

DBN ENVIRONMENTAL AND SOCIAL RISK MANAGEMENT POLICY

Introduction

The Environmental and Social Risk Management (ESRM) Policy establishes DBN's comprehensive strategy and guidelines for responsible financing.

The policy seeks to introduce a systematic approach to the management of relevant social and environmental issues, and the risks inherent in DBN's business processes and operations. DBN will ensure that adequate financial and human resources needed to implement this policy are made available within the institution.

Towards operationalizing and promoting an appropriate Environmental and Social Risk Management System (ESMS) for itself – as well as for the financial institutions it on-lends to – in order to effectively assess and manage the E&S risk exposure associated with DBN's lending activities. DBN is committed to:

- a) A systematic approach to the management of relevant social and environmental issues, and the risks inherent in DBN's business processes and operations.
- b) Ensuring that adequate financial and human resources needed to implement this Policy are made available within the institution.
- c) Deliberately give increasing attention to climate change considerations where possible in DBN's operations and take steps to encourage on-lending activities in support of green growth and low carbon economy.
- d) Ensuring all operations and on lending activities are carried out safely and no harm to any individual or group of persons.
- e) Respecting human rights and promoting gender equality. This includes but not limited to addressing Sexual Exploitation, Abuse, and Harassment (SEAH) in DBN and DBN funded activities.
- f) Mainstreaming Green and Climate finance.
- g) Encourage initiatives that will support flow of finance to vulnerable and financially excluded people.
- h) Regularly report progress in implementing all stated policies and principles and require all PFIs to also make appropriate disclosures on their ESG issues.

Policy Approach

1. Through this Policy, DBN puts in practice its commitment to integrating environmental and social considerations into decision-making processes relating to its business activities to avoid, minimize or reduce, or compensate for/offset risks and negative impacts.
2. DBN strives for positive development outcomes in the activities it supports. These activities include:
 - a) Lines of credit to eligible PFIs for on-lending to eligible MSMEs and small corporates, including both investment and working capital loans
 - b) Providing credit guarantees, through a Credit Guarantee Facility,¹ on PFIs' loans made to MSMEs. This model is intended to overcome limitations in MSME access to finance, reduce volatility, and increase the contribution of the Nigerian financial sector to economic development.
3. DBN believes that an important component of achieving positive development outcomes is the environmental and social sustainability of these activities, which DBN expects to achieve through the application of this Policy.

4. DBN recognizes that in the delivery of its lending and investment, it may be exposed – through the PFIs – to the E&S risks associated with the business activities of the sub-borrowers and sub-projects they finance. Managing such risks means that DBN and the PFIs must develop and maintain adequate systems, procedures, and capacity for identifying, managing, and monitoring risks and impacts of sub-borrowers² and sub-projects³ commensurate with the types, scope, and nature of financing provided.
5. DBN, therefore, supports the capacity development of the PFIs to manage environmental and social risks and PFIs are obligated to adhere to DBN policy in the use of DBN fund. This is achieved primarily through the development and implementation of an Environmental and Social Management System (ESMS).
6. The policy also addresses Health and Safety Risk, Climate Risk as well as International Labour Organization (ILO) Laws and other relevant Conventions.

Objectives of the Environmental and Social Management System (ESMS) Policy

7. Specific objectives of the ESRM Policy are to:
 - a) Integrate ESRM considerations into the DBN's credit and investment decision-making processes.
 - b) Fully implement and comply with national requirements for E&S risk management in Nigeria, as well DBN's bilateral and multilateral lenders and/or shareholders requirements.
 - c) Set out requirements for the PFIs for assessment and management of environmental and social risks and impacts associated with sub-borrowers and subprojects they finance.
 - d) Promote greater transparency and accountability on E&S issues internally and externally through disclosure and reporting.

Scope of Application

8. The requirements of this Policy apply to all financial products and services, as defined in paragraph 2 of this Policy, offered by DBN through PFIs.

Environmental and Social Due Diligence and Supervision

9. In order to appropriately identify the E&S risks associated with providing support to PFIs during the appraisal process, DBN will review the ESMS of these PFIs, existing and proposed business activities of the PFIs against the exclusion list to identify risks and impacts associated with sub-borrowers and sub-projects. Based on this assessment, DBN defines requirements and standards the PFIs will apply to manage these risks. DBN will also review the capacity of the PFIs to manage E&S risks and impacts.
10. To ensure no exposure to prohibited activities, the categorization and screening process of supported PFIs and checklist of key E&S risks are based on good international practices. The screening templates for identification, measuring and reporting E&S risks for PFIs are efficient and user-friendly.

11. DBN categorizes all its lending to PFIs and capital market activities into one of four categories (*High, Substantial, Medium, Low*) based on exposure to risk and in accordance with the requirements of the Nigeria Sustainable Banking Principles (NSBPs) and Investment Project Financing Policy (Part A). DBN takes into consideration (a) the types of products and services provided by the PFI with DBN's support; (b) size and tenor of financing; (c) the nature of the PFIs portfolio, including sectors and locations; (d) organizational capacity and commitment of the PFIs to identify, assess and manage environmental and social risks and impacts of its DBN supported portfolio; (e) any contextual risks, to the extent possible.
12. In particular, DBN will categorize PFIs that have substantial exposure to the activities on DBN's List of E&S Sensitive Activities, where supported by DBN financing, as *High Risk*.
13. DBN will develop and maintain regular program and procedures for supervision of its investments. DBN will periodically review adequacy and implementation effectiveness of the PFIs' ESMS, including the processes and the results of the E&S due diligence conducted by the PFIs on its sub-borrowers/sub-projects. In addition, DBN will periodically review a sample of PFIs' sub-borrowers/sub-projects, especially for business activities with significant E&S risks.

Applicable Requirements

14. As a condition of eligibility to receive financing from DBN, the PFI will put in place and maintain an Environmental and Social Management System (ESMS) to identify, assess, manage, and monitor environmental and social risks and impacts associated with activities they finance, as commensurate with the nature and magnitude of such risks and impacts at the individual transaction and portfolio⁴ level. Such ESMS will be in compliance with the NSBPs.⁵ Where the PFI can demonstrate that it already has an ESMS at the time of DBN's due diligence, it will provide adequate documented evidence to that effect.⁶
15. The PFI's ESMS should include the following elements:
 - a) Environmental and Social Policy
 - b) Clearly defined environmental and social risk identification, assessment, and management procedures
 - c) Organizational capacity and competency
 - d) Monitoring and review of E&S risks of individual transactions and the portfolio, and
 - e) External communications mechanism
 - f) Occupational Health and Safety

The ESMS will be endorsed by the PFI's senior management and have adequate resources dedicated to its implementation.

16. The PFI's ESMS must include an E&S risk categorization system. The PFI's categorization procedures will incorporate the requirements of the NSBPs, and will consider type, size, and tenor of financing; the nature of activities, including sectors and locations; and borrower's capacity to manage E&S risks. As part of this procedure, the PFI will be required to categorize activities on DBN's List of E&S Sensitive Activities, if any, as *High Risk*⁷, or provide DBN with a justification for not doing so.

17. The PFI's ESMS, as part of the PFI's E&S policy, will clearly outline the following applicable requirements, depending on the level of risk associated with sub-borrowers and subprojects supported by the DBN:
- The PFI will require that all sub-borrowers and sub-projects follow relevant environmental and social national and local laws and regulations.
 - The PFIs will comply with the requirements of the NSBPs on E&S risk management.
 - The PFI will not finance activities on the DBN Exclusion List. Also, where specific funds provided through DBN by other shareholders and/or bilateral and multilateral lenders agreements contain requirements such as additions to the Exclusion List, to which DBN has committed to comply, the PFIS will also comply to such exclusion list or terms/conditions.
 - Where DBN, as a result of its E&S due diligence process, is not satisfied that adequate capacity exists in a PFI for identifying, assessing, and managing risks and impacts, DBN may also exclude some or all of the activities on the DBN's List of E&S Sensitive Activities from its support to the PFI, until DBN is able to confirm that the PFI developed adequate capacity over time.
 - All sub-borrowers and sub-projects categorized by the PFI as *High Risk*, in accordance with the PFI's E&S categorization system as outlined in paragraph 11 of this Policy, will apply relevant requirements of the NSBPs and the World Bank Environmental and Social Framework.⁸ For these projects categorized both as *High Risk* and where there are affected communities, this will include a grievance mechanism prepared and implemented in accordance with the provisions of the Environmental and Social Framework.
18. Where necessary, DBN will require the PFIs to strengthen their ESMS as well as organizational capacity, responsibilities, and accountability for implementing the ESMS.
19. DBN will require PFIs to maintain labour management procedures in line with national laws and ILO Core Labour Standards.
20. DBN will encourage PFIs to have Grievance Redress Mechanism (GRM) in their branch locations and/or website. Also, DBN funded projects by the PFIs will be encouraged as much as possible to have GRM at project sites.
21. The PFI will prepare and submit to DBN an Annual E&S Report on the implementation of its ESMS that will include information on environmental and social risk profile of its portfolio financed through DBN. The PFI will promptly notify DBN of any significant accidents or incidents associated with sub-borrowers or sub-projects.

Communications and Disclosure

22. DBN will communicate the provisions of this Policy internally at all levels of the institution and externally to all stakeholders. DBN will also maintain a process for external communications to manage public inquiries and concerns related to E&S matters which can be lodged anonymously. (See *GM for E&S related complaints reporting channels*).
23. DBN is committed to reporting on its ESRM activities in accordance with the NSBPs obligations and the requirements of other investors. DBN will put in place a system for internal reporting to senior management on implementation of its ESMS. In addition, DBN will also seek to incorporate such reporting into its annual external publications.

The World Bank Environmental and Social Framework Standards can be found here

24. DBN will require PFIs to publicly disclose summaries of E&S assessment reports for any sub-projects supported by DBN classified as High Risk according to PFIs' E&S risk categorization system unless prohibited by relevant national laws and regulations.
25. DBN's ESRM policies and procedures are reviewed and approved by the Board of Directors.
26. DBN will review the ESRM Policy every two years to ensure its adequacy in line with any changes in DBN's operations, compliance with relevant national laws and alignment with funding bilateral or multilateral lender and investor requirements, as relevant. The review will also ensure that the overall approach to assessing and managing E&S risk remains relevant and aligns with ESRM national and international best practices and standards.
27. DBN may, as necessary, also develop complementary E&S policies, procedures and tools to address specific risks more comprehensively. Examples include detailed measures to address sector-specific (e.g., agriculture) or issue-specific (e.g., child and forced labour) risks.
28. The Environmental and Social Risk Coordinator has the responsibility for proposing changes as needed to the ESRM policies and procedures or creating new policies and presenting these to the DBN's senior management for approval.

ENVIRONMENTAL AND SOCIAL RISK MANAGEMENT PROCEDURES

Purpose

ESRM Procedures set out DBN's institutional arrangements and processes that aim to support the implementation of DBN's Environmental and Social Risk Management Policy. These procedures describe how DBN conducts its due diligence on investment activities under consideration, as well as its supervision on activities to which financing has been provided. The procedures identify the relevant functions and individuals involved in implementation.

These procedures are an integral part of DBN's risk management framework, are embedded in the overall investment screening and appraisal process, and form part of DBN's investment decision-making. DBN's ESRM Procedures are based on the principle of continuous improvement. These procedures allow for engagement with Participating Financial Institutions (PFIs) on the identified risks and impacts to improve their policies, systems, and processes for better E&S outcomes in their portfolios.

Applicability

ESRM procedures apply to all of DBN's investment activities.

Revisions and Approval

DBN's ESRM procedures are approved by DBN's Board of Directors. DBN reviews these procedures every two years to ensure they reflect the scope and nature of DBN's lending activities, as well as requirements of bilateral and multilateral lenders and/or shareholders.

Structure of the ESRM Procedures

The ESRM Procedures are composed of five (5) distinct components, with each component representing a critical step of DBN's integrated ESRM approach. The structure of the procedures follows the typical chronology of events in the investment project cycle.⁹

Grievance Mechanism (GM)

The ESMS grievance mechanism addresses stakeholders' complaints related to issues where DBN projects have failed to respect ESMS principles, standards, and procedures. The mechanism applies to all projects covered under the scope of the ESMS.

The aim of the grievance mechanism is to provide people or communities fearing or suffering adverse impacts from a project with the assurance that they will be heard and assisted in a timely manner.

DBN will operate multiple GM. Key amongst these is the whistle blowing policy. The GM would set timelines for redress of grievances and escalation windows in case the complainant is not satisfied.

DBN will review each grievance case to understand whether a potential breach of ESMS principles, standards or procedures has occurred. A process identifies the root causes of the subject of the grievance and ensures that issues of non-compliance with the ESMS are corrected; some cases may also require remedial actions to redress potential harm resulting from a failure to respect the ESMS provisions or preventive measures to avoid repetition of non-compliance. The DBN would expect PFIs to have a grievance mechanism, process, or procedure to receive and facilitate resolution of concerns and grievances of project-affected parties arising in connection with the project, in particular about the Borrower's environmental and social performance.

Focus on Gender

If any of the ESMS process has determined that women could be negatively affected by the project or that key information is lacking, a more detailed gender analysis will be carried out as part of the ESMS process. The scope and depth of the gender analysis will be proportional to the complexity of the project.

Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH)

DBN will seek to determine the borrower's commitment, capacity and willingness to ensure SEA and SH prevention and response will be adequately integrated into project activities. Exclusion analysis will cover the following basic issues:

- a) Has the borrower ever been involved in financing a project in which SEA and SH incidents were recorded and, if so, did the borrower take action to address these incidents? If no action was taken in a situation where a SEA or SH incident was recorded in a previous financing operation, project is excluded.
- b) Does the borrower have a basic awareness of its responsibilities to address SEA and SH as part of project oversight? If no, is the borrower willing and able to learn its responsibilities to address SEA and SH as part of project oversight? If no, project is excluded.
- c) Having understood the responsibilities to address SEA and SH risk as part of project oversight, is the borrower committed to taking measures for preventing and responding to SEA and SH during the implementation of the project? If no, project is excluded.

DBN exclusion list

DBN Exclusion List outlines activities DBN will not support through the provision of financial products and services. The Exclusion List is compliant with Nigerian law and is aligned to the exclusion requirements of multilateral and bilateral lenders and/or shareholders that provide financing to DBN. The Exclusion List is reviewed annually to ensure compliance with national regulations in Nigeria and alignment to IFIs' lists of prohibited activities.

DBN will not finance any activity involving:

- Production or trade in any product or activity deemed illegal under the host country laws or regulations on international conventions and agreements.
- Production or trade in pharmaceuticals, pesticides/herbicides, ozone depleting substances, polychlorinated biphenyls (PCBs) subject to international phase-outs or bans.
- Trade in wildlife or wildlife products regulated under Convention on International Trade in Endangered Species (CITES).
- Production or trade in weapons and ammunition.¹⁰
- Production or trade in alcoholic beverages (excluding beer and wine).¹⁰
- Production or trade in tobacco.¹⁰
- Pornography and/or prostitution.
- Gambling, casinos and equivalent enterprises.¹⁰
- Racist and/or undemocratic and or neo-Nazi media.
- Production or trade in radioactive materials. This does not apply to the purchase of medical equipment, quality control (measurement) equipment and any equipment where DBN considers the radioactive source to be trivial and/or adequately shielded.
- Cross-border trade in waste and waste products, unless compliant with the Basel Convention and the underlying regulations.
- Production or trade in or use of unbonded asbestos fibers.
- Driftnet fishing in the marine environment using nets in excess of 2.5 km in length, electric shocks, or explosive materials.
- Production or trade in wood or other forestry products other than from sustainably managed forests.¹³
- Production or activities involving forced labour¹¹ or child labour.¹²
- Any activities involving significant degradation or conversion of natural.^{14,16} and/or critical habitats.^{15,16} and/or any activities in legally protected areas.
- Activities involving live animals for scientific and experimental purposes, including the breeding of these animals.
- Military or police equipment or infrastructure.

Footnotes

1. The Credit Guarantee Facility is a wholly owned subsidiary of DBN.
2. For the purposes of this Policy, sub-borrowers are defined as enterprises that receive support from DBN through PFIs.
3. For the purposes of this policy, sub-projects are defined as a distinct set of activities for which sub-borrowers receive support from DBN through PFIs.

4. For the purposes of this Policy, portfolio means the portfolio of current and/ or proposed sub-projects financed by the DBN to which this Policy applies, as set out in paragraph 7.
5. DBN will limit PFI review to Principle I under the Central Bank of Nigeria Sustainable Banking Principles: “Our business activities: Environmental and Social Risk Management”.
6. Where DBN is providing support to a PFI, and other multilateral or bilateral funding agencies/or shareholders will or have already provided financing to the same Financial Institutions, DBN may agree on a common approach or to rely on the requirements of such other agencies project, including any ESMS already established by the PFI, provided that such requirements will enable the PFI to achieve objectives materially consistent with this Policy. A PFI may be required to enhance or supplement its ESMS, as deemed necessary by DBN.
7. High risk categorization by PFIs may not be limited to activities on DBN’s List of E&S Sensitive Activities.
8. World Bank Environmental and Social Framework can be found [here](#)
9. The sequencing may vary to satisfy specific project needs (e.g., the needs for disclosure according to the requirements of the Nigerian law or bilateral and multilateral lenders and/or shareholders).
10. This does not apply to project sponsors who are not substantially involved in these activities. “Not substantially involved” means that the activity concerned is ancillary to a project sponsor’s primary operations.
11. Forced labour means all work or service, not voluntarily performed, that is extracted from an individual under threat of force or penalty.
12. Employees may only be taken if they are at least 15 years old, as defined in the ILO Minimum Age Convention (C138, Art. 2), and ratified by Nigeria in 2002. Children under the age of 18 will not be employed in hazardous work. Children will not be employed in any manner that is economically exploitive or is likely to be hazardous to, or to interfere with, the child's education, or to be harmful to the child's health, or physical, mental, spiritual, moral, or social development.
13. Sustainable Forest management may be demonstrated by the application of industry-specific good practices and available technologies. In some cases, it may be demonstrated by certification/ verification or progress towards certification /verification under a credible standards system.
14. Natural habitats are areas composed of viable assemblages of plant and/or animal species of largely native origin, and / or where human activity has not essentially modified an area’s primary ecological functions and species composition.
15. Critical habitat is a subset of both natural and modified habitat that deserves particular attention. Critical habitat includes areas with high biodiversity value that meet the criteria of the World Conservation Union (IUCN) classification, including habitats of significant importance for required for critically endangered or endangered species as defined by the IUCN Red List of Threatened Species; habitats of significant importance for endemic or restricted range species; habitats supporting globally significant concentrations of migratory species and /or congregatory species; areas with unique assemblages of species or which are associated with key evolutionary processes. Primary Forests or forests of High Conservation Value shall be considered Critical Habitats.
16. This includes High Conservation Value (HCV) forests. HCV areas do not directly correspond with definitions for modified, natural and critical habitat. The HCV Resource Network, an internationally recognized group, provides information and support on the evolving usage of HCV to ensure a consistent approach. <https://www.hcvnetwork.org>

DBN list of E&S sensitive activities

There are environmentally and socially sensitive activities that are subject to restrictions in PFI transactions financed by DBN, where DBN is not satisfied that adequate systems and capacity exist within the PFI to screen, assess, and manage the associated risks.

DBN will revise this list on a regular basis to ensure it meets the requirements of relevant Nigerian laws and regulations and those of bilateral and multilateral lenders and/or shareholders. These include:

- 1) Activities involving the risk of work performed by children;
- 2) Activities involving land acquisition and/or restrictions on land use resulting in:
 - i. Involuntary resettlement or economic displacement.^a
 - ii. Industrial-scale activities in or near critical habitats.^b
 - iii. Industrial-scale activities involving production,^c harvesting,^d or trade in wood or other forestry products from plantation and natural forests or wild fish and other aquatic species;
- 3) Industrial-scale production trade, storage, or transport of significant volumes of hazardous chemicals or commercial scale usage of hazardous chemicals.
- 4) Hazardous chemicals include gasoline, kerosene, other petroleum products, textile dyes etc.
- 5) Production or activities that have adverse impacts, including relocation, on the lands, natural resources, or critical cultural heritage that are used as livelihoods by vulnerable and/or historically underserved traditional local communities.^e
- 6) Activities involving significant adverse impacts on critical cultural heritage.^f

Footnotes

- a) Land acquisition and/or restrictions on land use may result in the physical displacement of people (involuntary resettlement) as well as their economic displacement (as loss of assets and/or means of livelihood, regardless of whether or not the affected people are physically displaced).
- b) Critical habitat is a subset of both natural and modified habitat that deserves particular attention. Critical habitat includes areas with high biodiversity value that meet the criteria of the World Conservation Union (IUCN) classification, including habitats of significant importance for required for critically endangered or endangered species as defined by the IUCN Red List of Threatened Species; habitats of significant importance for endemic or restricted range species; habitats supporting globally significant concentrations of migratory species and/or congregatory species; areas with unique assemblages of species or which are associated with key evolutionary processes. Primary Forests or forests of High Conservation Value shall be considered Critical Habitats.
- c) Production means cultivation or rearing of plants or animals, including annual and perennial crop farming, animal husbandry (including livestock), aquaculture, plantation forestry, etc.
- d) Harvesting refers to productive activities that include extraction of these resources from natural ecosystems and habitats.
- e) Vulnerable and/or historically underserved traditional local communities refers to those communities that may be most marginalized in the country context and lack access to resources and public services.

- f) Critical cultural heritage consists of (i) the internationally recognized heritage of communities who use or have used, within living memory, the cultural heritage for long-standing cultural purposes; and (ii) legally protected cultural heritage areas, including those proposed by host governments for such designation.

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