text"/>
Land Acquisition and Involuntary Resettlement	<input type="text"/>	Vulnerable Groups and Gender	<input type="text"/>
Biodiversity Conservation and Sustainable Management of Living Natural Resources	<input type="text"/>		<input type="text"/>

11 Do you have human rights due diligence processes in place when selecting sustainable projects?

In particular, how do you integrate the ILO conventions and recommendations into your project selection?

0/900

How do you ensure that projects will not lead to forced / child labor?

0/900

12 Any additional comment you would like to make on your E&S assessment process?

0/900

Organisational Capacity

13 Can you describe how E&S management is being structured in your organisation? For instance, the number of people in charge, who is responsible, which part of the FI is supervising E&S management?



0/900

- 14 Do you perform regular review of the E&S risk assessment once loans have been granted?

*Frequency**Other*

If yes, who is supervising this review?

0/450

- 15 Do you have an audit process in place to ensure that the monitoring is done as stated in internal policies? If yes please elaborate

0/450

Escalation and Engagement Process

- 16 Have you set up a grievance mechanism to enable stakeholders to report any problems related to the development of a project?

- 17 How do you ensure that grievance from affected communities and other stakeholders of projects that you finance are responded to and managed in a proper way?

0/900

- 18 Have you experienced a significant controversy on a project you financed?

Date

If yes, do you have an escalation process in place and can you describe it?

0/900

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- 19 Do you engage and set up remediation plans in conjunction with your borrower to mitigate negative externalities on the projects you finance?

If yes, can you provide some examples?

0/900

- 20 Have you already stopped financing projects from a client that was not responsive to your engagement?

If yes, can you provide some examples?

0/900

Appendix 6. Issuer-level ESG assessments

ESG assessment of corporate issuers

The Fund Manager's ESG Research analysts are sector specialists tasked with:

- Staying abreast of emerging and advanced ESG topics and monitor trends of each business sector;
- Assessing sustainability risks and opportunities as well as negative exposure to sustainability factors;
- Selecting relevant KPIs and weights associated in the Fund Manager's proprietary ESG scoring system.

Our ESG analysis methodology is comprised of 38 criteria to determine the ESG profile of each sector of activity. Of the 38 criteria; 17 are cross-sector criteria, common to all companies regardless of their business sector, and 21 are sector-specific criteria, as shown in the table below:

	ENVIRONMENT	SOCIAL	GOVERNANCE
GENERIC CRITERIA	Emissions & Energy	Health & Safety	Board Structure
	Water Management	Working Conditions	Audit & Control
	Biodiversity & Pollution	Labour Relations	Remuneration
	Supply Chain - Environment	Supply Chain - Social	Shareholders' Rights
		Product & Customer Responsibility	Ethics
		Community Involvement & Human Rights	Tax practices
			ESG Strategy
SECTOR-SPECIFIC CRITERIA	Clean Energy	Bioethics	
	Green Car	Responsible Marketing	
	Green Chemistry	Healthy Product	
	Sustainable Construction	Tobacco Risk	
	Responsible Forest Management	Vehicle Safety	
	Paper Recycling	Passenger Safety	
	Green Investing & Financing	Responsible Media	
	Green Insuring	Data Security & Privacy	
	Green Business	Digital Divide	
	Packaging	Access to Medicine	
		Financial Inclusion	

Source: The Fund Manager.

The weighting of ESG criteria is a key element of ESG analysis. The weight attribution model considers that ESG criteria can have an influence on the value of a firm by means of 4 vectors: regulation, reputation, business model, operational efficiency.

To weight the ESG criteria, the ESG research analyst considers the likelihood and the magnitude of the impact of each factors on the following two materialities:

- 1st materiality: Ability to anticipate and manage the sustainability risks and opportunities inherent to its industry and to its individual circumstances
- 2nd materiality: Ability of the management team to handle potential negative impact of their activities on the sustainability factors

This approach to analysis through the two materialities allows analysts to prioritise risks by taking into account the particularities and events specific to each sector. The weightings take into account the intensity of the risk involved, whether it is emerging or established, and its time horizon. In this way, the most material risks are given the highest weighting. ESG ratings are calculated by using the ESG criteria and weights assigned by the analysts and combining the ESG scores obtained from our external data providers.



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At each stage of the calculation process, the scores are normalised into Z-scores. Z-scores are a way to compare results to a “normal” population (deviation in the issuer's score compared with the average score of the sector, by number of standard deviations). Each issuer is assessed with a score scaled around the average of their sector, enabling to distinguish best practices from worst practices at sector level. At the end of the process, each company is assigned an ESG score (approximately between -3 and +3) and the equivalent on a scale from A to G, where A is the best, and G the worst. Rating D represents the average scores (from -0.5 to +0.5); each letter corresponds to a standard deviation. There is only one ESG rating for each issuer, regardless of the benchmark universe chosen. The ESG rating is therefore “sector neutral: no sector is privileged or, conversely, disadvantaged.

ESG assessment for sovereigns

The Fund Manager's ESG sovereign scoring methodology aims to assess the ESG performance of sovereign issuers. E, S and G factors can have an impact on the issuer's ability to repay its debt in the medium and long-term. They can also reflect on how countries are faring in dealing with major sustainability issues that affect global stability. The Fund Manager's methodology relies on a set of about 50 ESG indicators deemed relevant by the Fund Manager ESG research to address sustainability risks and sustainability factors. Each indicator can weigh in several data points, coming from different sources, including open-source international databases (such as from the World Bank Group, the United Nations, etc.) and proprietary databases. The Fund Manager has defined the weights of each ESG indicator contributing to the final Fund Manager's sovereign ESG scores, and its various sub-components (E, S and G). The indicators are sourced from an independent data provider – Verisk Maplecroft. All indicators have been grouped into eight categories in order to provide greater clarity, each category falling into one of the pillars E, S or G. Similar to our corporate ESG rating scale, issuers' ESG score is translated in an ESG rating ranging from A to G.

Environmental	Climate change - Natural Capital
Social	Human Rights - Social Cohesion - Human Capital - Civil Rights
Governance	Governance Effectiveness - Economic Environment



Appendix 7. Stakeholder Engagement plan

1. Introduction

The principles guiding stakeholder engagement within the GCF's investment into the Global Green Bond Initiative (GGBI) prioritize inclusiveness, transparency, and responsiveness. These principles aim to foster trust, collaboration, and accountability as key tenets of the program's stakeholder engagement strategy across the 10 target countries: Angola, Bangladesh, Brazil, Cameroon, Côte d'Ivoire, Egypt, Kenya, Namibia, Senegal, and Uganda. The focus is on promoting green bond issuance to close the financing gap for climate change mitigation and adaptation.

2. Principles Guiding Stakeholder Engagement

This Stakeholder Engagement Plan is anchored in core principles designed to ensure meaningful and inclusive interactions with a wide range of stakeholders.

2.1 Inclusiveness

We commit to engaging a broad spectrum of stakeholders, ensuring that the voices of all relevant actors, including underserved communities, national and subnational governments, private sectors, civil society organizations, and institutional investors, are included. Engagement strategies will be sensitive to local contexts, aiming to bridge gaps between stakeholders with varying levels of power, influence, and technical understanding.

- **Key Principle:** Ensure that stakeholder engagement is representative and inclusive, with particular attention to marginalized groups and smaller market actors.

2.2 Transparency

Clear, accurate, and accessible communication will underpin all interactions. We will ensure that stakeholders receive timely and detailed information about the GGBI objectives, processes, and outcomes. Transparent communication helps build trust and legitimacy for the GGBI while managing expectations regarding its limitations and possibilities.

- **Key Principle:** Ensure all stakeholders have access to relevant, understandable, and accurate information regarding GGBI activities, progress, and decision-making.

2.3 Responsiveness

Stakeholder feedback will be actively solicited and responded within the GGBI scope of activities to the extent possible...

- **Key Principle:** Develop mechanisms to collect and respond to stakeholder needs within GGBI scope of activities to the extent possible..

2.5 Cultural and Contextual Sensitivity



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Stakeholder engagement processes will be tailored to the cultural and socio-political contexts of the target countries. By recognizing and adapting to local nuances, the program will build trust and facilitate meaningful dialogue with a wide range of stakeholders.

- **Key Principle:** Customize stakeholder engagement strategies to reflect the local social, cultural, and political contexts of each target country.

2.6 Equity and Fairness

Engagement efforts will ensure equity and fairness in participation, especially for stakeholders who may face barriers to engagement, such as low capacity or resources. The program will provide additional support, , to enable equitable participation.

- **Key Principle:** Promote fair and inclusive stakeholder engagement .

3. Engagement Modalities

To translate these principles into action, the envisaged stakeholder engagement program will adopt the following engagement modalities:

3.1 Information Disclosure and Transparency

- Maintain a dedicated online platform that provides stakeholders with regular updates, reports, and data on the program's activities.
- Distribute reports in multiple formats (e.g., online reports, newsletters, and social media updates) to ensure accessibility for different stakeholders.

3.2 Stakeholder Feedback Mechanisms

- Establish open feedback channels (e.g., workshops, surveys, public consultations) to continuously gather input from stakeholders on the program's operations.
- Implement grievance redress mechanisms that ensure any concerns or complaints are addressed promptly and transparently.

4. Grievance Redress Mechanism

A formal grievance redress mechanism will be established to ensure that all stakeholders have an opportunity to raise concerns about the program's implementation, particularly in cases where stakeholder interests are negatively impacted. The mechanism will be easily accessible, transparent, and consistent with global best practices in accountability.

5. Commitment to Continuous Improvement

Recognizing that effective stakeholder engagement is an evolving process, the GGBI is committed to learning from stakeholder interactions and global best practices.



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Through these principles, the GGBI aims to not only meet but exceed global standards for meaningful, impactful, and ethical stakeholder engagement, ensuring that all voices are heard and valued throughout the program's life cycle.

6. Preliminary Stakeholder Mapping

- ☐ **Government Ministries (Finance, Environment, Planning)**
- ☐ **Potential Green Bond Issuers (Sovereign, Sub-sovereign, Corporate)**
- ☐ **National Service Providers, Regulators, and Government Institutions**
- ☐ **Private Sector Local Investors**
- ☐ **Public Actors, CSOs, Community Representatives**



Appendix 8. Guidance to Climate Risk and Vulnerability Assessment

In terms of guidance on Climate Risk and Vulnerability Assessment, issuers can use approaches designed by GCF's Accredited Entities such as the one outlined in the [UNDP Guidance Note on Climate Change and Disaster Risks](#). This document provides comprehensive guidelines for integrating climate change and disaster risk considerations into projects. The document emphasizes the importance of addressing both geophysical and hydro-meteorological hazards to minimize adverse impacts on people and the environment. It outlines a structured approach for screening, assessing, and managing these risks throughout the project lifecycle, ensuring that projects are resilient and sustainable

Key components of the guidance include the identification and categorization of risks, ranging from low to high, and the corresponding assessment requirements. For projects with moderate to high risks, detailed assessments and management plans are necessary to mitigate potential impacts. The document also highlights the need for stakeholder engagement, particularly with communities directly affected by the projects, to ensure their concerns and insights are incorporated into risk management strategies

Additionally, the guidance note aligns with broader principles such as human rights, gender equality, and sustainability. It integrates these principles into the risk management process, promoting a holistic approach to project planning and implementation. By adhering to these guidelines, issuers can enhance the resilience of its projects, contributing to sustainable development goals and reducing vulnerability to climate change and disasters.

Other guidance notes and tools available for issuers that have been developed by GCF's Accredited Entities include:

- [World Bank Climate and Disaster Risk Screening Tools](#).
- FAO's [Climate risk toolbox](#) and [guidance document](#)
- [GIZ's note for Assessment of climate-related risks](#)



Appendix 9. Indigenous Peoples Planning Framework

First, it should be noted that the proposed GCF's investment into the GGBI initiative does not relate to a standard project finance activity but rather to the purchasing of bonds on listed markets or through private issuance. Therefore, this approach differs significantly from the one adopted for area-based project finance,, where the exact location and impact of the investment are known.

Per the GGBI exclusion list, activities that may cause adverse impacts to Indigenous people are automatically excluded from GGBI investment. This concerns:

4. Activities that, based on the assessment of the fund or the issuer, bear significant environmental and social risks/impacts, significant physical or economic resettlement, involuntary resettlement of indigenous peoples or local traditional communities and/or use of customary land/resources, impacts on critical habitats or on critical cultural heritage sites, or in general activities which are planned to be carried out in sensitive locations or may have a perceptible impact on such locations, even if the project does not require an ESIA.

In addition, the ESG screening system of the fund manager will include indicators that might be relevant to screen out projects for Indigenous Peoples, gender and Gender-Based Violence and Harassment considerations (if data is available, based on multiple industry ESG databases).

When applying its ESMS, the fund manager is expected to ensure that the issuer has policies and procedures in place that align with the provisions of EIB's Standard 7 on Vulnerable Groups, Indigenous Peoples and Gender, that can be summarized as follows:

1. **Screening and Identification of Indigenous Peoples:** Early in the project, the promoter must identify whether Indigenous Peoples, as defined in paragraph 10 of Standard 7, are present in the project area or if their lands, territories, or resources might be impacted. If so, their rights and interests must be recognized and considered in compliance with relevant national legislation and this Standard.
2. **Consultation and Engagement:** The Standard emphasizes meaningful, culturally appropriate consultation with Indigenous Peoples throughout the project cycle. This includes engaging them from the early stages of project design and continuing through to implementation, ensuring their voices are heard in decision-making processes.
3. **Free, Prior, and Informed Consent (FPIC):** For projects that affect Indigenous Peoples' lands or resources, the FPIC process is required. This means consent must be obtained without coercion or manipulation, and Indigenous communities must be fully informed about the potential impacts of the project. If FPIC is required, no project financing can proceed without documentation proving the consent of the affected communities.
4. **Impact Assessment:** An independent assessment must be conducted to evaluate both the positive and negative impacts of the project on Indigenous Peoples. This includes considering how the project might affect their cultural heritage, livelihoods, and natural resources.
5. **Development of an Indigenous Peoples Development Plan (IPDP):** Where Indigenous Peoples are affected, a tailored IPDP must be prepared, outlining how the project will avoid or mitigate negative impacts and promote benefit-sharing. This plan should be integrated into a broader Community Development Plan (CDP) when Indigenous and non-Indigenous communities are affected.



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6. **Monitoring and Reporting:** The promoter must ensure that the project's monitoring system is gender-responsive and tracks the implementation of the engagement processes and mitigation measures designed to protect the rights and interests of Indigenous Peoples. Regular reports must be provided, documenting the progress of the project, including any challenges or changes in the approach .

This IPPF, based on the alignment with EIB's E&S standards, will serve as a guideline to ensure that Indigenous Peoples' rights and interests are safeguarded and respected throughout the funded activities by the GCF's investment into the GGBI.



Appendix 10. Sexual Exploitation, Abuse, and Harassment (SEAH)

First, it should be noted that the proposed GCF's investment into the GGBI does not relate to a standard project finance activity but rather to the purchasing of bonds on listed markets or through private issuance. This approach differs significantly from area-based project finance, where the exact location and impact of the investment are known.

Per the GGBI exclusion list, activities that could likely present risks of SEAH are automatically excluded from GGBI investment.

In addition, the Fund Manager's ESG screening system will aim to screen controversies related to gender and SEAH consideration (if data is available, based on multiple industry ESG databases).

When applying its ESMS, the Fund Manager is expected to ensure that the issuer has policies and procedures that align with EIB's E&S Standards. Such policies and procedures should be aligned with the requirements of the Standards that cover aspects related to Sexual Exploitation, Abuse and Harassment (SEAH) under the more general umbrella of Gender-Based Violence and Harassment (GBVH) and can be summarized as follows:

- **Standard 1: Environmental and Social Impacts and Risks**
 - **Risk Identification and Management:** The standard mandates an integrated approach to identifying, assessing, and managing environmental, social, and human rights impacts, including GBVH risks. This includes addressing gender-specific risks and risks related to vulnerable groups like women and children.
 - **Mitigation Measures:** EIB requires projects to implement prevention and mitigation strategies, following the "mitigation hierarchy." These strategies aim to prevent and reduce negative impacts like GBVH.
 - **Stakeholder Engagement:** The standard encourages active engagement with communities and other stakeholders to identify risks related to GBVH, ensuring transparency and inclusivity in the process.
- **Standard 2: Stakeholder Engagement**
 - **Inclusive Engagement:** EIB mandates that stakeholder engagement should be inclusive and gender-sensitive, with special attention to marginalized and vulnerable groups. Projects must ensure that women, girls, and other at-risk populations are included in the decision-making process and are provided with safe spaces to voice concerns.
 - **Grievance Mechanism:** Projects must establish a grievance mechanism that is accessible to all stakeholders, particularly vulnerable groups. The grievance process should address GBVH concerns and provide a non-retaliatory environment for complaints.
- **Standard 7: Vulnerable Groups, Indigenous Peoples, and Gender**
 - **Protection of Vulnerable Groups:** EIB emphasizes that discrimination, entrenched social and gender roles and attitudes, gender-based violence and lack of access to decision-making can weaken the resilience of Indigenous People and other groups and render them disproportionately vulnerable to adverse project impacts.. The standard requires targeted measures to address gender-based violence and sexual exploitation, ensuring that such groups are not marginalized in the project's development and implementation.



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- **Gender-Specific Measures:** The standard mandates that projects consider the specific needs of women and girls, incorporating GBVH prevention into project planning and execution.
- **Standard 8: Labor Rights**
 - Prevention of Exploitation in the Workplace:** EIB projects must respect international labour standards, prohibiting sexual harassment and exploitation in the workplace. Employers are required to maintain policies and mechanisms that protect employees from GBVH and provide avenues for addressing grievances.
 - **Influx Management Plan:** The standard mandates that specific measures must be in place to address the risks of gender-based violence and potential adverse impacts in the case of significant influx of workers.
- **Standard 9: Health, Safety, and Security**
 - **Workplace and Community Safety:** EIB highlights the need for ensuring the safety of both workers and community members. This includes creating safe working conditions that protect against all forms of harassment, abuse, and exploitation.
 - **Incident Reporting:** In case of incidents like GBVH, the standard requires immediate reporting, investigation, and appropriate corrective actions to prevent recurrence.

Therefore, the GCF's SEAH policy is addressed by requesting the Fund Manager to screen the relevant policies and procedures of the issuers in line with these requirements in EIB's E&S Standards, which collectively cover a comprehensive framework for preventing more broadly GBVH in projects ensuring that the project environments remain safe and inclusive for all stakeholders.



Appendix 11. Resettlement Policy Framework

First, it should be noted that the proposed GCF investment into the GGBI does not relate to a standard project finance activity but rather to the purchasing of bonds on listed markets or through private issuance. This approach differs significantly from area-based project finance or equity funds, where the exact location and impact of the investment are known.

Per the GGBI's exclusion list, activities that would involve significant physical or economic resettlement or displacement (including due to environmental degradation), involuntary resettlement of indigenous peoples or local traditional communities and/or use of customary traditional or ancestral land are automatically excluded from GGBI investment.

In addition, the Fund Manager's ESG screening system will aim to screen controversies related to resettlements (if data is available, based on multiple industry ESG databases).

When applying its ESMS, the Fund Manager is expected to ensure that the issuer has policies and procedures that align with EIB's E&S Standards. Such policies and procedures should be aligned with the requirements of Standard 6 on Involuntary Resettlement and can be summarized as follows:

- **Avoidance and Minimization of Resettlement:** Involuntary resettlement should be avoided wherever possible. If unavoidable, the project design should be adjusted to minimize the impact. Efforts should be made to mitigate the social and economic impacts of the resettlement.
- **Eligibility Criteria and census:** The Promoter should identify the concerned persons as per paragraph 18 and should then conduct a census to identify all Project-Affected Persons (PAPs)
- **Consultation and Participation:** The promoter must ensure active and meaningful consultation with affected persons (PAPs) and disclose relevant information in a timely and accessible manner. The consultations should account for vulnerable and marginalized groups, including considerations on gender.
- **Compensation and Livelihood Restoration:** Compensation must be provided at full replacement cost for assets and other losses incurred due to the resettlement. Livelihoods and living standards should be restored or improved to pre-project levels.
- **Resettlement Planning:** The project promoter is required to prepare a **Resettlement Action Plan (RAP)** or a **Resettlement Policy Framework (RPF)**, and/or a Livelihood Restoration Plan depending on the scope of the resettlement. These plans should include a census, eligibility criteria, and measures for ensuring displaced persons are compensated fairly and have their livelihoods restored.
- **Vulnerable Groups and Gender Dimensions:** Special attention should be given to vulnerable groups and ensure they are protected in the resettlement process. Gender-specific issues must also be addressed, and women should have equal rights in resettlement processes and compensation mechanisms.
- **Grievance Mechanism:** The project must establish an appropriate grievance mechanism for PAPs to be able to raise any issues arising from the resettlement process. The mechanism should be socially appropriate and accessible to all and should not impede access to the country's judicial and administrative system.
- **Monitoring and Evaluation:** The project promoter is responsible for monitoring the resettlement process and ensuring its compliance with the EIB E&S standards. Monitoring reports should be submitted to the EIB, and if significant impacts occur, an external party must conduct a review or audit of the resettlement.

Appendix 12 Approach to Conflict Sensitivity

When EIB supports projects in fragile and conflict affected contexts (FCC), the guiding framework is the EIB's Strategic Approach to Fragility and Conflict. The Strategic Approach for Fragility and Conflict places importance on the contextualisation and multidimensional nature of fragility and conflict, emphasising forward-looking risks and a responsive and conflict prevention approach. The Strategic Approach is based on several guiding principles, with the most relevant for GCF's investment to GGBI being :

1. **Impact Driven Investments.** Projects should aim to actively contribute to conflict prevention, reducing fragility and building resilience, recovery and peace building. Investments in climate adaptation and mitigation will also aim to create peace amplifying economic opportunities and resilience.
2. **Conflict Sensitivity.** At a minimum, projects should avoid aggravating conflict when operating in FCC (do no harm principle), mitigate the conflict/fragility-related risks to the extent possible within the project context, and identify opportunities to do good.
3. **Social Sustainability and Inclusion.** Social sustainability and inclusion has relevance for all EIB geographies, but especially in FCC, where rights, resilience and equality are often critically absent. In FCC, projects should be enhanced to focus on the most disadvantaged, vulnerable, and excluded groups. The Strategic Approach promotes gender equality and protection from sexual exploitation and abuse/gender-based violence and harassment.

These guiding principles have been reflected in the EIB's Environmental and Social Standards and all of the social standards include approaches for FCC. In particular, the standards that are most relevant for FCC are:

1. **Environmental and Social Impact Assessment:** Promoters are required to consider whether the location of the project is in an area known to have a high occurrence of social risks such as presence of indigenous people, violation of human rights, including any actual and potential discrimination, conflict and/or social violence, gender-specific risks, labour rights as well as any conflict-affected and fragile situations;
2. **Stakeholder Engagement in FCC:** Projects in conflict or fragile settings should incorporate stakeholder engagement tailored to ensure safety and inclusivity. Promoters are encouraged to adapt consultation mechanisms to account for conflict risks, fostering safe participation;
3. **Systemic Discrimination and Governance Weaknesses:** Promoters are required to address systemic discrimination, weak governance, and risks of marginalization in conflict-affected and fragile areas by implementing measures to manage risks and mitigate adverse impacts on vulnerable groups;
4. **Risks from Worker Influx in Conflict Areas:** Promoters must manage risks associated with worker influx, such as exacerbation of tensions, gender-based violence, and other security issues in conflict and post-conflict affected areas;

In sum, the specific requirements EIB's E&S standards related to social aspects are generally designed to address issues which pertain to persons or groups affected by the project, in relation to cross-cutting dimensions such as: human rights, stakeholder engagement, gender equality, building resilience (in particular in conflict-affected and fragile situations), and social inclusion. These requirements ensure that EIB-financed projects operate responsibly in conflict-sensitive regions, addressing risks and enhancing benefits for affected communities.



Appendix 13 Sample of potential E&S risks and impacts in targeted countries

Below is a structured overview of potential environmental and social (E&S) risks and impacts by country and by illustrative types of climate change mitigation and adaptation projects. The categories of projects considered include:

1. Renewable Energy (Solar, Wind, Geothermal, Hydropower)
2. Climate-Resilient Agriculture & Irrigation Systems
3. Water Management & Infrastructure (Flood Control, Coastal Protection, Water Supply)
4. Forestry, Reforestation, and Land Restoration
5. Urban Transport & Energy Efficiency (Public Transportation, Green Buildings)
6. Waste Management & Circular Economy Initiatives

For each country, the key considerations include contextual governance strength, enforcement of labour laws, existing environmental regulations, and community relations. The E&S risks/impacts mentioned are not exhaustive but represent common issues that may arise in these project types.

The mitigating measures presented are just a sample of the best practices that issuers should implement to avoid, prevent and reduce any significant adverse effects of the projects to be supported by the green bonds.



Sector	Labour and Working Conditions	Environmental risks and impacts	Other E&S Risks	Mitigating Measures:
Kenya				
Renewable Energy (e.g., Wind Farms in Northern Kenya, Geothermal in Rift Valley)	<ul style="list-style-type: none"> - Risks of non-compliance with occupational health and safety (OHS) standards on remote construction sites. - Use of contractors and sub-contractors with weak labour oversight may lead to wage disputes and excessive working hours. 	<ul style="list-style-type: none"> - Dust and noise emissions during construction. - Possible hazardous material handling (transformer oils, lubricants) - Geothermal development risks such as sulphur gas emissions. - Impact on wildlife and avifauna (e.g. bird collisions with wind turbines). 	<ul style="list-style-type: none"> - Land acquisition and potential conflict with pastoralist communities over grazing lands. - Disturbance of sacred or culturally significant sites. 	<ul style="list-style-type: none"> - <i>Labour Risks:</i> Enforce occupational health and safety (OHS) standards; provide safety training and proper equipment. Implement fair wage policies, including for contractors. - <i>Environmental Risks:</i> Conduct EIAs; use bird-safe turbine designs; monitor sulphur emissions from geothermal projects; implement waste management plans for hazardous materials. - <i>Other Risks:</i> Conduct stakeholder consultations for land acquisition; compensate pastoralist communities fairly; preserve culturally significant sites through mapping and engagement.
Climate-Resilient Agriculture & Irrigation Projects (Arid and Semi-Arid Lands)	<ul style="list-style-type: none"> - Use of seasonal, casual labour with inadequate rest periods and poor wage conditions. - Health hazards from exposure to pesticides. 	<ul style="list-style-type: none"> - Agrochemical runoff into water sources. - Soil contamination and reduced soil fertility from improper fertilizer use. - Biodiversity loss from monoculture farming. 	<ul style="list-style-type: none"> - Competition for water resources with local communities. - Displacement of subsistence farmers if project sites are not well planned 	<ul style="list-style-type: none"> - <i>Labour Risks:</i> Implement fair wage policies; provide protective gear for pesticide handling. - <i>Environmental Risks:</i> Promote organic farming techniques; establish runoff control systems. - <i>Other Risks:</i> Develop water-sharing agreements; involve subsistence farmers in project planning..



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Sector	Labour and Working Conditions	Environmental risks and impacts	Other E&S Risks	Mitigating Measures:
Water Management & Infrastructure (e.g. Dams, Flood Control)	<ul style="list-style-type: none"> - Risk of accidents during dam construction and handling heavy machinery. - Temporary labour camps with insufficient sanitation and living conditions. 	<ul style="list-style-type: none"> - Siltation and water turbidity affecting downstream ecosystems. - Construction debris management. 	<ul style="list-style-type: none"> - Downstream impact on fisheries and aquatic habitats. - Resettlement of communities and loss of livelihoods if water flow patterns change. 	<ul style="list-style-type: none"> - <i>Labour Risks</i>: Provide sanitation and adequate accommodations for workers; implement safety training for handling heavy machinery. - <i>Environmental Risks</i>: Conduct EIAs; install sediment traps; establish waste disposal plans. - <i>Other Risks</i>: Create Resettlement Action Plans (RAPs); protect downstream fisheries through water flow regulation.
Cote d'Ivoire				
Renewable Energy (e.g. Solar Farms, Biomass Projects)	<ul style="list-style-type: none"> - Potential child labour risks, particularly in rural biomass supply chains. - Limited labour inspections in remote areas. 	<ul style="list-style-type: none"> - Improper disposal of solar panel packaging and electronic waste from panel end-of-life. 	<ul style="list-style-type: none"> - Land disputes with local communities. - Reduced availability of agricultural residues for local use if diverted to biomass energy. 	<ul style="list-style-type: none"> - <i>Labour Risks</i>: Strengthen labour inspections in rural areas; ensure child labour is eliminated in supply chains. - <i>Environmental Risks</i>: Conduct EIAs; develop recycling systems for solar panel waste; regulate agricultural residue use to avoid local shortages. - <i>Other Risks</i>: Address land disputes through participatory land-use planning.



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Sector	Labour and Working Conditions	Environmental risks and impacts	Other E&S Risks	Mitigating Measures:
Climate-Resilient Agriculture (Cocoa and Coffee Regions)	<ul style="list-style-type: none"> - Risk of forced or child labour in remote plantations. - Poor sanitation and lack of protective equipment. 	<ul style="list-style-type: none"> - Overuse of pesticides and fertilizers leading to soil and water contamination. - Loss of biodiversity from monoculture expansions. 	<ul style="list-style-type: none"> - Community conflicts if benefit-sharing mechanisms are not clear. 	<ul style="list-style-type: none"> - <i>Labour Risks</i>: Provide protective gear and sanitation facilities; enforce child and forced labour prohibitions. - <i>Environmental Risks</i>: Implement integrated pest management (IPM) techniques; promote crop diversity. - <i>Other Risks</i>: Establish clear and fair benefit-sharing mechanisms involving affected communities.
Uganda				
Renewable Energy (e.g. Small Hydropower, Solar Mini-Grids)	<ul style="list-style-type: none"> - Unsafe conditions for workers in dam construction. - Underpayment of local labour during project phases. - Informal labour arrangements with inadequate training and OHS measures. 	<ul style="list-style-type: none"> - Habitat destruction near dam sites. - Temporary increase in sedimentation during construction. - Improper disposal of solar infrastructure. - Alteration of river flow affecting fish habitats. 	<ul style="list-style-type: none"> - Displacement of local communities. - Land acquisition issues, affecting smallholder farmers. - Inadequate stakeholder engagement with local communities and cultural leaders. 	<ul style="list-style-type: none"> - <i>Labour Risks</i>: Provide formal contracts and OHS training; ensure fair wages. - <i>Environmental Risks</i>: Conduct EIAs, stabilize riverbanks to reduce sedimentation; establish solar infrastructure recycling systems. - <i>Other Risks</i>: Engage local communities and cultural leaders in decision-making; provide fair compensation for land acquisition.



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Sector	Labour and Working Conditions	Environmental risks and impacts	Other E&S Risks	Mitigating Measures:
Forestry & Land Restoration (e.g. Tree Plantations, Agroforestry)	<ul style="list-style-type: none"> - Seasonal workers with limited contract protection. - Poor working conditions in rural areas. - Possible underpayment and lack of grievance mechanisms. 	<ul style="list-style-type: none"> - Use of herbicides to clear invasive species leading to soil and water pollution. 	<ul style="list-style-type: none"> - Encroachment on community land and traditional grazing areas. - Loss of native biodiversity if commercial species dominate 	<ul style="list-style-type: none"> - <i>Labour Risks</i>: Ensure grievance mechanisms for seasonal workers; standardize fair pay. - <i>Environmental Risks</i>: Limit herbicide use; prioritize native species for reforestation. - <i>Other Risks</i>: Clarify land ownership to prevent encroachment on community land.
Namibia				
Wind and Solar Energy Projects in Desert Areas	<ul style="list-style-type: none"> - Harsh working conditions (e.g. extreme heat) for labourers in arid regions. - Inadequate worker accommodations due to remote locations. 	<ul style="list-style-type: none"> - Groundwater overextraction leading to salinization. - Disturbance of sensitive desert ecosystems and rare species habitats 	<ul style="list-style-type: none"> - Visual impact on tourism landscapes. 	<ul style="list-style-type: none"> - <i>Labour Risks</i>: Provide heat-resistant clothing and shaded rest areas for workers as well as adequate accommodations for labourers. - <i>Environmental Risks</i>: Conduct EIAs; implement water-saving measures during construction; consider and avoid rare species habitats. - <i>Other Risks</i>: Design projects to minimize visual impact on tourism landscapes.



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Sector	Labour and Working Conditions	Environmental risks and impacts	Other E&S Risks	Mitigating Measures:
Drought Management and Water Infrastructure (e.g. Desalination Plants, Coastal Protection)	<ul style="list-style-type: none"> - Long working hours at remote coastal sites.. - Need for proper OHS measures when handling chemicals for desalination. 	<ul style="list-style-type: none"> - Brine discharge affecting marine ecosystems. - Chemical storage and handling risks. - Potential impacts on marine protected areas. 	<ul style="list-style-type: none"> - Conflicts over coastal land use (fishing communities vs. infrastructure). 	<ul style="list-style-type: none"> - <i>Labour Risks</i>: Enforce chemical handling protocols; regulate working hours at remote sites. - <i>Environmental Risks</i>: Conduct EIAs; use eco-friendly desalination technology; monitor brine discharge into marine ecosystems. - <i>Other Risks</i>: Engage fishing communities in coastal land use planning.
Senegal				
Coastal Protection and Flood Management	<ul style="list-style-type: none"> - Health hazards for workers exposed to floodwaters. - Informal labour lacking job security. 	<ul style="list-style-type: none"> - Marine pollution from seawall construction materials. - Loss of habitats for marine species. 	<ul style="list-style-type: none"> - Displacement of coastal communities. 	<ul style="list-style-type: none"> - <i>Labour Risks</i>: Provide PPE and training for floodwater exposure; formalize contracts for informal labourers. - <i>Environmental Risks</i>: Use sustainable construction materials; restore marine habitats post-construction. - <i>Other Risks</i>: Relocate displaced communities with fair compensation and livelihood programs.
Agriculture/Irrigation Schemes (River Delta Management)	<ul style="list-style-type: none"> - Seasonal labour without adequate contract terms. - Hazardous pesticide use without PPE. 	<ul style="list-style-type: none"> - Nutrient runoff leading to eutrophication in water bodies. - Reduced water availability downstream, affecting local fisheries and livelihoods. 	<ul style="list-style-type: none"> - Conflict between smallholders and commercial farms. 	<ul style="list-style-type: none"> - <i>Labour Risks</i>: Ensure seasonal workers have contracts and access to grievance mechanisms. - <i>Environmental Risks</i>: Introduce nutrient runoff control systems; promote sustainable pesticide use.



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Sector	Labour and Working Conditions	Environmental risks and impacts	Other E&S Risks	Mitigating Measures:
				- <i>Other Risks</i> : Develop equitable water allocation plans to avoid conflicts.
Solar PV and Wind Projects (Sahelian Regions)	<ul style="list-style-type: none"> - Inadequate safety measures for construction workers. - Limited employment opportunities for local communities. - Potential for migrant labour with poor working conditions. 	<ul style="list-style-type: none"> - Soil disturbance and dust generation. - Solid waste from construction materials and damaged solar panels. - Impact on migratory bird populations. 	<ul style="list-style-type: none"> - Land acquisition conflicts. - Potential displacement of marginal land users. 	<ul style="list-style-type: none"> - <i>Labour Risks</i>: Provide safety training and personal protective equipment (PPE) for all workers, especially during installation and maintenance. Ensure formal contracts and fair wages for labourers, with grievance mechanisms in place. Use local contractors and suppliers where possible. - <i>Environmental Risks</i>: Conduct EIAs. Implement biodiversity management plans to protect migratory bird routes and bat populations. Establish proper recycling programs for end-of-life solar panels and wind turbine components. - <i>Other Risks</i>: Engage local communities in project planning to address land use conflicts and ensure fair compensation for land acquisition.
Cameroon				
Reforestation & Agroforestry Projects (Rainforest Regions)	<ul style="list-style-type: none"> - Low wages and temporary contracts for tree planters. - Limited training on safe use of planting equipment. 	<ul style="list-style-type: none"> - Chemical use for weed and pest control. - Monoculture plantations reducing biodiversity. 	<ul style="list-style-type: none"> - Displacement of indigenous communities if land rights are not respected. 	<ul style="list-style-type: none"> - <i>Labour Risks</i>: Offer long-term contracts to tree planters; provide training on safe equipment use. - <i>Environmental Risks</i>: Limit chemical use for pest control; preserve native biodiversity.



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Sector	Labour and Working Conditions	Environmental risks and impacts	Other E&S Risks	Mitigating Measures:
				- <i>Other Risks</i> : Respect indigenous land rights through participatory land management.
Hydropower Development	<ul style="list-style-type: none"> - High-risk construction environments with potential for accidents. - Potential use of migrant or undocumented labour. 	<ul style="list-style-type: none"> - Sedimentation and ecosystem disruption in rivers. - Reservoir creation leading to greenhouse gas emissions from decaying biomass. - Impacts on fisheries and aquatic life. 	<ul style="list-style-type: none"> - Large-scale resettlement and loss of agricultural land for local communities. - Changes in downstream water flows affecting fisheries and navigation. 	<ul style="list-style-type: none"> - <i>Labour Risks</i>: Monitor migrant labourers working conditions; ensure compliance with safety standards. - <i>Environmental Risks</i>: Conduct EIAs. Manage sedimentation through upstream vegetation; minimize greenhouse gas emissions from reservoirs. - <i>Other Risks</i>: Establish community benefit-sharing agreements; regulate downstream water flows.
Angola				
Urban Adaptation Projects	<ul style="list-style-type: none"> - Informal and unsafe working conditions for drainage projects. - Lack of gender-sensitive labour policies. 	<ul style="list-style-type: none"> - Solid waste pollution exacerbating urban flooding. 	<ul style="list-style-type: none"> - Unequal access to benefits of urban flood management systems. - Increased displacement in low-income areas. 	<ul style="list-style-type: none"> - <i>Labour Risks</i>: Improve labour conditions for workers; introduce gender-sensitive policies. - <i>Environmental Risks</i>: Create urban waste recycling programs; improve drainage to reduce urban flooding. - <i>Other Risks</i>: Ensure low-income areas benefit equally from projects; relocate displaced populations equitably.
Climate-Resilient Agriculture (Irrigation in	<ul style="list-style-type: none"> - Poor field sanitation and exposure to agrochemicals. 	<ul style="list-style-type: none"> - Fertilizer runoff leading to water quality issues. 	<ul style="list-style-type: none"> - Resource conflicts between commercial agriculture and subsistence farmers. 	<ul style="list-style-type: none"> - <i>Labour Risks</i>: Provide adequate sanitation facilities for field workers; train workers on safe agrochemical use.



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Sector	Labour and Working Conditions	Environmental risks and impacts	Other E&S Risks	Mitigating Measures:
Drought-Prone Areas)		- Loss of traditional seed varieties and local food security concerns.		- <i>Environmental Risks</i> : Promote natural fertilizers to reduce runoff; preserve traditional seed varieties. - <i>Other Risks</i> : Resolve resource conflicts with inclusive planning processes
Renewable Energy Expansion (e.g. Solar and Wind Projects)	- Poor working conditions in remote project sites. - Lack of safety measures for high-risk jobs (e.g. working at heights).	- Disposal of e-waste from solar and battery systems. - Waste management of packaging materials and equipment. - Localized dust and noise during construction. - Ecosystem impacts during construction phases.	- Land acquisition in rural areas with unclear tenure. - Pressure on scarce water resources for construction in arid zones.	- <i>Labour Risks</i> : Provide safety training, PPE, and fair contracts; monitor working conditions. • <i>Environmental Risks</i> : Conduct EIAs; implement recycling systems for solar panels and turbine components. • <i>Other risks</i> : Engage local communities, ensure fair land compensation, and establish benefit-sharing mechanisms.
Bangladesh				
Coastal Protection & Flood Management (e.g. Embankments, Mangrove Restoration)	- Construction crews working in flood-prone areas with inadequate safety measures. - Informal work arrangements with low pay. - Potential exploitation of migrant labourers.	- Sedimentation altering river ecosystems. - Construction debris and waste management challenges. - Loss of mangrove habitat affecting fisheries and coastal protection services.	- Inadequate resettlement planning if people are relocated from high-risk areas.	- <i>Labour Risks</i> : Provide safety gear and flood risk training; formalize contracts for migrant workers. - <i>Environmental Risks</i> : Use sedimentation management techniques; recycle construction waste. - <i>Other Risks</i> : Establish robust resettlement plans for relocated communities.



Annex VI (b) – Environmental and Social Management Framework

Green Climate Fund Funding Proposal

Sector	Labour and Working Conditions	Environmental risks and impacts	Other E&S Risks	Mitigating Measures:
Renewable Energy Initiatives (e.g. Solar Home Systems, Wind Projects)	<ul style="list-style-type: none"> - Informal labour markets leading to low wages and lack of formal contracts. - Insufficient training in safe electrical installations. 	<ul style="list-style-type: none"> - Battery disposal from off-grid solar systems. - Disruption of ecosystems during project construction. 	<ul style="list-style-type: none"> - Lack of adequate consultation and limited access to project benefits. - Land conflicts in densely populated areas. 	<ul style="list-style-type: none"> - <i>Labour Risks</i>: Train workers on safe electrical installations; enforce fair labour practices. - <i>Environmental Risks</i>: Conduct EIAs; establish battery recycling plants; restore ecosystems post-construction. - <i>Other Risks</i>: Engage vulnerable communities in consultations; resolve land conflicts collaboratively.
Egypt				
Water Desalination and Irrigation Systems	<ul style="list-style-type: none"> - Unsafe conditions during canal rehabilitation. - Limited enforcement of health and safety standards. 	<ul style="list-style-type: none"> - Soil salinity issues from inefficient irrigation. - Brine discharge impacting marine life. - Chemical storage and handling risks. 	<ul style="list-style-type: none"> - Water-use conflicts among communities. - Potential changes to coastal communities' access to fisheries. - Inequitable water allocation leading to social tensions. 	<ul style="list-style-type: none"> - <i>Labour Risks</i>: Enforce safety measures during canal rehabilitation; improve worker accommodations. - <i>Environmental Risks</i>: Use brine discharge diffusers to protect marine life; address soil salinity with improved irrigation techniques. - <i>Other Risks</i>: Facilitate water-sharing agreements among communities.
Solar PV and Wind Projects (Desert and Red Sea Coast)	<ul style="list-style-type: none"> - Informal labour in solar and wind projects. - Extreme heat exposure risks. - Potential lack of proper 	<ul style="list-style-type: none"> - Improper disposal of renewable energy infrastructure. - Dust and habitat disturbance in desert ecosystems. <p>Impact on migratory birds along Red Sea flyways.</p>	<ul style="list-style-type: none"> - Potential cultural heritage site disturbances in desert areas. 	<ul style="list-style-type: none"> - <i>Labour Risks</i>: Ensure proper accommodations for migrant workers; provide heat safety protocols. - <i>Environmental Risks</i>: Conduct EIAs; minimize habitat disturbance during construction; recycle old solar panels and wind turbines.



Annex VI (b) – Environmental and Social Management Framework

Green Climate Fund Funding Proposal

Sector	Labour and Working Conditions	Environmental risks and impacts	Other E&S Risks	Mitigating Measures:
	accommodations for migrant workers.			- <i>Other Risks</i> : Conduct cultural heritage assessments before project development.
Brazil				
Forestry, REDD+ Projects, and Agroforestry (Amazon Forest Conservation)	<ul style="list-style-type: none"> - Exploitation of indigenous workers. - Informal labour with limited protections in remote forests. - Exposure to agrochemicals in plantation settings. 	<ul style="list-style-type: none"> - Soil degradation if monocultures are planted. - Encroachment into protected areas. 	<ul style="list-style-type: none"> - Displacement of indigenous communities. - Conflicts with indigenous peoples over ancestral land rights. 	<ul style="list-style-type: none"> - <i>Labour Risks</i>: Ensure legal protections for indigenous workers; monitor for forced labour practices. - <i>Environmental Risks</i>: Promote mixed-species plantations to maintain soil health; restrict agrochemical use. - <i>Other Risks</i>: Partner with indigenous groups for land co-management; resolve ancestral land disputes.
Renewable Energy (e.g. Hydropower, Wind Farms in Northeastern Brazil, Solar Farms in Semi-Arid Regions)	<ul style="list-style-type: none"> - Risks of forced labour or labour trafficking in remote Amazon projects. - Inadequate safety measures for workers at height (wind turbines). 	<ul style="list-style-type: none"> - Alteration of river ecosystems and methane emissions from new reservoirs. - Noise and dust during construction phases. - Biodiversity loss due to habitat fragmentation. 	<ul style="list-style-type: none"> - Displacement of indigenous and traditional communities, affecting livelihoods. 	<ul style="list-style-type: none"> - <i>Labour Risks</i>: Monitor labour standards for remote workers; provide safety measures for working at heights. - <i>Environmental Risks</i>: Conduct EIAs; manage methane emissions from reservoirs; restore fragmented habitats post-construction. - <i>Other Risks</i>: Engage local communities in benefit-sharing; address displacement with livelihood support programs.
Urban Climate Adaptation (e.g. Flood Prevention, Water)	<ul style="list-style-type: none"> - Unsafe conditions for informal workers during infrastructure upgrades. 	<ul style="list-style-type: none"> - Solid waste generation during construction. - Air and noise pollution during construction of infrastructure. 	<ul style="list-style-type: none"> - Inequitable access to climate-resilient infrastructure. - Community disturbances during 	<ul style="list-style-type: none"> - <i>Labour Risks</i>: Ensure fair working conditions for informal labourers; provide safety equipment and training for workers involved in urban infrastructure upgrades.



Sector	Labour and Working Conditions	Environmental risks and impacts	Other E&S Risks	Mitigating Measures:
Management, Heat Adaptation)	<ul style="list-style-type: none">- Traffic hazards for construction workers in urban settings.- Potential issues with subcontractors not meeting labour standards.		construction (traffic congestion, reduced access).	<ul style="list-style-type: none">- <i>Environmental Risks</i>: Use green infrastructure solutions, such as urban green spaces and permeable surfaces, to manage flooding and reduce heat islands.- <i>Other Risks</i>: Prioritize equitable access to climate-resilient infrastructure for low-income areas; engage communities in urban planning to ensure their needs are met.

In summary, addressing these issues requires robust E&S management plans, stakeholder engagement, capacity building for contractors, strict enforcement of labor laws, compliance with international E&S standards, and transparent benefit-sharing mechanisms.