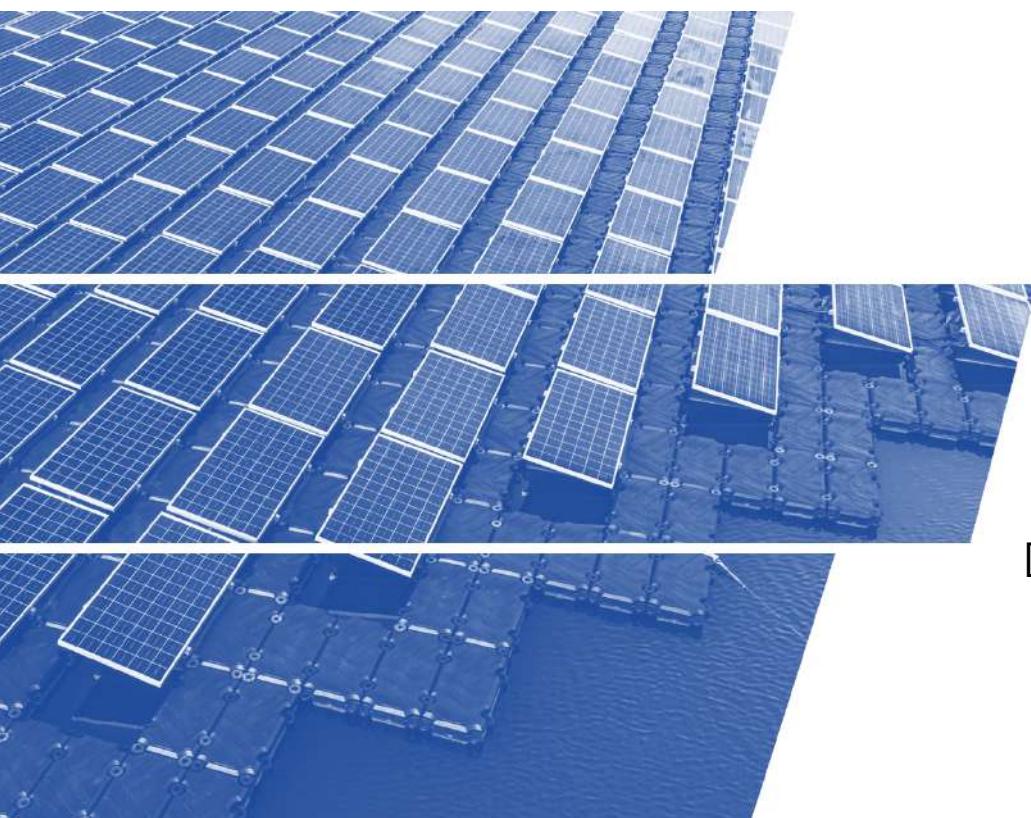




Saguling 60MW Floating Solar PV Power Plant, Saguling Reservoir West Java, Indonesia

Human Rights Risk
Assessment

December 2024



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APPENDIX B: OUTCOME OF STAKEHOLDER CONSULTATIONS

LIST OF ABBREVIATIONS

ABBREVIATION	MEANING
AoI	Area of Impact
CEDAW	Convention on the Elimination of All Forms of Discrimination against Women
CESMP	Construction Environmental & Social Management Plan
CRC	Convention on the Rights of the Child
CRPD	International Convention on the Protection of the Rights of All Migrant Workers and Members of their Families
EP	Equator Principles
ESIA	Environmental & Social Impact Assessment
ESMS	Environmental & Social Management System
ESMS	Environmental & Social Management System
FPV	Floating Photovoltaic
GBVH	Gender Based Violence & Harassment
GRM	Grievance Redress Mechanism
ICCPR	International Covenant on Civil and Political Rights
ICERD	International Convention on the Elimination of All Forms of Racial Discrimination
ICESCR	International Covenant on Economic, Social & Cultural Rights
IFC	International Finance Corporation
ILO	International Labour Organisation
IP	Indonesia Power
OESMP	Operation Environmental & Social Management Plan
OHS	Occupation Health & Safety
OHTL	Overhead Transmission Line
O&M	Operation & Maintenance (Company)
PAPs	Project Affected Persons
SEA	Sexual Exploitation and Abuse
SEP	Stakeholder Engagement Plan
SEP	Stakeholder Engagement Plan
UNGPs	United Nations Guiding Principles on Business and Human Rights
5 Capitals	5 Capitals Environmental and Management Consulting

1 INTRODUCTION

This document is the Human Rights Risk Assessment (HRRA) for the Saguling 60MW Floating Solar PV plant in Bandung Barat, West Java, Indonesia (the Project). 5 Capitals Environmental and Management Consulting (5 Capitals) has been engaged by ACWA Power to prepare this report for the Project as part of the Environmental & Social Impact Assessment (ESIA) documents package.

1.1 Objectives of the HHRA

This HHRA has been prepared based on the Equator Principles 4 (EP4) Guidance Note: 'Implementation of Human Rights Assessment under the Equator Principles' dated September 2020. It aims to identify, assess, and address the potential human rights risk associated with the proposed Project which may affect the enjoyment of these rights by right-holders (Project workers, supply chain workers, local communities etc).

1.2 Scope of Work

The scope of the HHRA includes:

- Identifying the actual and/or potential human rights risks and impacts from the Project. These includes the rights of:
 - Project workers.
 - Workers along the supply chain.
 - Formal and informal landowners, users, and tenants (includes all those who will be economically impacted).
 - Fishermen with fishing cages and fishing stalls within the Project footprint.
 - Communities within the Project Area of Influence (AoI) including vulnerable groups.
- Understanding additional studies including management measures and safeguards that will be required to mitigate potential risks and impacts concurrent to the ESIA and related documents.
- Recommend enhancement measures on human rights opportunities during the Project's lifecycle.

1.3 Approach to HRRA

This HRRA has been developed as an accompanying safeguard of the ESIA (and related plans such as the Supply Chain Screening Report and the Stakeholder Engagement Plan) to assess

the potential adverse human rights risks and impacts of the Project and to put in place appropriate management strategies for the Project Company to implement.

The following approach was followed to meet the scope of this HRRA:

- **Review of national and local context:** This included a review of publicly available information to establish an understanding of the national and local human rights that are pertinent with infrastructure developments.
- **Internal engagement with ACWA Power** on matters relating to human resources, security and the corresponding timelines vs construction schedule, grievance redress mechanism and other related policies and procedures. This data was requested through the submission of a Request for Information (RFI) and meetings.
- **Compilation of the human rights baseline:** Involved the review and assessment of the data collected during the ESIA phase surveys including the outcomes of the stakeholder consultations.
- **Identification of salient human rights impacts:** This was undertaken through the completion of an initial screening for human rights risks (Refer to Appendix A). The screening identified potential human risks areas. The topic areas included in the screening were taken from the International Covenant on Economic, Social & Cultural Rights (ICESCR) and International Covenant on Civil and Political Rights (ICCPR).
- **Qualitative risk assessment:** A qualitative assessment of rights at risk, a description of the right holders as well as risks and proposed mitigations have been developed in accordance with EP4 Guidance Note.

1.4 Structure of the HRRA

This HRRA report follows the following structure:

- Chapter 1: Introduction
- Chapter 2: Project Description
- Chapter 3: Standards and Guidelines
- Chapter 4: Human Rights Context in Indonesia
- Chapter 5: Stakeholder Identification & Engagement
- Chapter 6: Human Rights Risks
- Chapter 7: Summary of the HRRA
- Appendix A: Human Rights Screening
- Appendix B: Outcome of Stakeholder Consultations

2 PROJECT DESCRIPTION

The Project site is located on the reservoir formed by the Saguling Dam, Bandung Barat, West Java, about 26km west of Bandung City. The existing dam is owned and operated by PT Indonesia Power and is currently used alongside other infrastructure for the generation of hydro-electric power. The floating PV (FPV) arrays will be placed on the water surface of the reservoir with an OHTL running north towards the district of Cipatat. The key components of the Project are summarised in the table below.

Table 2-1 Project Components

Component	Description	Remark
Floating solar PV	This will include 9 floating PV arrays	This will also include the establishment of a restricted zone around the FPVs (and cables) to prevent unauthorized boats from entering the area.
Floating cables	Rating: 20kV Length: 7.5 km Width: 2.5m	Approximately 300 m of the evacuation cables will be buried on land, and it will include a 1m safety buffer on each side (2m) where future land activities will be restricted.
Substation Area	150kV substation	The floating cable from the FPV will connect to this substation located northwest of the reservoir.
Access road connecting to the 150kV substation, and the jetty	Length: 200m Width: 6m	This road will be permanent with 2 layers of asphalt.
Jetty area	-	The jetty will be constructed for the construction and operational phase of the project.
20kV OHTL	Length: 800m	The EPC will request PT. PLN Distribusi to provide the electricity supply during the construction of the project. The electricity lines will be installed on existing OHTL towers and therefore there will be no additional land impacts.
150kV OHTL	Length: 8.5km No of towers: 23	This OHTL will extend northwards of the 150kV substation.
Switching station	150kV switching station	This switching station will be located west of the existing Rajamandala substation.
	Connection to the grid	The power from the switching station will be evacuated through two locations: one to an existing 500kV OHTL and the other to the existing Rajamandala substation.

Component	Description	Remark
Access road to the switching station	Length: 3.8km Width: 6m	<p>This access road will connect to an existing local road that goes through Cihea village and land belonging to the Forest agency Perhutani.</p> <p>The access road will include the following elements:</p> <ul style="list-style-type: none"> • 2.4km upgrading of an existing road through Cihea village. • 1.4km construction of a new asphalt access road.

In addition to the above, the Project will also include temporary construction facilities such as the laydown area (assembly area) and the corresponding utility requirements.

2.1.1 Project Construction Requirements

The Project construction requirements encompass both land-based and reservoir-based activities. Land based activities will involve earthworks and civil works etc. Reservoir-based activities will include floating out the FPV onto the reservoir and anchoring them including setting up the cables.

At this stage it is understood that about 403 personnel will be involved during the peak construction period. Out of these 403 workers, it is projected that about 70% will be Indonesian nationals, while the remaining 30% will be foreign nationals under the EPC Contractor and potentially the Owner's engineer(s).

With regards to accommodation, it is anticipated that certain worker accommodation facilities will be situated in the Project laydown/assembly area. Moreover, workers will have the option to stay on accommodation facilities located in nearby towns such as in Bandung city, Cipeundeuy, Cipatat and Pandalarang districts.

2.1.2 Operational Phase Requirements

The duration of the PPA will be 25 years from the Project Commercial Operation Date (COD). The operations and maintenance of the FPVs will be undertaken by a joint venture between the First National Operations and Maintenance Company (NOMAC)¹ and a subsidiary under Indonesia Power.

¹ NOMAC is a wholly owned subsidiary of ACWA Power.

The operational phase workers will be part of the Operation & Maintenance Company (O&M) and it is understood that the Project intends to maximise staffing for the Project from within Indonesia, emphasizing a commitment to local workforce development.

Note: Please refer to the lender's ESIA for more details about the Project.

3 STANDARDS & GUIDELINES

3.1 National Standards

3.1.1 Constitution of the Republic of Indonesia (as per the Fourth Amendment of 2002)

The Constitution of the Republic of Indonesia (2002) is an important tool for the protection and promotion of human rights. The Constitution provides for the protection of the following rights provided in the table below among others.

Table 3-1 Overview of the Basic Rights within the Constitution

HUMAN RIGHTS	BRIEF DESCRIPTION
Right to Work	Article 27 (2) states that every citizen shall have the right to work and to earn a humane livelihood. Article 28D (2) also states that every person shall have the right to work and to receive fair and proper remuneration and treatment in employment.
Right to Associate & Assemble	Article 28 states that the freedom to associate and assemble, to express written and oral opinions etc., shall be regulated by law. Article 28E (3) further states that every person shall have the right to freedom to associate, to assemble and to express opinions.
Right to Life, freedom from torture and freedom of thought and conscience	Article 28A states that every person shall have the right to live and to defend his/her existence. Article 28I (1) states that the rights to life, freedom of thought and conscience, freedom of religion, freedom from enslavement, recognition as a person before the law, and the right not to be tried under a law with retrospective effect are all human rights that cannot be limited under any circumstances.
Right to Family	Article 28B states that every person shall have the right to establish a family and to procreate based upon lawful marriage.
Rights to children	Article 28B (2) states that every child shall have the right to live, to grow and to develop, and shall have the right to protection from violence and discrimination.
Right to Education	Article 28C states that every person shall have the right to develop him/herself through fulfilment of his/her basic needs, the right to education and to benefit from science and technology, arts and culture, for the purpose of improving quality of his/her life for the welfare of the human race. Article 31 (1) also states that every citizen has the right to receive education.
Right to Information	Article 28F states that every person shall have the right to communicate and to obtain information for the purposes of the development of his/herself and social environment, and shall have the right to seek, obtain, possess, store, and convey information by employing all available types of channels.

HUMAN RIGHTS	BRIEF DESCRIPTION
Right to equal treatment	Article 28H (2) states that every person shall have the right to receive facilitation and special treatment to have the same opportunity and benefit in order to achieve equality and fairness.
Right to own property	Article 28H (4) states that every person shall have the right to own personal property, and such property may not be unjustly held possession by any party.
Right to freedom of religion	Article 29 states that the State guarantees all persons the freedom of worship, each according to his/her own religion or belief. This right is also enshrined in Article 28E (2).
Freedom from discrimination	Article 28I (2) states that every person shall have the right to be free from discriminative treatment based upon any grounds whatsoever and shall have the right to protection from such discriminative treatment.
Others include	Article 28H (3): Right to social security to develop once self fully as a dignified human being. Article 28I (3): The cultural identities and rights of traditional communities shall be respected in accordance with the development of times and civilisations. Article 28J (1): Every person shall have the duty to respect human rights of others in the orderly life of the community, nation, and state.

3.1.2 Law No 39 Year 1999 Concerning Human Rights

This law recognises that Indonesia is a member of the United Nations, and has a moral and legal responsibility to respect, execute, and uphold the Universal Declaration on Human Rights, and several other international instruments concerning human rights ratified by the Republic of Indonesia.

The key human rights provisions in the Law include:

CHAPTER 2 ON BASIC RIGHTS

- Article 3 states that everyone is born in dignity and human rights and is bestowed with the intellect and reason to live with others in the spirit of brotherhood.
- Article 4 relates to the right to life, the right to not be tortured, the right to freedom of the individual, to freedom of thought and conscience, the right not to be enslaved, the right to be acknowledged as an individual before the law, and the right not to be prosecuted retroactively under the law. These rights cannot be diminished under any circumstances whatsoever.

CHAPTER 3 ON HUMAN RIGHTS AND FREEDOMS

- Article 9 states (1) Everyone has the right to life, to sustain life, and to improve his or her standard of living. (2) Everyone has the right to peace, happiness, and wellbeing. (3) Everyone has the right to an adequate and healthy environment.

- Article 14 (2) states that everyone has the right to seek, obtain, own, store, process, and impart information using all available facilities.
- Article 20 (1) states that no one shall be held in slavery or servitude. (2) Slavery, the slave trade, and servitude shall be prohibited in all their forms.
- Article 24 (1) states that everyone has the right to peaceful assembly and association.
- Article 25 states that every citizen has the right to express his opinion in public, and this includes the right to strike according to prevailing law.
- Article 36 (1): Everyone has the right to own property, both alone and in association with others, for the development of himself, his family, nation, and society through lawful means.
- **Section Nine on Women Rights**
 - Article 48 states that women and men have equal rights to adequate access to and conditions of schooling and education.
 - Article 49 (1) states women have the right to select, be selected and appointed to an adequate job, position, or a profession, in line with prevailing law.
- **Section Ten on Children's Rights**
 - Article 52 (1) states that all children have the right to protection by parents, family, society, and state.
 - Article 53 (1): From conception, every child has the right to life, to maintain life and to improve his standard of living.
 - Article 64 states that every child has the right to protection from financial exploitation, and from doing any work which is dangerous and/or which could interfere with his education or his physical, mental, or spiritual health.

3.1.3 Law on Manpower

The principal legislation governing employment law in Indonesia is Law No. 13 of 2003, known as the 'Manpower Law' as amended by Government Regulation Law No.6 of 2023 on Job Creation. This law recognises two types of employees based on the period of employment agreement i.e., permanent employees and fixed-term employees. Expatriates are employed under a fixed-term employment agreement subject to their work permit.

The 'Manpower Law':

- Protects against discrimination in applying for, obtaining, and advancing skills at jobs.
- Grants male and female workers performing work of equal value, equal pay.
- Ensures that every person available for a job has the same opportunity to get a job without discrimination.

- Ensures that every worker has the right to receive equal treatment without discrimination from their employer.
- States that every person who is available for a job shall have the same right and opportunity to find a decent job and to earn a decent living without being discriminated against on grounds of sex, ethnicity, race, religion, political orientation, in accordance with the person's interest and capability, including the provision of equal treatment to the disabled.
- States that normal working hours should not exceed seven hours per day, six days per week, and 40 hours per week; and
- States that workers are entitled to take all public holidays off. Public national holidays are determined each year by the Joint Ministerial Decree.

The Manpower Law recognises Collective Labour Agreements (CLA) as an instrument of collective bargaining between a registered labour union(s) with an employer or organisations. The CLA contains the rights and obligations of the employer, labour union and employees etc.

3.1.4 Other Key Relevant Acts

Other key relevant Acts relating to safeguarding of human rights for different groups in Indonesia are as provided in the table below.

Table 3-2 Overview of other Acts in Indonesia

REGULATION	BRIEF DESCRIPTION
Law No.12 of 2022 Regarding Sexual Violence Crimes	This law sets out different types of sexual abuse, including physical, non-physical sexual abuse, forced contraception, sexual exploitation etc. It allows for prison time for crimes committed and stipulates that victims of sexual violence receive restitution and be provided with counselling.
Law on the Elimination of Domestic Violence No. 23 of 2004	This law is intended to promote human rights, to achieve gender equality, to eliminate discrimination and to protect victims of violence, to punish perpetrators and to maintain harmony of the household. It also highlights the roles of government, community, the need for protection and rehabilitation for victims and it also provides for sanctions to be imposed on perpetrators.
Law No.2 of 2004 on Settlement of Industrial Relations Disputes	Governs the settlement of industrial disputes between employers and workers through mediation, reconciliation, and arbitration.
Law No. 40 of 2004 on Social Security System; Amended by Gov. Regulation Law No. 2 of 2022; Amended by Law no. 4 of 2023 on Development and Strengthening of the Financial Sector.	Governs the national security system which includes social security for workers, such as health insurance, pension scheme, and work accident insurance.

REGULATION	BRIEF DESCRIPTION
Government Regulation No. 36 of 2021 on Wage; Amended by Government Regulation No. 51 of 2023	Includes requirements for minimum wage, wage payments and protection for workers who receive wages below the minimum wage.
Law No. 21 of 2000 on Employee/Labour Union	"Labour Union Law": Includes provisions for labour unions and employee participation, industrial action etc.
Penal Code of Indonesia ²	Includes provisions relating to GBVH such as, Article 285 prohibits forcing or threatening to force a woman to have sexual intercourse outside of marriage and punishes violators. Article 286 punishes sexual intercourse with an unconscious or helpless woman.
Law No. 21 of 1999 on Ratification of ILO Convention No.111 of 1948 on Discrimination in Respect of Employment and Occupation	Protects employees against discrimination which is also prohibited under the Manpower Law. Unlawful discrimination includes: <ul style="list-style-type: none"> Discrimination on the opportunity to obtain a job and receive the same treatment from the employer. Discrimination over salaries between male and female employees; and Discrimination against employees living with HIV/AIDS.
Government Regulation No. 39 of 2023 Concerning Amendments to Government Regulation No 19. of 2021 regarding Land Acquisition for Development in Public Interest	Stipulates the usage of land designated for public use, provisions for compensation (which can be provided in form of money, replacement land, resettlement, shareholding, or any other form agreed by both parties). In addition, it requires compensation to be fair to the entitled party, manager and/or user of goods in the land acquisition process. In addition, it includes procedures for changing the status and obtaining permission for land acquisition from different types of land such as State land, forest land, village land, customary land, agricultural land, and asset land.
Law of the Republic of Indonesia No.8 of 2016 on Persons with Disabilities	This law focuses on the rights of persons with disabilities, aiming to eliminate discrimination and ensure their full participation in society.
Law of the Republic of Indonesia No. 40 of 2008 on Elimination of Racial & Ethnic Discrimination with some amendments under Law No. 1 of 2023.	This law addresses discrimination based on race and ethnicity, aiming to promote equality and protect the rights of the minority.
Presidential Regulation No 53 of 2021 on Human Rights Action Plan 2021-2025	Underlines the respect, protection, fulfilment, enforcement, and promotion of human rights.
Presidential Regulation No.60 of 2023 on the National Action Plan on	Includes the state's obligation to protect human rights, the responsibility of business actors, and the rights of

² A new Criminal law/Penal Code came into force in 2022 but it will not take effect immediately, but instead, it will take effect three years after the bill is enacted into law.

REGULATION	BRIEF DESCRIPTION
Business and Human Rights (NAP-BHR)	victims for remedies that are “effective, legal, accessible, provide certainty, fair, transparent, and accountability, both through judicial and non-judicial mechanisms.”
Law No. 12 of 2022 on Sexual Violence	This law gives legal protection to victims/survivors for criminal acts of sexual violence. This law provides for provision of personal safety, provide support such as legal support, provide testimony without pressure, and help with the recovery process etc.
Trade Union Act No. 21/2000	Provides for the rights of workers to join independent unions, conduct legal strikes, and bargain collectively

3.1.5 Core International Human Rights Instruments Ratified by Indonesia

Indonesia is party to major international human rights instruments which are summarised in the table below.

Table 3-3 International human rights instruments

INSTRUMENT	DATE
Convention against Torture and Other Cruel Inhuman or Degrading Treatment or Punishment	Ratified in October 1998
International Covenant on Civil and Political Rights (ICCPR)	Accession in February 2006
Convention on the Elimination of All Forms of Discrimination against Women (CEDAW)	Ratified in September 1984
International Convention on the Elimination of All Forms of Racial Discrimination (ICERD)	Accession in June 1999
International Covenant on Economic, Social, and cultural Rights (ICESCR)	Accession in February 2006
Convention on the Rights of the Child (CRC)	Ratified in September 1990
Convention on the Rights of Persons with Disabilities	Ratified in November 2011
International Convention on the Protection of the Rights of All Migrant Workers and Members of their Families (CRPD)	Ratified May 2012

In addition, it is party to various ILO conventions as provided in the table below.

Table 3-4 ILO conventions ratified by Indonesia

INSTRUMENT	DATE
Convention No 29 on Forced Labour adopted in 1930	12 th June 1950
Convention No 87 on Freedom of Association and Protection of the Right to Organise, adopted on 17th of June 1948	09 th June 1998
Convention No 98 on the Right to Organise and Collective Bargaining adopted on 8th of June 1949	15 th June 1957
Convention No 100 on Equal Remuneration adopted 6th of June 1951	11 th August 1958
Abolition of Forced Labour Convention No.105, 1957	07 th June 1999

INSTRUMENT	DATE
Convention 111 on Discrimination (Employment and Occupation) adopted 4th of June 1958	07 th June 1999
Convention 138 on Minimum Age adopted 6th of June 1973	07 th June 1999
Convention 182 on the Worst Forms of Child Labour adopted 17th June 1999	28 th March 2000
C187 Promotional Framework for Occupational Safety & Health Convention, 2006	31 st August 2015

3.2 Lenders Requirements

ACWA Power is actively seeking Project finance from institutions, specifically Deutsche Investitions- und Entwicklungsgesellschaft (DEG) and Proparco (subsidiary of the Groupe Agence Française de Développement). These lenders are affiliated with the European Development Financial Institutions (EDFI) which requires compliance with the following requirements:

- IFC Performance Standards on E&S Sustainability (2012).
 - Including the ILO Fundamental Conventions including core conventions on labour, such as those stated in IFC PS2.
- United Nations Guiding Principles on Business and Human Rights (UNGPs).

3.2.1 IFC Performance Standards

3.2.1.1 IFC Performance Standard 2 - Labour and Working Conditions

IFC PS2 recognises that the pursuit of economic growth through employment creation and income generation should be accompanied by protection of the fundamental rights of workers. This includes rights for direct, contracted and supply chain workers (as applicable for key primary supply chains).

PS 2 is in part guided by several ILO conventions, as follows:

- ILO Convention 87 on Freedom of Association and Protection of the Right to Organize (ratified by Indonesia in June 1998).
- ILO Convention 98 on the Right to Organize and Collective Bargaining (ratified by Indonesia in June 1957).
- ILO Convention 29 on Forced Labour (ratified by Indonesia in 1950).
- ILO Convention 100 on Equal Remuneration (ratified by Indonesia August 1958).
- ILO Convention 105 on the Abolition of Forced Labour (ratified by Indonesia in June 1999).

- ILO Convention 111 on Discrimination (Employment and Occupation) (ratified by Indonesia in June 1999).
- ILO Convention 138 on Minimum Age (of Employment) (ratified by Indonesia In June 1999).
- ILO Convention 182 on the Worst Forms of Child Labour (ratified by Indonesia In March 2000).
- UN Convention on the Rights of the Child, Article 32.1 (ratified by Indonesia in September 1990).
- UN Convention on the Protection of the Rights of all Migrant Workers and Members of their Families (ratified by Indonesia in May 2012).

In addition to this, PS 2 outlines certain requirements for projects linked to Human Resource (HR) policies, management, working conditions and terms of employment (other elements not linked to the ILO conventions above) as well as key processes for occupational health and safety (OHS) management and grievance redress.

3.2.1.2 IFC Performance Standard 4 - Community Health, Safety and Security

This standard establishes requirements for the safeguard of the local community from potential risks associated with the project including impacts associated with the introduction of communicable disease, loss of ecosystem function, site access and operation, material use etc. It requires the Client (and Project) to avoid or minimize the risks and impacts to community health, safety, and security that may arise from project related activities, with particular attention to vulnerable groups.

3.2.1.3 IFC Performance Standard 5 – Land Acquisition and Involuntary Resettlement

PS 5 recognizes that project-related land acquisition and restrictions on land use can have adverse impacts on communities and persons that use this land. Involuntary resettlement refers both to physical displacement (relocation or loss of shelter) and to economic displacement (loss of assets or access to assets that leads to loss of income sources or other means of livelihood) because of project-related land acquisition and/or restrictions on land use. Where involuntary resettlement is unavoidable, it should be minimized and appropriate measures to mitigate adverse impacts on displaced persons and host communities should be carefully planned and implemented.

It is noted that the proposed Project will only lead to economic displacement through land acquisition and relocation of fishing cages and fishing stalls within the Project AoI.

3.2.2 IFC Guidance on Gender Based Violence and Harassment (GBVH) in the Construction Sector

The assessment, prevention, monitoring, and response measures with regards to GBVH should be underpinned by the following principles:

- **Survivor Centred:** The rights of GBVH survivors need to be consistently prioritised and used as the starting point for all decisions on efforts to assess, prevent, monitor, and respond to GBVH.
- **Safe:** Survivors, witnesses, and those who report and seek to address GBVH can be at risk of retaliation, including threatening and violent behaviour, often from those who do not like their position of power being challenged. Companies should prioritise the safety of those who have experienced, witnessed, and reported GBVH.
- **Context specific:** All measures need to be rooted in a thorough understanding of the local context. Investors and companies should understand the legal and social context and identify the support mechanisms that are in place.
- **Collaborative:** Companies should seek inputs from a range of internal and external stakeholders to increase the likelihood of broader buy-in and make GBVH prevention more effective.
- **Inclusive:** Companies should recognise the heightened risks of GBVH faced by certain groups who are subject to discrimination and marginalisation. High risk groups often include people with disabilities, single parents, migrants and ethnic minorities and sexual and gender minorities. The system should also account for illiterate or non-literate people who may not be able to access written information on GBVH reporting mechanisms.
- **Integrated:** Processes, efforts to assess, prevent, monitor, and respond to GBVH needs to be integrated as much as possible into existing processes and management systems, such as OHS, security management systems, environmental and social management systems (ESMS) and human resources (HR) policies and procedures.
- **Non-discriminatory:** All survivors need to be listened to and treated equally and promote diversity in the workplace.
- **Well-informed:** Companies should draw on relevant expertise when developing prevention and response measures. The grievance redress mechanism and investigation procedures should be set up to ensure they are appropriate, relevant, and safe in the local context.

According to the guidance, the benefits of addressing GBVH include:

- Improvement to workers' physical and emotional wellbeing and strengthening of OHS.
- Avoiding reputational damage, financial risks and legal liabilities for companies, investors, and construction contractors.

- Building relationships and social license to operate in communities. This can result from regular dialogue to understand and track project GBVH risks as well as the effective use of measures to prevent and respond to GBVH.
- Broadening of the pool of potential workers that companies can draw upon, including women workers from nearby communities because of lower perceived risk of GBVH.

3.2.3 United Nations Human Rights Guiding Principles on Business & Human Rights

HRGP II on “The corporate responsibility to respect human rights” recognises that it is the responsibility of businesses and corporations to respect human rights. It is a global standard of expected conduct for all business enterprises wherever they operate. It exists independently of a states’ ability and/or willingness to fulfil their human rights obligations and does not diminish those obligations. The Foundational principles to take into consideration are:

- Principle 11: Business enterprises should avoid infringing on the human rights of others and should address adverse human rights impacts with which they are involved.
- Principle 12: The responsibility of business enterprises to respect human rights refers to internationally recognized human rights – understood, at a minimum, as those expressed in the International Bill of Human Rights and the principles concerning fundamental rights set out in the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work.
- Principle-13: The responsibility to respect human rights requires that business enterprises avoid causing or contributing to adverse human rights impacts through their activities and address such impacts when they occur.
- Principle-14: The responsibility of business enterprises to respect human rights applies to all enterprises regardless of their size, sector, operational context, ownership, and structure. Nevertheless, the scale and complexity of the means through which enterprises meet that responsibility may vary according to these factors and with the severity of the enterprise’s adverse human rights impacts.
- Principle-15: Business enterprises should have policies and processes appropriate to their size and circumstances in place, including:
- Principle 16: Policy commitment
- Principle 17 to 21: Human rights due diligence
- Principle 22: Remediation

According to the UN Guiding Principles, when exercising human rights due diligence, businesses are required to consider, at minimum, the rights captured in the International Bill of Human Rights (comprising The Universal Declaration is codified in international law through the International Covenant on Civil and Political Rights (ICCPR) and the International Covenant

on Economic, Social and Cultural Rights (ICESCR)³) and the ILO's eight core conventions outlined in the Declaration of Fundamental Principles and Rights at Work (addressing non-discrimination, bonded and forced labour, child labour, and freedom of association).

3.2.4 Equator Principles IV

As stated in Chapter 1 above, this HRRA has been undertaken in line with EPIV requirements. In the context of EPIV, each client is expected to conduct human rights due diligence in line with the UNGPs and to document that process in its assessment documentation (EPIV, Principle 2). The depth of the assessment should be indicated by the scope of project risks, which will also dictate the level of detail to be included in project documentation provided in EPIV.

EPIV also provides a Guidance Note: '*Implementation of Human Rights Assessment under the Equator Principles*' dated September 2020 which provides guidance to clients on how to meet the human rights requirements under Principle 2.

3.2.5 Gap Analysis Between Indonesia National & Lenders Requirements

The gap analysis below has been undertaken between HRGP and Indonesian legislation. It is noted that analysis of HRGP relies on ILO and ICESCR/ICCPR as the core references. The gap analysis focuses on the existing Indonesia law under the Constitution, Law on Concerning Human Rights, Law on Manpower and refers to other relevant regulations such as those relating to the protection of the children etc.

³ Human Rights Translated 2.0 A Business Reference Guide prepared in Collaboration with the UNHCR & United Nations Global Compact (2017)

Table 3-5 Gaps between Indonesia Legislation, ILO & HRGP

HUMAN RIGHTS ISSUE	HRGP (ILO & ICCPR/ICESCR)	INDONESIAN LEGISLATION	GAPS AND MEASURES TO BRIDGE THE GAPS
Child Labour	<ul style="list-style-type: none"> ICCPR Article 24 'Rights of Protection for the Child' requires children to have special protection and must not be engaged in work that is hazardous or that which can cause physical or mental harm. ILO Declaration on Fundamental Principles and Rights to Work calls for prohibition of child labour. ILO C138 prohibits hazardous work for all persons under 18 years. It also prohibits labour for those under 15, with limited exceptions for developing countries. ILO C182 obligates members to take immediate and effective measures to secure the prohibition and elimination of the worst forms of child labour as a matter of urgency. 	<ul style="list-style-type: none"> Article 64 of the Law No 39 Year 1999 Concerning Human Rights states that every child has the right to protection from financial exploitation, and from doing any work which is dangerous and/or which could interfere with his education or his physical, mental, or spiritual health. Article 74 of the Manpower Law states that everybody shall be prohibited from employing children and involving children in the worst forms of child labour. These include slavery, prostitution, production, use or procurement of drugs, jobs harmful to the health, safety and moral of the child. Article 68 of the Manpower Law states that entrepreneurs are not allowed to employ children. However, Article 69, 70, 71 provides the exemptions such as engagement in light work as prescribed under these articles. 	<p>The Indonesia law aligns with the international requirements as a minimum.</p> <p>ACWA Power and the Project Company will ensure that verification of identification documents is undertaken before hiring of employees by all Project parties.</p> <p>ACWA Power and the Project Company will also ensure the implementation of the Supply Chain Management Plan and Responsible Sourcing Policy to ensure there is no child labour within its supply chain.</p>
Right to Work and Forced Labour	<ul style="list-style-type: none"> ICCPR Article 8 'Right to not be Subjected to Slavery, Servitude or Forced Labour'. The fact that a person is paid does not mean that labour is not forced if the other elements of forced labour are not met. <ul style="list-style-type: none"> This also included any forms of bonded labour, compulsory labour and prison labour (permitted under certain circumstances), trafficking. 	<ul style="list-style-type: none"> Article 27 of the Constitution states that every citizen shall have the right to work and to earn a humane livelihood. Article 28D (2) further states that every person shall have the right to work and receive fair and proper 	<ul style="list-style-type: none"> The Indonesia law aligns with the international requirements on work and forced labour. The project will implement Indonesian law, ILO and align with ICESCR/ICCPR.

HUMAN RIGHTS ISSUE	HRGP (ILO & ICCPR/ICESCR)	INDONESIAN LEGISLATION	GAPS AND MEASURES TO BRIDGE THE GAPS
	<ul style="list-style-type: none"> ICESCR Article 6 'Right to Work' recognizes the right of everyone to the opportunity to make their living by work, which they freely chose or accept. This implies no one should be forced to exercise or engage in employment and that potential workers have a right to access to a system of protection guaranteeing access to employment. <ul style="list-style-type: none"> - Even if the prohibition of forced labour is not explicitly included it may be derived from the right to free choice of employment. - Requires work to be decent which means that work respects the fundamental rights of the person as well as the rights of worker in terms of conditions or work safety and remuneration. - The right to work also includes the prohibition of arbitrary dismissal. ILO Declaration on Fundamental Principles and Rights to Work also calls for elimination of all forms of forced or compulsory labour. ILO C029 and C105 Article 1 calls on members to suppress the use of forced labour or compulsory labour in all its forms. 	<ul style="list-style-type: none"> remuneration and treatment in employment. Further Article 28I of the Constitution states that freedom from enslavement is a human right that cannot be limited under any circumstances. Article 4 of the Law Concerning Human Rights states that everyone has a right to freedom while Article 20(1) states that no one shall be held in slavery or servitude. Article 32 subsection 1 of the Manpower Law states that jobseekers must not be forced to accept a job and employers too, must not be forced to accept manpower offered to him. 	<ul style="list-style-type: none"> Workers will also be informed of their legal rights and the grievance redress mechanism at the time of hiring including other avenues they can use to complain such as the hotlines operated by the government (i.e., for Forced Labour reports can be made to the Witness and Victim Protection Agency). These details will be included during the induction. ACWA Power and the Project Company will also ensure the implementation of the Supply Chain Management Plan and Responsible Sourcing Policy to ensure there is no forced labour within its supply chain
Collective bargaining freedom and association	<ul style="list-style-type: none"> ICCPR Article 22 'Right to Freedom of Association' protects the right to form or join all types of associations such as political parties, religious societies, sporting and other recreational clubs, non-governmental organisations and trade unions. ICESCR Article 8 'Right to Form Trade Unions & the Right to Strike' concerns the right of everyone to form trade unions and to join the trade union of their choice. 	<ul style="list-style-type: none"> The Trade Union Act 21/2000 provides for the rights of workers to join independent unions, conduct legal strikes, and bargain collectively. The Manpower Law recognises Collective Labour Agreements (CLA) as an instrument of collective bargaining between a registered labour union(s) with an employer or 	<ul style="list-style-type: none"> The Indonesian law aligns with the international requirements as a minimum. ACWA Power and the Project Company will ensure that the workers are aware of their rights to form and/or join trade unions or elect workers

HUMAN RIGHTS ISSUE	HRGP (ILO & ICCPR/ICESCR)	INDONESIAN LEGISLATION	GAPS AND MEASURES TO BRIDGE THE GAPS
	<ul style="list-style-type: none"> - This right may only be restricted by States in circumstances set down in law and are necessary to protect national security, public order, or the rights and freedoms of others. • ILO Declaration on Fundamental Principles and Rights to Work states that members have an obligation to promote freedom of association and the effective recognition of the right to collective bargaining. • ILO C098 Article 2 states that workers and employees without distinction shall have the right to establish and subject to the organization concerned, to join organisations of their own choosing without previous authorization. • In addition, workers should not be discriminated against because of trade union membership. 	<ul style="list-style-type: none"> organisations. The CLA contains the rights and obligations of the employer, labour union and employees etc. • Chapter VI of the Trade Union Act states that Unions are obliged to protect members against violations of their rights, to improve the welfare of members and their families and to manage their affairs in accordance with their constitution. • Chapter III of the Trade Union Act states that each union must have at least 10 workers as members. 	<ul style="list-style-type: none"> representatives. This information will be provided during the induction process and documented. • Additionally, workers will be provided with details of the Workers Grievance Mechanism including how to access it and make anonymous complaints.
Non-discrimination	<ul style="list-style-type: none"> • ICCPR Article 26 'Right to Equality Before the Law, Equal Protection of the Law, and Rights of Non-Discrimination'. Prohibits discrimination of race, colour, gender, language, religion, political or other opinion, national or social origin, property, and birth or other status. • Non-discrimination is a fundamental and overarching principle of international human rights. Article 2 (1) obliges states to prohibit any distinctions, exclusions, restrictions and limitations by both public and private bodies. Article 3 states that the government should ensure the equal right of men and women to the enjoyment of all civil and political rights. • ILO Declaration on Fundamental Principles and Rights to Work calls for elimination of discrimination in respect of employment and occupation. 	<ul style="list-style-type: none"> • Article 28I (2) of the Constitution states that every person shall have the right to be free from discriminative treatment based upon any grounds whatsoever and shall have the right to protection from such discriminative treatment. • Chapter III (Article 5) of the Manpower Law states that every person available for a job shall have the same opportunity to get a job without discrimination. Article 6 further states that every worker has the right to receive equal treatment without discrimination from their employer. 	<ul style="list-style-type: none"> • The Indonesian law aligns with the international requirements as a minimum. • The Project Company and the EPC Contractor/O&M will encourage women to apply for employment opportunities at different levels based on their qualifications and abilities

HUMAN RIGHTS ISSUE	HRGP (ILO & ICCPR/ICESCR)	INDONESIAN LEGISLATION	GAPS AND MEASURES TO BRIDGE THE GAPS
	<ul style="list-style-type: none"> ILO C111 requires Members to declare and pursue national policy designed to promote, by methods appropriate to national conditions and practice, equality of opportunity and treatment in respect to employment and occupation with a view to eliminate any discrimination based on race, colour, sex, religion, political opinion, national extraction, or social origin. 		
Wages, working hours, benefits	<ul style="list-style-type: none"> ICESCR Article 7 'Right to Enjoy Just and Favourable Conditions for Work' states that workers have the right to enjoy favourable working conditions. <ul style="list-style-type: none"> As such workers must be provided with remuneration which can include wages and other allowances such as health insurance, a fair minimum wage to provide workers with a decent living for themselves and their families. Workers should also be entitled to adequate time for rest and leisure including paid holiday leave. ILO C095 Article 3 'Protection of Wages Convention' states that wages payable in money will be paid only in legal tender, and payment in the form of promissory notes, vouchers or coupons or in any other form alleged to represent legal tender shall be prohibited. Article 4 elaborates more on worker allowances and how this shall be enforced 	<ul style="list-style-type: none"> Article 28D (2) of the Constitution states that every person shall have the right to work and receive fair and proper remuneration and treatment in employment. The Law on Manpower provides for the working hours requirements including Article 78 which requires for employers to get the consent of workers before they are required to work overtime. In addition, any workers who work overtime will be paid. Article 88 of the Law on Manpower states that every worker has the right to earn a living that is decent from the viewpoint of humanity. The Law on Manpower provides for benefits to women such as: <ul style="list-style-type: none"> Article 81 states that female workers who feel pain during their menstrual period and inform their employer are not obliged to come to work on the first and second day of menstruation. 	<ul style="list-style-type: none"> The Indonesian law aligns with the international requirements as a minimum. The Project Company, EPC contractor and sub-contractor and the O&M Company will ensure workers are not liable for any expenses related to their recruitment process. They will ensure that recruitment agencies (if used) have not received payments from the workers and any recruitment expenses paid by the workers for getting employed by the Project will be reimbursed; these may be identified through consultations with workers during the early stages of recruitment. To ensure the workers have a clear understanding of

HUMAN RIGHTS ISSUE	HRGP (ILO & ICCPR/ICESCR)	INDONESIAN LEGISLATION	GAPS AND MEASURES TO BRIDGE THE GAPS
		<ul style="list-style-type: none"> - Article 82, 83 and 153 provides the benefits to women who are pregnant and those that are breastfeeding. 	<p>the content of the agreements and contracts (that they will receive in local language such as Bahasa, Sundanese, and English if needed), it is recommended that the contracts' clauses are translated to the workers' native language or explained to them in their native language (where needed) during the recruitment process by a staff member to ensure they are aware of their rights.</p> <ul style="list-style-type: none"> • Male and especially female employees will be informed of their benefits during the employment process and during induction (personal information will not be shared during induction).
Freedom of movement	<ul style="list-style-type: none"> • ICCPR Article 12 'Right to Freedom of Movement' allows people who are in the country to move freely throughout the country and leave if they wish to do so. • Movement may be restricted to protect national security, public order, health or morals or the rights and freedoms of others. 	<ul style="list-style-type: none"> • Article 27 (1) of the Law Concerning Human Rights states that all Indonesian citizens have the right to freedom of movement and residence within the borders of Indonesia. 	<ul style="list-style-type: none"> • The Indonesian law aligns with the international requirements as a minimum. • As such, the Project will not withhold employees' official documents or restrict their movement within the country unless there are national restrictions in place

HUMAN RIGHTS ISSUE	HRGP (ILO & ICCPR/ICESCR)	INDONESIAN LEGISLATION	GAPS AND MEASURES TO BRIDGE THE GAPS
			due to security or health reasons.
Gender based violence & harassment, sexual exploitation & abuse, sexual harassment (GBVH/SEA/SH)	<ul style="list-style-type: none"> ICCPR Article 7 'Right not to be subjected to torture, cruel, inhuman and/or degrading treatment or punishment' prohibits these acts including sexual violence and rape. 	<ul style="list-style-type: none"> Article 28I (1) of the Constitution states that the freedom from torture is a human right that cannot be limited under any circumstances. Article 33 of the Law on Human Rights states that everyone has the right to freedom from torture, or cruel, inhuman and degrading punishment or treatment. Law No. 12 of 2022 regarding Sexual Violence and Crimes criminalises acts of sexual violence and guarantees legal protection and remedies for victims of sexual violence. Article 58(1) of the Law on Human Rights states that every child has the right to protection before the law against all forms of physical and mental violence, neglect, mistreatment, and sexual assault while under the carer. 	<ul style="list-style-type: none"> The Indonesia law aligns with the international requirements as a minimum. ACWA Power and the Project Company will implement a GBVH Policy which will detail the list of unacceptable behaviour among workers, provisions for reporting, sanctions for perpetrators and available resources & support systems for victims in accordance with lenders and Indonesian regulations. The workers and local community members will be provided with details of how to report cases relating to GBVH/SEA and the type of support provided to witnesses & survivors.
Security and Privacy	<ul style="list-style-type: none"> ICCPR Article 9 'Rights to Liberty and Security of Person'. It prohibits unlawful or arbitrary arrest or detention of any kind and is set to ensure the right to security of person and protect individuals against physical or psychological injury, regardless of whether the victim is detained or non-detained. Article 17 of the ICCPR 'Right to Privacy' protects against arbitrary unreasonable or unlawful interference 	<ul style="list-style-type: none"> Article 29 (1) of the Law on Human Rights states that everyone has the right to protection of the individual, family, opinion, honour, dignity, and rights. 	<ul style="list-style-type: none"> The Constitution does not clearly identify the requirements for security. However, it is understood that the project will hire security guards. A security Management Plan will be established and

HUMAN RIGHTS ISSUE	HRGP (ILO & ICCPR/ICESCR)	INDONESIAN LEGISLATION	GAPS AND MEASURES TO BRIDGE THE GAPS
	with people's privacy, home, correspondence, as well as unlawful attacks on their honour and reputation.		<p>implemented by the EPC Contractor, outlining expectations and the required training for security and conflict management.</p> <ul style="list-style-type: none"> The Project is required to have a robust grievance redress mechanism to address all grievances raised in relation to security and safety issues, without fear of reprisal or retribution. In addition, data privacy of workers and project affected persons will be ensured.
Land acquisition	<ul style="list-style-type: none"> ICESCR Article 11 'Right to an adequate standard of living'. This includes the right to <ul style="list-style-type: none"> Adequate housing: must fulfil certain basic criteria, such as security of tenure, availability of utilities and other services (e.g. sewage facilities and access to safe drinking water), affordability, habitability, accessibility, location, and cultural adequacy of housing. Land transactions that require population relocation or forced evictions should explore feasible alternatives. Adequate housing procedural safeguards including comprehensive impact assessments, prior consultation and notification, provision of legal remedies, fair and just compensation, and adequate relocation should be deployed to minimize the adverse impacts. <u>Right to food</u> implies that food should be available and accessible to people in a quantity and of a quality 	<ul style="list-style-type: none"> Article 28H (4) of the Constitution states that every person shall have the right to own personal property, and such property may not be justly held possession by any party. Government Regulation No.39 of 2023 Concerning Amendments to Government regulations No.19 of 2021 regarding Land Acquisition for Development in Public Interest. This law provides the legal framework for land acquisition processes, compensation, and related matters when land is acquired for public interest development projects. Article 	<ul style="list-style-type: none"> Even of the Indonesian Law requires for compensation to be fair, there are some gaps between international requirements and the Indonesian law in land acquisition, compensation, recognition of informal landowners and users, and restoration of livelihoods to ensure adequate standards of living. This also applies to the fishing cage and, traditional fishing, fishing stalls owners who are

HUMAN RIGHTS ISSUE	HRGP (ILO & ICCPR/ICESCR)	INDONESIAN LEGISLATION	GAPS AND MEASURES TO BRIDGE THE GAPS
	sufficient to satisfy their dietary needs, free from adverse substances, and acceptable to their culture.	<ul style="list-style-type: none"> 1 of this regulation requires for compensation to be fair. The implementation of the land acquisition for development of public interest is carried out in four stages: planning; preparation; implementation; and delivery of results. 	<p>located within the restricted zone of the Project AOL.</p> <ul style="list-style-type: none"> As such, the Project will implement the Livelihood Restoration Plan which will be prepared in line with international best practice and lenders requirements.
Health	<ul style="list-style-type: none"> ICESCR Article 12 'Right to Health' of ICESCR requires that companies ensure that their operations and products do not impact on the health of people such as workers. Workers should also have access to treatment and adequate infrastructure such as water and sanitary facilities and healthy working conditions and a healthy environment. ILO C167 'Safety & Health in Construction Convention' states that all appropriate precautions shall be undertaken to ensure all workplaces are safe without risk of injury to the safety and health of workers. 	<ul style="list-style-type: none"> Article 28H (1) of the Constitution states that every person shall have the right to live in physical and spiritual prosperity, to have a home and to enjoy a good health environment and shall have the right to obtain medical care. Article 49 (2) of the Law on Human Rights states that women have the right to protection in undertaking of work or profession that could put her safety and/or her reproductive health. Article 86 (1) of the Law on Manpower states that every worker has the right to receive occupational safety and health protection. In addition, Article 87 (1) states that every enterprise is under an obligation to apply an occupational safety and health management system that shall be integrated into the enterprise's managed system. 	<ul style="list-style-type: none"> The Indonesian law aligns with the international requirements as a minimum. The Project will implement all the environmental and social requirements to ensure that it does not have an impact on the health of the local communities and/or workers. In addition, the Project will develop and implement an Occupational Health and Safety Management System.

HUMAN RIGHTS ISSUE	HRGP (ILO & ICCPR/ICESCR)	INDONESIAN LEGISLATION	GAPS AND MEASURES TO BRIDGE THE GAPS
Education	<ul style="list-style-type: none"> ICESCR Article 13 & 14 'Right to Education' guarantee all children the right to free and compulsory primary education. The right also requires progressive steps from governments aimed at the provision of secondary and higher education, including the provision of 'fundamental' education for those who could not complete primary education. The right to education also includes the right of equal access to education and equal enjoyment of education facilities etc. 	<ul style="list-style-type: none"> Article 31 of the Constitution states that every citizen has the right to receive education. Article 60 (1) of the Law on Human Rights states that every child has the right to access education and schooling as befits his interest, talents, and intellectual capacity. Article 64 further states that every child has the right to protection from financial exploitation, and from doing any work which is dangerous and/or which could interfere with his education or his physical, mental, or spiritual health. 	<p>The Indonesian law aligns with the international requirements as a minimum.</p> <ul style="list-style-type: none"> As such, the project will not employ school going children. This is interlinked with the requirements under Child Labour above.

4 HUMAN RIGHTS CONTEXT IN INDONESIA

4.1 National Overview

The Government of Indonesia is committed to protecting and promoting human rights as defined in the Constitution of the Republic of Indonesia as amended in 2002. In addition, the government has signed and ratified or acceded to various international human rights instruments including core ILO conventions.

The commitment to the promotion and protection of human rights in Indonesia is derived from Pancasila (five pillars), notably from the second pillar of "A just and civilised humanity" as well as relevant articles in the Constitution. The promotion of human rights is based on principles of indivisibility, equality, and recognition to the prevailing national conditions. The indivisibility principle implies that civil, political, economic, social, and cultural rights as well as right to development are regarded as integral parts of a whole that cannot be broken up without diminishing each of the components.

This commitment is further demonstrated by the establishment of the National Commission on Human Rights in 1993 for the purpose of developing a national atmosphere conducive to the exercise and safeguarding of human rights.

Additionally, Indonesia formulated the National Human Rights Action Plan (NHRAP) with the current being mandated under the Presidential No. 53 of 2021 on National Human Rights Action Plan 2021-2025 (RANHAM 2021-2025). The main target groups under the RANHAM include women, children, indigenous groups, and people living with disabilities.

RANHAM is an integral instrument of ensuring fundamental rights, such as the right to life, to health, as well as child's right to development and to education, as these categories of rights are embedded upon all individuals. Guarantee over these rights is included in the international conventions/instruments ratified by Indonesia such as ICCPR, ICESCR, CRC, ICERD, CEDAW, and CRPD. The ratification of these instruments is followed by obligations for Indonesia to respect, protect, fulfil, enforce, and promote the rights of every individual, with no exception.

4.2 Human Rights Baseline Description

Reports on human rights conditions in Indonesia, as highlighted in forums like Human Rights Watch, US Department of State, and Amnesty International etc., predominantly focus on the political challenges and corresponding civil and political rights, which fall outside the scope of this report. Yet it is undeniable that the government's political willingness significantly influences the protection of other rights, including those pertaining to economic, social, and cultural aspects.

Based on this, the adherence to and protection of human rights in Indonesia does not entirely align with the United Nations Council declaration or the national-level legislation. However, the government has made considerable efforts to prioritise gender equality, empowerment of women and girls, and protection of their rights (UNHRC, 2023).

It's positive to note that during the UN Human Rights Council (UNHRC) Universal Review for Indonesia (Fourth Cycle) in 2022, there was support from the government of Indonesia for the recommendations related to various crucial human rights aspects. These include the legal and general framework of implementation, international humanitarian law, universal and cross-cutting issues, civil and political rights, economic, social, and cultural rights, women's rights, children's rights and rights of other specific groups and persons.

4.3 Conditions in West Java

According to the 2023 report by the Human Rights Commission (Komnas Ham)⁴, there were 135 reported human rights violations documented in West Java Province. West Java ranked second in the number of human rights violations related to Freedom of Religion. The Setara Institute reported 25 cases, primarily involving disruptions of places of worship and religious blasphemy⁵.

Furthermore, the Human Rights Commission recorded a total of 288 cases in 2020, with only 4 complaints originating from West Bandung Regency and none from Cianjur Regency⁶. Historical data from the Commission indicates a decrease in the number of cases reported in West Java from 2015 to 2021. The annual report shows 631 cases reported in 2015, compared to 234 cases in 2021. This decline could be attributed to many reasons including the Covid-19 outbreak.

The Ministry of Law and Human Rights in West Java organized a human rights dissemination activity, with a specific focus on ten (10) fundamental human rights, particularly emphasising land-related issues. The primary objective of this activity was to impart essential information to stakeholders, enhance the awareness of the system, and promote a better understanding of topics related to access to land services and resolution of land cases. The dissemination aimed

⁴ Human Rights Situation in Indonesia, Period 1st Semester of 2023, the National Human Rights Commission (Komnas HAM), August 2023

⁵ <https://bandungbergerak.id/article/detail/15094/jawa-barat-peringkat-dua-dalam-catatan-pelanggaran-kebebasan-beragama>

⁶ <https://www.komnasham.go.id/index.php/news/2021/3/24/1727/kegiatan-sinergi-stakeholder-pengaduan-komnas-ham-di-provinsi-jawa-barat-pada-tanggal-17-20-maret-2021.html>

to ensure that potential human rights violations could be anticipated and promptly addressed in an appropriate manner⁷.

4.4 Mechanism to Address Human Rights Complaints

There are different ways of reporting human rights complaints in Indonesia. The reporting mechanism largely depends on the nature of the rights violated.

Labour related disputes can be addressed through employees initiating an industrial relation dispute settlement as regulated under the Law No. 2 of 2004 on Industrial Relations Dispute Settlement or file a report under the local office of the Manpower Agency. In addition, the employees have a right to join and form labour unions in accordance with the Law No. 21 of 2000 on Employee/Labour Union where their complaints can be addressed through the representation of a labour union.

For GBVH related cases. Most police stations in Indonesia have a women and children's protection unit (*Unit Perlindungan Perempuan dan Anak*) that specifically handle cases in which the victims are female and juvenile. In addition, cases can be reported through the *Sahabat Perempuan dan Anak (SAPA) 129* which can be accessed via hotline number 021-129 or WhatsApp number 08111-129-129. SAPA 129 has six types of services which include public complaint service, victim outreach, case management, temporary shelter, mediation, and victim assistance service. In addition, cases can be submitted through online forums such as the National Public Service Complaints Management System or through letters etc.

Matters relating to property rights, such as land, generally go through the court or through alternative dispute resolution such as mediation.

To effectively uphold and safeguard the human rights in the Project area, the Project Company, EPC Contractor and O&M Company (including sub-contractors, suppliers) will implement a grievance redress mechanism in accordance with the requirements in the Stakeholder Engagement Plan. In addition, stakeholders including local community members will be informed about the grievance mechanism through regular consultations and engagement to create awareness.

4.4.1 Human Rights Information System (SIMASHAM)

The Ministry of Human Rights has a regional office in West Java. This office also operates the Human Rights Information System (SIMASHAM) which is an application network. The

⁷ <https://jabar.kemenkumham.go.id/berita-kanwil/berita-utama/kemenkumham-jabar-fasilitasi-ditjen-ham-sebarluaskan-10-hak-dasar-manusia-dengan-fokus-isu-pertanahan-melalui-diseminasi>

application aims to enable citizens (in the country or abroad) to submit a complain if they feel that their rights have been violated. Anyone who submits a complaint can also be able to track the status of their application.

Table 4-1 SIMASHAM System

ACTION	REMARK
Submission of a complaint	https://simasham.kemenkumham.go.id/pengaduan
To check the status of a complaint	https://simasham.kemenkumham.go.id/pengaduan/cekstatus
Others	Submissions can also be made via letters, faxes, and through in-person submissions
Other Avenues	
National Human Rights Commission	Submission via website: www.komnasham.go.id
	Email submission: complaining@komnasham.go.id
Submissions can also be made directly to the Commission's Complaint Service Unit	

4.4.2 Other Institutions

In West Java Province, there are around 49 Legal Aid Institutions registered with the National legal Development Agency. Specifically, there are two legal aid institutions registered in Cianjur Regency, while none are available in West Bandung Regency⁸. These include:

- Kusumah Bangsa Cianjur, Pacet Sub-district
- Women & Children Legal Aid Institute, Cianjur Sub-district

In the addition to the above, there is also Indonesia Legal Aid and Human Rights Association (PBHI). PBHI is an association consisting of individual members and operates as a non-profit organization dedicated to the promotion and defence of human rights. PBHI also aims to promote the universal values of human rights, defending victims of abuse, and educating members and prospective members as advocates of human rights.

It operates without distinction of race, ethnicity, political affiliation, ideology etc. PBHI is based in Jakarta and has a nationwide presence through regional associations with more than 2,000 members. Membership is distributed across various regions, including West Java, North Sumatra, West Sumatra, Lampung, DKI Jakarta, Yogyakarta, Central Java, Bali, West Kalimantan, and South Sulawesi⁹.

The location of PBHI in West Java and Jakarta is provided as:

⁸ <https://bphn.go.id/layanan/bantuan-hukum/obh>

⁹ <https://pbhi.or.id/>

- **Jakarta:** SX-TX, Ji. Hayam Wuruk No.4, RT.9/RW.5, Kb. Kpl., Kec Taman Sari, Kota Jakarta Barat, Daerah Khusus Ibukota Jakarta 10120, Indonesia.
 - Telephone: +62 21 3859968

Note:

1. *Information about the existing mechanisms to address human rights violations and how to access them will be provided to all workers during the induction process and contact information posted in strategic areas across the site.*
2. *The above will include details of the legal aid institutions in the Project area including PBHI.*

4.5 Project Context

The ESIA Vol 2 provides an overview of the current conditions in Indonesia relevant to the Project, highlighting elements that pose risks to various human rights. These include:

- Forced labour (refer to section 18.2.2 of the ESIA Vol 2)
- Child labour (refer to section 18.2.1 of the ESIA Vol 2)
- Collective bargaining (refer to section 18.2.3 of the ESIA Vol 2)
- Working conditions (refer to section 18.2.4 of the ESIA Vol 2)
- Occupational health & safety (refer to section 18.2.5 of the ESIA Vol 2)
- Gender based violence, harassment & exploitation (refer to section 17.2.3 of ESIA Vol 2)
- Supply chain (refer to the Supply Chain Screening Report)
- **Military Training at Saguling Reservoir (Refer to 17.2.5, 17.4.1.4, and 18.4.1.7) of the ESIA.**

5 STAKEHOLDER IDENTIFICATION & ENGAGEMENT

Consultation with stakeholders is an essential part of the HRIA process. The key objective of the consultation is to establish a dialogue with those stakeholders who may be affected by aspects of the Project and those who have a role in upholding workers and community rights (including vulnerable groups).

The table below identifies the main Project stakeholders and their role in ensuring that human rights are upheld.

Table 5-1 Project Stakeholders

Stakeholder Group	Types of Stakeholders	Role
Rights-Holders	Project construction phase workers including Project sub-contractor workers. This also includes supply chain workers	<ul style="list-style-type: none"> Understand their rights under the law. Report abuse of human rights through the grievance redress mechanism. Uphold the rights of fellow workers and local communities.
	Operational phase workers	
	Directly and indirectly impacted community members. These include formal and informal landowners and users on farms, and agricultural lands within the OHTL Right of Way (RoW) and other project facilities (permanent or temporary). In addition, this also includes the fishing cages and fishing stall owners, traditional fishermen, in areas where the FPV will be installed, water transportation users. Vulnerable groups including female led households, elderly, those with chronic illness etc.	<ul style="list-style-type: none"> Understand their rights under the law. Report abuse of human rights to the Project Company through the grievance redress mechanism Uphold the rights of workers.
Duty Bearers	Ministry of Environment and Forest and the Environmental Agency of West Java Province Environmental Agency of Bandung Barat Regency.	<ul style="list-style-type: none"> Review the AMDAL (National EIA) studies and provide the construction and environment permit. Inspect and audit the sites to ensure compliance with the standards to ensure a healthy and safe work environment for workers and community. Address any grievances related to malpractices
	Ministry of Manpower	<ul style="list-style-type: none"> Ensure the implementation of the labour laws in Indonesia and support workers who have complained through regional labour offices.

Stakeholder Group	Types of Stakeholders	Role
		<ul style="list-style-type: none"> Inspect the work areas and labour camps to ensure they are compliant with the required standards.
	Ministry of Law and Human Rights including the West Java Regional Office	Ensure that workers' and communities rights are upheld, and any complaints lodged through their systems are addressed.
	National Commission on Human Rights	Ensure that workers' and communities rights are upheld, and any complaints lodged through their systems are addressed.
	Relevant government ministries including but not limited to: Ministry of energy and Mineral Resources Ministry of Public Work & Housing Ministry of Transportation Ministry of Health	Ensure that the applicable rights of right holders i.e., water, health, food, access to natural resources and livelihoods, road safety etc are maintained during the development of the Project.
	Local government authorities including: Saguling village office Jati village office Sarinangen village office Karanganyar village office Girimukti village office Mekarsari village office Tanjung Jaya village office Mekarjaya village office Saguling sub-district office Ciponkor sub-district office Cililin sub-district office Cihampelas sub-district office Bandung Barat Regency government	To ensure that the rights of the local communities are upheld as applicable and that the Project operates within the national law.
	NGOs, Community based organizations and religious groups	Ensure that the rights of the local communities and workers are upheld and participate in the Project's stakeholder engagements.
	Indonesia Power	<ul style="list-style-type: none"> Uphold the rights of the workers of the Project Company, the EPC contractor, sub-contractors, O&M Company, and the local communities. Comply with the laws and regulations and lenders' requirements. Ensure that Project Company, EPC contractor, sub-contractors and O&M Company, are implementing the Project ESMS.

Stakeholder Group	Types of Stakeholders	Role
		<ul style="list-style-type: none"> Address grievances received from workers or community members in coordination with the Project Company.
	Project Company (and ACWA Power)	<ul style="list-style-type: none"> Uphold the rights of the workers of Project Company, the EPC contractor, subcontractors, O&M Company, and the local communities. Comply with the laws and regulations and lenders' requirements. Ensure that Project EPC contractor, and sub-contractors are implementing the Project ESMS. Address grievances received from workers or community members.
	EPC Contractor, sub-contractor, including suppliers	<ul style="list-style-type: none"> Uphold workers' rights and ensure that employees know their rights, duties and terms and conditions of their employment contracts in line with the Indonesian law and international requirements. Address grievances received from workers or community members. Undertake monitoring and audits in line with the Project requirements and obligations.
	Legal Aid Institutions such as PBHI	Bring attention to any human rights issues in the local communities.
	Trade Unions & Workers Associations	Ensure that the workers' rights are upheld including on issues relating to wages, working conditions etc.
Other Relevant Stakeholders	Project Lenders	<ul style="list-style-type: none"> Ensure that ACWA Power, the Project Company, the Project contractors are upholding human rights in accordance with Indonesian law and international standards. This will also include a review of monitoring reports. Appointment of independent third-party auditors to assess the Project compliance with: <ul style="list-style-type: none"> Social conditions (accommodation, working conditions, grievance redress mechanism, LRP, Supply Chain Management Plan, and human rights) H&S /OHS Environmental and social compliance

5.1 Relevant Consultations

Human rights consultations were undertaken by the Project between 20th to 27th November 2023 as part of the Key informant interviews. The community leaders, representatives, and respected figures participating in the human rights discussions expressed low awareness of human rights issues in the local communities. They attributed this to the absence of current government or NGO initiatives promoting human rights awareness in their communities.

The consultations were undertaken with representatives from the following villages:

- Baranangsiang village
- Cihea village
- Jati village
- Rajamandala Kulon village
- Saguling village
- Karanganyar village
- Sarinagen village

Overall, the main issues highlighted during the meetings with the key informants include:

- Right to work: This relates to the ability of local communities being able to apply for employment during the Project construction and operational phases.
 - It was stated that while skilled labour might be limited, unskilled labour is abundantly available within the community and should be considered.
 - The communities expect that the rights of the local workers must be safeguarded because the Project may potentially be more concerned about the rights of the foreign or migrant workers.
- Freedom from discrimination: This relates to the recruitment process and the treatment between local and foreign workforce.
 - Concern was raised that there might be potential discrimination against individuals with lower levels of education in the employment process. This is because there is a national trend and concern that projects in Indonesia often involve a significant number of foreigners including unskilled workers.
- Right to Family, right to an adequate standard of living, right to life etc.
 - Concerns were raised that the arrival of foreign workers will have a negative influence on the culture of the communities. For instance, concerns were raised that presence of foreign workers could lead to the supply and sale of alcohol, loss of a sense of community and discrimination etc.

Refer to Appendix B for an extract of key issues raised relating to human rights.

5.1.1 Human rights issues raised during socio-economic surveys

As mentioned earlier, there is a low awareness of human rights in the Project AOL. Nevertheless, the issues raised by households during the socio-economic surveys can be directly associated with various human rights, as outlined in the table below.

Table 5-2 Concerns raised during the socio-economic survey and linkage to human rights

CONCERN RAISED DURING THE SOCIO-ECONOMIC SURVEY	HUMAN RIGHTS LINKAGE	REMARK
Loss of agriculture and productive land due to land acquisition for the project	<ul style="list-style-type: none"> Right to an adequate standard of living 	<ul style="list-style-type: none"> There is a potential risk to households if compensation for economic displacement is not provided on replacement cost. In addition, this might be exacerbated in situations where unsustainable livelihood programmes are implemented. There is risk of lesser compensation being provided to land owned by women in comparison to men.
Loss and/or disturbance of community livelihoods	<ul style="list-style-type: none"> Right to self determination Right to equality between men and women 	<p>The above will be managed through the implementation of the Livelihood Restoration Plan (LRP).</p>
Increase in potential radiation	Right to health	<p>This risk is not foreseen for the project as this is a PV project and the OHTL and sub-station will be constructed in accordance with the national requirements.</p>
Disturbance and/or prohibition of floating net cage fishing activities	<ul style="list-style-type: none"> Right to an adequate standard of living Right to self determination Right to freedom of movement 	<ul style="list-style-type: none"> The relocation of fishing net cages and fishing stalls will have an economic impact which could potentially impact the life of the affected fishermen/cage owners. In addition, the anchoring of floaters will potentially impact the movement of fishing boats on the reservoir if suitable access alternatives are not provided. <p>The above will be managed through the implementation of the LRP.</p>
The project might result to the use of non-local workers rather than those from the local communities	<ul style="list-style-type: none"> Right to work Right to enjoy just and favourable conditions of work Freedom from discrimination Right to equality between men and women 	<p>To mitigate this, the project will be required to ensure that the recruitment process and available jobs are advertised in the local communities. In addition, a Local Recruitment Plan will be developed and implemented.</p>
There might be potential closure of community access roads due to Project activities	Right to freedom of movement	<p>It is not expected that the project will result to the closure of any local access roads. In addition, the EPC Contractor will be required to implement the requirements of the ESIA.</p>

Given the information provided above, it is evident that community members can express their concerns regarding the Project, even if they may not explicitly link them to the corresponding human rights issues. Consequently, the Project will be required to incorporate human rights issues during the construction and operational phase stakeholder consultations. This will create more awareness within the communities and among workers regarding human rights, including the process of submitting complaints and/or concerns through the Project grievance redress mechanism.

6 HUMAN RIGHTS RISKS ASSESSMENT

This section analyses the risks and impacts that could potentially arise from the Project. An assessment on potential human rights impacts was undertaken using baseline information available as part of the ESIA process. Based on this initial assessment, the human rights risks have been grouped based on the following topic areas.

- Labour
 - Child labour
 - Forced labour
 - Collective bargaining and freedom of association
 - Job security and right to work.
 - Non-discrimination
 - Occupational health and safety
 - Wages (salary and benefits equity, standard of living)
 - Working hours
 - Adequate accommodation facilities
 - Gender based violence & harassment, sexual exploitation & abuse & sexual harassment (GBVH/SEA/SH)
 - Grievance redress mechanism.
- Economic & social
 - Environmental Aspects
 - Public/community health & safety
 - Public/community security
- Civil and political
 - Freedom of expression and access to information.
 - Right to privacy.
 - Freedom of move
- Groups rights/heightened risk of vulnerability
 - Women
 - Children
 - People living with disabilities
 - Supply chain workers
- Land Acquisition and Relocation of Fishing Cages and Fishing stalls
 - Economic displacement
 - Compensation and the right to an adequate standard of living

6.1 Outcomes

The table below provides the outcomes of the human rights risk assessment for the Saguling 60MW Floating PV with a summary of the risk and the risk rating. The assessment uses the following terms as provided in EPIV Guidance Note.

- **Scale:** High, medium, or low – which reflects the magnitude of changes associated with the human rights risks.
- **Scope:** Individual, community, region – which reflects the geographic area of the human rights risks.
- **Remediability:** a description of the steps that could be taken to address the risk before the harm occurs using standard mitigation and monitoring measures.
- **Likelihood:** High, Medium, or Low – Which reflects the potential for the human rights risk to occur, after standard mitigation has been applied.

The overall human rights have been classified into:

- **Low risks** – Where the risks are unlikely to occur, if they did occur, they can be eliminated or mitigated through the implementation of mitigation, management, and monitoring measures as in the project plans.
- **High risk** – include those where further assessment and an in-depth analysis is required and where risks could cause a delay, reputational risks, or breach of national and lenders' requirements for the Project due to the specific characteristics of the Project.

Figure 6-1 Human Rights Risk Assessment¹⁰

THEMATIC AREAS	RIGHT HOLDER	DESCRIPTION OF POTENTIAL ISSUES	HUMAN RIGHTS AT RISK	HUMAN RIGHTS ASSESSMENT SCALE: HIGH, MEDIUM OR LOW SCOPE: INDIVIDUAL, HOUSEHOLD, COMMUNITY, REGION REMEDIABILITY: STEPS THAT COULD BE TAKEN TO ADDRESS THE RISKS BEFORE THE HARM OCCURS LIKELIHOOD: HIGH, MEDIUM OR LOW	OVERALL RISK LEVEL HIGH OR LOW	PROPOSED MITIGATION THROUGH IMPLEMENTATION OF PROJECT PLANS & PROCEDURES
Labour						
Child Labour	Children within the host communities and wider region including along the supply chain.	<ul style="list-style-type: none"> Increased income earning opportunities may potentially lead to increased truancy and a higher proportion of out of school youth within the host communities. This is because young employment seekers may opt (or be asked by their families) to forgo school in hopes of securing quick returns from project-induced economic opportunities. The supply chain screening did not reveal the presence of child labour (based on available information). However, there is still a potential risk especially for suppliers who are exposed to forced labour within their supply chain and those involved in labour transfer programmes. Additionally, some of the Indonesian suppliers were identified to have a history of hiring workers without contracts which exposes them to hiring of children due to lack of safeguards. 	Right to health Right to education Right to the protection of the child Right to adequate standard of living Right to liberty and security of person.	<ul style="list-style-type: none"> Scale: High as an incident could result into the injury or death of a child. It also denies the child, the ability to enjoy their basic human rights. Scope: Individual children and their households could be affected by human rights abuses. Remediability: The Project Company, and the EPC Contractor/O&M will undertake public announcements and community meetings to publicize employment eligibility and the Project's zero tolerance to child labour. The EPC Contractor and O&M will also ensure verification of identification documents is undertaken before hiring their workers. In addition, the EPC Contractor (and O&M if applicable) will carry out periodic subcontractor and supply chain audits to demonstrate the absence of child labour. Likelihood: High, While the presence of child labour is very unlikely to occur given the controls described above under the O&M and the EPC, there is higher risk within the supply chain. This is because screening of the supply chain identified the presence of suppliers and vendors who have exposure to 	High	<p>Implementation of:</p> <ul style="list-style-type: none"> Human Resources Policy and Procedures. Human Rights Policy with zero tolerance to child labour Contractor Management Plan Supply Chain Management Plan Responsible Sourcing Procedure Periodic audit of the Supply Chain as established in the Supply Chain Management Plan Quarterly third-party Labour Audits (construction) and annually during operation

¹⁰ Appendix A details out the screening of potential human rights at risk and applicability to the Project.

THEMATIC AREAS	RIGHT HOLDER	DESCRIPTION OF POTENTIAL ISSUES	HUMAN RIGHTS AT RISK	HUMAN RIGHTS ASSESSMENT SCALE: HIGH, MEDIUM OR LOW SCOPE: INDIVIDUAL, HOUSEHOLD, COMMUNITY, REGION REMEDIABILITY: STEPS THAT COULD BE TAKEN TO ADDRESS THE RISKS BEFORE THE HARM OCCURS LIKELIHOOD: HIGH, MEDIUM OR LOW	OVERALL RISK LEVEL HIGH OR LOW	PROPOSED MITIGATION THROUGH IMPLEMENTATION OF PROJECT PLANS & PROCEDURES
				forced labour and/or are involved in labour transfer programs. Additionally, some workers may potentially have no work contracts meaning that proper vetting processes for child labour may have existing gaps.		
Forced Labour	Workers, including supply chain worker and Women	<ul style="list-style-type: none"> Forced labour may potentially exist within the contracted workforce where people (including women) are forced to work, or where their recruiters or employers have placed them into a position of debt upon their start of work. The Supply Chain Screening Report shows that the main PV suppliers are potentially exposed to forced labour within their own supply chains. In addition, some of the electric system suppliers are alleged to be directly involved in labour transfer programmes which have been affiliated with forced labour programmes. There is also potential that workers identity cards and passports are retained by their employer to prevent them from leaving the workplace. 	Rights to not be subjected to slavery, servitude or forced labour Right to life Right to Work Right to enjoy just & favourable conditions of work Right to an adequate standard of living.	Scale: High, as slavery could have a long-term impact on the mental health and general wellbeing of the individual. Scope: Several individuals could be potentially affected by forced labour. Remediability: (i) The EPC Contractor and sub-contractors & O&M will only use vetted and registered employment agencies and workers identity documents will be returned to them immediately. (ii) The Project Company, EPC Contractor, Sub-contractors and O&M will not retain any of the workers identification documents. (iii) Auditing of all suppliers and vendors to ensure that they have controls in place to prevent forced labour/modern slavery in their activities , how they monitor their own suppliers, reporting and auditing requirements etc. Likelihood: High, the presence of forced labour under the Project Company and the EPC/O&M is unlikely to occur given the safeguards provided. However, the risk remains high for the suppliers and vendors especially for those who are exposed through their supply chain or are alleged to participate in labour transfer programmes. Based on this,	High	Implementation of: <ul style="list-style-type: none"> Human Resources Policy and Procedures. Human Rights Policy with zero tolerance to forced labour. E&S Policy Workers Grievance Procedure Contractor Management Plan Supply Chain Management Plan Responsible Sourcing Procedure Periodic audit of the Supply Chain as established in the Supply Chain Management Plan Quarterly third-party Labour Audits (construction) and annually during operation

THEMATIC AREAS	RIGHT HOLDER	DESCRIPTION OF POTENTIAL ISSUES	HUMAN RIGHTS AT RISK	HUMAN RIGHTS ASSESSMENT SCALE: HIGH, MEDIUM OR LOW SCOPE: INDIVIDUAL, HOUSEHOLD, COMMUNITY, REGION REMEDIABILITY: STEPS THAT COULD BE TAKEN TO ADDRESS THE RISKS BEFORE THE HARM OCCURS LIKELIHOOD: HIGH, MEDIUM OR LOW	OVERALL RISK LEVEL HIGH OR LOW	PROPOSED MITIGATION THROUGH IMPLEMENTATION OF PROJECT PLANS & PROCEDURES
				periodic audits for the supply chain will be required to address this risk in addition to the implementation of ACWA Power's Responsible Sourcing Procedure and a Project specific Supply Chain Management Plan.		
Collective bargaining and freedom of association	Workers including supply chain workers	<ul style="list-style-type: none"> The Project (including its suppliers) may potentially prevent workers from forming and/or joining trade unions of their choice or electing workers representatives. In addition, those who form or join Trade unions might be prevented from functioning freely and undertaking worker organisation such as strikes, asking for a raise or better working conditions etc. The Supply Chain Screening Report revealed that some of workers from 6 of the shortlisted vendors/suppliers had engaged in a strike/demonstration with the support of a union in Indonesia. As such, it is important to ensure that this right is upheld by the Project and its suppliers so that workers can be able to demand for their rights without intimidation. 	Right to form trade unions & join a trade union & the right to strike Right to freedom of Association Right to freedom of opinion & expression. Freedom from discrimination Right to freedom of assembly Right to work Right to enjoy just & favourable conditions of work	<ul style="list-style-type: none"> Scale: Medium as a lack of collective bargaining could result in lower standards of working terms and conditions amongst the FPV workers. Scope: All workers as individuals could be impacted from these human right abuses. Remediability: The ability for workers to form unions is enshrined in the national legislation. As such, the Project Company will ensure that all construction and operational phase workers are aware of their rights to form and join trade unions/elect representatives and to participate in lawful activities. The same right will be guaranteed for workers along the supply chain through periodic sub-contractor and supply chain audits. Likelihood: Low, (i) The prohibition of workers to form and/or join trade unions is unlikely to occur, given the provisions in place at the national level and lenders requirements. However, monitoring will still be required to ensure that workers' rights are not suppressed. In addition, corrective action will be undertaken if collective bargaining or worker 	Low	<p>Implementation of:</p> <ul style="list-style-type: none"> Human Resources Policy & Procedures Human Rights Policy Workers Grievance Procedure Contractor Management Plan Supply Chain Management Plan Responsible Sourcing Procedure Periodic audit of the Supply Chain as established in the Supply Chain Management Plan. This will also include implementation of a Corrective Action Plan if needed. Quarterly third-party Labour Audits (construction) and annually during operation

THEMATIC AREAS	RIGHT HOLDER	DESCRIPTION OF POTENTIAL ISSUES	HUMAN RIGHTS AT RISK	HUMAN RIGHTS ASSESSMENT SCALE: HIGH, MEDIUM OR LOW SCOPE: INDIVIDUAL, HOUSEHOLD, COMMUNITY, REGION REMEDIABILITY: STEPS THAT COULD BE TAKEN TO ADDRESS THE RISKS BEFORE THE HARM OCCURS LIKELIHOOD: HIGH, MEDIUM OR LOW	OVERALL RISK LEVEL HIGH OR LOW	PROPOSED MITIGATION THROUGH IMPLEMENTATION OF PROJECT PLANS & PROCEDURES
				<p>representation is not allowed along the supply chain.</p> <p>(ii) All Project parties (including suppliers) will be able to demonstrate that the right to join/form trade unions or elect workers representative has been communicated to all employees. In addition, all workers contracts will reference relevant collective agreements where applicable.</p> <p>(iii) Each worker will be provided with a copy of their signed contract in a language understandable to them i.e., Bahasa, Indonesian, English etc.</p>		
Job security & right to work	Workers including supply chain workers	<ul style="list-style-type: none"> • Abrupt termination of an employment relationship is likely to be a traumatic experience to an employee and the loss of income will have a direct impact on their household's livelihood. • As such, the employment of a worker should not be terminated unless there is a valid reason (such as misconduct, incapacity to meet their duties, end of contract) and all processes within the law and HR procedures are followed. • Due to the cyclical nature of the Project, there will be demobilisation taking place, which may pose a huge risk for the project if not managed correctly as the workforce may not understand project type employment and why they were not permanently employed. 	Right to work Right to enjoy just & favourable conditions of work Freedom from discrimination Right to social security, including social insurance	<ul style="list-style-type: none"> • Scale: High, this is because abrupt termination of a worker's contract will impact their well-being and their households' livelihood. • Scope: Both individuals and their households/dependents. • Remediability: Workers will be informed about their terms and condition of employment, duration etc. As a result, end of contract period will not come as a surprise, and it will allow them to start looking for alternative sources of employment. Operational phase workers will also be informed of their terms of employment based on the life of the Project. • Likelihood: Low, (i) Construction workers will only be contracted during the construction phase and will be regularly informed by the HR about the nature of their contracts. This will allow them to seek other employment/income opportunities. (ii) The Project 	Low	<p>Implementation of:</p> <ul style="list-style-type: none"> • Human Resources Policy & Procedures • Human Rights Policy • Human Resource Dept. must ensure that all workers are aware and understand the terms of their contracts/employment. This will include regularly informing workers of the short-term nature of their contracts especially towards the end of the construction phase. • Local Recruitment Plan • Contractor Management Plan • Quarterly third-party Labour Audits (construction) and annually during operation • Supply Chain Management Plan • Responsible Sourcing Procedure • Periodic audit of the Supply Chain as established in the Supply Chain Management Plan. This will also include

THEMATIC AREAS	RIGHT HOLDER	DESCRIPTION OF POTENTIAL ISSUES	HUMAN RIGHTS AT RISK	HUMAN RIGHTS ASSESSMENT SCALE: HIGH, MEDIUM OR LOW SCOPE: INDIVIDUAL, HOUSEHOLD, COMMUNITY, REGION REMEDIABILITY: STEPS THAT COULD BE TAKEN TO ADDRESS THE RISKS BEFORE THE HARM OCCURS LIKELIHOOD: HIGH, MEDIUM OR LOW	OVERALL RISK LEVEL HIGH OR LOW	PROPOSED MITIGATION THROUGH IMPLEMENTATION OF PROJECT PLANS & PROCEDURES
				<p>Company & O&M will also provide written contracts to all its workers stipulating the conditions and duration of the employment. This will also apply to supply chain workers.</p> <p>(iii) All workers contracts will be updated when any material changes to the terms or conditions of employment occur, whether it is required by the national law or not. All Project parties (including suppliers) will demonstrate that written contracts are concluded with – and communicated to – all employees.</p> <p>(iv) Each worker will be provided with a copy of their signed contract in a language understandable to them i.e., Bahasa, Indonesian, English etc</p>		<p>implementation of a Corrective Action Plan if needed.</p> <ul style="list-style-type: none"> • Retrenchment Plan (Operational Phase if needed)
Non- discrimination	Workers including those within the supply chain. (Women may be at a higher risk)	<ul style="list-style-type: none"> • Wage discrimination: Where women are paid less than their male counterparts even when they are undertaking work of the same value. • Discrimination based on employment benefits & guarantees: For instance, women of childbearing age may face potential discrimination during the recruitment process since the Project Company, EPC Contractor, O&M, and suppliers may want to avoid providing the benefits and guarantees relating to maternity or childcare. • Security guards might also discriminate against workers or harass them due to the power they wield. 	<p>Freedom from discrimination</p> <p>Right to work</p> <p>Right to equality between men and women</p> <p>Right to enjoy just and favourable conditions of work</p>	<ul style="list-style-type: none"> • Scale: High, discrimination, harassment and violence in the workplace could have potential lasting impacts on the victims. • Scope: Individuals • Remediability: The implementation of the HR Policy and Procedures which includes the workers' code of conduct and prohibits any form of discrimination and harassment (among other things). There will also be requirements for security personnel to not discriminate against any workers, women etc, use of force etc. • Likelihood: Low, (i) Project Company, EPC Contractor, sub-contractors & O&M will be required to have HR procedures in place as part of their ESMS. This will include an explicit 	Low	<p>Implementation of:</p> <ul style="list-style-type: none"> • Human Resources Policy & Procedures • Human Rights Policy • Local Recruitment Plan • Workers' Code of Conduct • Workers' Grievance Redress Mechanism • Supply Chain Management Plan • Responsible Sourcing Procedure • Periodic audit of the Supply Chain as established in the Supply Chain Management Plan. This will also include implementation of a Corrective Action Plan if needed. • Security Management Plan

THEMATIC AREAS	RIGHT HOLDER	DESCRIPTION OF POTENTIAL ISSUES	HUMAN RIGHTS AT RISK	HUMAN RIGHTS ASSESSMENT SCALE: HIGH, MEDIUM OR LOW SCOPE: INDIVIDUAL, HOUSEHOLD, COMMUNITY, REGION REMEDIABILITY: STEPS THAT COULD BE TAKEN TO ADDRESS THE RISKS BEFORE THE HARM OCCURS LIKELIHOOD: HIGH, MEDIUM OR LOW	OVERALL RISK LEVEL HIGH OR LOW	PROPOSED MITIGATION THROUGH IMPLEMENTATION OF PROJECT PLANS & PROCEDURES
				prohibition on any forms of discrimination. (ii) The same right will be guaranteed to workers along the supply chain through periodic audits.		
Occupational health & safety	Workers including supply chain workers	<ul style="list-style-type: none"> Workers may potentially be exposed to physical risks such as noise, vibration, working at height, operation of other heavy mobile equipment etc. Similar risk exists for workers in the supply chain who work in factories where they operate machinery, assemble materials etc. In addition, there is a risk of workers falling into water and/or drowning during the installation of the FPVs. The Indonesian Military (TNI) conducts periodic shooting training at the Saguling reservoir near the intake. This poses a safety risk to workers during the construction and operational phases if safety measures, such as halting work during the training sessions and strictly following TNI's instructions, are not implemented. 	Right to life Right to enjoy just and favourable conditions of work Right to health Right to work Right to social security, including social insurance	<ul style="list-style-type: none"> Scale: High, as an occupational health and safety incident could lead to injury or death Scope: Individual workers and their households Remediability: The occupational health and safety of the workforce will be addressed through the development of a H&S Management System which is designed around the requirements of ISO 45001:2018 including the implementation of a H&S Policy. In addition, the Project Company and the EPC Company/O&M will also undertake H&S Risk Assessment and implement the applicable H&S Management Plans. Likelihood: High, (i) The Project Company and the EPC Contractor/O&M have not yet undertaken the HSE risk assessment for the Project including the risk posed by the periodic training exercises undertaken by the military. The EPC and O&M will be required to undertake H&S risk assessment before the start of construction and operation phase respectively. This will ensure that associated hazards and risks can be identified and controlled at the activity and task level based on a well-designed, implemented, and managed H&S management system. This will 	High	Implementation of: <ul style="list-style-type: none"> H&S Policy EPC Contractor will undertake a H&S Risk Assessment before mobilisation while the O&M will undertake the H&S Risk Assessment before the start of operation. This will include the assessment of the risks posed by the periodic training undertaken by the military. Implement a Project specific H&S Management System in accordance with ISO 45001:2018 H&S Management Plan (and its sub-plans) Emergency Preparedness & Response Plan Workers' Grievance Redress Mechanism Supply Chain Management Plan Responsible Sourcing Procedure Periodic audit of the Supply Chain as established in the Supply Chain Management Plan. This will also include implementation of a Corrective Action Plan if needed.

THEMATIC AREAS	RIGHT HOLDER	DESCRIPTION OF POTENTIAL ISSUES	HUMAN RIGHTS AT RISK	HUMAN RIGHTS ASSESSMENT SCALE: HIGH, MEDIUM OR LOW SCOPE: INDIVIDUAL, HOUSEHOLD, COMMUNITY, REGION REMEDIABILITY: STEPS THAT COULD BE TAKEN TO ADDRESS THE RISKS BEFORE THE HARM OCCURS LIKELIHOOD: HIGH, MEDIUM OR LOW	OVERALL RISK LEVEL HIGH OR LOW	PROPOSED MITIGATION THROUGH IMPLEMENTATION OF PROJECT PLANS & PROCEDURES
				ensure protection of workers and community members including vulnerable groups. (ii) In addition, period audits will ensure that the suppliers have a robust H&S Management system in place to safeguard the health and safety of their workers.		
Wages (salary & benefits equity, standard of living	Workers especially females and those working in the supply chain.	<ul style="list-style-type: none"> • The Project Company, EPC Contractor and O&M may potentially provide unequal recruitment opportunities for women and less wages and benefits compared to their male counterparts. This is also a potential risk along the supply chain. • Additionally, contracted workforce such as cleaners or manual labourers may be offered low pay that does not guarantee a decent standard of living. 	Freedom from discrimination Right to equality between men and women Right to enjoy just and favourable conditions of work Right to work Right to adequate standard of living Right to social security, including social insurance	<ul style="list-style-type: none"> • Scale: Medium, as this depends on the difference between the salary and the relevant minimum wage category and salary. • Scope: Individuals and their households • Remediability: (i) A benchmark will be undertaken to determine the salary required to provide a decent standard of living (the determined living wage cannot be below the minimum wage in the Project region or suppliers country of operation). (ii) In addition, workers must receive their salaries on time to be able to meet their needs to ensure an adequate standard of living. • Likelihood: Low, if the remediability measures are implemented. This will also include periodic audits along the supply chain and a requirement for corrective action to be undertaken if there are any violations. 		Implementation of: <ul style="list-style-type: none"> • HR Policy & Procedures • Workers Grievance Redress Mechanism • Local Recruitment Plan • Supply Chain Management Plan • Responsible Sourcing Procedure • Periodic audit of the Supply Chain as established in the Supply Chain Management Plan. This will also include implementation of a Corrective Action Plan if needed. • Contractor Management Plan • Quarterly third-party Labour Audits (construction) and annually during operation
Working hours	All workers including those working in the supply chain	<ul style="list-style-type: none"> • Project workers including those along the supply chain may potentially be requested to work excessive hours and possibly without overtime pay. • It is noted that the Indonesian law states that overtime hours should not be longer than 3 hours in a day or 14 hours in a week including payment for overtime. 	Right to life Right to enjoy just and favourable conditions of work	<ul style="list-style-type: none"> • Scale: Medium, as this will depend on the quantity of excess overtime hours worked and may differ from one worker to the next based on their role, union representation etc., • Scope: Individuals and their households 		Implementation of: <ul style="list-style-type: none"> • HR Policy & Procedures • Human Rights Policy • Workers' Grievance Redress Mechanism • Contractor Management Plan • Supply Chain Management Plan

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			Right to family Right to work Right to family life	<ul style="list-style-type: none"> Remediability: The legislation clearly provides that an employer will not require an employee to work outside of the provisions of the applicable laws. In addition, All workers will also be provided with details of their employment agreements details and contract (including working hours, overtime and overtime pay, wages etc). Likelihood: Low, (i) The Project Company, EPC Contractor/O&M, and sub-contractors will be required to have HR procedures in place as part of their ESMS. (ii) In addition, periodic audit of the supply chain will be undertaken to ensure that the workers are not required to work for excessive hours without their consent or overtime pay. (iii) All workers contracts will be updated when any material changes to the terms or conditions of employment occur, whether it is required by the national law or not. All Project parties (including suppliers) will demonstrate that written contracts are concluded with – and communicated to – all employees. (iv) Each worker will be provided with a copy of their signed contract in a language understandable to them i.e., Bahasa, Indonesian, English etc 		<ul style="list-style-type: none"> Responsible Sourcing Procedure Periodic audit of the Supply Chain as established in the Supply Chain Management Plan. This will also include implementation of a Corrective Action Plan if needed. Quarterly third-party Labour Audits (construction) and annually during operation
Adequate accommodation facilities	Workers including female employees and those along the supply chain	<ul style="list-style-type: none"> Workers' camp may potentially be inadequate vs the IFC & EBRD Workers accommodation: Processes & Standards (2009). The key risk areas are likely to be during the start of construction when accommodation facilities are not fully in 	Right to enjoy just and favourable conditions of work	<ul style="list-style-type: none"> Scale: High, as lack of adequate accommodation facilities could lead to outbreak of diseases and cause distress to 	Low	Implementation of: <ul style="list-style-type: none"> Workers Accommodation Plan Workers' Grievance Redress Mechanism Contractor Management Plan

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		<p>place. In addition, there is a risk that workers who are housed outside the site are accommodated in sub-standard buildings if proper auditing of such facilities is not undertaken before workers move in.</p> <ul style="list-style-type: none"> There may potentially be lack of key facilities and welfare provisions such as clean drinking water, hygienic and ample toilet facilities, rest areas, food canteens etc. In addition, female workers would require some separate accommodation, rest, and sanitation facilities etc. which could be potentially inadequate for catering for separate sex living and welfare provisions. 	Right to an adequate standard of living	<p>female workers in cases where privacy is not guaranteed.</p> <ul style="list-style-type: none"> Scope: Individual workers especially females Remediability: (i) Workers' accommodation will be provided in accordance with IFC and EBRD Workers' Accommodation requirements including those with accommodation facilities outside the site. (ii) Regular monitoring and audits of accommodation facilities will also be undertaken in accordance with the Workers Accommodation Plan requirements. (iii) separate and secure accommodation facilities and sanitary facilities will be provided to the female employees. Likelihood: Low, if the remediability measures are implemented. 		<ul style="list-style-type: none"> Quarterly third-party Labour Audits (construction) and annually during operation Supply Chain Management Plan Responsible Sourcing Procedure Periodic audit of the Supply Chain as established in the Supply Chain Management Plan. This will also include implementation of a Corrective Action Plan if needed.
Gender-based violence & harassment, sexual exploitation & abuse, sexual harassment (GBVH/SEA/SH)	<p>Workers especially females including those along the supply chain.</p> <p>Local communities especially women and young girls</p>	<ul style="list-style-type: none"> There may be cases of GBVH/SEA/SH especially towards female workers as construction workforce is expected to be predominantly male. This risk of GBVH/SEA/SH also exists within the supply chain especially for female employees. Worker influx during construction could increase the risk of Gender Based Violence & Harassment, Sexual Exploitation & Abuse and Sexual Harassment (GBVH/SEA/SH) towards women and young girls. Exposure to GBVH/SEA/SH has the potential to have profound, long-term impacts on the health and mental well-being of the victims including how they are viewed and/or treated in by their own families and communities. Male workers may make advances towards young and vulnerable adolescent schoolgirls in who in some cases maybe underage. The above GBVH/SEA/SH risks may potentially occur during the construction and operational phase. However, the operational phase will not 	<p>Right to liberty and security of person</p> <p>Right to work</p> <p>Right to education</p>	<ul style="list-style-type: none"> Scale: High, as incidences of GBVH/SEA/SH will have a lasting impact on the health and mental well-being of the victim. Scope: Individual workers and community members especially females and their households. Remediability: Workers at all levels will be required to undergo training on the prevention of GBVH/SEA/SH at the workplace and in the community. In addition, Project personnel charged with receiving GBVH/SEA/SH grievances will receive appropriate training on how to handle such complaints including the referral pathways available for victims/survivors. 	Low	<p>Implementation of:</p> <ul style="list-style-type: none"> Human Resources Policy & Procedures and Workers' Code of Conduct. Human Rights Policy GBVH Policy Influx Management Plan Security Management Plan Stakeholder Engagement Plan GBVH Incident Reporting, Response & Support Procedure Quarterly third-party Labour Audits (construction) and annually during operation Supply Chain Management Plan Responsible Sourcing Procedure

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		include worker influx as the number of workers is expected to be limited.		<ul style="list-style-type: none"> Likelihood: Low, this risk will be addressed through standard control measures above. The workers' grievance redress mechanism will also be available so that workers can raise their concerns about the behaviour of other workers (even anonymously). This will also include grievance mechanism, for local communities. (ii) In addition, periodic audits along the supply chain will ensure that the supply chain workers have access to GRM to report GBVH/SEA/SH cases including access to support and referral pathways. 		<ul style="list-style-type: none"> Periodic audit of the Supply Chain as established in the Supply Chain Management Plan. This will also include implementation of a Corrective Action Plan if needed.
Grievance redress mechanism	Workers including those within the supply chain	<ul style="list-style-type: none"> There is a risk that workers contracted by the Project Company, EPC contractor, sub-contractors and O&M may not be able to freely express their opinions or seek remedy. This is because they may not know that a grievance redress mechanism exists, how it works or are afraid of retribution. Local communities may not be able to raise their concerns, request for additional information etc if they are not aware of the grievance redress mechanism or it is not easily accessible to them. In addition, the GRM may not cater for the needs of the illiterate or those who cannot afford a phone. There is a risk that the GRM may not align with the cultural norms and practices of how local communities resolve conflict and as such, they may opt to not use it. The Supply Chain Screening Report identified that a few of the vendors/suppliers have an internal and external GRM in place. However, it was not clear if an external and/or internal GRM exists for most of the suppliers/vendors. As such, there is a risk that some of the supply chain workers may not have suitable avenues to express their concerns. 	Freedom of expression Right to enjoy just and favourable conditions of work Freedom from discrimination	<ul style="list-style-type: none"> Scale: High to low depending on the nature of the grievance. Scope: Both individuals and communities Remediability: (i) A fully implemented grievance redress mechanism will be available for the workers to raise their concerns. Details of the GRM will be included in HSE inductions and workers will be reminded about its availability on a regular basis. In addition, posters will be posted in accessible areas explaining how grievances can be submitted including provision of grievance boxes. (ii) A community grievance mechanism will also be available and implemented in accordance with the SEP. <p>The above requirements for GRM will be applicable during the operational phase as well.</p> <p>(iii) Suppliers will also implement a GRM for all their workers and a</p>	Low	Implementation of: <ul style="list-style-type: none"> Human Rights Policy Stakeholder Engagement Plan Ensure that the external GRM is accessible to all without fear of reprisal and intimidation. Worker Grievance Mechanism Induction trainings will include providing the workers with information about the GRM, how to access it etc. Posters about the GRM will also be posted at site areas and camp areas including provision of grievance boxes. Contractor Management Plan Quarterly third-party Labour Audits (construction) and annually during operation Supply Chain Management Plan Responsible Sourcing Procedure Periodic audit of the Supply Chain as established in the

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				<p>GRM Log maintained for review during the periodic audits.</p> <ul style="list-style-type: none"> Likelihood: Low, (i) There will be established procedures for workers and local communities to raise grievances. The risks will be addressed through the standard control measures as per the ESMS. (ii) In addition, the Project Company and EPC Contractor/O&M will ensure that the supply chain workers have access to a GRM, and its implementation will be assessed during the periodic sub-contractor and suppliers' audits. 		Supply Chain Management Plan. This will also include implementation of a Corrective Action Plan if needed.
Economic & Social						
Environmental Aspects	Local communities and vulnerable groups such as the elderly, people living with disabilities and children. Workers	There will be different environmental impacts based on the project activities and these will include but are not limited to: <ul style="list-style-type: none"> Waste: Mismanagement of project waste (food, hazardous, wastewater etc) could potentially lead to contamination & pollution of soil and water resources which can lead to outbreak of diseases. Air quality (construction): The construction of the land-based Project facilities (such as laydown area/assembly area, sub-station and switchyard etc) will result to movement of fugitive emissions of dust and particulate matter especially during the dry season. This will also include exhaust emissions. Such impacts can potentially have an impact on the health of communities and workers if management and mitigation measures are not put in place. During the construction phase, there is potential for elevated ambient noise levels from the movement of construction vehicles and ground borne vibration which may potentially affect local communities and Project workers. Contamination of water in the reservoir may also potentially occur during the installation of the floating PV supporting structures, illegal or 	Right to health Right to life Right to an adequate standard of living	<ul style="list-style-type: none"> Scale: High, as environmental impacts could pose a danger to human health/life and the environment. Scope: Individuals and communities Remediability: A Construction Environmental & Social Management Plan (CESMP) and Operational Phase Environmental & Social Management Plan (OESMP) will be developed for the project and will include applicable mitigation and management measures relating to the specific project environmental impacts. This is in addition to the various management plans and procedures that will be required as part of the ESMS. Likelihood: Low, this risk will be addressed through the mitigation measures detailed in the CESMP and OESMP (in accordance with the lenders ESIA) and the applicable E&S 	Low	Implementation of: <ul style="list-style-type: none"> E&S Policy CESMP OESMP Environmental & Social Monitoring Plan Environmental & Social Training Plan Waste Management Plan Stakeholder Engagement Plan Grievance Redress Mechanism Applicable Ecological Management Plans such as BMEP (as provided in ESIA Vol 2 and 3)

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		<ul style="list-style-type: none"> accidental discharges and during the cleaning of PVs during the operational phase. Additionally, the construction and operation of the FPV project will have an impact on different ecological receptors as discussed in the ESIA Vol 2. 		Management Plans (required as part of the ESMS-as provided in ESIA Vol 3).		
Public/community health & safety	Local communities and vulnerable groups such as the elderly, people living with disabilities and children and women.	<p>The Project construction will generate health and safety risks associated with the following:</p> <ul style="list-style-type: none"> Spread of communicable diseases and increased local morbidity: For instance, the Influx of predominant male workforce may lead to increased local incidences of HIV/AIDS, STIs. There is also a risk for water-borne diseases due to improper disposal of sewerage and contamination of water resources such as groundwater. Traffic related H&S incidents that may result to injury and fatalities. These maybe caused by non-compliance with traffic rules human error, mechanic failure etc. Potential for criminal and abusive offence towards local community members such as theft, personal violence, harassment etc. Potential GBVH because of a male dominated construction workforce which can exacerbate the existing imbalance of power between men and women within the affected communities. The Project will establish temporary (during construction) and permanent (during operation) restrictions within the Project footprint especially along the FPV arrays and floating cables. This will disrupt the movement of boats in the reservoir and could potentially result to water related incidents before the reservoir users get 'used' to the new infrastructure on the lake. The access restrictions established by the project along the FPV arrays and floating cables, combined with periodic restrictions due to military training, must be closely coordinated to avoid confusion or contradictions in their implementation, as this could pose a safety risk to local communities. 	Right to health Right to life Freedom of movement	<ul style="list-style-type: none"> Scale: High, as injury, infections, water incidents etc could result to death and outbreak of disease could put a strain on local health services. Scope: Individuals, children, and communities, water reservoir users. Remediability: (i) Development of the specific management plans will be undertaken in accordance with the ESIA requirements. (iii) The EPC Contractor will undertake a Traffic Study prior to the commencement of mobilisation. The outcome of this study will further inform the Project specific Traffic Management Plan. (iii) Robust stakeholder consultations will be undertaken by the EPC Contractor and the Project Company (and O&M) to ensure that communities and boat users are aware of the suitable water transportation routes to use including the safeguards in place. (iv) The Project Company and the EPC Company/O&M will also undertake H&S Risk Assessment and implement the applicable H&S Management Plans Likelihood: High, (i) A traffic study has not been undertaken by the EPC Contractor. This 	High	<p>Implementation of:</p> <ul style="list-style-type: none"> EPC Contractor will undertake a H&S Risk Assessment before mobilisation while the O&M will undertake the H&S Risk Assessment before the start of operation. This will include the assessment of the risks posed by the periodic training undertaken by the military. Community Health & Safety Management Plan Influx Management Plan Traffic Study to be undertaken before the start of mobilisation for construction. Traffic Management Plan GBVH Policy and GBVH Incident Reporting, Response & Support Procedure Security Management Plan Stakeholder Engagement Plan Water Transportation Management Plan

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				<p>study will be required to inform the Traffic Management Plan.</p> <p>(ii) In addition, the EPC will require to undertake consultations before any temporary or permanent water restrictions are put in place. It will therefore be critical for the consultations to be undertaken, and the communities informed about the safeguards in place.</p> <p>(iii) The EPC and O&M will be required to undertake H&S risk assessment before the start of construction and operation phase respectively.</p>		
Public/community security	Local communities and vulnerable groups such as the elderly, women, people living with disabilities and children.	<ul style="list-style-type: none"> It is understood that there will be approximately ten (ten) security guards during the construction phase to minimize potential for construction site incidents or damage to project facilities. The number of operational phase guards is undefined at this point. These guards will not be armed. Based on the above, security personnel may potentially use force which maybe excessive, inappropriate, and disproportionate, in cases of local conflict such as community agitations, workers strikes and in worst cases violent protests/riots which is a threat to life. Labour camps and influx of large workforce may lead to conflict with local communities, pressure on local resources, and cases of gender-based violence & harassment. 	Right to Life Freedom from discrimination Right to liberty & security of person Right to not be subjected to torture, cruel inhuman and/or degrading treatment, or punishment.	<ul style="list-style-type: none"> Scale: High, as any conflict, harassment with individuals and local communities could have significant impact on the relationship between the project and local communities. Scope: Individual and communities Remediability: Security arrangements will be guided by the UN Code of Conduct for Law enforcement officials and IFC's Good Practice Handbook on the Use of Security Forces: Assessing and Managing Risks and Impacts. Likelihood: Low, this human rights risk will be addressed through standard control measures within the ESMS. The grievance mechanism will also be available to all workers and external stakeholders. 	Low	<p>Implementation of:</p> <ul style="list-style-type: none"> Stakeholder Engagement Plan Grievance Redress Mechanism Security Management Plan which will include guidance from UN Code of Conduct & IFC's Good Practice, Use of Security Forces. Screening of security guards before they are hired. Gender Based Violence Policy and GBVH Incident Reporting, Response & Support Procedure. Influx Management Plan
Water	Local communities and workers	<ul style="list-style-type: none"> Project activities could contaminate/pollute water resources if waste, wastewater, and hazardous materials are not managed in accordance with the ESIA requirements. 	Right to life Right to an adequate standard of	<ul style="list-style-type: none"> Scale: High, as water is critical for all life and there are already existing pressures to water resources (such as existing pollution to the lake) to which 	Low	<ul style="list-style-type: none"> Accommodation Management Plan Waste Management Plan Hazardous Materials and Waste Management Plan

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		<ul style="list-style-type: none"> Direct and contracted workers will need to be provided with safe drinking water and suitable sanitation facilities. 	living (which includes right to food, water)	<p>the project impacts could potentially add to.</p> <ul style="list-style-type: none"> Scope: Individuals and communities. Remediability: (i) Adequate drinking water and sanitation facilities will be provided to the workforce at construction site and onsite and offsite accommodation facilities. (ii) The Project will ensure that no untreated discharges are made into local water resources and all waste (liquid or solid) will be managed according to the Waste Management Plan and the ESIA mitigations. Likelihood: Low, this human rights risk will be addressed through standard control measures within the ESMS. The grievance mechanism will also be available to all workers and stakeholders. 		<ul style="list-style-type: none"> Water and Sediment Quality Monitoring Plan Grievance Redress Procedure Quarterly third-party Labour Audits (construction) and annually during operation
Ecosystem Services	Local Communities	<ul style="list-style-type: none"> Provisional services in relation to food, water, income generation etc. The direct impact to these services is attributed to the land take and the installation of floaters on the reservoir which will impact the fishing net cages and stalls. Regulating services: These relates to species recorded during the surveys that act as seed dispersers, pollinators, controllers of insects etc. These may potentially be impacted by the Project through habitat loss, earthworks, and general disturbance. Cultural services: The Project may potentially impact cultural services such as the recreational fishing that is undertaken at the fishing stalls located at the site. In addition, there are a number of sacred sites and graves located within 1km of the OHTL and one is located at the reservoir (visible during low tide). Land use change, restriction, and acquisition will occur because of Project facilities construction and operation. 	Right to life Right to an adequate standard of living (which includes right to food, water) Right to take part in cultural life	<ul style="list-style-type: none"> Scale: High, as the Project will have an impact on ecosystem services upon which communities/households depend for food, income, etc. Scope: Individuals (farmers, fishermen, community members etc). This means that individual households are impacted as well as the community at large. Remediability: (i) To address these impacts the mitigation, management and monitoring measures provided in the ESIA must be implemented during the construction and operational phase. (ii) Impacts relating to land use change, restriction and acquisition, relocation of fishing cages and stalls etc must be addressed in 	High	<ul style="list-style-type: none"> Human Rights Policy Livelihood Restoration Plan Stakeholder Engagement Plan Cultural Heritage Management Plan Grievance Redress Mechanism

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				accordance with the national and lenders requirements based on the project specific LRP. <ul style="list-style-type: none"> Likelihood: High <ul style="list-style-type: none"> (i) Displacement of the fishing cage owners occurred in June 2024 under the Citarum Harum Program prior to the development and implementation of a LRP. Based on the outcome of the LRP surveys conducted in October and November 2024, it was established that there were 115KJA owners within the restricted zone in the Project AOL. Out of these, four KJA owners were not able to successfully relocate their KJAs outside of the restricted zone. These four owners have become casual labourers. (ii) The surveys also established that 24 KJA owners relocated to Ranca which is also within the restricted zone and there is potential for future displacement under the Citarum Harum program. Additionally, 87 KJA owners moved to Bunder where they have reported additional operational costs and reduction in fish productivity. (iii) Failure to implement the LRP in a timely manner will also affect other Project Affected Persons (PAPs) such as landowners, informal land users, and other reservoir users. This could potentially have lasting impacts on many households. 		

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				and leave them worse-off than they were before the project.		
Civil & Political						
Freedom of expression and access to information	Workers including those along the supply chain. Communities including project affected persons	<ul style="list-style-type: none"> The direct and contracted workforce may not be able to express their opinions and concerns freely without fear of retribution. These concerns may relate to working and living conditions, wages, trade unions etc. Affected communities may not be able to freely express their concerns and ask for additional information because a government entity (Indonesia Power) is also part of the Project. This also applies to directly impacted persons who are farmers or fishermen within the Adl. 	Freedom of expression Right to freedom of assembly Right to freedom of association	<ul style="list-style-type: none"> Scale: High, as freedom of expression applies to all stakeholders including workers. Scope: individuals and communities Remediability: The SEP (including the GRM) will be implemented. This will ensure that information is available, and grievances are addressed in a timely manner. (ii) A supply Chain Management Plan will also be prepared to ensure that the workers along the supply chain also have their rights safeguarded. Likelihood: Low, (i) The outcome of stakeholder engagement activities with local communities have identified concerns but no strong objection to the project. Details of the Project GRM were also communicated to the stakeholders. (ii) The ESIA phase consultations identified that there are existing GRM mechanisms that exist in local communities. These avenues will be utilised by the Project as part of the SEP. This risk will be addressed through standard control measures that are aligned with the ESMS. (iii) Periodic audits along the supply chain will also ensure that workers have access to a GRM including access to information etc. 	Low	Implementation of: <ul style="list-style-type: none"> Stakeholder Engagement Plan Grievance Redress Procedure HR Policy & Procedures Workers' Code of Conduct Human Rights Policy Supply Chain Management Plan Periodic audit of the Supply Chain as established in the Supply Chain Management Plan. This will also include implementation of a Corrective Action Plan if needed. Quarterly third-party Labour Audits (construction) and annually during operation

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Right to privacy	Workers including supply chain workers. Communities including project affected persons.	<ul style="list-style-type: none"> The project (and suppliers) will have access to private information belonging to workers and directly project affected persons. As such, there is a risk that this information could be unsecured, breached and/or used to victimise some stakeholders due to their opinions. 	Right to privacy	<ul style="list-style-type: none"> Scale: Medium, although this depends upon the extent of any breach of privacy through the uncontrolled release of data. Scope: individuals Remediability: All data gathered on workers (including those along the supply chain) and Project affected persons must be stored in a confidential manner in locked storage for paper records and password protected in digital devices. PAPs information will be coded within the publicly disclosed reports to ensure privacy. Likelihood: Low as this risk can be addressed through standard control measures that are aligned with the ESMS. 	Low	Implementation of: <ul style="list-style-type: none"> HR Policy & Procedures Human Rights Policy Livelihood Restoration Plan (to be prepared) Supply Chain Management Plan Periodic audit of the Supply Chain as established in the Supply Chain Management Plan. This will also include implementation of a Corrective Action Plan if needed. Quarterly third-party Labour Audits (construction) and annually during operation
Freedom of Movement	Communities and individuals using the reservoir for transportation purposes. Project workers including those along the supply chain	<ul style="list-style-type: none"> The local communities and reservoir users water transportation within the Project Aoi will be impacted due to the implementation of construction and operational phase restrictions. While these restrictions are designed to ensure the safety of lake users and protect Project facilities, they will also impact the communities' ability to access fishing net cages and stalls, market, farms etc. This will impact the communities' freedom of movement and may have a direct impact on some of their livelihoods (i.e., for boat operators) especially if suitable alternatives are not established. There is a risk that Project workers and those along the supply chain may have their identification documents (i.e., IDs, passports) confiscated which would restrict their movement. 	Freedom of movement Right to self determination	<ul style="list-style-type: none"> Scale: High, because the restriction of movement for local communities and fishermen will have a direct impact on their livelihoods. Remediability: (i) The Project is located within the restricted zone where water transportation is prohibited for safety reasons. Nevertheless, the EPC contractor has identified suitable alternative routes for local communities to use and consultations are currently ongoing with the local communities on the suitability of the proposed alternatives. In addition, the EPC and Project Company will undertake stakeholder consultations to ensure that the communities and boat owners are aware of the available alternatives and the safeguards in place. 	Low	<ul style="list-style-type: none"> Community Health & Safety Management Plan Stakeholder Engagement Plan HR Policy & Procedures Quarterly third-party Labour Audits (construction) and annually during operation Supply Chain Management Plan Responsible Sourcing Procedure Water Transportation Management Plan Periodic audit of the Supply Chain as established in the Supply Chain Management Plan. This will also include implementation of a Corrective Action Plan if needed.

THEMATIC AREAS	RIGHT HOLDER	DESCRIPTION OF POTENTIAL ISSUES	HUMAN RIGHTS AT RISK	HUMAN RIGHTS ASSESSMENT SCALE: HIGH, MEDIUM OR LOW SCOPE: INDIVIDUAL, HOUSEHOLD, COMMUNITY, REGION REMEDIABILITY: STEPS THAT COULD BE TAKEN TO ADDRESS THE RISKS BEFORE THE HARM OCCURS LIKELIHOOD: HIGH, MEDIUM OR LOW	OVERALL RISK LEVEL HIGH OR LOW	PROPOSED MITIGATION THROUGH IMPLEMENTATION OF PROJECT PLANS & PROCEDURES
				<p>(ii) The Project Company, ECP, sub-contractors, O&M and suppliers will return identification documents to workers immediately upon verification. No workers identification documents will be confiscated.</p> <ul style="list-style-type: none"> • Likelihood: Low (i) as the project will be required to provide suitable alternative water transportation routes in consultation with the local communities. (ii) The project entities including suppliers will return identification documents to all workers upon verification. 		
Groups with heightened risk to vulnerability						
Children	Children	<p>The requiring of parents to work for long hours or for long durations without leave can impact their welfare, development, and protection.</p> <p>(refer to Child labour section for labour related risks to children)</p>	Right to health Right to education Right to the protection of the child Right to adequate standard of living Right to liberty and security of person Right to family	<ul style="list-style-type: none"> • Scale: Low, as it is expected a lot of workers will be recruited from the project region which means most will be closer to their families. • Scope: individual children and their households • Remediability: The incoming, non-local workforce will be provided with details of their employment terms prior to them accepting their role so that they are fully aware of worker accommodation arrangement, working periods and time they are expected to be at the workplace on consecutive days without a break etc. • Likelihood: Low (i) It will be clear to workers that they will be based away from home for extended periods of time with benefits on leave days explained. This risk can be addressed through standard control measures within the ESMS. 	Low	<ul style="list-style-type: none"> • HR Policy & Procedures • Human Rights Policy • Supply Chain Management Plan • Periodic audit of the Supply Chain as established in the Supply Chain Management Plan. This will also include implementation of a Corrective Action Plan if needed.

THEMATIC AREAS	RIGHT HOLDER	DESCRIPTION OF POTENTIAL ISSUES	HUMAN RIGHTS AT RISK	HUMAN RIGHTS ASSESSMENT SCALE: HIGH, MEDIUM OR LOW SCOPE: INDIVIDUAL, HOUSEHOLD, COMMUNITY, REGION REMEDIABILITY: STEPS THAT COULD BE TAKEN TO ADDRESS THE RISKS BEFORE THE HARM OCCURS LIKELIHOOD: HIGH, MEDIUM OR LOW	OVERALL RISK LEVEL HIGH OR LOW	PROPOSED MITIGATION THROUGH IMPLEMENTATION OF PROJECT PLANS & PROCEDURES
				(iii) All workers contracts will be updated when any material changes to the terms or conditions of employment occur, whether it is required by the national law or not. All Project parties will demonstrate that written contracts are concluded with – and communicated to – all employees. (iv) Each worker will be provided with a copy of their signed contract in a language understandable to them i.e., Bahasa, Indonesian, English etc (v) The same will be implemented for workers along the supply chain and monitored regularly through periodic monitoring.		
People living with disabilities	People living with disabilities	<ul style="list-style-type: none"> • People living with disabilities may be discriminated against during the recruitment process. 	Right to work Freedom from discrimination	<ul style="list-style-type: none"> • Scale: High as, people living with disabilities may want to apply for employment within the project. • Scope: individuals and their households • Remediability: The project will support people living with disability in the application of employment opportunities based on their qualifications and Project needs. In addition, discrimination and harassment of people living with disabilities will be forbidden under the Workers Code of Conduct. • Likelihood: Low, as the project will be able to prevent discrimination and harassment based on the standard procedures within the ESMS. 	Low	Implementation of: <ul style="list-style-type: none"> • HR Policy & Procedures • Human Rights Policy • Workers' Code of Conduct • Stakeholder Engagement Plan • Grievance Redress Procedure • Quarterly third-party Labour Audits (construction) and annually during operation.

THEMATIC AREAS	RIGHT HOLDER	DESCRIPTION OF POTENTIAL ISSUES	HUMAN RIGHTS AT RISK	HUMAN RIGHTS ASSESSMENT SCALE: HIGH, MEDIUM OR LOW SCOPE: INDIVIDUAL, HOUSEHOLD, COMMUNITY, REGION REMEDIABILITY: STEPS THAT COULD BE TAKEN TO ADDRESS THE RISKS BEFORE THE HARM OCCURS LIKELIHOOD: HIGH, MEDIUM OR LOW	OVERALL RISK LEVEL HIGH OR LOW	PROPOSED MITIGATION THROUGH IMPLEMENTATION OF PROJECT PLANS & PROCEDURES
Women	Female workers Women within the local communities	<ul style="list-style-type: none"> According to the ESIA, Indonesia is largely a patriarchal society and as such this culture may limit the ability of women to actively benefit from the Project employment. In addition, construction is viewed as a 'male dominated field'. Such existing biases may prevent women from applying to the Project or for them to be underpaid due to their gender. Please refer to sections above for more details on other potential human right issues and risks to women Gender disparities during the compensation process is discussed further below. 	Freedom from discrimination Right to equality between men and women Right to enjoy just and favourable conditions of work Right to work Right to adequate standard of living	<ul style="list-style-type: none"> Scale: High, as discrimination or harassment in the workplace or during the employment process could have significant impact on individuals' wellbeing. Scope: individuals and their households Remediability: Workers will be required to comply with the Workers' Code of Conduct that will prohibit any form of discrimination and/or harassment to ensure the workplace is suitable for women (and ethnic minorities). The Project Company, and the EPC Contractor/O&M will also actively encourage women to apply for open positions. In addition, the GRM will be implemented. Likelihood: Low, as the Project will be able to prevent discrimination in the workforce through the measures described above. The risk can be addressed through standard control measures. 	Low	Implementation of: <ul style="list-style-type: none"> HR Policy & Procedures Workers' Code of Conduct Grievance Redress Mechanism Quarterly third-party Labour Audits (construction) and annually during operation
Supply Chain	Workers within the supply chain, children	As provided in the labour section above, potential risks to supply chain workers include: <ul style="list-style-type: none"> Child labour. Forced labour. Inability of workers along the supply chain to join trade unions or other types of associations (collective bargaining & freedom of association). Lack of Job security & right to work. Occupational health and safety. Poor working conditions such as poor wages, excessive working hours without pay, GBVH etc. Lack of access to the grievance mechanism. 	Right to health Right to education Right to the protection of the child Right to adequate standard of living	Refers to the section on labour which also includes supply chain workers.		

THEMATIC AREAS	RIGHT HOLDER	DESCRIPTION OF POTENTIAL ISSUES	HUMAN RIGHTS AT RISK	HUMAN RIGHTS ASSESSMENT SCALE: HIGH, MEDIUM OR LOW SCOPE: INDIVIDUAL, HOUSEHOLD, COMMUNITY, REGION REMEDIABILITY: STEPS THAT COULD BE TAKEN TO ADDRESS THE RISKS BEFORE THE HARM OCCURS LIKELIHOOD: HIGH, MEDIUM OR LOW	OVERALL RISK LEVEL HIGH OR LOW	PROPOSED MITIGATION THROUGH IMPLEMENTATION OF PROJECT PLANS & PROCEDURES
			Right to liberty and security of person. Right to health Right to enjoy just and favourable conditions of work Right to enjoy just and favourable conditions of work Freedom from discrimination Right to freedom of assembly Right to form trade unions & join a trade union & the right to strike Right to life Rights to not be subjected to slavery, servitude or forced labour			
Land Acquisition & Relocation of fishing cages and fishing stalls						
Economic displacement	All the Project Affected Persons (PAPs) including: • Private landowners	• Land based facilities: The affected PAPs especially those informally using land owned by Indonesia Power and Forestry will experience loss,	Right to self determination	• Scale: High, the Project will impact land and water-based livelihoods.	High	• Livelihood Restoration Plan • Stakeholder Engagement Plan including the GRM

THEMATIC AREAS	RIGHT HOLDER	DESCRIPTION OF POTENTIAL ISSUES	HUMAN RIGHTS AT RISK	HUMAN RIGHTS ASSESSMENT SCALE: HIGH, MEDIUM OR LOW SCOPE: INDIVIDUAL, HOUSEHOLD, COMMUNITY, REGION REMEDIABILITY: STEPS THAT COULD BE TAKEN TO ADDRESS THE RISKS BEFORE THE HARM OCCURS LIKELIHOOD: HIGH, MEDIUM OR LOW	OVERALL RISK LEVEL HIGH OR LOW	PROPOSED MITIGATION THROUGH IMPLEMENTATION OF PROJECT PLANS & PROCEDURES
	<ul style="list-style-type: none"> Informal land users on Indonesia Power land and forestry land. Fishing cages (KJA) owners and workers Fishing stall owners. Traditional fishermen Water transportation users in Saguling reservoir. 	<ul style="list-style-type: none"> or loss of access to the land they use which could impact their livelihoods, current standard of living and well-being. The displacement of the fishing cage owners (KJA owners) occurred in June 2024 under the Citarum Harum Program prior to the development and implementation of a LRP. Based on the outcome of the LRP surveys conducted in October and November 2024, it was established that there were 115KJA owners within the restricted zone in the Project Aol. Out of these, four KJA owners were not able to successfully relocate their KJAs (in June 2024) outside of the restricted zone. These four owners have become casual labourers. The surveys also established that 24 KJA owners relocated to Ranca which is also within the restricted zone and there is potential for future displacement under the Citarum Harum program. Additionally, 87 KJA owners moved to Bunder where they have reported additional operational costs and reduction in fish productivity. Based on the above, there is a likelihood that the livelihoods of the KJA owners will be impacted if the LRP is not implemented and corrective action taken. 	Right to family life Right to an adequate standard of living (which includes right to food etc)	<ul style="list-style-type: none"> Scope: Individuals (landowners/users, fishing net cages and stall owners, workers, traditional fishermen etc). This means that household livelihoods will be impacted. Remediability: To address impacts arising from economic impact, the Project will implement the LRP. <p>Likelihood: High, because displacement of the KJA owners occurred in June 2024 under the Citarum Harum Program without the provision of compensation or support to those affected. Based on this, 4 KJA owners were not able to relocate and they are now casual labourers while 24 KJA owners relocated to Ranca and 87 to Bunder. Those who relocated to Ranca are still within the restricted zone and are at risk of further displacement under the Citarum Harum program's Action Plan. The others, moved to Bunder where they have reported lower fish productivity and increased operational costs. As such, there is potential risk to their livelihoods and those of their households.</p> <p><i>Failure to implement the LRP in a timely manner will also affect other Project Affected Persons (PAPs) such as landowners, informal land users, and other reservoir users. This could potentially have lasting impacts on many households and leave them worse-off than they were before the project.</i></p>		<ul style="list-style-type: none"> Water Transportation & Management Plan
Compensation & right to adequate standard of living	All PAPs including landowners/users, owners	<ul style="list-style-type: none"> There is a risk that the PAPs may not be compensated at full replacement cost as there is no national requirement for this which may leave 	Right to self determination	<ul style="list-style-type: none"> Scale: High, the Project will impact land and water-based livelihoods. 	High	<ul style="list-style-type: none"> Livelihood Restoration Plan Stakeholder Engagement Plan including the GRM

THEMATIC AREAS	RIGHT HOLDER	DESCRIPTION OF POTENTIAL ISSUES	HUMAN RIGHTS AT RISK	HUMAN RIGHTS ASSESSMENT SCALE: HIGH, MEDIUM OR LOW SCOPE: INDIVIDUAL, HOUSEHOLD, COMMUNITY, REGION REMEDIABILITY: STEPS THAT COULD BE TAKEN TO ADDRESS THE RISKS BEFORE THE HARM OCCURS LIKELIHOOD: HIGH, MEDIUM OR LOW	OVERALL RISK LEVEL HIGH OR LOW	PROPOSED MITIGATION THROUGH IMPLEMENTATION OF PROJECT PLANS & PROCEDURES
including livelihood restoration.	This includes formal and informal landowners/users and fishing cages and stalls operators and users.	<ul style="list-style-type: none"> them worse-off than they were before the Project. In addition, the Indonesian law does not recognise informal land users including the 'illegal' owners of the fishing net cages who were displaced in June 2024, and stalls within the restricted zone. There is also no requirement to provide livelihood restoration, transitional support or additional support to vulnerable groups. 	Right to family life Right to an adequate standard of living (which includes right to food)	<ul style="list-style-type: none"> Scope: Individuals (landowners/users, fishing net cages and stall owners and traditional fishermen). This means that household livelihoods will be impacted. Remediability: To address impacts arising from economic impact, the Project will have to implement the LRP. Likelihood: High because the displacement of KJA owners occurred in June 2024 under the Citarum Harum Program and without any provision of compensation or other support. Consultations undertaken with the affected PAPs show their livelihoods are being affected through increased operational costs and reduced fish productivity. In addition, 4 KJA owners were not able to relocate their KJAs and are now casual labourers. Failure to have the LRP prepared on time and implemented within the required timeline and in accordance with the lenders' IFC PS5 requirements may potentially have lasting impacts on households and leave them worse-off than they were before the Project. 	High	<ul style="list-style-type: none"> Water Transportation & Management Plan

7 SUMMARY OF THE HRRA

The results of the Human Rights Impact Assessment have identified the following as having a 'High Risk' rating which requires further studies to be undertaken. The summary of further studies required to be undertaken is provided in the table below:

Table 7-1 Additional Studies to be Undertaken by the Project Company and EPC Contractor (as part of the ESIA & HRIA)

Requirement	Comment
Periodic Supply Chain audits	To be undertaken in accordance with the Supply Chain Management Plan which will require to be prepared for the Project.
H&S Risk Assessment	EPC Contractor will undertake a H&S Risk Assessment before mobilisation while the O&M Company will undertake the H&S Risk Assessment before the start of operation. This will also include the assessment of the risks associated with the periodic military training exercises at the Saguling reservoir especially near the intake.
Traffic Study	To be undertaken by the EPC Contractor before the start of mobilization. This will ensure all transportation permits are in place and inform the Traffic Management Plan. This will also include the local access road in Cihea, Saguling and those that will be used during the construction of the OHTL.
Screening of Security Guards	To be undertaken for all guards for past offences involving violations of protocols on the use of force including abuse of power, GBVH etc. This will be undertaken before the guards are hired and the process documented.
Livelihood Restoration Plan	The LRP is currently being updated and is under review by the lenders and their advisor.
Labour audits	Quarterly third-party Labour Audits (construction) and annually during operation

The above studies relate to labour and working conditions, community health & safety, land acquisition and relocation/removal of fishing cages. A summary of these key issues is provided in sections below.

7.1 Labour & Working Conditions

The overall risks of Project impacts relating to child labour, forced labour, occupational health & safety have been rated as "High Risk" because of the following:

- The Supply Chain Screening Report revealed that all the solar suppliers are exposed to forced labour through their supply chains. In addition, some of the electric system companies are involved in labour transfer programmes which are

associated with forced labour. The risk of forced labour also heightens the risk of child labour along the supply chain.

- Occupational health & safety: The HSE risk assessment for the Project have not been undertaken especially for the construction phase.

As such, it is critical that the Project Company ensures that the Responsible Sourcing Procedure and Supply Chain Management Plan are implemented. In addition, the Project Company, EPC Contractor and the O&M will undertake the H&S assessments before the start of the construction and operational phases.

7.2 Community Health & Safety

This has been determined as “High risk” as the ESIA requires for additional studies to be undertaken in relation to Project related traffic. In addition, the Project Company, EPC Contractor and O&M Company will require to undertake robust stakeholder engagement and consultations. This will be to ensure that the communities and boat users are aware of the construction and operational phase restrictions and safeguards in place and the alternatives available.

7.3 Economic Displacement

7.3.1 Landowners and Users

The construction of land-based Project facilities is anticipated to affect land ownership and use. This impact is anticipated to be confined to the Project footprint, encompassing the laydown/assembly areas, substation and switching station areas, footprint of the OHTL towers as well as the associated access roads. Permanent land impact is foreseen at the substation, switching station, jetty, access road, and at the OHTL towers, while the impact at the laydown/assembly areas is anticipated to be temporary. It is expected that land use beneath the OHTL will be possible, albeit with some restrictions within the Right of Way (RoW), including limitations on the types of crops/trees that can be cultivated. This will impact both formal and informal landowners and users. LRP baseline surveys undertaken in October and November 2024 show that there will be no physical displacement from the construction of any of the Project facilities.

Furthermore, access to islands near the FPV installation, utilised for farming purposes, may experience temporary disruption during the floaters’ installation. However, this scenario is deemed unlikely, as alternative access routes have been identified and consultations are on-going with local communities to determine their suitability. Additionally, the EPC Contractor will be required to undertake further consultations as per the SEP before the implementation of any access restrictions in the project area.

7.3.2 Fishing Net Cages (KJAs)

During the surveys conducted in October and November 2024 as part of the LRP, it was established that all the KJAs had already been relocated from the restricted zone where the project will be developed, and none were observed in the area. However, preliminary surveys undertaken by ACWA Power CLO in June 2024 had gathered data on the KJA operators within this zone. At the time, it was determined that 115 KJA owners were going to be affected by the relocation. The data collected by the ACWA Power's CLO was then used by the LRP social team to validate the list of affected KJA owners through consultations with both the KJA owners and local community leaders. It was confirmed that no additional KJA operators were identified, and the list remains at 115 affected owners.

Consultations undertaken with the KJA owners in October 2024 revealed that of the 115 owners operating in the restricted zone, 111 managed to relocate their KJAs, while 4 ceased operations due to an inability to afford the relocation costs. The four KJA owners have become casual labourers.

Of those that were able to relocate, 24 moved to Kampung Ranca Bugis in Sarinagen village which is still within the restricted zone and had approximately 120 existing KJAs. The other 87 KJAs moved to Bunder in Tanjung Jaya in an area that had approximately 1,100 existing KJAs.

It is noted that the process of relocating and/or removal of KJAs from the restricted zone was conducted by KJA owners at their own cost. Consultations undertaken with the KJA owners in October/November 2024, revealed that they use motor boats during this process. For instance, four KJA petak/plots require 4 motor boats which each costing approximately IDR 500,000 (USD31).

The KJA operators who were able to relocate their KJAs reported to have experienced the following impacts:

- Relocation costs and time: The time it took to successfully relocate is attributed to the process of identifying relocation site and financing the relocation process which most of the KJA owners stated was expensive. As a result, 4 KJA owners stopped operation since they could not afford the associated costs and are now casual labourers.
- Increased operational costs at the KJA relocation sites in Bunder and Ranca: The relocation to these sites increased the distance the owners must travel to about 4-5km. As such, they stated that this has led to increased costs of operation due to an increase in transportation costs.
 - Some of the KJA owners reported incidents of their KJAs being broken into and fish being stolen, which they attributed to their inability to remain close to the KJA locations due to the increased distance from their own homes.

- Decreased productivity: Those who relocated to Bunder stated that the productivity of Carp fish had decreased, and the breeding season would be extended for additional 2 weeks.
 - A review of the water quality data showed that Ammonia levels in Bunder are very high at 2mg/l which can be attributed to the significant increase of fish waste due to increase in the number of KJAs. This could potentially inhibit growth of the fish and damaged tissues and grills triggering the death of fish. However, no deaths of fish were reported.
- Risk of being displaced from the relocation sites: The 24KJAs that were relocated to Ranca are at a risk of being displaced in future as they are still within the restricted zone of the Saguling Reservoir.
 - Furthermore, the Citarum Harum program has a mandate to regulate the number of KJAs in the reservoir, which could directly affect the Bunder relocation area where 87 KJAs were reestablished.
 - Any further displacement of these KJAs could significantly impact the livelihoods of their owners, potentially resulting in the loss of income or necessitating a transition to alternative sources of income.

To establish the implementation program of the Citarum Harum Program, ACWA Power and Indonesia Power are in the process of initiating consultations with the Citarum Harum Secretariate.

7.3.3 Fishing Stalls

During consultations undertaken in October and November 2024 as part of the LRP, fishing stall owners voiced concerns about the relocation of KJAs in June 2024, which they relied on to attract feeding fish. They explained that the KJAs served as a food source for fish, indirectly supporting their fishing stalls operations. Consequently, they are worried that the relocation of the KJAs will have a potential impact on their businesses.

Based on the current design from October 2024, access to the fishing stalls will still be possible through the alternative routes provided under the project. However, these stalls may potentially lose anglers due to the restricted size of the boat navigation route near the project areas and the proximity of the project.

7.3.4 Traditional Fishing

Consultations undertaken as part of the LRP revealed that the traditional fishermen also relied on the operations of the KJAs to attract fish in their fishing area. The fishermen requested for the project to give them access to fish within the restricted project zone so that their livelihoods are not impacted. They stated that the establishment of the restricted zone around the project facilities would force them to travel further into the reservoir to find suitable fishing locations.

This would result in increased fishing time and boat costs, with no assurance of an improved catch to compensate for the additional effort.

Although traditional fishermen will no longer have access to fishing in areas within the restricted project zones, they will still be able to fish outside of this zone, albeit with a reduced fishing area. However, the reduced fishing zone could result into reduced catch which may potentially impact their livelihoods.

CONCLUSION

Based on the above, there is a need to have the LRP finalised, approved by the lenders and implemented in a timely manner and before imposing land and reservoir access restrictions or causing any further displacement.

7.4 Other Human Rights Risks

Other human rights risks will be managed through the development and implementation of a Project specific ESMS throughout the construction and operation phases.

Furthermore, various management plans will be formulated and executed as an integral component of the ESMS, aligning with both national regulations and the lenders requirements. These plans will encompass key performance indicators (KPIs), reporting mechanisms, and corrective actions specifically tailored to address human rights issues and concerns. The status of these plans is outlined in the table below.

Table 7-2 Status of Plans/Procedure/Policies required as part of the HRIA mitigations

Plan/Policy	Comment
Human Resource Policy	
E&S Policy	
Human Rights Policy	
GBVH Policy	
HR Procedures including Workers Code of Conduct	To be prepared as part of the ESMS
Contractor Management Plan	
Supply Chain Management Plan	
Responsible Sourcing Procedure	This plan exists under ACWA Power Corporate.
Workers Grievance Procedure	
Local Recruitment Plan	To be prepared as part of the ESMS
Retrenchment Plan	To be prepared before the start of the operational phase
Security Management Plan	To be prepared as part of the ESMS

Plan/Policy	Comment
Setting up H&S Management System in line with ISO 45001:2018	
H&S Management Plan	
Emergency Preparedness & Response Plan	
Workers Accommodation Plan	
Influx Management Plan	
Stakeholder Engagement Plan including third-party GRM	
GBVH Incident Reporting, Response & Support Procedure	
Construction Environmental & Social Management Plan (CESMP)	
Operation Environmental & Social Management Plan (OESMP)	
Environmental & Social Monitoring Plan	
Environmental & Social Training Plan	
Waste Management Plan	
Community Health & Safety Management Plan	
Traffic Management Plan	
Water Transportation Management Plan	
Hazardous Materials and Waste Management Plan	
Water & Sediment Quality Monitoring Plan	
Cultural Heritage Management Plan	
Livelihood Restoration Plan	Prepared as part of the ESIA package.

APPENDIX A - HUMAN RIGHTS SCREENING

This section details out the screening of potential human rights (ICCPR & ICESCR) at risk and applicability to the Project.

Appendix A- Human Rights Screening

HUMAN RIGHTS	APPLICABILITY TO THE PROJECT	POTENTIAL HUMAN RIGHTS RISKS
ICCPR		
Right of self-determination	Applicable	<ul style="list-style-type: none"> The project will lead to economic displacement for land users within the land-based Project AOL including the OHTL alignment. In addition, the FPV will impact lake-based users who have fishing net cages within the Project area including the operators/owners of the fishing stalls. If compensation is not provided in accordance with the national and lenders requirements (and in a timely manner), it will impact the PAPs ability to pursue their economic development. In such cases vulnerable groups such as women, the elderly and household that solely depend on natural resources as a source of livelihood will be disproportionately impacted.
Freedom from discrimination	Applicable	<ul style="list-style-type: none"> The project will employ workers from local communities including some foreign workers for positions where highly technical skills are required and are absent in local communities or in the country. In addition, there will be employment opportunities suitable for both men and women. Therefore, the risk will be in case workers face discrimination during the recruitment process or in salaries, employment benefits and guarantees etc due to their gender, creed, nationality etc.
Right to equality between men and women	Applicable	<ul style="list-style-type: none"> The project will lead to economic displacement for men and women, and it will further employ male & female workers (who will be from different religious, tribal, nationality, sex etc). Therefore, the potential violation is associated to not respecting or treating all the affected persons and workers equally irrespective of their gender, creed, nationality etc.

HUMAN RIGHTS	APPLICABILITY TO THE PROJECT	POTENTIAL HUMAN RIGHTS RISKS
		<ul style="list-style-type: none"> There may also be a risk of providing lesser compensation rates for assets, land etc owned by women in comparison to male land and/or asset owners.
Right to life	Applicable	<ul style="list-style-type: none"> Potential risks associated with the use of force by the security forces, community health and safety accidents such as road accidents, and health & safety risks to workers which possess the threat of life to communities and workers.
Right to not be subjected to torture, cruel inhuman and/or degrading treatment, or punishment.	Applicable	<ul style="list-style-type: none"> The risk of project workers being subjected to severe harassment or dangerous working condition that can cause mental distress and anguish. There is also a risk that security guards would potentially use force when dealing with local communities.
Right to not be subjected to slavery, servitude or forced labour	Applicable	<ul style="list-style-type: none"> Potential risk associated with workers employed directly to the project, contractual workers, and the workers in the supply chain of the project. Potential risks can be that the workers do not have legal right to perform work, freedom to terminate contracts, have their personal identification documents withheld etc.
Right to liberty and security of person	Applicable	<ul style="list-style-type: none"> This is only applicable as far as the project may threaten and/or intimidate workers and communities with violence through the contracted project security personnel.
Right to be treated with humanity in detention	Not applicable	<ul style="list-style-type: none"> The Saguling FPV Project will not be engaging in management of detention or prison services.
Right to freedom of movement	Applicable	<p>The risk to the freedom of movement may potentially arise for:</p> <ul style="list-style-type: none"> Local communities whose movement across the Saguling Reservoir will be impacted especially due to the implementation of construction and operational phase restrictions especially for the water-based facilities (floating cables and FPVs). This will potentially impact their access to fishing cages and stalls, market, farms etc especially if suitable alternatives are not identified. Workers: in case their identification documents such as national IDs, passports are withheld which would restrict their movement.
Right to aliens to due process when facing expulsion	Not Applicable	<ul style="list-style-type: none"> The Project will not have any influence on the immigration policies of the country or how deportations from the country are executed.
Right to fair trial	Not Applicable	<ul style="list-style-type: none"> The Project will not have influence on the judicial system in Indonesia.

HUMAN RIGHTS	APPLICABILITY TO THE PROJECT	POTENTIAL HUMAN RIGHTS RISKS
Right to be free from retroactive criminal law	Not Applicable	<ul style="list-style-type: none"> The Project will not have any influence on how this is enforced within Indonesia.
Right to recognition before the law	Not Applicable	<ul style="list-style-type: none"> The Project will not have any influence on how this is enforced, and it is not applicable for the Project.
Right to privacy	Applicable	<ul style="list-style-type: none"> The Project may potentially put this right to risk if they disclose workers, project affected persons, other stakeholders' private data without their consent.
Rights to freedom of thought, conscience & religion	Applicable	<p>The Project may impact on this right for:</p> <ul style="list-style-type: none"> Workers who need to pray during work hours or those who request days off to observe certain religious holidays. In addition, issues may arise regarding wearing religious clothing, headwear, jewellery at the workplace.
Right to freedom of opinion expression	Applicable	<ul style="list-style-type: none"> The Project will result in economic displacement including restriction/disruption of water transportation routes within the restricted zone of the reservoir. As such, communities will need to freely express their concerns about how the Project might impact their livelihoods and daily lives. The project will also employ workers. A violation of this right will be if communities, PAPs, workers are not allowed to freely express their concerns, opinions, and expectations etc.
Rights to freedom from war propaganda, & freedom from incitement to racial, religious, or national hatred	Not Applicable	<ul style="list-style-type: none"> This right is not impacted by the Project.
Right to freedom of assembly	Applicable	<ul style="list-style-type: none"> The risk to this right will be if the workers are denied the right to peaceful assembly to discuss issues that might affect them in the workplace.
Right to freedom of association	Applicable	<ul style="list-style-type: none"> This could be potentially violated if the Project does not allow workers to form trade unions or form workers representation groups within the workplace.
Right to protection of the family & the right to marry	Applicable	<ul style="list-style-type: none"> This is only applicable as far as the Project may require workers to work overtime and for long durations without leave which will impact their ability to spend time with their families.

HUMAN RIGHTS	APPLICABILITY TO THE PROJECT	POTENTIAL HUMAN RIGHTS RISKS
Rights of protection for the child	Applicable	<ul style="list-style-type: none"> This right maybe put at risk if the Project does not observe the minimum age of employment and undertake due diligence and monitoring of the supply chain.
Right to participate in public life	Not Applicable	<ul style="list-style-type: none"> This right is not impacted by the Project.
Right to equality before the law, equal protection of the law, & rights of non-discrimination	Applicable	<ul style="list-style-type: none"> Refer to right to Freedom from discrimination and right to equality between men and women above.
Rights of minorities	Not Applicable	<ul style="list-style-type: none"> There are no Indigenous Peoples within the Project area
ICESCR		
Right to work	Applicable	<ul style="list-style-type: none"> This may be put at risk if the Project arbitrarily or unfairly dismisses workers.
Right to enjoy just and favourable conditions of work	Applicable	<ul style="list-style-type: none"> May potentially be impacted if the Project does not maintain adequate standards of occupational health and safety and eliminating or minimising workplace hazards. Risks in situations where sick leave and/or maternity leave is not provided. In addition, there is risk where workers are exposed to harassment, sexual abuse/exploitation and bullying especially for female employees.
Right to form trade unions & join a trade union & the right to strike	Applicable	<ul style="list-style-type: none"> The Project may impact this if they prevent union membership and activity amongst employees which might include strikes due to poor working conditions, wages etc.
Right to social security, including social insurance	Applicable	<p>Workers social security benefits are regulated under the Decree of the Minister of Manpower Number KEP-150/MEN/1999 of 1999 concerning the Implementation of the Labor Social Security Program for Daily Workers Casual, Contract and Certain Time Work Agreements ("Kepmenaker 150/1999") and Regulation of the Minister of Manpower Number 44 of 2015 concerning the Implementation of Work Accident Insurance Programs and Death Benefits for Casual Daily Workers, Contract and Certain Time Work Agreements in the Construction Services Business Sector ("Permenaker 44/2015").</p> <ul style="list-style-type: none"> Manpower Decree 150/1999 requires employers who employ workers under Specific Time Work Agreement ("PKWT") ("contract employees") for 3 consecutive

HUMAN RIGHTS	APPLICABILITY TO THE PROJECT	POTENTIAL HUMAN RIGHTS RISKS
		<p>months or more are required to include them in work accident insurance, death insurance, old age insurance and health care insurance programs.</p> <ul style="list-style-type: none"> • If employers employ PKWT workers for less than 3 consecutive months, they are required to include them in the work accident insurance, and death insurance programs. • Permenaker 44/2015 requires construction services sector employers to register their workers in the work accident insurance and death insurance programs. • The above applies to both construction phase and operational phase workers.
Right to a family life	Applicable	<ul style="list-style-type: none"> • Refer to Right to protection of the family & the right to marry above.
Right to an adequate standard of living This includes right to adequate housing, right to food, right to water)	Applicable	<ul style="list-style-type: none"> • The right is applicable because the Project will provide workers' accommodation. There is a risk that accommodation facilities may be inadequate i.e, lacking relevant facilities, welfare provisions such as clean drinking water, rest areas, sanitation facilities for women and men, food etc. • There is a risk to push families into poverty if compensation for economic displacement (land-based and reservoir-based livelihoods) is not provided based on replacement value/full cost. In addition, this could be exacerbated in situation where unsustainable livelihood programmes are implemented.
Right to health	Applicable	<ul style="list-style-type: none"> • Potential violation associated to this right for local communities (especially to women, children) may arise if mitigation and management measures against worker influx are not implemented. • Risk of exposure for workers and communities to communicable diseases such as HIV/AIDS etc.
Right to education	Applicable	<ul style="list-style-type: none"> • Potential violation associated with employment of child labour which will violate their right to education.
Right to take part in cultural life & to benefit from scientific progress	Applicable	<ul style="list-style-type: none"> • The project is within 1km of several sacred sites including graves which could potentially be impacted by the Project especially due to workers influx.

APPENDIX B: OUTCOME OF STAKEHOLDER CONSULTATIONS

STAKEHOLDER BODIES	DATE	KEY ISSUES
Baranangsiang village	21 st November 2023	<ul style="list-style-type: none"> The community is concerned about potential discrimination against individuals with lower levels of education in the employment process. There is a national trend and concern that projects in Indonesia often involve a significant number of foreigners including unskilled workers. Concern was also raised that the rights of local workers will not be safeguarded because the Project may potentially be more concerned about the rights of the foreign or migrant workers. It was communicated that forced labour and child labour are very rare in the community. However, this must be addressed during the Project development. The community representative also stated that only local authority that has been mandated on issues relating to human rights is at the district level. In addition, they stated that the social assistance support was cut off by the village government in 2020, which caused issues of distrust between the different parties.
Cihea village	23rd November 2023	<ul style="list-style-type: none"> No issues were raised in relation to potential Project impacts. However, it was stated that the receipt of <i>Bantuan Langsung Tunai</i> (BLT – direct cash aid) and other government assistance in Bantar Kalong hamlet is not transparent. It was stated that several families who are economically stable receive support whereas this should be directed to vulnerable families currently not receiving any type of support.
Jati village	24 th November 2023	<ul style="list-style-type: none"> Concerns were raised about potential competition between local and non-local workers during the recruitment process. In addition, the community hopes that the rights of local workers will be equally safeguarded as those of non-local workers. Concerns were expressed that the proposed Project would primarily benefit a select few, with limited distribution of benefits to the local communities. The participants also stated that they are not aware of cases of child labour which they attributed to the community not being situated in an industrial zone. Additionally, it was stated that awareness regarding human rights is a shared responsibility between the communities and government. However, not many people are aware of the importance of paying attention to and protecting human rights. It was also stated that no human rights campaigns/awareness creation has been conducted in the village.
Rajamandala Kulon village	23 rd November 2023	<ul style="list-style-type: none"> The participants requested that the Project should consider the rights of local workers. The primary concern expressed by the community regarding children is related to those who beg on the streets. They believe this practice violates the rights of the children.

STAKEHOLDER BODIES	DATE	KEY ISSUES
		<ul style="list-style-type: none"> The participants are not aware of any cases relating to forced labour in the community.
Saguling village	22nd November 2023	<ul style="list-style-type: none"> The community voiced concern that the rights of local workers to work in the Project will be overshadowed by those of foreign workers. They emphasized that while skilled labour might be limited, unskilled labour is abundantly available within the community and should be considered. Participants stated that they are not aware of human rights violations including cases of child labour in the community. The Project was also informed that government entities responsible for human rights are found at the national, provincial and district levels including the Manpower Office and the National Human Rights Commission.
Karanganyar village	21 st November 2023	<ul style="list-style-type: none"> Participants stated that they are not aware of human rights violations including cases of child labour and forced labour in the community. It was stated that residential areas were relocated during the construction of the Saguling reservoir. Some of the community members were moved to Cikampek, Cianjur, and within the Karanganyar village. In addition, there are no village level institutions and authorities that address human rights issues in the village. However, issues related to women are addressed through Posyandu Cadres. <p><i>Posyandu cadres are part of the health workers whose role is to establish a healthy community and empowering the community as motivators and health care.</i></p>
Sarinagen village	22 nd November 2023	<ul style="list-style-type: none"> Concerns were raised that the arrival of foreign workers will have a negative influence on the culture of the community. For instance, concerns were raised that presence of foreign workers could lead to the supply and sale of alcohol, loss of a sense of community and discrimination etc. The participants stated that they expect the rights of local residents must be safeguarded even more than those of non-locals. As such, local people should be recruited for employment opportunities. They are not aware of any cases of child labour and forced labour in the community. Human rights issues are handled by central level authorities.