APPENDIX XII

EMERGENCY PREPAREDNESS AND RESPONSE PLAN

SEPTEMBER 2025

EMERGENCY PREPAREDNESS AND RESPONSE PLAN FOR ORPOWER TWENTY-TWO LTD 35 MW GEOTHERMAL POWER PLANT IN MENENGAI

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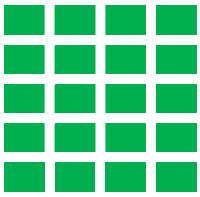

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List of Abbreviations

CIPU:	Critical Infrastructure Protection Unit
EPRP:	Emergency Preparedness and Response Plan
ERT:	Emergency Response Team
GDC:	Geothermal Development Company
MCFA:	Menengai Community Forest Association
NDOC:	National Disaster Operations Centre
NEMA:	National Environment Management Authority
PPE:	Personal Protective Equipment

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1 Introduction

The OrPower Twenty-Two project involves construction of a 35 MW modular geothermal Power Plant within the Menengai Caldera in Nakuru County, Kenya. The site is inside a government-designated geothermal development area managed by the Geothermal Development Company (GDC) – a forested caldera zone with multiple geothermal wells already drilled by GDC. OrPower Twenty-Two (also referred to as OTTL) is one of three independent power producers (IPPs) licensed to develop a 35 MW plant in this area under a Build-Own-Operate scheme. The plant will tap steam supplied by GDC's geothermal wells and convert it to electricity via steam turbines, with brine (geothermal water) managed through reinjection or evaporation ponds.

OrPower Twenty-Two Ltd (OTTL) is the special purpose vehicle (SPV) established to develop, construct, and operate the Menengai 35 MW Geothermal Power Plant (Phase I Unit III). OTTL is owned by Kaishan Kenya Engineering Company Ltd, a subsidiary of China-based Kaishan Group Co. Ltd**.** (Kaishan acquired OrPower Twenty-Two in 2023). Kaishan Group is the project developer and has been contracted to perform the Engineering-Procurement-Construction (EPC) work and long-term O&M. As the operator, OTTL will ensure that the plant adheres to all health, safety, and environmental standards during its operational phase.

This Emergency Preparedness and Response Plan (EPRP) outlines project-specific measures for potential emergency scenarios through the project life cycle. It is developed in alignment with IFC Performance Standards PS 1& PS 4, AfDB ISS OS 1 & OS 4 and GDC's Disaster Management Plan (2021). The plan defines clear roles and responsibilities of all stakeholders, detailed response actions for credible scenarios, communication protocols, and resource requirements. It supports GDC's overarching emergency framework and will be reviewed and updated regularly to ensure continued effectiveness and compliance with IFC expectations on emergency preparedness and response.

2 Objectives

The key objectives of this EPRP are:

- **Protect human Lives and Assets:** Ensure the Well-being and safety of personnel, visitors and nearby communities. The aim is to minimize harm to personnel, visitors, community members, and assets by rapid, effective response to emergencies.
- **Minimize environmental Impact:** Prevent or mitigate environmental damage from emergencies.
- **Reduce downtime:** Minimize the impact of emergencies on plant operations and production.
- **Clear Roles and Responsibilities:** Establish an incident command structure defining the duties of the project company (Orpower22/Kaishan), GDC, contractors, local authorities, and community representatives during emergencies.
- **Effective Communication:** Ensure timely notification to all stakeholders, including workers, emergency services, regulators, and potentially affected communities.
- **Regulatory and IFC Compliance:** Meet or exceed requirements of national laws and IFC Performance Standards for emergency preparedness (including disclosure of relevant information to communities).
- **Continuous Improvement:** Conduct training, drills, and post-incident evaluations to improve response capabilities over time.

3 Emergency Scenarios & Response Actions

The following potential risks have been identified to necessitate Emergency response planning. Response measures have been provided for each risk. Response protocols cover detection, immediate actions, escalation, and communication for each scenario, ensuring alignment with both GDC's Disaster Management Plan and international best practices. All site personnel will be trained on these procedures, and key steps will be summarized in on-site emergency signage and flip charts.

3.1 H_2S Gas Leak (Hydrogen Sulfide Release)

Hydrogen sulfide may be released from geothermal wells or pipelines. See the table below for details:

Table 3-1: Response for H_2S release

Item	Detail
Likely location	▪ GDC wellhead pads, steam lines, separators, or tie-ins upstream of the plant fence.
Detection/trigger	▪ H_2S fixed/portable detector alarms; odor reports; visual plume; radio call from GDC Control.
GDC – Lead actions	▪ Dispatch well/pipe team to **isolate source** (valves/remote shutdown). ▪ Establish **exclusion zones** upwind/downwind. ▪ Lead **community warning** if plume migration is possible; commence air monitoring and statutory notifications as required.
OTTL – Coordinated actions	▪ **Alarm** and **evacuate or shelter-in-place** per wind direction. ▪ Issue PPE/SCBA to designated responders; stop hot work; secure ignition sources. ▪ Maintain comms with GDC Control; prepare **medical response** (on-site paramedic/ambulance) and perform muster/roll-call. ▪ Make regulatory/lender notifications per severity thresholds.
Joint communication & community	▪ Use the agreed call-down list (GDC ↔ OTTL ↔ community/County). ▪ GDC will lead **public alerting**, with OTTL supporting messages and traffic control at plant access roads.
All-clear & hand-back	▪ GDC will confirm **safe H_2S levels** before re-entry; OTTL will restart only after joint verification and documentation.

3.2 Well Blowout (Uncontrolled Well Eruption)

In the event of a well blowout – an uncontrolled release of geothermal fluids/gas – the following actions are critical:

Table 3-2: Response for well blowout

Item	Detail
Likely location	▪ GDC drilling/production pads or gathering nodes upstream of the plant.

Detection/trigger	▪ Sudden high-rate fluid/gas release, audible roar, visible plume, abnormal pressures, alarm from GDC.
GDC – Lead actions	▪ **Declare emergency**, mobilize **well-control specialists**, activate BOPs, control ignition sources. ▪ Establish a large **exclusion perimeter** and coordinate multi-agency response. ▪ Lead statutory notifications and public authority liaison; plan for **relief well** if needed.
OTTL – Coordinated actions	▪ **Cease non-essential operations**, close steam admission as instructed; secure transformers/ignition sources. ▪ **Evacuate or shelter-in-place** per impact assessment; conduct muster/roll-call; ready medical support. ▪ Keep emergency access routes clear; provide site maps/hydrant plan; make lender/regulatory notifications per covenants.
Joint communication & community	▪ GDC will lead external communications; OTTL will support traffic management and ensure consistent messaging via local channels.
All-clear & hand-back	▪ Upon control of the well and declaration of safety by authorities/GDC, OTTL will complete **plant integrity checks** before controlled re-start; both parties will contribute to a **joint investigation**.

3.3 Brine Spill

Table 3-3: Response to brine spills

Item	Detail
Likely location	▪ GDC brine holding ponds, injection lines, or manifolds outside the plant boundary.
Detection/trigger	▪ High-level alarms, visible discharge, patrol reports, third-party calls; downstream water discoloration/steam.
GDC – Lead actions	▪ **Stop inflow** and isolate failure; **contain** with berms/booms; deploy trained cleanup teams with appropriate PPE. ▪ Notify environmental lead; start **sampling and impact assessment**; make statutory notifications. ▪ Lead downstream/community alerts if off-site migration is possible.
OTTL – Coordinated actions	▪ Protect plant personnel (thermal/chemical PPE); secure internal drains if ingress risk exists; **stand by to assist** with containment materials on request. ▪ Log incident details; support regulatory reporting inputs as needed; inform lenders if thresholds are met.
Joint comms & community	▪ GDC will lead downstream notifications; OTTL will align messages and ensure plant traffic does not impede external responders.

All-clear & hand-back	▪ GDC will confirm containment, complete clean-up and monitoring; OTTL will resume operations after confirmation that **no residual risk** affects the plant.

3.4 Fire (e.g. Electrical Transformer Fire or Workshop Blaze):

In case of fire or explosion:

- **Alarm and Initial Response:** Activate the fire alarm. If the fire is of a small magnitude (e.g. contained incipient stage), attempt to extinguish with the nearest appropriate fire extinguisher **without endangering oneself**.
- **Evacuation:** If the fire is large or growing, evacuate all personnel to the emergency muster point. Do not re-enter to retrieve personal items. Account for everyone at the muster point.
- **Call Fire Services:** Dial the County Fire Brigade and also alert GDC Security immediately. Provide details on the type of fire and any risks (e.g. fuel or chemicals on site). The on-site Critical Infrastructure Protection Unit (CIPU) officers will assist with access for fire engines.
- **Isolate Energy:** If safe to do so, isolate electrical power or fuel supply feeding the fire (e.g. turn off transformers, gas lines).
- **Protect Surroundings:** Use fire hoses or extinguishers to cool nearby equipment or structures to prevent fire spread, if properly trained. CIPU security will cordon off the area to keep bystanders away.
- **Medical Aid:** Be prepared to provide first aid for any burn or smoke inhalation injuries. Call ambulance services if any person is injured or if there is risk of smoke exposure to the community.
- **Aftermath:** Once fire services extinguish the blaze, do not disturb the scene until an investigation is conducted. Support a root cause analysis and document all actions taken.

3.5 Wildfire

Given the forest/grassland mosaic around Menengai, wildfires have occurred historically. A wildfire originating off-plant could threaten the site via embers, radiant heat and smoke. Because ignition and spread will often be outside OTTL's control, the response will distinguish KFS (landscape fire authority), GDC (steam/brine infrastructure operator) and OTTL (power plant operator).

Triggers & Where It Might Occur.

- Regional/forest fire moving toward the GDC/OTTL footprint under high winds.
- Perimeter grass/shrub fire near roads or third-party areas.
- Equipment sparks/hot work during high fire-danger days (on or off plant).
- Anthropogenic activities e.g. charcoal burning, arson

Detection & Initial Actions (OTTL).

- On smoke/ember detection, the Incident Commander will **declare tier** (standby/defensive/evacuation), wet critical assets (ACC, transformer yard), isolate non-essential systems, manage traffic/egress and issue smoke PPE (e.g., N95) as needed.

Table 3-4: Response to wildfire

Phase	GDC (steam/brine systems outside plant)	KFS (Kenya Forest Service – landscape fire lead)	OTTL (power plant inside fence)
Prevention & Preparedness	Maintain clear corridors around steam/brine lines, access to pads/ponds; coordinate pre-season briefings with KFS/OTTL; ensure hydrant/water points at GDC assets.	Issue seasonal fire-danger advisories; plan patrols and initial attack resources; agree access routes and radio channels with GDC/OTTL.	Keep firebreaks intact; install ember screens (ACC); stage hose lines and pumps; brief staff on wildfire SOP; pre-season joint walk-through with GDC/KFS.
Detection & Notification	Report smoke/flame sightings along gathering system; activate internal call-down and notify KFS & OTTL.	Dispatch patrol/crews; size-up fire; notify County Fire/authorities as needed; advise GDC/OTTL on expected spread.	Raise site alarm; confirm wind and exposure; declare tiered response; notify security to manage gates and roadways.
Initial Response (Defensive)	If safe, clear vegetation and remove combustibles near lines/pads; support traffic control for responder access.	Anchor/contain fire per ICS; request additional resources; designate safety zones and ingress/egress.	Wet down perimeters and critical assets (ACC/transformer yard); isolate non-essential systems; prepare for evacuation or shelter-in-place.
Escalation / Evacuation	Secure non-essential GDC areas; help establish exclusion zones; support community notifications via agreed channels.	Lead evacuations/road closures as needed; direct resources to protect life and critical infrastructure.	Evacuate to upwind assembly points or shelter-in-place if egress blocked; account for personnel; keep access clear for KFS/County Fire.
Communications	Maintain liaison with KFS and OTTL; provide maps of GDC assets/hydrants; share situation updates.	Act as on-scene lead; provide periodic updates and instructions to GDC/OTTL; coordinate with County Fire/Police.	Single point of contact to KFS/GDC; issue internal safety bulletins; align any external messages with KFS lead.
Notifications	Notify internal management; assist with	Lead statutory notifications related to	Make lender/regulatory notifications if thresholds

	statutory notifications as required.	forest fire; coordinate with authorities.	are met; log timeline and actions.
All-Clear & Recovery	Inspect steam/brine assets; repair damages; report back to KFS/OTTL; update fire prevention measures.	Declare perimeter cold; hand back area; recommend post-fire mitigation.	Inspect/repair plant; check ACC, cable trays, roofs, hydrants; conduct after-action review; close corrective actions.

3.6 Wildlife Encounter

Based on the ESIA baseline, potentially dangerous species in the Menengai area may include: large mammals (e.g., buffalo, hyena), primates (e.g., baboon troops), reptiles (multiple snake species, monitor lizards), aggressive/territorial birds (e.g., raptors during nesting), and stinging insects (bees/wasps). Encounters may occur on access roads, laydown areas, around the forest edge and occasionally within the plant perimeter:

General Principles (apply to all species).

- **Do not approach, feed or harass** wildlife; maintain distance; never corner animals.
- **Stop work** in the immediate area; create space and a **clear egress** route.
- **Report immediately** by radio to the control room/HSE; log GPS/location and species if known.
- **No lethal control** unless there is an **immediate threat to life**; contact **KWS/KFS** through the emergency call-down if an animal is trapped, injured or poses ongoing risk.
- **Protective housekeeping:** keep waste secured; no food scraps in open bins; eliminate attractants (standing water, sheltering debris).
- **Training & signage:** toolbox talks will cover species ID basics, seasons (e.g., nesting), and the **do-not-do** list.

Procedures by Risk Tier.

- **Tier 1 – Sightings at a Distance (no threat):** Observe from afar; continue work if outside exclusion; report for log; avoid routes that would intersect.
- **Tier 2 – Close Proximity (potential threat):** Cease work; **slowly retreat** along a clear path; gather team in vehicles or safe shelter; supervisor to place **temporary exclusion** (e.g., 50–100 m for large mammals, 30 m for primates/birds; as advised by Safety Officers).
- **Tier 3 – Aggressive Behavior/Attack:** Raise **emergency alarm**; move to vehicles/indoors; **first aid** for any injuries (including anaphylaxis kits for stings); call **ambulance/paramedic** and **KWS/KFS**; keep area cordoned until authorities clear.

Species-Specific Notes

- **Large mammals (buffalo/hyena):** Avoid dusk/night foot patrols; use vehicles/spotters; never separate from group; back away diagonally—do not run.
- **Primates (baboons):** Do not display food; secure waste; avoid eye contact/gestures; keep doors/windows closed in break rooms.

- **Snakes:** Assume venomous unless identified by trained staff; do not handle; mark last seen location; call trained responder; if bite occurs—immobilize limb, keep victim calm, transport urgently (no tourniquets/cutting/suction).
- **Raptors/territorial birds:** Identify **nesting areas** in pre-work surveys; impose seasonal **no-go buffers**; if swooping occurs, suspend work and re-route.
- **Bees/wasps:** Identify/mark hives/nests; cordon off; engage licensed remover if in conflict zone; stock **anaphylaxis kits** and train in use.

Roles & Equipment.

- **HSE/Wildlife Focal Point** will maintain contact lists for **KWS/KFS**, oversee buffers/no-go zones and keep the wildlife encounter log.
- **Security** will support cordons and manage traffic/visitors.
- **First-Aid/Medical** will maintain bite/sting kits (incl. EpiPens), stretchers, and transport plans.

3.7 Serious Injury or Medical Emergency (Non-Hazard Specific)

This covers any medical emergency on site during construction and/or within premises of the Power plant during operations such as falls from height, fractures, cardiac arrest, or any serious illness among workers or visitors:

- **Initial Response:** Anyone discovering a medical emergency should immediately call out for help and contact the site HSE Officer or first aider via radio/phone. If trained in first aid, start lifesaving measures (e.g. CPR for cardiac arrest, pressure on severe bleeding).
- **Site Medical Support:** The on-site first aid team (or clinic staff if available) will take charge of stabilizing the victim. Ensure use of proper PPE (gloves for blood, etc.) while assisting.
- **Emergency Services:** Call for an ambulance or arrange transport to the clinic/hospital depending on severity. Use the **emergency contact list** to notify the County Ambulance Service or nearby medical facilities. For severe trauma or life-threatening cases, request advanced life support.
- **Area Control:** Secure the scene of the accident if it's due to a safety incident (to prevent further injury or preserve evidence for investigation). CIPU can assist in controlling any onlookers and guiding the ambulance on routes within the premises.
- **Communication:** The Site Manager or HSE Officer must inform GDC and the project management of the situation as soon as possible, especially if the injury is critical. If the injured person is a community member (unlikely on site without escort, but possible if trespass or during outreach), inform the Community Liaison to support communication with the family.
- **Incident Investigation:** As soon as practical after the emergency, conduct an incident investigation (identify root causes if it was an accident). Report to DOSHS (Directorate of Occupational Safety and Health Services) within the required timeframe for serious injuries.
- **Post-Incident Support:** Ensure the affected individual and family receive appropriate support (insurance, compensation if work-related). Use the lessons learned to update risk assessments and prevention measures.

3.8 Chemical Spill

Geothermal power plants use various chemicals for different purposes, including:

- **Corrosion inhibitors:** To protect equipment and pipelines from corrosion.
- **Scale inhibitors:** To prevent scaling and mineral buildup in pipes and equipment
- **pH control chemicals**: To adjust the pH of fluids and prevent corrosion or scaling
- **Cleaning agents**: For maintenance and cleaning of equipment.

Initial Response

Alert and Notify: Inform plant personnel, supervisors, and emergency teams.

Evacuate the area: Ensure everyone in the immediate area is safely evacuated;

Identify the chemical: Determine the type and quantity of chemical spilled.

Assess the situation: Evaluate the risks and potential hazards to guide further actions.

Containment and Mitigation

i. **Contain the spill:** Use absorbent materials, dikes or berms to prevent the spill from spreading.
ii. **Neutralize the chemical (if possible):** Use appropriate neutralizing agents or procedures
iii. **Ventilate the area:** Ensure adequate ventilation to prevent inhalation of fumes.

Cleanup and Disposal (Important to note that cleanup and disposal procedures depend on type of chemical)

i. **Clean up the spill:** Use appropriate personal protective Equipment (PPE) and cleaning agents.
ii. **Dispose of contaminated Material:** Follow proper procedures for disposing of hazardous waste.
iii. **Decontaminate equipment and surfaces:** Ensure all Equipment and surfaces are thoroughly cleaned and decontaminated

3.9 Seismic risk

Menengai Caldera is prone to seismic risks due to its volcanic nature and tectonic activity. The geothermal project is situated within a relatively young caldera that can still be tectonically activated, suggesting ongoing seismic and volcanic activity. The caldera's seismic activity is also linked to its geothermal potential. In view of the foregoing, the proposed geothermal power plant is prone to seismic risks. Below is an emergency response plan for emergency risks.

Design and Construction

i. The plant and its components should be designed in a manner that it should withstand seismic forces. For example, the design should incorporate seismic isolation techniques to reduce the impact of earthquakes on structures/ buildings. These techniques involve decoupling the structures from the ground to allow it to move freely during seismic events, thereby reducing the transmission of seismic forces.
ii. materials that can resist seismic force should be used to construction the plant.

Risk Assessment

i. Thorough and regular seismic hazard assessments should be conducted to identify potential risks.
ii. Measures should be put in place to mitigate seismic risks such as seismic isolation or retrofitting

Seismic Monitoring

i. The plant should have installed seismic monitoring system to detect earthquakes.
ii. Regular inspections should be conducted to ensure the plant structural integrity.

Shut down procedures

i. Procedures should be established for shutting down he plant during seismic events.
ii. A safety protocol should be established to protect personnel and equipment. For example, designate safety areas for personnel evacuation.

Communication Protocol

A communication protocol should be established in line with the plant emergency response management.

4 Post Incident Activities.

After attendance to any incident, the following improvement or corrective initiatives should be undertaken

i. **Investigate the incident:** Determine the root cause of the incident and implement corrective actions.
ii. **Review and Update procedures:** Review and update emergency response procedures to prevent similar incidents.
iii. **Damage Assessment:** Assess damage to the plant, equipment and other material.
iv. **Safety Inspections:** Conduct safety inspections to ensure the plant is safe to operate.
v. **Repair and restoration:** Plan and execute repairs to restore plant operations.
vi. **Train Personnel:** Provide training or further training to personnel on respective incident response procedures.

5 Muster Roll Call

This refers to a process where personnel are accounted for during emergency situations or drills. The purpose of the Muster roll call is for:

i. Accountability: Ensure all personnel are safely evacuated and accounted for.

ii. **Safety:** Verify that everyone is present and safe during emergency situations.

Procedure for Muster Roll call

i. Designated Assembly Points: This requires the site/ plant to have a designated area where all personnel gather during emergencies.

Roll call: A designated person conducts a roll call to account for all personnel

Reporting: Any missing personnel are reported to the incident commander or emergency response team.

6 Emergency Roles and Responsibilities

Clarity in roles and responsibilities is crucial for effective emergency response. Below is a presentation on the key Actors/stakeholders and their roles during an emergency response. (minor or major incidents):

Table 6-1: Emergence response responsibilities

Actor/Stakeholder	Responsibility
Contractor Site/Plant Manager – Incident Commander:	Acts as the first level Incident Commander. Responsible for declaring the level of emergency (e.g., first aid case, site emergency, or full evacuation) and activating the EPRP. Coordinates all internal resources and efforts. Ensures that a muster roll call is completed and all personnel are accounted for. Notifies GDC management, emergency services, and the client (project owner) as needed. Authorizes any internal or external communications to staff or community and leads the post-incident debrief and investigation process.
Contractor HSE Officer – EPRP Technical Lead	Serves as the first responder or response coordinator and technical lead for health, safety, and environment. Provides immediate first aid or life-saving measures as needed. Ensures all emergency equipment (gas monitors, alarms, fire extinguishers, first aid kits, muster point signage) are maintained and functional. Conducts regular emergency drills (at least quarterly) and trainings for workers and subcontractors on emergency procedures. During an incident, advises the Incident Commander on technical measures and later helps document the incident for E&S reporting.
GDC Environmental & HSE Lead	GDC's on-site representative (or on-call specialist) who takes technical control for geothermal-specific hazards. For incidents like brine pond breaches, significant H_2S releases, steam pipeline ruptures, or any subsurface/geothermal reservoir issues, the GDC lead will assume command or co-commander role as per GDC's Disaster Plan. Coordinates any GDC field crews to help isolate flows (e.g., shutting wellheads, redirecting steam). Notifies external regulators such as NEMA, County authorities, or others as legally required. Leads community notification protocols if any hazard extends beyond the site (e.g. bad odor or gas affecting communities) and ensures environmental monitoring (sampling, etc.) is conducted.
Menengai Community Forest Association (MCFA)	Acts as the community interface during emergencies. Upon notification, MCFA representatives will disseminate emergency warnings to surrounding community members, especially forest users (e.g. grazers, beekeepers, local tourists). They assist in guiding community members to safety – for instance, helping evacuate people from areas at risk (downwind of a gas leak, etc.). MCFA also operates a hotline to receive incident reports from community and relay urgent information to the project company and GDC. They participate in joint community drills and awareness sessions so that communities know how to react during a site emergency.

Kenya Forest Service (KFS)	As the area falls within a forest reserve, KFS officers collaborate in emergency response to protect the public and environment. They can close off forest access points to prevent entry into a danger zone. KFS coordinates response on any forest firefighting efforts if a bushfire breaks out, and work with GDC and county disaster teams to evacuate or search for any stranded public in the forest. Post-incident, KFS will evaluate if any part of the forest or community land has been contaminated or poses ongoing risk before allowing public access again.
Critical Infrastructure Protection Unit (CIPU) Officers:	Provide on-site security and law enforcement support. They secure the site perimeter during any incident to prevent unauthorized access or looting. CIPU manages traffic control for evacuation routes and ensures emergency vehicles (fire trucks, ambulances) can move in and out smoothly. If an incident involves any security threat (sabotage, violent protest), CIPU handles law enforcement and coordinates with the National Police Service for backup. They maintain a 24/7 security presence and also assist in any investigation where foul play or theft is suspected as a cause.
County Emergency Services (Fire, Medical, Police)	The Nakuru County fire brigade, ambulance service, and police are critical external responders. Upon receiving an emergency call, they will deploy to site. Fire services will combat fires or chemical incidents; paramedics will triage, and transport injured persons; police may manage crowd control or road closures. The project's EPRP works in tandem with these services by having clear muster points, access routes, and site maps available for them. After major incidents, the police will also handle official reports, and in worst cases (fatalities) coordinate with other agencies for necessary investigations.
Local Community Leaders (Village Emergency Committees)	Local community representatives serve as first reporters and cooperative responders in some cases. The community is encouraged to immediately report to the project hotline or MCFA any unusual sights, odors (like rotten-egg smell of H_2S), or sounds that could indicate an emergency at the facility. If an evacuation of community areas is advised (for example, an off-site toxic gas drift or large fire), these leaders guide their communities to pre-identified safe muster points in the villages. They also assist post-incident by providing witness accounts and feedback for the investigation, and by participating in any community-level emergency drills organized by GDC or the project.

Note: In addition to the above, all workers and contractors on site have the duty to immediately report emergencies, follow instructions from emergency coordinators, and refrain from taking risky independent actions that could worsen the situation. They should know the location of emergency equipment and exits. Regular toolbox talks will be held to refresh roles and procedures.

7 Emergency Communication and Reporting

In an emergency, prompt communication is critical, both internally and externally:

- **Internal Alerts:** The first witness of an incident should immediately notify the control room or sitemanager. The site uses an emergency siren and radio/cell phone tree to cascade alerts. All personnel must proceed to the muster point or as directed by wardens. The Site Manager (or HSE Officer) will use loudhailers or handheld radios to give instructions at the scene.

- **Notifying Authorities:** The EPRP includes a specific contact persons to call for various scenarios (e.g., Fire – call County Fire at 999; Medical – call Ambulance; H_2S leak – call GDC HSE Lead, etc.). Many of these contacts should also be listed in GDC's Disaster Management Plan and are synchronized with it. Key regulatory notifications (e.g., DOSH for serious injuries, NEMA for environmental incidents) will be made within the required timeframes.

- **Community Communication:** In line with IFC requirements, the company will disclose appropriate emergency information to potentially affected communities. This means if an incident poses any off-site risk, communities will be informed promptly about what happened and what actions they should take (for example, staying indoors, evacuating certain areas, avoiding a water source, etc.). Pre-established channels like the MCFA hotline, community leaders' phone tree, local radio (if available), or even police/community messaging systems will be used. After the incident, the company will also inform the community of the outcomes and any residual risks or follow-up actions.

- **Media and External Communication:** Only the designated Incident Commander or an authorized spokesperson will communicate with media. GDC's Corporate Communications policy will be followed to ensure accurate and timely information is provided without causing undue alarm. The project will also notify the client and lenders as required by emergency reporting protocols (e.g., IFC to be informed of serious incidents in a timely manner).

- **Incident Reporting and Investigation:** All emergencies, once stabilized, must be documented in an incident report. This includes a log of chronology of events, actions taken, persons involved, and outcomes. The EPRP includes an incident report template aligned with GDC's reporting format and IFC's reporting expectations. A formal investigation will be carried out for any major incident, with participation from Orpower, GDC, and independent experts if needed. Lessons learned will be incorporated into updated emergency response measures.

8 Emergency Contacts and Key Information

A **Key Emergency Contacts** list should be posted on site. This one-page contact sheet will be posted prominently at the site (e.g., control room, main office, and muster point) and regularly updated. It includes names, roles, and 24-hour telephone numbers for individuals and services critical in an emergency. An example excerpt from the emergency contact list is shown below:

Table 8-1: Emergency Contacts

Contact Person / Agency	Role in Emergency	Phone Number
Site Manager	Incident Commander – declares emergency, coordinates site-wide response	XX XXX XXX
HSE Officer	Site HSE Lead – first aid and technical advisor on HSE	XX XXX XXX
GDC Environmental Supervisor	GDC Lead for H_2S, brine, and well control support	XX XXX XXX

County Ambulance Service	Medical emergency evacuation	XX XXX XXX
Nakuru Fire Brigade	Fire response	XX XXX XXX
CIPU Security (Menengai Unit)	On-site security and law enforcement support	XX XXX XXX
MCFA Community Hotline	Community alert and liaison (24/7)	XX XXX XXX

(Note: The above contacts are for template purposes – actual contact details will be filled in and verified regularly.) This list also contains contacts for local police, nearest hospital, GDC headquarters emergency line, and specialized services (e.g., poison control center in case of H_2S exposure). The EPRP mandates that this list be reviewed quarterly to keep numbers current and that all staff have access to it.

Training, Drills, and Monitoring

To ensure readiness, all employees and contractors will receive training on emergency response procedures during induction and refresher trainings every six months. Drill exercises for key scenarios (fire, evacuation, H_2S leak, etc.) will be conducted at least quarterly. Joint drills involving external responders (fire brigade, ambulance) and community representatives (through MCFA) will be organized annually so that interfaces are tested and improved.

All drills and actual incidents will be followed by a debrief to capture lessons learned. The Emergency Response Plan will be re-assessed at least annually and after any major incident, and updated as necessary. GDC's Disaster Management Plan requires regular re-assessment and updates when there are changes in site conditions or lessons learned – this project EPRP will follow the same principle.

Monitoring of emergency preparedness includes verifying that: emergency equipment is inspected monthly (fire extinguishers charged, alarm system functioning, first aid kits stocked), all new workers complete drills within one month of joining, and any gaps identified in exercises are closed. The HSE Officer will maintain an **Emergency Drill and Equipment Checklist** (and include findings in monthly HSE reports.