



PROMASS ENGINEERING SERVICES LIMITED

ENVIRONMENTAL AND SOCIAL EXCLUSION CRITERIA

For the Proposed 1 MW Solar Hybrid Interconnected Mini-grid Project under the Distributed Access through Renewable Energy Scale-up (DARES) Programme

Submission purpose: Project-level eligibility and exclusion standard for screening project sites, associated facilities, contractors, suppliers, technologies and activities before commitment, procurement, construction, interconnection, energisation, operation or decommissioning.

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Prepared by	Promass Engineering Services Limited
Approved by	Dr Sani Mohammed Bida, MD/CEO

This is a controlled document. Uncontrolled copies shall be checked against the current approved version before use.

DOCUMENT APPROVAL AND CONTROL

Promass Engineering Services Limited approves this Environmental and Social Exclusion Criteria document as the mandatory first gate for the proposed DARES Interconnected Mini-grid Project. It shall be applied before land commitment, design freeze, contractor or supplier appointment, material procurement, construction, network interface work, energisation and any material project change.

Role	Name / Position	Signature	Date
Prepared / coordinated by	Environmental and Social Manager		29 July 2026
Reviewed by	Project Director / Technical Lead		
Approved by	Dr Sani Mohammed Bida, MD/CEO		

Revision history

Version	Date	Description of change	Approval
0.1	08 September 2025	Original environmental and social exclusion criteria contained in Annex 3 of the Promass ESMS for a proposed standalone mini-grid.	MD/CEO
1.0	29 July 2026	Expanded into a controlled project-level exclusion document for the DARES Interconnected Mini-grid Project, including decision gates, DisCo interface, electrical safety, battery and e-waste, supply chain, land, biodiversity, cultural heritage, labour and community criteria.	MD/CEO

Controlled distribution

Controlled holder	Use
MD/CEO and Project Director	Approval, investment and final eligibility decisions.
E&S Manager	Screening, evidence review, escalation, register maintenance and reporting.
Technical / Interconnection Lead	Technical eligibility, grid interface and energisation controls.
Procurement and Contracts	Bidder, supplier, equipment and contractual exclusion screening.
Project Manager / EPC / O&M Contractor	Site application, subcontractor control and change management.
REA / DARES and relevant DisCo	Submission, review and interface clearance, as applicable.

Required before submission: Complete the project location, host communities, installed capacity, DisCo, point of common coupling, land status, relevant permits, named screening officers and approval contacts. The current DARES/REA exclusion list and any written programme or lender direction shall be attached to the controlled project copy.

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EXECUTIVE SUMMARY

This document establishes the environmental and social activities, locations, arrangements, counterparties and technical conditions that Promass Engineering Services Limited will not accept for the proposed 1 MW Solar Hybrid Interconnected Mini-grid Project under the DARES Programme. It expands the exclusion criteria contained in the company ESMS into a project-level, auditable decision standard.

The exclusion process is preventive. It is applied before commitments are made and before adverse impacts are created. Screening covers the generation site, battery system, powerhouse, transformers, switchgear, point of common coupling, distribution lines, access roads, storage areas, temporary camps, borrow or disposal areas, customer connection activities, contractors, subcontractors, labour providers, primary suppliers and material design changes.

Mandatory rule: Where an exclusion trigger is known or reasonably suspected, Promass shall not acquire land, promise compensation, award or mobilise a contract, procure affected equipment, commence works, connect to the network or energise the system until the matter is documented, independently verified where necessary, and resolved through the applicable decision route. No commercial urgency overrides an exclusion criterion.

Decision outcomes

RED - REJECT	The activity or site is prohibited, illegal, inconsistent with the current DARES/REA exclusion list, or presents an unacceptable impact that cannot be reduced to an eligible level. The opportunity is rejected and recorded.
AMBER - HOLD / REFER	A red flag or information gap exists. No commitment may proceed. Additional studies, alternatives, consultation, permits, RAP/LRP, biodiversity or cultural heritage review, DisCo clearance or written REA direction is required.
GREEN - PROCEED WITH CONTROLS	No exclusion applies and evidence is adequate. The project may proceed to normal risk categorisation and preparation of site-specific safeguards instruments, permits, contracts and monitoring controls.

Core exclusion themes

- Forced labour, trafficking, debt bondage, child labour and serious worker-rights abuse.
- Illegal hazardous activities, uncontrolled battery or electronic-waste disposal, open burning and unlawful cross-border waste movement.
- Protected areas, internationally recognized biodiversity areas, critical habitat and significant degradation of natural habitat.
- Flood-prone locations and other hazard zones where the current DARES/REA list or law prohibits development.
- Illegal forced eviction, unresolved displacement, uncompensated project-related removal, coercive land donation and disputed rights.
- Destruction, relocation or significant adverse impact on critical cultural heritage.
- Unapproved interconnection, energisation or live electrical work, and technical arrangements creating unacceptable risk of back-feed, islanding, electrocution, fire or system instability.
- Security, discrimination, community safety or human-rights arrangements inconsistent with law, proportionality and the project Code of Conduct.

1. INTRODUCTION

1.1 Background

The original Promass ESMS included an Environmental and Social Exclusion Criteria annex for mini-grid developers, solar-home-system companies, contractors and mini-grid or power-generation sites. It excluded forced labour, child labour, unlawful cross-border waste movements, non-compliant sites, protected and internationally recognized areas, critical habitat, significant natural-habitat degradation, flood-prone zones, uncompensated project-related displacement, illegal forced eviction and significant adverse impacts on physical cultural property.

The amended DARES ESMS retained those commitments and added interconnected-mini-grid controls for land and livelihood due diligence, battery and e-waste, DisCo approvals, electrical safety, energisation, security and vulnerable groups. This standalone document consolidates those requirements and defines how Promass will make and record eligibility decisions.

1.2 Purpose

- Prevent Promass from entering sites, contracts, technologies or activities that are ineligible or unacceptable.
- Provide an early, consistent and traceable screen for business-development, engineering, procurement and project teams.
- Distinguish absolute exclusions from red flags that require a hold, specialist assessment and written decision.
- Ensure alternatives are considered before land, cost or schedule commitments create pressure to accept an unsuitable option.
- Provide documentary evidence for REA/DARES review, lender due diligence, DisCo coordination, contractor management and internal audit.

1.3 Status and hierarchy

This document is a mandatory component of the Promass ESMS. It does not replace an ESIA, ESMP, Stakeholder Engagement Plan, Labour Management Plan, RAP, LRP, biodiversity assessment, security plan, emergency plan or interconnection study. Passing the exclusion screen only means that the option may proceed to normal risk assessment and permitting. Where requirements differ, the more protective current requirement applies unless REA provides written direction otherwise.

2. PROJECT AND APPLICATION BOUNDARY

2.1 Project concept

The proposed project comprises solar photovoltaic generation, battery energy storage and associated balance-of-system equipment connected to an existing distribution network through an agreed point of common coupling. It may include a powerhouse or containerized systems, inverters, battery management systems, transformers, switchgear, protection, metering, overhead or underground distribution, service connections, access routes, temporary work areas and network rehabilitation.

2.2 Persons and entities covered

- Promass directors, employees, consultants and project-development teams.
- EPC, O&M and specialist contractors; subcontractors; labour brokers; transporters; security providers and waste handlers.
- Suppliers and manufacturers of solar modules, batteries, inverters, transformers, switchgear, cables, poles and related equipment.
- Landowners, occupants, tenants, users, customary rights holders and any person affected by access or land arrangements.
- Associated facilities and third-party infrastructure that are necessary for the project to function and are under Promass influence or control.

2.3 Activities and decisions covered

Decision point	Exclusion screen required
Opportunity identification	Before public announcement, exclusivity agreement or representation that a site has been selected.
Site and land due diligence	Before option, lease, donation, purchase, compensation, clearing or access commitment.
Concept and detailed design	Before design freeze and after any route, capacity, technology or point-of-common-coupling change.
Procurement	Before prequalification, award, purchase order or acceptance of primary equipment and waste services.
Construction and mobilisation	Before mobilisation and whenever unforeseen conditions or new red flags arise.
Interconnection and energisation	Before interface work, testing, switching, back-feed or energisation.
Operation and decommissioning	Before major modification, battery replacement, waste transfer, closure, site relinquishment or asset transfer.

3. POLICY BASIS AND GOVERNING PRINCIPLES

3.1 Source and compliance basis

The criteria are based on the Promass ESMS exclusion list and screening procedures, the amended DARES Interconnected Mini-grid ESMS, applicable DARES/REA programme requirements, the World Bank Environmental and Social Framework, applicable Nigerian environmental, labour, land, planning, electricity and safety requirements, the Basel Convention for hazardous-waste movements, and relevant DisCo technical and safety requirements. The current applicable versions shall be confirmed in the project legal and obligations register before each formal eligibility decision.

3.2 Governing principles

Principle	Application
Legality	Promass will not support an activity that is illegal or lacks a lawful route to required approval.
Avoidance first	An unsuitable site, route, supplier or design is changed or rejected before reliance on mitigation or compensation.
Precaution	A material information gap is an AMBER hold, not evidence of eligibility.
No harm created by screening	Promass will not clear land, displace people, disclose sensitive data or disturb heritage merely to determine eligibility.
Meaningful consent and consultation	Land or stakeholder acceptance obtained through coercion, misinformation, political pressure or unrealistic refusal rights is invalid.
Highest-risk component governs	Where a project contains several sites or associated facilities, the most restrictive applicable decision governs until components are separated and independently viable.
No segmentation	Infrastructure will not be divided into smaller contracts or phases to avoid an exclusion or assessment requirement.
Evidence and accountability	Every decision requires named reviewers, dated evidence, conditions, approvals and a retrievable record.

3.3 Relationship to risk categorisation

Exclusion screening precedes risk categorisation. A GREEN result does not mean low risk. It means no exclusion has been identified. The project must then be categorised and subjected to proportionate assessment and management. An AMBER item is not categorised as acceptable until the hold condition is resolved. A RED decision is not converted to GREEN by an ESMP or contractor method statement.

4. DEFINITIONS

Term	Definition
Associated facility	A facility or activity not necessarily financed as part of the project but necessary for project viability and developed or controlled in coordination with it.
Child labour	Work by a person below the applicable minimum age or work by a person below 18 that is hazardous, exploitative, interferes with education or harms development. Promass applies a minimum project-employment age of 18.
Critical cultural heritage	Cultural heritage of high significance, including legally protected, internationally recognized or community heritage whose loss, destruction or material alteration would be unacceptable.
Critical habitat	An area with high biodiversity value requiring particular protection, including habitat important for endangered, endemic, restricted-range, migratory or congregatory species and certain highly threatened or unique ecosystems.
Economic displacement	Loss of land, assets, access to assets, income sources or means of livelihood caused by land acquisition or restrictions on land use, whether or not physical relocation occurs.
Exclusion criterion	A condition that makes an activity, site, entity, technology or arrangement ineligible or requires a formal hold and referral before it can be considered.
Forced eviction	Permanent or temporary removal against the will of individuals or communities without appropriate legal protection, due process, notice, consultation, grievance opportunity and remedy.
Forced labour	Work or service not voluntarily performed and extracted under threat, penalty, coercion, abduction, fraud, deception, debt or restriction of movement.
Internationally recognized area	An area recognized for global biodiversity or heritage importance, including applicable UNESCO, Ramsar, biosphere, key biodiversity or equivalent designations.
Natural habitat	Land or water where biological communities are formed largely by native species and primary ecological functions have not been essentially modified.
Physical displacement	Relocation, loss of residential land or loss of shelter resulting from project-related land acquisition or restrictions.
Point of common coupling	The agreed electrical interface between the interconnected mini-grid and the existing distribution network.
Significant adverse impact	An impact of sufficient magnitude, extent, duration, irreversibility, likelihood or receptor sensitivity to require rejection, major redesign or specialist assessment.
Voluntary land donation (VLD)	A transfer of land without compensation that is valid only when fully informed, genuinely voluntary, documented and capable of being refused without retaliation or loss of unrelated benefit.

5. EXCLUSION DECISION FRAMEWORK

5.1 Decision classes

Class	Meaning	Permitted action	Authority
RED - Reject	The criterion is prohibited, unlawful, explicitly excluded, or cannot be made eligible without changing the essential site, activity or counterparty.	Stop. Record the reason. Do not negotiate, procure, mobilise, construct or energise.	MD/CEO on recommendation of E&S Manager; notify REA where required.
AMBER - Hold / Refer	A credible red flag, uncertainty, missing evidence or potentially significant impact exists.	Freeze commitment. Obtain specialist study, alternatives, consultation, permit or written clearance. Re-screen after evidence is complete.	E&S Manager and Project Director; written REA/DisCo clearance where applicable.
GREEN - Proceed with controls	No exclusion is identified and evidence is adequate.	Proceed to risk categorisation, site-specific instruments, permits and contract controls.	E&S Manager and Project Director.

5.2 Decision rules

1. A single confirmed RED criterion makes the affected site, activity, package or counterparty ineligible.
2. Where the RED issue can be removed through a genuine alternative - for example, relocating a route away from critical habitat - the alternative is screened as a new option; the original option remains rejected.
3. Any uncertainty about protected status, ownership, displacement, critical habitat, cultural heritage, hazardous waste, child or forced labour, or electrical authorization is AMBER until resolved.
4. Verbal assurances are not evidence where documents, mapping, permits, title records, consultation records or technical approvals should reasonably exist.
5. A decision is invalid if made by a person with an undisclosed financial, land, family or contractual conflict of interest.
6. Conditional approval shall state the exact condition, responsible person, deadline and evidence required; work affected by the condition remains prohibited until formal closure.

5.3 Stop-work discovery rule

Unforeseen exclusion trigger: If construction or operation reveals an archaeological find, disputed ownership, unrecorded occupant, critical habitat feature, hazardous contamination, child or forced labour, illegal waste practice, unsafe back-feed, unauthorized switching or another potential exclusion, the affected work shall stop, the area shall be made safe, and the E&S Manager shall lead re-screening before work resumes.

6. PROHIBITED COMPANY, LABOUR AND BUSINESS ACTIVITIES

The following are RED exclusions for Promass, its contractors, subcontractors, suppliers, labour providers and waste handlers:

Excluded activity	Criterion
Forced labour and trafficking	Use of forced, bonded, indentured, prison or trafficked labour; retention of identity documents; restriction of movement; recruitment debt; threats or penalties preventing voluntary termination.
Child labour	Employment of any person below 18 on the project; use of children by subcontractors or informal suppliers; hazardous, night, electrical, lifting, excavation, transport or battery work by persons under 18.
Illegal or sanctioned activity	Activities prohibited by applicable law, permit condition, DARES/REA requirement or binding financing condition.
Illegal hazardous waste trade	Unlawful cross-border transport or trade in hazardous waste; shipment inconsistent with the Basel Convention or applicable national requirements.
Weapons and harmful products	Production or trade in weapons, ammunition, illegal drugs or other products expressly excluded by current DARES/REA requirements.
Corruption and coercion	Bribery, fraudulent documents, coercive land acquisition, intimidation of stakeholders or payment to suppress grievances or conceal incidents.
Serious discrimination or abuse	Business arrangements that require or tolerate unlawful discrimination, SEA/SH, GBV, violence against children, collective punishment or retaliation.
Deliberate concealment	Knowingly concealing a material environmental or social incident, protected-area status, displacement, labour abuse, ownership dispute, waste destination or electrical safety failure.

6.1 Counterparty remedy and disengagement

Where a prohibited practice is found after engagement, Promass shall protect affected persons, stop the relevant activity, preserve evidence, notify the appropriate internal and external authorities, require immediate remedy and determine whether termination or replacement is necessary. Remedy to affected workers or communities does not automatically restore eligibility; re-engagement requires documented senior approval and any required REA direction.

7. SITE AND LOCATION EXCLUSION CRITERIA

Trigger	Exclusion criterion	Decision
Legal non-compliance	Site or route prohibited by environmental, land, planning, electricity, road, aviation, fire, heritage or other applicable law; or no lawful pathway to required approval.	RED
Legally protected area	Generation, storage, distribution or access infrastructure within a legally protected area where development is prohibited or would undermine conservation objectives.	RED
Internationally recognized area	Site within a UNESCO natural heritage property, biosphere reserve, Ramsar wetland, key biodiversity area or equivalent designation where significant adverse impact cannot be avoided.	RED / AMBER pending specialist confirmation
Critical habitat	Activity in critical habitat that would cause measurable adverse impact, reduction in biodiversity value, habitat fragmentation or loss of ecological function inconsistent with applicable requirements.	RED
Significant natural-habitat conversion	Large-scale or irreversible conversion or degradation of natural habitat where feasible alternatives exist or acceptable approval and mitigation are not available.	RED
Flood-prone zone	Site identified as flood-prone under the applicable DARES/REA exclusion list or where safe design, access, emergency response and long-term resilience cannot be demonstrated.	RED by default; written REA reconsideration only where expressly permitted
Geotechnical or natural hazard	Landslide, erosion, subsidence, wildfire, severe wind, unstable slope or other hazard that creates intolerable residual risk to workers, communities or infrastructure.	RED if intolerable; otherwise AMBER
Airport / aviation conflict	PV glare, structures, cranes, lines or equipment within restricted aviation zones or creating unapproved aviation risk.	AMBER / RED if prohibited
Security no-go area	Area where lawful access, safe work, emergency response, human-rights-respecting security and community engagement cannot be maintained.	RED until conditions materially change
Existing contamination	Site with suspected hazardous contamination, unexploded ordnance or dangerous waste without competent assessment, lawful remediation plan and responsible-party arrangement.	AMBER; RED if unsafe or unlawful to proceed

7.1 Route and associated-facility rule

The exclusion screen applies to the full area of influence, not only the fenced generation plot. Distribution routes, poles, substations, access roads, laydown areas, temporary camps, waste storage, quarries or borrow sources and any associated network rehabilitation shall be screened. A suitable generation site does not cure an excluded line route or waste destination.

8. LAND, RESETTLEMENT AND LIVELIHOOD EXCLUSION CRITERIA

Land issue	Criterion	Decision
Illegal forced eviction	Land from which owners, occupants, tenants, squatters, encroachers or users were removed in anticipation of the project without due process and appropriate remedy.	RED
Unresolved project-related displacement	Physical displacement or significant economic displacement without an approved and fully budgeted RAP/LRP and implementation before impact.	RED until resolved; may become eligible only through approved process
Uncompensated removal	Land cleared, crops destroyed, businesses interrupted or access restricted before valuation, agreement, payment and livelihood measures required by the applicable instrument.	RED / stop-work
Disputed ownership or boundary	Material ownership, inheritance, customary-rights, tenancy, user or boundary dispute that cannot be resolved through a lawful and transparent process before commitment.	AMBER; RED if unresolved
Coercive VLD	Donation where refusal is unrealistic, information is incomplete, consent is pressured, unrelated benefits are threatened, documents are signed by unauthorized persons, or affected spouses/users do not consent.	RED
VLD causing material harm	Donation requiring physical relocation, materially reducing productive assets, affecting vulnerable livelihoods, creating landlessness or involving land needed for critical community services.	RED
Land promised for jobs or tariff benefit	Land access obtained through misleading promises of employment, free electricity, preferential connections, compensation outside approved terms or political favour.	RED
Restriction of common resources	Loss or material restriction of grazing, water, farming, fishing, forest, market, religious or access routes without acceptable alternatives and livelihood measures.	AMBER; RED if significant and unremedied
Retaliation or exclusion from consultation	Threats, harassment, arrest, service denial or community sanction against persons who refuse land, seek compensation or lodge grievances.	RED

8.1 Minimum land evidence

- Cadastral or community boundary information and mapped project footprint.
- Ownership, customary rights, occupancy, tenancy and actual land-use verification, including seasonal users.
- Consultation records showing separate engagement with women, vulnerable users and persons not represented by title holders.
- Independent valuation and compensation or livelihood records where impacts occur.
- Signed agreements in understandable language, witnessed without coercion, with grievance access and proof of payment where applicable.
- For VLD, documented refusal rights, limited impact, spousal and user consent, independent verification and no physical relocation.

9. BIODIVERSITY AND NATURAL RESOURCE EXCLUSION CRITERIA

Criterion	RED exclusion / AMBER red flag
Protected or critical biodiversity value	RED where the project is prohibited or would significantly affect protected areas, critical habitat, endangered species habitat, primary forest, high-conservation-value forest or key ecological functions.
Natural-habitat conversion	RED where significant conversion or degradation is unavoidable and feasible lower-impact alternatives exist; AMBER where significance requires specialist study.
Migratory or congregatory species	AMBER where PV arrays, lines, lighting or structures intersect important bird, bat or other migration routes; RED if significant impact cannot be avoided.
Wetlands and watercourses	RED where prohibited or causing significant loss, obstruction or pollution; AMBER where buffers, hydrology or downstream users require study.
Community natural resources	AMBER where access to grazing, water, fuelwood, fishing, hunting or non-timber products may be reduced; RED if severe unremedied livelihood or conflict risk remains.
Invasive species and restoration failure	AMBER where construction or landscaping may introduce invasive species or restoration is not feasible; RED where irreversible ecosystem damage would result.
Illegal wildlife or timber sourcing	RED for procurement, food supply, camp use or construction materials involving illegal wildlife, protected species or unlawfully harvested timber.

9.1 Biodiversity verification

Desktop mapping alone is insufficient where sensitive habitat is plausible. Screening shall use available protected-area and biodiversity information, site walkover, seasonal knowledge, community and regulator consultation and, where required, qualified ecological assessment. Absence of a formal designation does not prove absence of critical habitat.

10. CULTURAL HERITAGE EXCLUSION CRITERIA

Heritage issue	Criterion	Decision
Critical cultural heritage	Destruction, removal, relocation, inundation or material alteration of critical cultural heritage, sacred sites, graves, shrines, archaeological sites or heritage landscapes.	RED
Legally protected heritage	Work inconsistent with legal protection, permit conditions or custodian requirements.	RED
Community heritage without valid consent	Material interference with heritage used by communities, including intangible practices, without meaningful consultation and acceptable avoidance.	RED / AMBER
Unknown subsurface potential	Excavation in an area with credible archaeological or burial potential without survey and chance-find procedure.	AMBER
Commercialization or removal of finds	Purchase, sale, private retention, transport or unauthorized removal of discovered artefacts or human remains.	RED
Restricted access	Permanent or severe restriction of access to worship, burial, festival, ceremonial or traditional-resource areas without acceptable alternative and community agreement.	AMBER; RED if unremedied

10.1 Chance-find hold point

Chance find: Work shall stop in the immediate area; the find shall be protected against disturbance, theft and weather; human remains shall not be handled; and the competent authority, community custodians and E&S Manager shall be notified. Work may resume only under written clearance and an approved management instruction.

11. COMMUNITY, HUMAN RIGHTS AND SECURITY EXCLUSION CRITERIA

Issue	Criterion	Decision
Severe community health and safety risk	Design or activity with unavoidable intolerable risk of electrocution, arc flash, fire, explosion, traffic injury, open excavation, structural failure, battery incident or hazardous exposure.	RED
Uncontrolled access to energized assets	Network or facility design that cannot prevent public access, climbing, contact, illegal connection or unsafe back-feed through reasonable engineering and operational controls.	RED
Discriminatory project arrangement	Tariff, connection, employment, land, consultation or grievance arrangement that unlawfully excludes eligible persons or disproportionately harms vulnerable groups without remedy.	RED / AMBER
SEA/SH, GBV and child safeguarding failure	Contractor or security arrangement lacking enforceable Code of Conduct, reporting channels and survivor-centred response where risk is material; any known tolerance or concealment of abuse.	AMBER before mobilisation; RED for deliberate tolerance or repeated failure
Security abuse	Use of excessive force, collective punishment, unlawful detention, intimidation, weapons or security personnel without lawful authority, screening, training and accountability.	RED
Critical service interruption	Interconnection or outage arrangement creating unacceptable risk to health facilities, water supply, telecoms, schools or vulnerable customers without agreed continuity and communication measures.	AMBER; RED if no safe solution
Community rejection linked to material unresolved harm	Credible, sustained opposition arising from land, safety, livelihood, heritage or rights impacts that have not been transparently assessed and addressed.	AMBER; RED if impacts remain unacceptable
No accessible grievance route	Project phase begins without functioning community and worker grievance mechanisms, including confidential SEA/SH channels.	AMBER hold

11.1 Security decision standard

Security need does not justify human-rights abuse. If lawful, proportionate and accountable security cannot be established, the site or activity is ineligible. Promass shall not rely on informal armed groups or persons with unresolved credible allegations of serious abuse.

12. POLLUTION, HAZARDOUS MATERIALS, BATTERY AND WASTE EXCLUSIONS

Waste / pollution trigger	Criterion	Decision
Unlicensed or unknown waste destination	Transfer of hazardous, battery, electronic, oil, chemical or contaminated waste to an unapproved, untraceable or informal handler.	RED
Open burning or burial	Open burning, dumping, burial or uncontrolled dismantling of batteries, solar modules, electronic equipment, cables, oil, chemicals or contaminated materials.	RED
Illegal cross-border waste movement	Export, import or transit of hazardous waste inconsistent with applicable law and the Basel Convention.	RED
Uncontrolled battery risk	Battery technology, layout or operation lacking credible protection against short circuit, thermal runaway, fire, explosion, toxic gas, electrolyte release, incompatible charging or unsafe access.	RED until redesigned
Prohibited or unverified hazardous substance	Use of a substance prohibited by law or project requirements; or supplier unable to provide composition, safety data and lawful end-of-life route for a material of concern.	RED / AMBER
Significant water pollution	Direct discharge of untreated wastewater, oil, fuel, chemicals or sediment causing significant harm to surface water, groundwater or community supply.	RED
Waste-management capacity absent	Project cannot establish lawful storage, transport, recycling or disposal for expected hazardous and non-hazardous waste over the asset life.	RED until capacity secured
Transformer oil and PCB risk	Equipment containing prohibited PCB concentrations or unknown oil composition where lawful testing, handling and disposal are not established.	RED / AMBER
Unsafe chemical or fuel storage	Storage location or design cannot provide segregation, containment, ventilation, fire protection, spill response and restricted access.	RED until redesigned

12.1 Chain-of-custody requirement

No hazardous or regulated waste may leave project control without a documented description, quantity, source, classification, packaging, transporter, destination, receiving signature and permit verification. Missing chain-of-custody documentation is an AMBER hold; evidence of informal disposal is a RED breach.

13. INTERCONNECTION, ELECTRICAL AND TECHNICAL EXCLUSION CRITERIA

Technical trigger	Criterion	Decision
No lawful interconnection pathway	Project cannot obtain the required agreement, permit, consent, protection approval, metering approval or operating interface with the relevant DisCo and authorities.	RED
Unapproved point of common coupling	Site or design depends on connection at a location not accepted by the network owner or without verified capacity and ownership.	RED until approved alternative
Unsafe back-feed or islanding	Design cannot reliably prevent unintended energisation, islanding, reverse power, automatic reclose exposure or unsafe multiple-source conditions.	RED
Protection incompatibility	Protection grading, fault level, earthing, synchronization, anti-islanding or switching requirements cannot be demonstrated or accepted.	RED until redesign and approval
Unauthorized live work or energisation	Any plan requiring live work without lawful authorization and exceptional controls, or energisation without formal readiness and switching approval.	RED
Inadequate public electrical safety	Lines, poles, substations, service connections or earthing cannot meet required clearance, guarding, warning, access and fault-protection standards.	RED
Unsafe battery or inverter compatibility	Unverified battery-inverter/BMS compatibility, settings or communications that may create overcharge, thermal or protection failure.	RED until verified
Unmanageable outage impact	Construction, testing or switching would create unacceptable unplanned or prolonged service interruption without approved outage, communication and continuity arrangements.	AMBER; RED if no safe route
Counterfeit or uncertified critical equipment	Critical electrical equipment with unverified origin, falsified certificates, inadequate ratings or no traceable quality documentation.	RED
Emergency isolation unavailable	System cannot provide accessible, labelled and coordinated emergency shutdown and isolation for PV, battery, AC, transformer and network sources.	RED

13.1 Energisation gate

No energisation without authority: Energisation is prohibited until technical studies, protection settings, as-built drawings, inspection, test results, earthing, labelling, emergency isolation, operational procedures, training, community notification and the required Promass and DisCo approvals are complete and signed.

14. CONTRACTOR, SUPPLIER AND PROCUREMENT EXCLUSION CRITERIA

Counterparty trigger	Criterion	Decision
Labour abuse risk	Confirmed child labour, forced labour, trafficking, retention of documents, recruitment fees or serious wage abuse in a contractor or primary supplier.	RED; remedy and disengagement review
Serious safety incapacity	No competent HSE/electrical personnel, repeated fatal or severe incidents without corrective action, falsified certificates or refusal to comply with stop-work requirements.	RED
Environmental illegality	Illegal sourcing, disposal, emissions, land take or operation material to the contract.	RED
No traceability for critical equipment	Supplier cannot identify manufacturer, model, ratings, certification, warranty, serial traceability, battery cell origin or end-of-life arrangement.	AMBER; RED for counterfeit or falsified evidence
Conflict, fraud or bribery	Undisclosed beneficial interest, falsified due diligence, bribery, collusion, intimidation or fraudulent permit/land/equipment documents.	RED
Refusal of contract flow-down or audit	Counterparty refuses mandatory E&S clauses, Code of Conduct, worker GRM, incident reporting, records, site access or subcontractor controls.	RED
Waste handler not authorized	Transporter, recycler or disposal facility lacks required authorization, capability, records or lawful destination.	RED
Security provider risk	Security provider lacks lawful status, training, accountability, rules on use of force or has unresolved credible serious-abuse allegations.	RED / AMBER pending independent review

14.1 Procurement control

The exclusion checklist and declaration in Annex H shall form part of prequalification and contract award. Contract clauses shall permit verification, worker interviews, document review, corrective action, suspension, payment hold and termination. Approval of a bidder does not waive screening of its subcontractors, manufacturers, labour brokers, transporters or waste facilities.

15. SCREENING, VERIFICATION AND APPROVAL PROCEDURE

15.1 Workflow

Step	Required action
1. Define option	Map the full footprint, associated facilities, activities, contractors, primary equipment and material interfaces.
2. Gather evidence	Obtain land, mapping, legal, environmental, social, technical, supplier and stakeholder information listed in Annex C.
3. Complete checklist	E&S Manager coordinates Annex B with technical, land, procurement and community inputs.
4. Validate red flags	Conduct site visit, document verification, stakeholder consultation and specialist review proportionate to the issue.
5. Classify	Assign RED, AMBER or GREEN to each criterion and to the overall option.
6. Decide	Record rejection, hold conditions or permission to proceed in Annex D. Required written clearances are attached.
7. Register and communicate	Enter the decision in Annex I, notify relevant teams and ensure procurement and project controls reflect the outcome.
8. Re-screen	Repeat after material design, route, site, land, supplier, DisCo, legal or baseline change and when new information arises.

15.2 Minimum verification methods

- Review official maps, permits, titles, survey plans, environmental records, DisCo documents and supplier evidence.
- Visit the site and route with E&S, technical and community personnel; use coordinates and photographs.
- Consult affected land users, women, vulnerable persons, community leaders, relevant authorities and service providers; do not rely solely on a single representative.
- Interview workers privately where labour risk is relevant.
- Use competent biodiversity, heritage, land, electrical, geotechnical, waste or security specialists where the issue exceeds internal competence.
- Check consistency among documents, physical conditions and stakeholder accounts; unexplained inconsistency remains AMBER.

15.3 Approval thresholds

Outcome	Minimum sign-off
GREEN	E&S Manager and Project Director. Technical Lead signs where interconnection or equipment is involved.
AMBER closure	E&S Manager, Project Director and responsible specialist. REA/DisCo or authority sign-off where required by the hold condition.
RED rejection	E&S Manager recommendation and MD/CEO approval; procurement and business-development registers updated.
Exceptional reconsideration	Only where the current DARES/REA exclusion list expressly permits reconsideration and written REA clearance is obtained. No internal waiver may override an external prohibition.

16. CHANGE CONTROL, MONITORING AND REPORTING

16.1 Re-screening triggers

- Change in project site, footprint, distribution route, access road, point of common coupling, capacity, technology or battery chemistry.
- New land claimant, occupant, tenant, user, livelihood impact, heritage information or community grievance.
- New protected-area, flood, hazard, biodiversity or cultural heritage information.
- Change in contractor, primary supplier, labour broker, waste handler, security provider or critical equipment manufacturer.
- DisCo study, outage, protection or connection requirement that changes risk or scope.
- Incident, near miss, enforcement action, credible allegation, audit finding or evidence of falsified information.
- Change in law, permit, DARES/REA requirement or financing condition.

16.2 Monitoring controls

Control	Frequency / trigger	Record
Site exclusion conditions inspection	Monthly during construction; quarterly in operation; after material event.	Inspection checklist, coordinates and photographs.
Land and stakeholder condition review	Before access, clearing and each new work front; on grievance.	Land register, consultation and compensation records.
Contractor and supplier review	Pre-award, pre-mobilisation, monthly performance and annual supplier refresh.	Due diligence, declaration, audit and corrective-action record.
Waste chain-of-custody review	Every transfer and quarterly reconciliation.	Waste register, manifests, licences and receiving evidence.
Interconnection eligibility review	Design gate, pre-test, pre-energisation and after protection/design change.	Study, approvals, tests, switching and energisation records.
Management review	At least annually and after any RED breach.	Minutes, decisions, actions and revised criteria if required.

16.3 Incident and breach reporting

A confirmed RED breach, serious labour-rights issue, illegal disposal, forced eviction, major heritage or biodiversity damage, unauthorized energisation, serious community harm or material falsification shall be reported immediately to senior management and to REA/DARES and other authorities within the applicable timeline. Corrective action shall prioritize safety, remedy and prevention. A breach report shall not include identifying survivor information for SEA/SH cases.

17. ROLES AND RESPONSIBILITIES

Role	Responsibilities
MD/CEO	Approves the document, RED rejections, major corrective actions and resources; ensures commercial decisions respect exclusion outcomes.
Project Director	Integrates exclusion gates into development, design, procurement and schedule; prevents work from bypassing holds.
E&S Manager	Owns the criteria, coordinates screening, validates evidence, maintains register, escalates red flags and reports performance.
Technical / Interconnection Lead	Screens point of common coupling, network studies, protection, equipment, switching, testing, energisation and public electrical safety.
Land / Legal Adviser	Verifies ownership, rights, contracts, disputes, permits, compensation process and legality; identifies conflicts of interest.
Community Liaison Officer	Conducts inclusive consultations, verifies users and vulnerable groups, receives grievances and supports land and heritage screening.
Procurement and Contracts	Screens bidders and suppliers, includes clauses, blocks excluded parties and verifies declarations and traceability.
HSE / Site Manager	Applies exclusion conditions on site, exercises stop-work authority and reports discoveries or breaches.
Contractors and suppliers	Disclose accurate information, screen their supply chain, comply with exclusions, stop work on discoveries and provide records.
Internal Audit / independent reviewer	Tests the adequacy, independence and traceability of screening and closure decisions.

17.1 Conflict of interest

Any person involved in screening shall disclose ownership, family, political, land, supplier or financial interests that could affect impartiality. A conflicted person shall not approve the decision. Undisclosed conflict or benefit linked to a screening outcome is a serious breach and may invalidate the decision.

18. TRAINING, DISCLOSURE AND RECORDS

18.1 Training

Audience	Minimum training
Business development and management	Exclusion purpose, no-commitment rule, land and stakeholder risks, escalation and approval authority.
E&S, land and community teams	Detailed checklist use, consultation, VLD, displacement, vulnerable groups, biodiversity, heritage, human rights and evidence quality.
Technical and DisCo interface teams	Grid eligibility, protection, islanding, back-feed, earthing, switching, outage, testing and energisation exclusions.
Procurement and contracts	Counterparty screening, labour and supply-chain exclusions, equipment traceability, waste handlers and contractual remedies.
Site supervisors and workers	Stop-work discoveries, protected areas, chance finds, land boundaries, child labour, waste, electrical authorization and reporting.
Contractors and suppliers	Pre-mobilisation briefing and annual refresher; signed declaration and flow-down obligations.

18.2 Disclosure

The full controlled criteria shall be available to relevant Promass staff, contractors and REA/DARES reviewers. A simplified summary of land, labour, grievance, heritage, waste and community-safety exclusions shall be communicated to affected communities in understandable formats. Confidential commercial, personal or sensitive biodiversity and heritage information shall be protected.

18.3 Required records

- Completed checklists and decision forms; evidence index; maps, coordinates and photographs.
- Land, consultation, grievance, compensation, VLD and livelihood records.
- Permits, regulator and DisCo correspondence, studies and written clearances.
- Contractor, supplier, equipment, labour and waste due diligence and declarations.
- Specialist biodiversity, heritage, geotechnical, security, electrical and waste assessments.
- Exclusion register, conditions tracker, corrective actions, audits and management-review minutes.

Records shall be retained for the project life and the applicable legal, contractual or DARES/REA retention period, whichever is longer. Access shall be controlled and personal data protected.

19. REVIEW AND MANAGEMENT COMMITMENT

19.1 Review cycle

This document shall be reviewed at least annually, before each new site or major package, and whenever the DARES/REA exclusion list, applicable law, project design, financing conditions or lessons learned change. Revisions require controlled approval and communication to affected users.

19.2 Management commitment

Promass Engineering Services Limited commits to reject unsuitable opportunities, even where development costs have been incurred, and to protect personnel who raise good-faith exclusion concerns. Management will provide competent people, time, specialist support and budget for credible screening. Performance targets or payment incentives shall not encourage staff or contractors to suppress red flags or proceed before closure.

Effective date: This document becomes effective upon approval by the MD/CEO. Project-specific fields and contacts shall be completed before submission or use. Any current written DARES/REA or DisCo requirement that is more restrictive shall be incorporated and followed.

ANNEX A - PROJECT INFORMATION AND INITIAL ELIGIBILITY RECORD

Field	Project-specific information
Project name	Proposed 1 MW Solar Hybrid Interconnected Mini-grid Project
Project location / coordinates	
Host community / LGA / State	
Installed generation and storage capacity	
Relevant DisCo	
Point of common coupling	
Distribution / rehabilitation scope	
Land area and tenure	
Access road / associated facilities	
Current DARES/REA exclusion-list reference	
Applicable permits / approvals	
E&S screening lead	
Technical screening lead	
Date of screening	
Overall decision	RED / AMBER / GREEN
Conditions / references	

Initial declaration

The screening team confirms that the full project footprint and material counterparties have been identified to the extent reasonably possible; no commitment has been made that would prejudice an impartial exclusion decision; and all known red flags and information gaps are recorded below.

Name / role	Signature	Date
E&S Manager		
Technical / Interconnection Lead		
Project Director		

ANNEX B - MASTER ENVIRONMENTAL AND SOCIAL EXCLUSION CHECKLIST

No.	Screening question	Yes	No	Evidence / comments	Decision
1	Forced labour, trafficking, debt bondage, retention of documents or coercive recruitment?				
2	Any worker under 18 or child labour in contractor or supply chain?				
3	Activity illegal or inconsistent with current DARES/REA exclusion requirements?				
4	Illegal cross-border hazardous-waste movement or unlawful hazardous trade?				
5	Site not capable of obtaining required environmental, land, planning or electricity approval?				
6	Legally protected area or internationally recognized biodiversity area?				
7	Critical habitat or likely significant natural-habitat degradation?				
8	Flood-prone or other natural-hazard area excluded by the programme or creating intolerable residual risk?				
9	Illegal forced eviction, unresolved displacement or uncompensated project-related removal?				
10	Coercive or materially harmful voluntary land donation?				
11	Material ownership, occupancy, user or boundary dispute?				
12	Critical cultural heritage impact, grave or sacred-site disturbance?				
13	Unacceptable community health, electrical, traffic, fire, battery or security risk?				
14	Discriminatory arrangement or exclusion of vulnerable groups without remedy?				
15	No functioning community/worker grievance and SEA/SH referral channels before mobilisation?				

Instruction: A Yes answer is not automatically RED in every case, but it is never GREEN without documented resolution. Use the criteria sections to classify RED or AMBER and identify required evidence.

ANNEX B - MASTER EXCLUSION CHECKLIST (CONTINUED)

No.	Screening question	Yes	No	Evidence / comments	Decision
16	Unlicensed, informal or unknown battery, e-waste, oil, chemical or waste destination?				
17	Open burning, dumping, burial or uncontrolled dismantling proposed or observed?				
18	Battery, inverter, transformer or chemical risk cannot be safely controlled?				
19	No lawful interconnection pathway or unapproved point of common coupling?				
20	Protection, islanding, back-feed, earthing, fault-level or synchronization risk unresolved?				
21	Unauthorized live work, switching, testing or energisation required or proposed?				
22	Critical equipment counterfeit, uncertified, under-rated or without traceability?				
23	Unacceptable outage or critical-service continuity impact?				
24	Contractor/supplier serious labour, safety, environmental, fraud or bribery concern?				
25	Counterparty refuses E&S clauses, audit, records, incident reporting or subcontractor flow-down?				
26	Security provider unlawful, unaccountable or linked to credible serious abuse?				
27	Any material information inconsistency, missing evidence or undisclosed conflict of interest?				
28	Any associated facility, access route, camp, borrow area or waste site not yet screened?				
29	Any new information since the last decision that may alter eligibility?				
30	Any current REA, DARES, lender or DisCo requirement more restrictive than this document?				

Overall checklist decision

Overall result	Reason / conditions	Approvers / date
RED / AMBER / GREEN		

ANNEX C - MINIMUM EVIDENCE REQUIREMENTS

Evidence group	Minimum evidence
Site and biodiversity	Coordinates; layout and route map; photographs; protected-area and biodiversity screening; flood and hazard information; site visit; specialist report where triggered.
Land and livelihoods	Title/customary-right evidence; ownership and user mapping; occupancy and livelihood survey; consultation; valuation; compensation/RAP/LRP/VLD evidence; grievance check.
Cultural heritage	Authority and community consultation; heritage mapping; site walkover; specialist assessment where needed; chance-find procedure.
Legal and permits	Legal register; screening or EIA status; planning, land, road, fire, electricity and other required approvals or documented pathway.
Interconnection	DisCo correspondence; point-of-common-coupling acceptance; load-flow/fault/protection studies as applicable; single-line diagram; earthing; metering; outage and energisation arrangements.
Equipment and battery	Manufacturer and model; ratings; test/certification evidence; warranty; battery chemistry/cell origin; BMS/inverter compatibility; SDS; fire and end-of-life plan.
Contractors and suppliers	Ownership; licences; labour and HSE policies; incident history; age verification; wage and worker records; Code of Conduct; declarations; audit rights; subcontractor list.
Waste handlers	Permits/licences; vehicles and packaging; facility capability; downstream destination; manifests; receiving records; Basel compliance where cross-border movement is contemplated.
Community and security	Stakeholder mapping; consultations; GRM; SEA/SH referral pathway; critical services; traffic and public-safety assessment; security risk assessment and provider due diligence.

Evidence quality: Documents must be current, legible, traceable to the correct site or entity and consistent with observed conditions. A copied permit, unsigned agreement, incomplete map, verbal assurance or generic policy does not by itself prove eligibility.

ANNEX D - EXCLUSION DECISION AND ESCALATION FORM

Field	Entry
Opportunity / site / package	
Date and screening reference	
Criterion triggered	
Source of concern	Document / site visit / stakeholder / audit / incident / other
Initial classification	RED / AMBER
Immediate action taken	Stop / hold / protect area / notify / other
Affected commitments blocked	Land / procurement / mobilisation / work / testing / energisation / payment
Evidence required	
Responsible person and deadline	
Specialist / authority / REA / DisCo referral	
Final finding	
Final decision	Reject / continue hold / proceed with conditions / GREEN
Conditions and monitoring	
Communication and register update	

Approval

Role	Name	Signature	Date
E&S Manager			
Technical / subject specialist			
Project Director			
MD/CEO - required for RED decision			
REA / DisCo / authority - where required			

ANNEX E - LAND DUE DILIGENCE AND VLD DISQUALIFIERS

E.1 VLD is not permitted where any item below applies

- The owner or user cannot freely refuse without retaliation, loss of unrelated services, employment, tariff benefit or political pressure.
- The person signing lacks legal or customary authority, or spouses, co-owners, tenants, users or heirs with material interests have not been consulted.
- Physical relocation, loss of shelter or material economic displacement would occur.
- The donated portion is material to household livelihood, food security, grazing, water, access or productive use.
- The donor is vulnerable and independent advice or verification is absent.
- Boundaries, ownership or use rights are disputed.
- The donation is sought after clearing, construction, threat, announcement of inevitability or other action undermining free choice.
- The terms, footprint, alternatives, grievance rights and compensation entitlement were not clearly explained in an understandable language.

E.2 Land screening record

Question	Yes / No	Evidence / action
All owners, occupants, tenants and users identified?		
Women and vulnerable users consulted separately where appropriate?		
Alternative sites/routes documented?		
Any physical or economic displacement?		
Any loss of common resources or access?		
Any dispute, grievance, pending inheritance or boundary issue?		
Agreement translated/explained and independently witnessed?		
Compensation and livelihood measures completed before impact?		

ANNEX F - BIODIVERSITY AND CULTURAL HERITAGE RED-FLAG CHECKLIST

Red flag	Observed?	Location / evidence	Required action
Protected-area boundary, buffer or conservation restriction			
Wetland, river, riparian zone, forest, primary vegetation or rare ecosystem			
Endangered, endemic, migratory or congregatory species or habitat			
Large trees, nesting, roosting, breeding or feeding concentration			
Community dependence on grazing, water, fishing, hunting or forest resources			
Graves, shrines, sacred trees, worship areas, festivals or ceremonial routes			
Archaeological material, pottery, bones, foundations or historical structures			
Community report of heritage significance not visible in formal records			
Any need to remove, relocate, disturb or restrict access to heritage			

Specialist decision

Specialist / authority consulted	Finding	Decision and conditions

ANNEX G - INTERCONNECTION AND ELECTRICAL ELIGIBILITY CHECKLIST

Eligibility item	Yes	No	Evidence / hold action
Relevant DisCo and asset ownership confirmed			
Point of common coupling accepted in writing			
Required NERC/REA/DisCo pathway identified			
Network capacity, voltage, fault level and load-flow issues assessed			
Protection philosophy and grading accepted			
Anti-islanding, reverse power and reclose risks addressed			
Earthing and neutral arrangement verified			
PV, battery, inverter, transformer and switchgear ratings compatible			
Battery-BMS-inverter communications and settings verified			
Metering and commercial boundary defined			
Outage and critical-service continuity plan agreed			
Switching, LOTO and permit boundaries defined			
Emergency isolation and fire response available			
Pre-energisation tests, as-builts and approvals defined			
No unauthorized live work or energisation required			

Technical outcome

Decision	Technical lead	E&S review	DisCo / authority reference
RED / AMBER / GREEN			

ANNEX H - CONTRACTOR AND SUPPLIER DECLARATION

The undersigned declares, to the best of its knowledge after reasonable inquiry, that neither the company nor the goods or services proposed for the Promass DARES Interconnected Mini-grid Project involve the excluded practices below.

No.	Declaration	Confirmed
1	Forced labour, trafficking, debt bondage or retention of workers documents.	Yes / No
2	Child labour or project employment of any person under 18.	Yes / No
3	Illegal environmental operation, protected-area damage or unlawful land acquisition.	Yes / No
4	Illegal hazardous-waste handling, open burning, informal disposal or unlawful cross-border movement.	Yes / No
5	Counterfeit, falsified, under-rated or untraceable critical equipment.	Yes / No
6	Bribery, fraud, coercion, intimidation, concealment of incidents or falsified permits/certificates.	Yes / No
7	SEA/SH, GBV, violence against children, discrimination, retaliation or security abuse.	Yes / No
8	Refusal to permit Promass verification, worker interviews, records review, incident reporting or subcontractor control.	Yes / No

The company will immediately disclose any change, allegation or evidence that could make this declaration inaccurate and will flow the requirements to subcontractors and primary suppliers.

Company	Authorized representative	Title	Signature / date

ANNEX I - EXCLUSION SCREENING REGISTER

Ref.	Date	Site / package / entity	Trigger	Decision	Conditions / action	Owner	Closure

The E&S Manager maintains the master register. RED items are never deleted; they are retained with the rejection reason and any later alternative screening reference. AMBER items remain open until evidence and approval are attached.

ANNEX J - MANAGEMENT ADOPTION AND APPROVAL

Promass Engineering Services Limited adopts this Environmental and Social Exclusion Criteria document for the proposed DARES Interconnected Mini-grid Project and commits to applying it before material commitments and throughout the project lifecycle.

- Management will not penalize any person for raising a good-faith exclusion concern or stopping affected work.
- No employee or contractor may waive a RED criterion or release an AMBER hold outside the approval route in this document.
- Commercial, schedule, political or community pressure will not substitute for evidence and written approval.
- Project-specific details, current programme requirements and named responsibilities will be completed before submission or implementation.

Approval role	Name / title	Signature	Date
Prepared / coordinated by	Environmental and Social Manager		
Reviewed by	Project Director		
Technical concurrence	Technical / Interconnection Lead		
Approved by	Dr Sani Mohammed Bida, MD/CEO		

Project-specific completion confirmation

Item	Completed / reference
Project location, coordinates and host communities	
DisCo and point of common coupling	
Current DARES/REA exclusion-list reference attached	
Named screening team and contacts	
Land status and supporting evidence	
Legal / permit pathway	
Initial exclusion screening decision	
Open AMBER conditions and closure dates	