

Environmental and Social Monitoring Report

Project Number: 53283-001
January–December 2021
February 2022

THAILAND: Green Yellow Rooftop Solar Project

Prepared by Green Yellow Solar 1 (Thailand) Co., Ltd. for the Asian Development Bank.

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GreenYellow Solar Thailand

Annual Safeguards and Social Monitoring Report
(ASMR)

Jan 2021 to Dec 2021

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ANNUAL SAFEGUARDS AND SOCIAL MONITORING REPORT (ASMR)

Reporting Period:	1 January 2021 to 31 Dec 2021
ASMR Completion Date:	10 Feb 2022
Number of projects under construction:	1
Number of projects under operation:	91

I PROJECT SUMMARY INFORMATION

1.1 Objective

The purpose of this Annual Safeguards & Social Monitoring Report (ASMR) is to report on Green Yellow Thailand's compliance with ADB's Safeguards Requirements (including the implementation of the Environmental and Social Action Plan [ESAP] and the Environmental and Social Management System, and Environmental and Social Management Plans [ESMP] prepared for the projects) and to assess any corrective actions implemented/proposed. The ASMR encompasses all subprojects and includes the following:

- Contact information for responsible individuals;
- Compliance with environmental and social requirements;
- Environmental and social aspects of subprojects under implementation;
- Occupational health and safety performance and significant incident information; and
- Sustainable development initiatives and community relations programs.

1.2 Key Developments and Major Changes

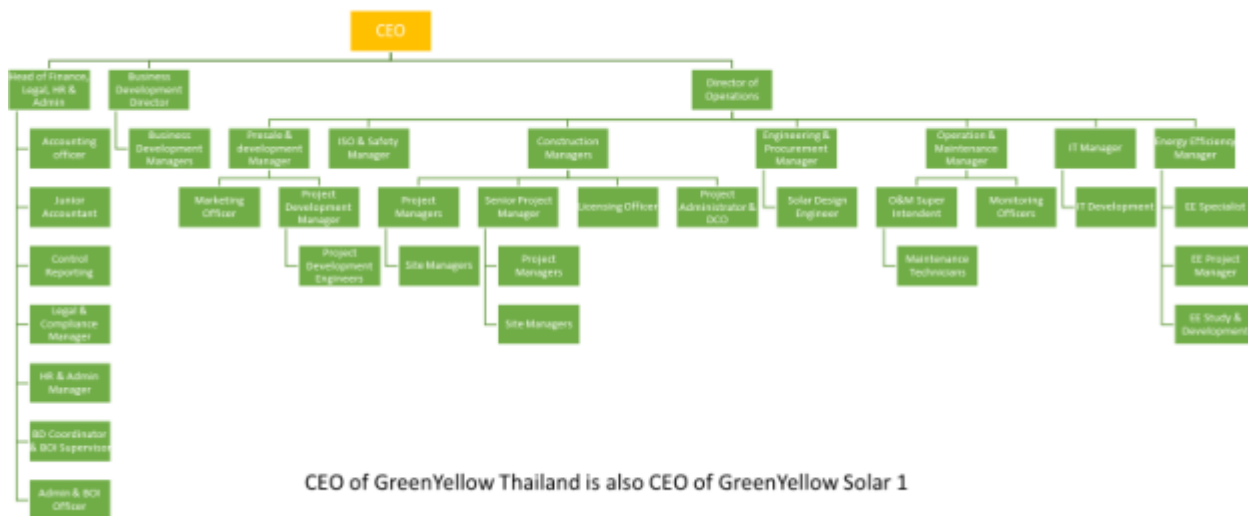
- *From total of 92 Projects, the 91 projects are already COD. The remaining project which is CPRAM Lardlumkaew is planned to be COD on 30 April 2022.*

II ENVIRONMENT AND SOCIAL MANAGEMENT CAPACITY

This ASMR was prepared by:

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Signature:	
Report Date:	10 Feb 2022

2.1 Environment, Social and Health and Safety Organization



The roles and responsibilities within GY and related entities to implement the requirements of the ESMS are outlined in the table below. As the ESMS evolves, GY will continuously assess required capacities within the organization for effective implementation.

Only CEO, Director of Operation, and Head of Finance and Legal Admin are under both GYTH and GYS1. The remaining employee from GYTH are indirectly employ by GYS1 as a service.

Role	Responsibilities
CEO (Frank, Gluck) CEO of GYTH and GYS1	<p>CEO is responsible for controlling the direction of the company as following.</p> <ul style="list-style-type: none"> • Decides budgets for all departments. • Delegates the authority to various Department Managers. • Establishes and reviews Quality Policy. • Establishes company objectives and targets. • Provides leadership and commitment to the ESMS process (provides visible support and adequate required resources, and makes ESMS a priority) • Approves annual budget allocations. • Ensures adequate provision of human and capital resources for effective functioning of the EMS in their respective departments
Director of Operations (Jerome, Adam) GYS1 and GYTH	<p>Director of Operations is responsible for planning, organizing, directing and running optimum day-to-day operations for the licensing, construction, operation, maintenance of the PV plants and approving budgets for all projects.</p> <p>Establishes technical standards framework and ensures adherence to ADB safeguard requirements and industry standards.</p> <p>Manages key aspects of network rollout strategies, stakeholder engagements and liaison.</p> <ul style="list-style-type: none"> • Participates in all Management Review meetings when on GYS1 • Provides leadership and commitment to the ESMS process (provides visible support and adequate required resources, and makes ESMS a priority) • Reviews and approves Environmental and Social Objectives, Targets and Actions in site business planning process. • Appoints a management representative to oversee the coordination and maintenance of the ESMS across site. • Review and approve annual safeguards and social monitoring report for submission to ADB.
Head of Finance Legal, HR and Admin (Francis Kaden-Corbo) GYS1 and GYTH	<p>Head of Finance and Administration is responsible for all administration aspects from the business development to the operation phase: financial, Administration and personnel human resource.</p> <ul style="list-style-type: none"> • provide strategic and operational HR advice and guidance relating to recruitment and resourcing, policy and performance, rewards and benefits, absence management, administration, employee relations. To undertake all duties in accordance with ESMS requirements, best practice, procedures, and policies. • Contribute to the development and implementation of HR and remuneration policies and procedure • Provide advice on HR projects led by the Senior Management Team • Provide advice and guidance to managers on all people-related issues including recruitment, equal opportunities, flexible working, discipline and grievance • Manage individual employee cases including absence management, capability and workplace conduct and grievance and disciplinary cases to ensure compliance with employment legislation • Work to resolve conflicts through positive and professional mediation • Ensure that employee grievances/complaints are managed and addressed appropriately in accordance with the ESMS and Employee Handbook.

<p>Construction Manager (Emilien, Vatz)</p> <p>and by delegation Project Manager and site Manager</p>	<p><i>Construction Manager is responsible for the project implementation timeline from the licensing to the commercial operation date, for delivering a PV plant within our quality standards and according to the budget and the delivery time.</i></p> <ul style="list-style-type: none"> • Ensures compliance with legal and other requirements in their activities • Ensures that all departmental activities are conducted in compliance with ESMS requirements • Identifies Environmental Aspects in their department and communicates new or any changed conditions to ISO & Safety Manager • Implements immediate action to control the environmental effects of any nonconformances and completes agreed corrective and preventive actions to eliminate or reduce risk of recurrence. • Ensures record keeping, documentation and communication for environmental aspects/issues aligns with requirements of EMS • Maintains a complete record of all pending and completed non conformance reports in the respective departments. • Ensures that all employees/contractors in the department receive required Environmental/ESMS Training in defined time frame as required by site • Ensures periodic reviews and updates of environmental objectives, targets and action plans under their responsibility. • Participates in management review meetings and reports on progress towards environmental targets defined in their area of responsibility. • Ensures ESMS Documentation are prepared and identifies needs for modification • Ensures all contract agreements include environmental and social requirements and ensure contractor adherence to these requirements. • Ensures effective communication on environmental issues to workforce within department • Considers environmental performance in employee performance reviews
<p>Operation & Maintenance Manager (Watcharin Changpanao)</p>	<p>Operation & Maintenance Manager is responsible for implementing our engineering quality standards, for optimizing our purchasing costs and monitoring the performance and the maintenance plan of our PV plants.</p>
<p>ISO& Safety Manager (Orawan Laoprasert)</p>	<ul style="list-style-type: none"> • Appointed as the Environmental and Social Management Representative. • Provides overall coordination and maintenance of the ESMS. • Provides final approval of all ESMS documentation and ensures documents are complete and maintained current • Updates ESMS responsibilities and authorities. • Utilizes the assistance of legal professionals in identifying applicable Legal Requirements subscribed by the operation, how those legal requirements affect the business • Ensures that the ESMS captures all legal requirements and other site obligations and that the ESMS supports activities to track and maintain compliance • Schedules and coordinates internal audits of the ESMS as required • Coordinates periodic site reviews and annual establishment of Environmental and social Objectives and Targets • Schedules and coordinates Management Review meetings and provides status of ESMS performance • Communicates to management team • Prepares and delivers relevant ESMS trainings to GY/GY Thailand staff and contractors • Prepares annual safeguards and social performance report for submission to ADB.

	<ul style="list-style-type: none"> • Provides regular reports on progress/status/issues and Contractor performance. • Ensures departmental specific competency modules are developed and maintained for departmental environmental operating procedures training • Responsible for the effective implementation of grievance mechanism
O&M Superintendent (Suratsawadee Pongpuak)	<ul style="list-style-type: none"> • Ensures adherence to environmental operating procedures in their area of responsibility • Takes immediate action to control environmental effects of actual or potential nonconformances and takes corrective actions required to eliminate or reduce risk of future recurrence. • Assist O&M Manager to execute ESMS functions in effective and efficient manner • Reports or communicates with immediate supervisor about any environmental performance deviation, degradation, or suggestions for improvement.
Contractor	
EPC contractor ISO & SAFETY manager	<p>The Contractor will be required to appoint a qualified ISO and Safety Manager throughout the construction phase. The EPC's ISO and Safety Manager responsibilities will include:</p> <ul style="list-style-type: none"> • Daily inspections of the GY site; • Site inductions for all employees, sub-contractors and other people/organization's entering the GY site; • Responsibility for developing and implementing the EPC Contractor's ESMP; • Training of employees and sub-contractor employees on the ESMP; • Daily toolbox talks covering the activities taking place on that particular day; • Regular meetings with the GY ISO and Safety Manager; • Incident reporting and monthly reporting on performance against the ESMP requirements • Report the grievances received from workers and status of resolution to GY, ISO and Safety Manager
All Personnel	
	<ul style="list-style-type: none"> • Adhere to ESMS policies and procedures • Ensure that all activities are conducted in compliance with regulatory requirements. • Communicate any information or issue related to the environment to persons responsible for Environmental Management in their respective departments • Communicates proposals for modification of existing Environmental Documentation or development of additional documentation as appropriate • Participate in the maintenance of ESMS requirements across the site GY. • Complete a health, safety and environment induction. • Understand risks applicable to their role. Raise risk management concerns to the attention of their line manager.

2.2 Environment and Social Policies and Management Systems

All employees, contractors and subcontractors will receive EHS Awareness training before commencing work on site, and then on a regularly basis. Specific Environmental and Social training modules will need to be completed by employees whose roles have direct relations with significant environmental and/or social aspect. A full detail of how these requirements are completed is prescribed in the mentioned training and awareness procedure.

The ESMS related modules for this training are:

- Site Induction: including an overview of the Safety & Sustainability Policy, Incident/Non- conformance reporting, General waste management and housekeeping, Archaeology Resources
- Occupational hygiene health and safety rules
- Solid Waste Management (General and Hazardous waste)
- Water management
- Hydrocarbon and Chemical Spill Management (if any)
- COVID-19 risk prevention and response
- Grievance Mechanism
- Emergency response plan
- All policy for GY (HSE policy, Envi and social policy, HR and Labor policy etc.)

HSE Training record as below.

Training Date	EPC name	Project name	Number of trainee	Subject training
24-Nov-21	Thai engineering power	Cleaning PV module all sites	13	ESMS and Safety induction

Summary list of safety and ESMS training with GY TH					
No.	Training Date	Company name	Project name	Number of trainee	Subject training
1	19-Mar-21	Green Yellow Thailand	Green Yellow Thailand	8	Working at height
2	27-May-21	Green Yellow Thailand	Green Yellow Thailand	6	Safety committee
3	10-Jun-21	Green Yellow Thailand	Green Yellow Thailand	6	Safety committee
4	16-Jun-21	Green Yellow Thailand	Green Yellow Thailand	1	Electrical safety
5	7-Jul-21	Green Yellow Thailand	All projects in Thailand	13	Safety induction for employee
6	9-Jul-21	Green Yellow Thailand	All projects in Thailand	60	ESMS kick off meeting
7	14-Jul-21	Green Yellow Thailand	All projects in Thailand	17	Safety induction for employee
8	21-Jul-21	Green Yellow Thailand	All projects in Thailand	25	Safety induction for employee
9	1-Sep-21	Green Yellow Thailand	All projects in Thailand	1	ESMS and safety induction for new employees
10	15-Sep-21	Green Yellow Thailand	All projects in Thailand	1	ESMS and safety induction for new employees
11	23-24 Sep 2021	Green Yellow Thailand	Green Yellow Thailand	1	Electrical safety for O&M
12	27-Sep-21	Green Yellow Thailand	All projects in Thailand	1	ESMS and safety induction for new employees
13	28-Sep-21	Green Yellow Thailand	Green Yellow Thailand	26	Safety office in management level
14	4-Oct-21	Green Yellow Thailand	All projects in Thailand	3	ESMS and safety induction for new employees
15	5-Oct-21	Green Yellow Thailand	Green Yellow Thailand	26	Safety office in management level
16	11-Oct-21	Green Yellow Thailand	All projects in Thailand	1	ESMS and safety induction for new employees
17	11-Oct-21	Green Yellow Thailand	Green Yellow Thailand	3	Working at height
18	20-21 Oct 2021	Green Yellow Thailand	Green Yellow Thailand	2	Electrical safety for O&M
19	27-Oct-21	Green Yellow Thailand	Green Yellow Thailand	2	Working at height
20	1-Nov-21	Green Yellow Thailand	All projects in Thailand	1	ESMS and safety induction for new employees
21	10-Nov-21	Green Yellow Thailand	Green Yellow Thailand	4	Working at height
22	25-Nov-21	Green Yellow Thailand	Green Yellow Thailand	2	Working at height
23	25-Nov-21	Green Yellow Thailand	Green Yellow Thailand	9	Safety office in management level
24	2-Dec-21	Green Yellow Thailand	Green Yellow Thailand	9	Safety office in management level
25	13-Dec-21	Green Yellow Thailand	All projects in Thailand	1	ESMS and safety induction for new employees
26	14-Dec-21	Green Yellow Thailand	Green Yellow Thailand	1	Working at height
27	16-Dec-21	Green Yellow Thailand	Green Yellow Thailand	20	Basic fire fighting
28	28-Dec-21	Green Yellow Thailand	Green Yellow Thailand	1	Working at height

III COMPLIANCE

3.1 Compliance with National Requirements

The principal labour protection law in Thailand is **the Labour Protection Act B.E. 2541 (1998)**. The law outlines the labor law of Thailand concerned with the following:

- Employment of Labour in General;
- Employment of Women;
- Employment of Young Workers;
- Wages, Overtime Pay, Holiday Pay and Holiday Overtime Pay;
- Wage Committee;
- Welfare;
- Occupational Safety, Health and Environment;
- Supervision
- Suspension from Work;
- Severance Pay;
- Lodgement and Consideration of Complaints;
- Employee Welfare Fund;
- Labour Inspectors;
- Delivery of Notices; and
- Penalties.

In order to manage environmental issues concerned with PV projects in Thailand, projects are required to comply with the Code of Practice (CoP) as stipulated by the Energy Regulatory Commission (ERC). The following legislation is concerned with CoP in Thailand:

- ERC Announcement on CoP Regulation, 27th November B.E. 2555 (2012)
- ERC Announcement on CoP Regulation for PV Systems with Power Generation License, 15th September B.E. 2557 (2014); and
- ERC Announcement on CoP Regulation for PV System Exempted from Power Generation License, 15th September B.E. 2557 (2014).

Solar projects require the preparation of either a mini-Code of Practice (CoP) or Code of Practice (CoP) report for submission to the Energy Regulatory Commission (ERC) as part of the application for an Electricity Generating License under “Notification of Energy Regulatory Commission (Code of Practice) 2014”. In addition, Ground-Mounted and Floating projects greater than 1,000 kWp require an Environmental Safety Assessment (ESA) report for submission to the Ministry of Industry as part of the application for an Operating Permit.

The following table listed the required regulatory procedure based on project size.

Solar Project Type	< 1,000 kWp	= or > 1,000 kWp
Rooftop	Mini CoP	Mini CoP
Floating	Mini CoP	CoP and ESA
Ground-Mounted	Mini CoP	CoP and ESA

Key E&S Thai Laws and regulations and requirements















Legislation	Scope/Requirements
ERC for Rooftop above 1MWp, Ground mounted of floating solar plants Local administrative Authority for rooftop solar plants below 1MWp	A construction and modification license from the ERC or the relevant local administrative organization/industrial estate authority in respect of the following activities: <ul style="list-style-type: none"> • The construction and installation of PV systems on the rooftop of commercial and industrial buildings; or • The construction of buildings necessary for the operation of the Projects (e.g. an inverter room)
ERC or Industrial Office for project above 1MWp	Factory License (RorNgor. 4) or Industrial Operation (IEAT 3-01) license from the ERC or relevant Industrial Office for all Projects which generate electricity from solar energy except for solar rooftop Projects with a generating capacity that does not exceed 1,000 kW.
ERC for projects below 1MWp	Notification of Electricity Generation License Exemption and Notification of Electricity Sale License Exemption
ERC for projects above 1MWp	Electricity Generation License and Electricity Sale License
ERC for projects above 1MWp and not rooftop	Electricity Distribution System License with a generating capacity of at least 1,000kW that require a distribution system to distribute electricity from the PV system to the Offtakers. This license is not applicable to solar rooftop Projects since they do not require a distribution system
DEDE for Project above 200kVA	Controlled Energy Generation License (Por.Kor. 2)
Grid supplier (MEA, PEA or equivalent)	an approval to grid synchronization from, and enter into a tripartite agreement with, the PEA or the MEA (as applicable) depending on the location of the Project, to synchronize the electricity system of the Offtaker with the grid of the PEA or the MEA (as applicable) for electricity backup purposes.






All projects of Green Yellow solar no.1 comply with E&S Thai Laws and regulations and E&S ad labor national laws and regulations in construction phase but in operation phase on process to follow as below.

3.2 Compliance with the Environmental and Social Action Plan (ESAP)

In 2021, GY Solar1 has completed all the requirements of Corrective Action Plan (CAP) for the activities related to environmental and social management, which are detailed in the table below. Remain only summit annual report.

INITIAL CORRECTIVE ACTION PLAN

No.	Corrective Action	Description of Issue (s)	Completion Indicator	Time Frame	Responsible Party	Status/Comment (28 th June 21)
1.	Environmental and Social Management System	<p>a) Develop a Company Environmental, Social, Health, and Safety policy for the Projects in Thailand. The policy should specify the following: roles and responsibilities for policy implementation, and E&S objectives and principles to ensure that the Projects are in compliance with ADB E&S policies and requirements.</p> <p>b) Develop a Legal Register of the applicable Environmental, Social, Health, and Safety laws and regulations of Thailand.</p> <p>c) Develop a Company Workers Grievance Mechanism for the workplace (office and Project sites).</p> <p>d) Develop a HR Manual or equivalent that can be provided to Company workers which details worker rights under national labor and employment law, applicable collective agreements worker rights related to hours of work, wages, overtime, and compensation.</p> <p>e) Develop Company HR policies related to labor practices:</p> <ul style="list-style-type: none"> Workers Organization Policy; Non-Discrimination and Equal Opportunity Policy; Child Labor and Forced Labor Policy 	Policies and management system endorsed by the management of GYT	Prior to the first Drawdown	GYT	<p>Items A to E of the ESMS have been provided as part of the ESMS Manual. Documents of the ESMS Manual are provided in ESMS&CAP Zip File as below.</p> <ul style="list-style-type: none">  ES-FM-001GrievanceRegistrationForm  ES-FM-002GrievanceRegisterForm  ES-FM-003IncidentReport  ES-FM-004IncidentRegister  ES-MA-001ESMSManual  ES-MP-001ESMPforRooftop  ES-MP-002ESMPforFL& GM  ES-PO-001E&SPolicy  ES-PO-002HR&LPPolicy  ES-PO-003H&SPolicy  ES-PR-001RiskIdentificationAndAssessmentProcedure  ES-PR-002StakeholderEngagementProcedure  ES-PR-003EPRP  ES-PR-004ESMSAudits  ES-PR-005EHStrainingAndAwareness  ES-PR-006NonConformanceCorrectiveActions  SD-HR-002 GY Employee Handbook  WI-CT-005JobSafetyAnalysisforRooftop  WI-CT-007JobSafetyAnalysisforSolarFarm  WI-OM-004JobSafetyAnalysisforMaintenance
2.	Environmental and Social Capacity	a) Appoint a dedicated Environmental and Social manager to oversee development and implementation of the E&S management programs and plans, and prepare the annual report to ADB.	a) CV provided to ADB, and offer of employment	a) Prior to the first Drawdown	GYT	<p>Appointed, referred to as Safety & ISO Manager. Offer of Employment shown in following document provided in ESMS&CAP Zip file:</p> <p> 20210329185405303</p> <p>CV provided in ESMS&CAP Zip file:</p> <p> CV - Orawan Laoprasert.docx</p>

No.	Corrective Action	Description of Issue (s)	Completion Indicator	Time Frame	Responsible Party	Status/Comment (28 th June 21)
3.	Environmental and Social Management Plans	<p>a) Prepare and implement standard Environmental and Social management plans (ESMP) for ground-mounted, floating and rooftop solar projects building on existing Code of Practice (CoP) and Environmental Safety Assessment (ESA) management measures to address ADB's requirements* and due diligence audit findings. The ESMP will include: mitigation measures commensurate to potential impacts and risks; monitoring and reporting requirements; implementation arrangements; capacity development and training requirements; implementation schedule; and cost estimates. Mitigation measures will cover the following aspects (as relevant for each type of project):</p> <ol style="list-style-type: none"> water resources, wastewater, and waste (including hazardous waste, disposal of broken or damaged solar panels, and asbestos) (all projects); Flood risk (GM); water quality (GM/FS); aquatic ecology (FS); hazardous materials and occupational health and safety of the transmission line to the Offtakers factory (GM); access, and health and safety management measures e.g. first aid, working at height and working on water; stakeholder engagement plans (GM/FS); community grievance procedures; and emergency preparedness and response procedures for potential emergency scenarios. <p>b) As required, the ESMPs will be adapted for each site (and the warehouse) to address the sitespecific findings of the LTA ESDD.</p>	a) Standard Environmental and Social Management Plans to ADB's satisfaction	a) Prior to the first Drawdown	GYT	<p>General ESMPs prepared for rooftop projects and floating/groundmounted projects provided in ESMS&CAP Zip file:</p> <p> ES-MP-001ESMPforRooftop  ES-MP-002ESMPforFL& GM</p> <p>Specific ESMPs provided for RPC (ground-mounted), SPM (floating) and SET (rooftop) in ESMS&CAP Zip file:</p> <p> ESMPforRPC  ESMPforSET  ESPMforSPM</p>

No.	Corrective Action	Description of Issue (s)	Completion Indicator	Time Frame	Responsible Party	Status/Comment (28 th June 21)
4.	EPC contracts, construction completion, and O&M contracts	<p>a) The contract between the Company and the EPC and O&M contractors will explicitly state that the contractor will comply with national environmental, health and safety, social and labor laws and regulations, as well as the ESMPs and relevant company policies (see action 1).</p> <p>b) Contractors will ensure that personnel visiting the sites have appropriate qualifications, understand job safety analysis (JSA) and H&S training required to perform the job (including first aid, emergency and response, working at height and working on water), and wear appropriate PPE.</p> <p>c) Contractors will report to the Company on a monthly basis concerning implementation of the JSAs, Community of Practice (CoP) reports, and ESMP requirements during the construction and operation.</p>	<p>a) Standard E&S contract clauses</p> <p>b) JSA and training records signed by workers</p> <p>c) Contractors reports</p> <p>d) Company's certification in the annual report to ADB</p>	<p>a) Prior to commencement of works</p> <p>b) Prior to commencement of works</p> <p>c) On a monthly basis</p> <p>d) Prior to operation</p>	Company / contractors	AFRY to verify/monitor as part of annual operations monitoring (Phase 2).
5.	Monitoring and Reporting	<p>a) Submit an Annual Environmental and Social monitoring report to ADB to provide an update on the project progress and CAP implementation (ADB will provide a template)</p>	<p>a) Submission of the annual report during the loan repayment period</p>	<p>a) Annually</p>	Company	AFRY to verify/monitor as part of annual operations monitoring (Phase 2).

*ADB's requirements include compliance with:

- Thai laws and regulations;
- ADB Safeguard Policy Statement (SPS) (2009) including the PIAL;
- ADB Social Protection Strategy (2001); and
- World Bank Group (WBG) Environmental, Health and Safety (EHS) Guidelines and EHS Guidelines for Electric Power Transmission and Distribution (2007).

3.3 Compliance with the Environment and Social Management Plan (ESMP)

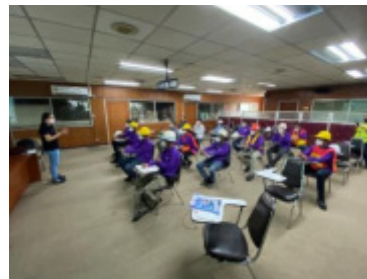
The anticipated environmental and social impacts of Ground Mounted and Floating solar Project will be avoided, minimized or mitigated by implementing generally recognized good practices as well as preventive and control measures as detailed in the environmental and social management plan (ESMP) below. The ESMP includes mitigation and monitoring measures applicable during the construction, operation and decommissioning phases of the project on a generic basis. Some project specificity would need to amend this Generic ESMP to reflect the local condition and also CoP, miniCoP and/or ESA requirements for particular projects. The site specific plans will be prepared by the ISO and Safety manager and Project Manager after issuance of CoP, Mini CoP and ESA.

The legal requirements on Environmental and Social management related to the project that has been implemented are shown in table below.

Solar Project Type	< 1,000 kWp	= or > 1,000 kWp
Rooftop	Mini CoP	Mini CoP
Floating	Mini CoP	CoP and ESA
Ground-Mounted	Mini CoP	CoP and ESA

Legislation	Scope/Requirements
ERC for Rooftop above 1MWp, Ground mounted or floating solar plants Local administrative Authority for rooftop solar plants below 1MWp	A construction and modification license from the ERC or the relevant local administrative organization/industrial estate authority in respect of the following activities: <ul style="list-style-type: none"> The construction and installation of PV systems on the rooftop of commercial and industrial buildings; or The construction of buildings necessary for the operation of the Projects (e.g. an inverter room)
ERC or Industrial Office for project above 1MWp	Factory License (RorNgor. 4) or Industrial Operation (IEAT 3-01) license from the ERC or relevant Industrial Office for all Projects which generate electricity from solar energy except for solar rooftop Projects with a generating capacity that does not exceed 1,000 kW.
ERC for projects below 1MWp	Notification of Electricity Generation License Exemption and Notification of Electricity Sale License Exemption
ERC for projects above 1MWp	Electricity Generation License and Electricity Sale License
ERC for projects above 1MWp and not rooftop	Electricity Distribution System License with a generating capacity of at least 1,000kW that require a distribution system to distribute electricity from the PV system to the Offtakers. This license is not applicable to solar rooftop Projects since they do not require a distribution system
DEDE for Project above 200kVA	Controlled Energy Generation License (Por.Kor. 2)
Grid supplier (MEA, PEA or equivalent)	an approval to grid synchronization from, and enter into a tripartite agreement with, the PEA or the MEA (as applicable) depending on the location of the Project, to synchronize the electricity system of the Offtaker with the grid of the PEA or the MEA (as applicable) for electricity backup purposes.

1) Training with EPC at site before working and safety talk.



3.4 Compliance with Social Protection Requirements of ADB

Describe compliance with applicable labor laws in relation to the project and measures taken to comply with internationally recognized core labor standards

- (a) Have you changed your Human Resources policies, procedures, or working conditions during the reporting period? Yes, on the employee handbook updated on 10 June 2021.

How GYT communicates the HR policies and procedures, and recent amendments, to employees/workers?

- New joiners : HR give out the policy and get them sign for acknowledgement within the 1st week.
- The policies are save in company folder, and printed out to put on information board in office.

- (b) Does GYT carry out its activities consistent with the intent of ensuring legally permissible equal opportunity, fair treatment, and non-discrimination in relation to recruitment and hiring, compensation, working conditions and terms of employment for its workers (including prohibiting any form of discrimination against women during hiring and providing equal work for equal pay for men and women? Yes.

Workforce information as of 31 December 2021.

Employment	Male	Female	Total
Direct Hire	45	22	67
Indirect Hire/ Hired by Contractors/ Subcontractors	0	0	0

- (c) Does the GYT not restrict its workers from developing a legally permissible means of expressing their grievances and protecting their rights regarding working conditions and terms of employment? Yes/No

- Yes, we not restrict workers from developing a legally permissible means of expressing their grievances and protecting their rights regarding working conditions and terms of employment.

Provide summary of grievance/s received from employees/workers and measures/actions undertaken for resolution.

- Company provide the suggestion box for employees are able to share their comments, grievance, ideas, etc.
- There is no grievance received for the reporting period of 1 Jan 2021 to 31 Dec 2021.

- (d) Please confirm that GYT engages contractors and other providers of goods and services: (i) who do not employ child labour or forced labour; (ii) who have appropriate management systems that will allow them to operate in a manner which is consistent with the intent of (a) ensuring legally permissible equal opportunity and fair treatment and nondiscrimination for their workers, and (b)

not restricting their workers from developing a legally permissible means of expressing their grievances and protecting their rights regarding working conditions and terms of employment; and (iii) whose subcontracts contain provisions which are consistent with items (d) and (d). Yes/No. If Yes, Provide discussions on the mechanism to ensure/ monitor compliance. If No, please provide discussions on GYT's actions to meet this requirement.

- Confirm

IV HEALTH AND SAFETY

4.1 Training Programs

Training plan in Y2021

Training courses cover all HSE local legal from Thailand.

No.	Course name	Target group	Number of training days	Plan									
				Apr-21	May-21	Jun-21	Jul-21	Aug-21	Sep-21	Oct-21	Nov-21	Dec-21	
1	Safety Orientation	All employees	1				Done	Done	Done	Done	Done	Done	
2	Safety Committee	Only safety committee	2		Done	Done							
3	Safety Office in management level	Only manager level (Thai and foreigner person)	2								Done	Done	
4	Basic fire fighting	40% employee in each department	1									Done 20 persons	
5	First Aid training	SM, Maintenance Technician, First aider in office.	1	Postpone to next year 2022 due to COVID-19									
6	Working at height	PM,SM,O&M technician,O&M superintendent	1	Done	Done	Done	Done	Done	Done	Done	Done	Done	
7	Safety Electrical training	PM,SM,O&M Manager	1									Postpone to Y2022	
8	Electrical training follow as law of Department of skill delvelopment	All O&M technician wrok with electrical	3						Done	Done			
9	ESMS	Sub-contractor (EPC), New GY employee	0.5				Done	Done	Done	Done	Done	Done	

Result training record as table below.

- For EPC

Summary list of safety and ESMS training with EPC				
No.	Training Date	EPC name	Number of trainee	Subject training
1	15-Jul-21	TID	10	ESMS and Safety induction
2	22-Jul-21	Solar Touch	17	ESMS and Safety induction
3	13-Sep-21	Prianant Power	30	ESMS and Safety induction
4	18-Aug-21	Sunvision	16	ESMS and Safety induction
5	18-Aug-21	Sunvision	31	ESMS and Safety induction
6	18-Aug-21	Sunvision	17	ESMS and Safety induction
7	14-Sep-21	Solaris	15	ESMS and Safety induction
8	14-Sep-21	Solaris	17	ESMS and Safety induction
9	14-Sep-21	Solaris	24	ESMS and Safety induction
10	14-Sep-21	Solaris	15	ESMS and Safety induction
11	20-Oct-21	Prime Power	4	ESMS and Safety induction
12	20-Oct-21	IJI	10	ESMS and Safety induction
13	2-Sep-21	Poly Tech	13	ESMS and Safety induction
14	3-Nov-21	JTN	1	Retraining safety standard of GY
15	12-Nov-21	IJI	7	Retraining safety standard of GY
16	19-Nov-21	Poly Tech	2	Retraining safety standard of GY
17	24-Nov-21	Thai engineering power	13	ESMS and Safety induction
18	1-Dec-21	All Energy Plus	7	ESMS and Safety induction
18	3-Dec-21	Solar touch	24	ESMS and Safety induction
19	20-Dec-21	Praianat	19	ESMS and Safety induction

- For GY employees

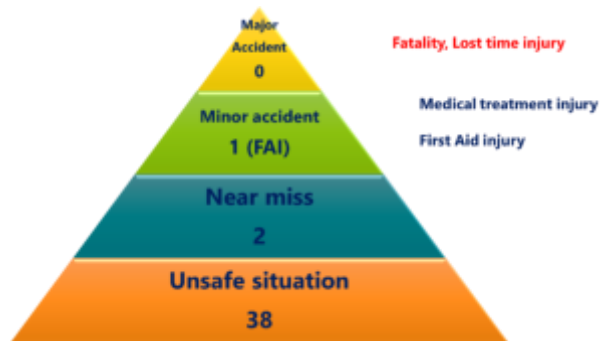
Summary list of safety and ESMS training with GY TH				
No.	Training Date	Company name	Project name	Subject training
1	19-Mar-21	Green Yellow Thailand	Green Yellow Thailand	Working at height
2	27-May-21	Green Yellow Thailand	Green Yellow Thailand	Safety committee
3	10-Jun-21	Green Yellow Thailand	Green Yellow Thailand	Safety committee
4	16-Jun-21	Green Yellow Thailand	Green Yellow Thailand	Electrical safety
5	7-Jul-21	Green Yellow Thailand	All projects in Thailand	Safety induction for employee
6	9-Jul-21	Green Yellow Thailand	All projects in Thailand	ESMS kick off meeting
7	14-Jul-21	Green Yellow Thailand	All projects in Thailand	Safety induction for employee
8	21-Jul-21	Green Yellow Thailand	All projects in Thailand	Safety induction for employee
9	1-Sep-21	Green Yellow Thailand	All projects in Thailand	ESMS and safety induction for new employees
10	15-Sep-21	Green Yellow Thailand	All projects in Thailand	ESMS and safety induction for new employees
11	23-24 Sep 2021	Green Yellow Thailand	Green Yellow Thailand	Electrical safety for O&M
12	27-Sep-21	Green Yellow Thailand	All projects in Thailand	ESMS and safety induction for new employees
13	28-Sep-21	Green Yellow Thailand	Green Yellow Thailand	Safety office in management level
14	4-Oct-21	Green Yellow Thailand	All projects in Thailand	ESMS and safety induction for new employees
15	5-Oct-21	Green Yellow Thailand	Green Yellow Thailand	Safety office in management level
16	11-Oct-21	Green Yellow Thailand	All projects in Thailand	ESMS and safety induction for new employees
17	11-Oct-21	Green Yellow Thailand	Green Yellow Thailand	Working at height
18	20-21 Oct 2021	Green Yellow Thailand	Green Yellow Thailand	Electrical safety for O&M
19	27-Oct-21	Green Yellow Thailand	Green Yellow Thailand	Working at height
20	1-Nov-21	Green Yellow Thailand	All projects in Thailand	ESMS and safety induction for new employees
21	10-Nov-21	Green Yellow Thailand	Green Yellow Thailand	Working at height
22	25-Nov-21	Green Yellow Thailand	Green Yellow Thailand	Working at height
23	25-Nov-21	Green Yellow Thailand	Green Yellow Thailand	Safety office in management level
24	2-Dec-21	Green Yellow Thailand	Green Yellow Thailand	Safety office in management level
25	13-Dec-21	Green Yellow Thailand	All projects in Thailand	ESMS and safety induction for new employees
26	14-Dec-21	Green Yellow Thailand	Green Yellow Thailand	Working at height
27	16-Dec-21	Green Yellow Thailand	Green Yellow Thailand	Basic fire fighting
28	28-Dec-21	Green Yellow Thailand	Green Yellow Thailand	Working at height

4.2 Incidents

For incident record we start to implement ESMS system since Jul 2021, so we have recorded some only project maybe not in Solar 1 project. Please see summary in below. Total 41 incident in 2021 for all project in GY TH but for GY solar 1 have only one incident (Unsafe situation from SPM project).

For SPM Project, Gim conclude

Please see more detail in attach in Thai



Month/Year	Number of Incident	Type of Incident
Jun-2021	3	Unsafe situation
Jul-2021	3	Unsafe situation
Aug-2021	6	Unsafe situation
Sep-2021	11	Unsafe situation
Oct-2021	8	Unsafe situation
	1	Near miss
Nov 2021	4	Unsafe situation
	1	Near miss
	1	Accident (FAI)
Dec 2021	3	Unsafe situation

4.3 Other Health and Safety Initiatives

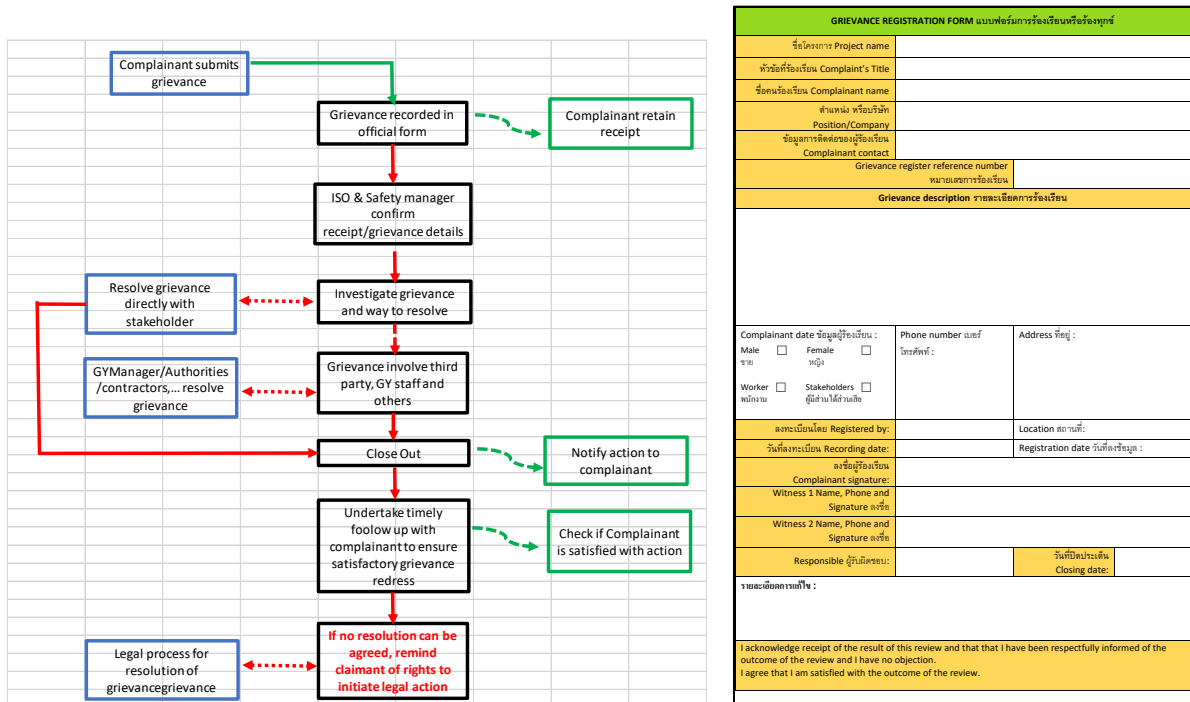
V GRIEVANCE REDRESS MECHANISM

Stakeholder engagement measures will work pro-actively towards identifying and addressing issues before they become grievances. However, when grievances are reported they need to be addressed in a consistent and verifiable manner. The purpose of the Grievance Mechanism is to implement a formalized process (identification, tracking and redress) to manage project-related complaints from communities, workers and other stakeholders. A Grievance Mechanism needs to ensure that stakeholder comments, suggestions and objections are captured and considered. The Grievance Mechanism is designed to be a transparent process that is gender responsive, culturally appropriate, and should permit anonymous grievances to be logged and readily accessible to all segments of the stakeholders at no costs and without retribution.

GY HR manager in collaboration with ISO and Safety Manager will dedicate one person as grievance mechanism manager (ISO and Safety Manager) who will inform colleagues and contractors about grievance mechanism procedures, gather grievance forms, report them to the grievance register and provide input to the

Project reporting. The stakeholders will be informed on the existence of such grievance mechanism and GYS1 will ensure that the process is considered by stakeholders to be culturally appropriate, trustworthy and effective.

The grievance mechanism is summarized in the following chart and Grievance form.



Summary of complaints, grievance received from local communities, recorded date and organizations involved, actions taken to resolve grievances, any outstanding issues and proposed measures for resolution.

During the last 1 year in 2021, GY Solar 1 didn't receive any complaints related to the project from local communities.

GY solar 1 has not received any grievances from the employees, workers, of contractors, and subcontractors during the reporting period. We have it on kick off meeting and training.

VI STAKEHOLDER CONSULTATION

The identified stakeholders are either **internal** or **external** to the company.

Internal stakeholders are:

- Manager
- Employees

External stakeholders are:

- Client
- Subcontractor

- Financial institutions
- Institution and regulatory government
- Regional authority
- Local authority
- Media and social networks
- Local population
- Vulnerable groups.

Detail of approach/methodology on addressing the concerns and issues raised at consultation and during operations.

For commune, district, provincial authorities, departments, partners of GY solar1;

- Sending administrative documents raising problem (official letters, notices, ets.)
- GY solar 1 received and process and reply in writing.

For opinions and recommendations of people related to the plant.

- Receive information.
- Contact information verification.
- Handling (Contact dialogue if needed).

We have stakeholder consultation with some special project which concern with legal (COP and ESA report) such as Royal porcelain factory as picture below.

Construction phase



Operation phase



VII OTHER INFORMATION AND FEEDBACK

- None -