

Environmental Management Plan

August 2021

Viet Nam: Lotus Wind Power Project

Lien Lap, Phong Huy, and Phong Nguyen Wind Power Projects – Security Management Plan – Operation Phase

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Security Management Plan – Operation Phase

Lien Lap, Phong Huy, Phong Nguyen Wind
Power Projects

29 July 2021

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Security Management Plan – Operation Phase

Lien Lap, Phong Huy, Phong Nguyen Wind Power Projects



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Security Management Plan – Operation Phase

Lien Lap, Phong Huy, Phong Nguyen Wind Power Projects

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Lien Lap, Phong Huy, Phong Nguyen Wind Power Projects

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Acronyms and Abbreviations

CCTV	Closed circuit television
CMS	Central Monitoring System
E&S	Environmental, health and safety, and social
EHS	Environmental, health and safety
EHSS	Environmental, health, safety and security
EIA	Environmental impact assessment
EPC	Engineering, procurement and operation
EPP	Environmental Protection Plan
FS	Feasibility study
GIIP	Good International Industry Practice
HR	Human Resource
ID	Identification
IESE	Initial Environmental and Social Examination
JSC	Joint Stock Company
MGP	Material Gate Pass
MoIT	Ministry of Industry and Trade
O&M	Operational and Maintenance
PC	People's Committee
PCC1	Power Operation JSC No.1
PPC	Province People's Committee
PPE	Personal Protective Equipment
SMP	Security Management Plan
T/L	Transmission Line
UXO	Unexploded ordnance
WTG	Wind turbine generator

1. OBJECTIVES AND SCOPE

1.1 Introduction

The Power Construction JSC No. 1 (PCC1) and Renova Renewables Vietnam 1 Pte. Ltd. (Renova) (collectively referred to as the “Sponsor”) are developing three wind power projects located in the mountainous area of Huong Hoa District, Quang Tri Province with a total installed capacity of 144MW (collectively referred to as the “Projects”). To manage and operate the Projects, the Sponsor has established three project subsidiary companies (individually referred to as the “Project Owner” or collectively as the “Project Owners”). In addition, the Project Owners have contracted with two companies i.e. Bao Lam Hydropower JSC (Bao Lam or BOP) and Vestas Wind Technology Vietnam (Vestas) for operation and maintenance (O&M) of three Projects. Details are described as below.

No.	Project	Project Owner	O&M Contractor
1	Lien Lap Wind Power Project (“Lien Lap”)	Lien Lap Wind Farm Joint Stock Company (JSC) (“Lien Lap JSC”)	Vestas Wind Technology Vietnam (Vestas): be responsible for O&M of turbines; and Bao Lam Hydropower JSC (Bao Lam or BOP): be responsible for O&M of other facilities (e.g. the T/L, and Operation House)
2	Phong Huy Wind Power Project (“Phong Huy”)	Phong Huy Wind Farm JSC (“Phong Huy JSC”)	
3	Phong Nguyen Wind Power Project (“Phong Nguyen”)	Phong Nguyen Wind Farm JSC (“Phong Nguyen JSC”)	

The Project Owner established a Wind Farm Level Team for managing all activities associated with the operation of all three Projects. The operation of the Projects will be mainly taken place at:

- Three wind farm areas, where wind turbines located.
- An Operation House located in Cua village, Huong Tan Commune, Huong Hoa District, Quang Tri Province. This is a shared facility of all three Projects but registered under Phong Nguyen Project.
- Transmission Lines (the T/L) connecting the Projects with substations. These substations are invested and managed by other wind farms projects in the local area and will not be included in the scope of this document.

See descriptions of these facilities in Table 1.1 and Table 1.2. Detail site map and facility for operation of each Project are provided in Appendix A.

Table 1.1 Overview of the Projects

Project	Lien Lap Wind Farm Project	Phong Huy Wind Farm Project	Phong Nguyen Wind Farm Project
Project Owner	Lien Lap Wind Farm JSC	Phong Huy Wind Farm JSC	Phong Nguyen Wind Farm JSC
Operation House	<ul style="list-style-type: none"> ■ Located in Cua village, Huong Tan Commune, Huong Hoa District ■ Total footprint: 9,407 m² 		
Wind farm Location	Tan Lap, Tan Lien, Huong Tan Communes and Khe Sanh Town. All areas are located in Huong Hoa District.	Huong Tan and Tan Thanh Communes. All areas are located in Huong Hoa District.	Huong Phung and Tan Thanh Communes. All areas are located in Huong Hoa District.
Approval of Intention of Investment	Decision No. 254/UBND-CN dated on 02 Feb 2021	Decision No. 252/UBND-CN dated on 02 Feb	Decision No. 253/UBND-CN dated on 02 Feb

Project	Lien Lap Wind Farm Project	Phong Huy Wind Farm Project	Phong Nguyen Wind Farm Project
	by Quang Tri Province People's Committee (PPC)	2021 by Quang Tri PPC by Quang Tri PPC	2021 by Quang Tri PPC by Quang Tri PPC
Approval of EIA/ EPP	(EPP) Decision No. 2690/GXN-STNMT dated 23 August 2019 by Department of Natural Resources and Environment of Quang Tri Province.	(EIA) Decision No. 1017/QD-UBND dated 17 April 2020 by Quang Tri PPC	(EIA) Decision No. 1016/QD-UBND dated 17 April 2020 by Quang Tri PPC
Project Operation Facilities¹	<ul style="list-style-type: none"> ■ 12 wind turbines with total installed capacity of 48 MW. ■ Internal road connecting turbines of 7,284 m. ■ Transformers 0.72/35 kV. ■ Transmission line (T/L) 35 kV: 10,330 m (i.e. 1,200 m 35 kV underground cable connecting turbines to overhead T/L, and 9,130 m 35 kV overhead T/L connecting to Huong Tan Substation 35/110 kV). 	<ul style="list-style-type: none"> ■ 12 wind turbines with total installed capacity of 48MW. ■ Internal road connecting turbines of 7,659 m. ■ Transformers 0.72/35 kV. ■ T/L 35 kV: 1,963 m underground cables connecting transformers 0.72/35 kV at each turbine to overhead T/L 35 kV and 5,510 m overhead T/L connecting to Huong Tan Substation 35/220kV. 	<ul style="list-style-type: none"> ■ 12 wind turbines with total installed capacity of 48 MW. ■ Internal road connecting turbines of 10,892 m. ■ Transformers 0.72/35 kV. ■ T/L 35kV: 1,174 m underground cables connecting transformers 0.72/35 kV at each turbines to the overhead T/L 35 kV and 9,750 m overhead T/L connecting to Huong Tan Substation 35/220 kV.
Land Agreement Contract	Contract No. 20/HDTD dated 3 Mar 2021	Contract No. 02/HDTD dated 18 Jan 2021	Contract No. 03/HDTD dated 18 Jan 2021

Total area of land for the operation phase will be presented in Table 1.2.

Table 1.2 Update on Land Area for Operation Phase

Component	Land area (m ²)		
	Lien Lap	Phong Huy	Phong Nguyen
Turbine foundation	123,038.60	37,035.00	72,824.00
Internal road	186,382.70	125,958.00	91,201.00
35kV TL and pylons	700	228.00	128.00
Subtotal within Project Boundary (1)	310,121.30	163,221.00	164,153.00

¹ The access roads being used for Lien Lap, Phong Huy, and Phong Nguyen WPPs will be handed over and fully managed by local authorities once completed.

Component	Land area (m ²)		
	Lien Lap	Phong Huy	Phong Nguyen
Other pylons and TL ROW (2)	12,681.30	-	-
Total	322,802.60	163,221.00	164,153.00

Note:

(1): These data were covered in Land Agreement Contracts mentioned in Table 1.2.

(2): These data refer to 15 pylons and RoW located outside of the Project's boundary for Lien Lap project only. Refer to Addendum of LREMDP Lien Lap for further details. These data will be updated once CSR documents are available.

1.2 Purpose

This Security Management Plan (the “Plan” or SMP) is intended to set out responsibilities and tasks associated with the management of security concerns during the operation of the Projects. This Plan was developed to:

- Ensure that the Projects comply with applicable environmental, health and safety, and social (EHSS) requirements defined in Section 3;
- Ensure that all personnel involved in the operation of the Projects, including the Wind Farm Level Team and any contractors and subcontractors working for or on behalf of the Projects fully understands the Project Owner's policies and expectations on security management; and
- Implement applicable Good International Industry Practices (GIIPs) to handle security management related issues in an appropriate manner.

1.3 Scope

This SMP applies to activities that are relevant to security management (e.g. physical security, access control, material control, etc.) during operation of Lien Lap, Phong Huy and Phong Nguyen Wind Power Projects (hereafter refers to “the Sites”) as the following:

- Commissioning and operational activities at the Operational House;
- Commissioning and operational and maintenance (O&M) activities at the Projects' sites (e.g. O&M of the Wind Turbine Generators (WTGs) area, the access roads and the T/L);
- O&M activities of ancillary facilities such as yards, stores, Central Monitoring System (CMS) building facilities;
- Rather than the facilities and areas of the Projects listed in Section 1.1 and activities listed in this section, this Plan does not cover: (i) the substations; and (ii) the T/L connecting from the substations to National Grid (220 kV Lao Bao Substation of Vietnam Electricity) as these facilities are financed and managed by other windfarm companies in the local area.

This SMP applies to all parties working for or on behalf of the Projects having activities relating to security during commissioning and operation of the Projects.

Failure to comply with the requirements of this Plan may lead to disciplinary action:

- for an individual, following the National Labour Code 2019 (e.g. reprimand, deferment of pay rise for up to 6 months, demotion, dismissal); and
- for groups or firms, such as the Site Contractors and Subcontractors, following the contractual penalty as guided in Law on Construction 2014 and Civil Code 2015 (e.g. withholding the payments, fines, compensation for damages).

2. REFERENCES

The SMP will be applied systematically in conjunction with the following related management plans and programs.

- IFC Good Practice Handbook, 'Use of Security Forces: Assessing and Managing Risks and Impacts: Guidance for Private Sector in Emerging Markets' (2017);
- The Projects' Environmental Impact Assessment (EIA) or Environmental Protection Plan (EPP);
- The Projects' Initial Environmental and Social Examination (IESE);
- The Projects' Environmental and Social Compliance Audit Reports;
- The Project Owner's Environmental & Social Management Plans, including:
 - Environmental and Social Policy, 2021;
 - Labor Management Plan, 2021;
 - Community Health and Safety for Operation, 2021;
 - Emergency Preparedness and Response Plan for Operation, 2021;
 - Employee Grievance Mechanism, 2020; and
 - Stakeholder Engagement Plan, 2020.

3. APPLICABLE REQUIREMENTS AND STANDARDS

All employees, the Wind Farm Level Team are required to comply with applicable E&S requirements and standards that are defined in this section for security management during the operation of the Projects. These requirements will also be incorporated into commercial contracts with the Wind Farm Level Team. In addition, where standards referred to below are inconsistent or contradictory, the approach is to apply the most stringent standard unless otherwise agreed by the Project Owner.

3.1 National Legislation

Table 3.1 List of National Legislation

Classification	Titles
Law	<ul style="list-style-type: none"> ■ Vietnam Labor Code No. 45/2019/QH14 dated 20 Nov 2019.
Decree	<ul style="list-style-type: none"> ■ Decree No. 96/2016/ND-CP providing for security and order conditions for a number of conditional business sectors dated 1 July 2016; and ■ Decree No. 06/2013/NĐ-CP on The Security Staff at Organizations and Enterprises dated 9 January 2013.
Circular	<ul style="list-style-type: none"> ■ Circular No. 42/2017/TT-BCA on guidelines for a number of articles of Decree No. 96/2016/ND-CP dated July 01, 2016 on providing for security requirements applied to certain business lines dated 20 October 2017; and ■ Circular No. 17/2018/TT-BCA regulations on cartridge, consumer explosive materials, and supporting tools dated 15 May 2018.

3.2 International Standards

- Asian Development Bank's Safeguard Policy Statement
- Equator Principles III;
- Japan International Cooperation Agency's Guidelines for Environmental and Social Considerations;
- IFC PS 2: Labor and Working Conditions (2012);
- IFC Guidance Note 2: Labor and Working Conditions (2012);
- IFC PS 4: Community Health, Safety, and Security (2012); and
- IFC Guidance Note 4: Community Health, Safety, and Security (2012).

4. DEFINITIONS

Term	Definition
Abuse	Abuse is the improper usage or treatment of a thing, often to unfairly or improperly gain benefit. Abuse can come in many forms, such as: physical or verbal maltreatment, injury, assault, violation, rape, unjust practices, crimes, or other types of aggression.
Audit	Systematic, independent and documented process for obtaining audit evidence and evaluating it objectively to determine the extent to which the audit criteria are fulfilled.
Children	Means a person who is under 18 years old.
Employees	Refer to all employees who participate in the Project including employees of Project Owner, the Sites, O&M contractor and subcontractors
Sexual harassment	Sexual harassment is an unwelcome sexual advance, unwelcome request for sexual favours or other unwelcome conduct of a sexual nature which makes a person feel offended, humiliated and/or intimidated, where a reasonable person would anticipate that reaction in the circumstances.
Procedure	Specified way to carry out an activity or a process.
Record	Document stating results achieved or providing evidence of activities performed.
Risk	Risks are defined as the product of threats and vulnerabilities. These vulnerabilities shall be mitigated against in this Security Management Plan.
Security contractors	Organizations, which have corporate capacity with legal status, engaged by the Projects to provide security service at the Projects site.
Stakeholder	Any person or organisation that has an interest in or is affected by the Projects.
The Wind Farm Level Team	The Wind Farm Level Team established by the Project Owner, directly managing the Lien Lap, Phong Huy, Phong Nguyen Sites during the operation phase. The Wind Farm Level has an office in the Operation House located in Cua village, Huong Tan Commune, Huong Hoa District, Quang Tri Province.
The Project Owner	Lien Lap JSC; Phong Huy JSC; Phong Nguyen JSC.

5. ROLES AND RESPONSIBILITIES

The EHS Manager and Security Leader of the Wind Farm Level Team are responsible for the overall coordination and implementation of the SMP at the Projects.

During operation phase, the Projects will involve an outsourced Security Contractor in the Project's security management. Security Contractor's personnel will coordinate with Security Leader when working at the Projects site in terms of security management during the operation phase. Figure 5.1 below presents the SMP structure over the Project operation phase.

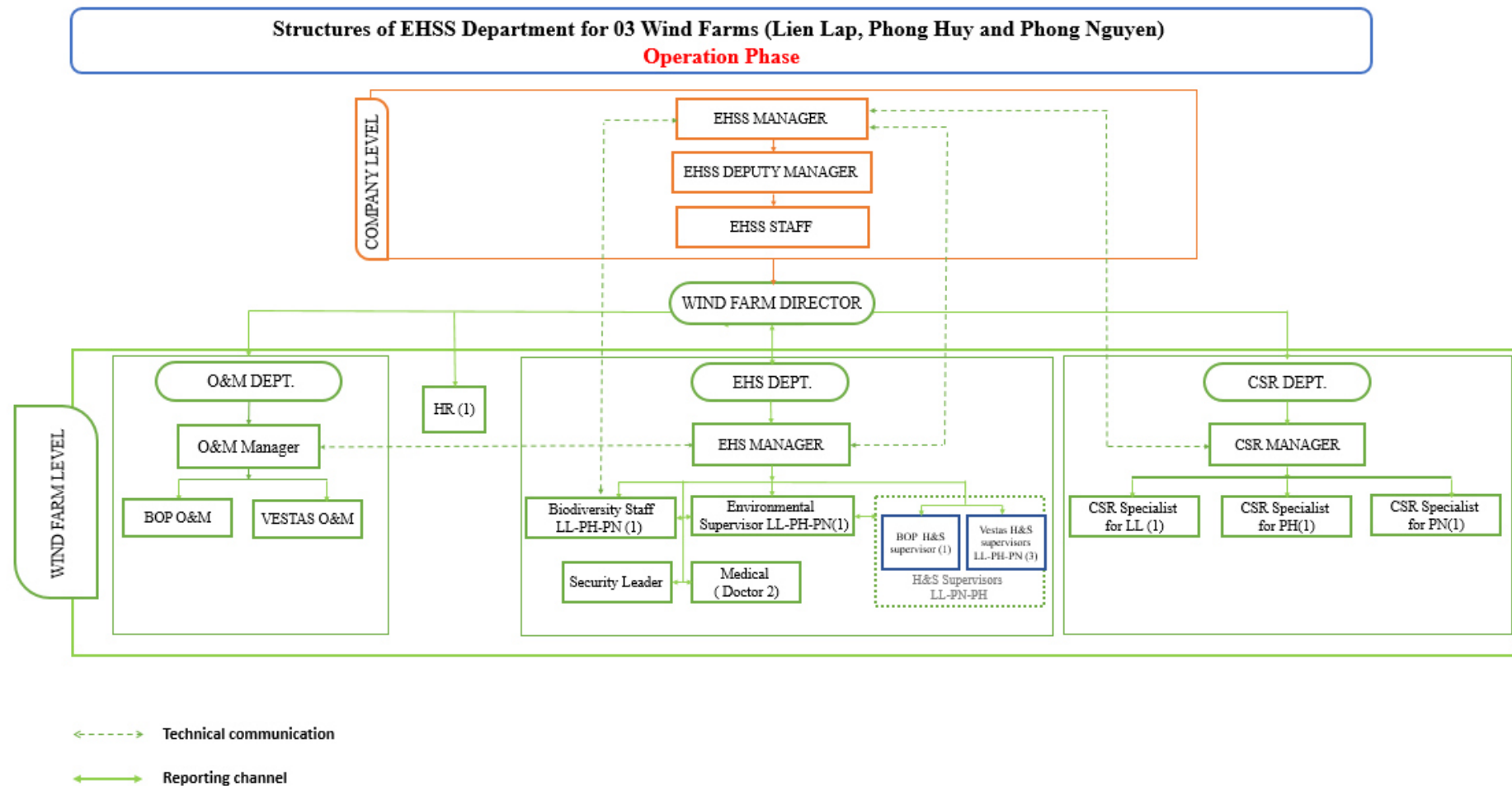


Figure 5.1 Operation Organisation Chart of the Projects

Within this SMP, roles and responsibilities in relation to security management are provided in Table 5.1.

Table 5.1 Roles and Responsibilities

Roles	Responsibilities
EHSS Manager at the Company Level ('EHSS Manager')	<ul style="list-style-type: none"> ■ Ensure the compliance of the Projects related to security management are achieved; ■ Provide all necessary resources to support the Projects in implementation of the SMP at the Projects site; ■ Ensure the implementation of the approved SMP and monitor the effectiveness and recommend necessary action for continuous improvement; ■ Liaise with site-level EHS Department in addressing security related issues, concerns and grievances; ■ Review and approve Annual Internal Security Audit Report submitted by EHSS Staff; ■ Review and approve External Security Report prior to sending to Lender (if required); and ■ Report to the Project Owner' General Director on management of environmental, health, safety and security (EHSS) issues at the Projects.
EHSS Deputy Manager at the Company Level ('EHSS Deputy Manager')	<ul style="list-style-type: none"> ■ Review and approve Annual Internal Security Audit Report submitted by EHSS Staff.
EHSS Staff at the Company Level ('EHSS Staff')	<ul style="list-style-type: none"> ■ Conduct Annual Internal Security Management Audit to the Projects; ■ Prepare and submit Annual Internal Security Management Audit to the EHSS Deputy Manager; and ■ Prepare and submit External Security Report to EHSS Manager for review and approval.
Wind Farm Director of the Wind Farm Level Team ('Wind Farm Director')	<ul style="list-style-type: none"> ■ Overall management security issues at the Projects site during the operation phase.
EHS Manager of the Wind Farm Level Team ('EHS Manager')	<ul style="list-style-type: none"> ■ Assign competent employees (i.e. had experience or well trained in managing security issues) to control and manage security issues at the Projects site; ■ Manage SMP implementation; ■ Review and update the SMP to ensure the compliance with Applicable Standards but still be appropriate with the actual practices at the Projects; ■ Ensure the SMP is acknowledged and implemented at the Projects site; ■ Review and approve Security Incident Report (Appendix J) submitted by Security Leader; ■ Prepare External Security Report and submit to EHSS Manager for approval prior to sending to Lender (if required); ■ Monitor the effectiveness of the programs; ■ Participate in investigating security incidents and provide advice to resolve serious security issues;

Roles	Responsibilities
Security Leader of the Wind Farm Level Team ('Security Leader')	<ul style="list-style-type: none"> ■ Review and approve weekly and random inspection report submitted by Security Leader; ■ Review and approve the SMP of the Projects, security policy and procedures of Security Contractor. <ul style="list-style-type: none"> ■ Communicate the SMP to all employees and all relevant stakeholders; ■ Responsible for screening, evaluating, reviewing and assessing Security Contractors' performance; ■ Coordinate with Security Manager to conduct weekly and random inspection on security facilities and equipment; ■ Prepare and submit the weekly and random inspection report to EHS Manager for review and approval; ■ Coordinate with Security Contractor to identify all security risks at the Projects site, and develop and implement security control measures corresponding to the identified risks; ■ Coordinate with the local authorities in the investigation and resolution process of security issues; ■ Participate and support Security Contractor in investigation of security issues (Refer to Appendix B) at the Projects site; ■ Ensure all security issues are investigated and corrective actions are implemented to avoid recurrence; ■ Review monthly security reports from Security Contractor; ■ Participate in and advise to investigate and solve serious security issues; ■ Coordinate with Security Contractor in development of security contact list and integrating security contact list into the contact list of other kinds of emergency (e.g. fire, strike, outbreak, occupational accident, etc.); ■ Manage relations with Public Security; ■ Coordinate with biodiversity staff in implementation of the SMP for consistent with the Projects' Biodiversity Management Plan; ■ Conduct monthly inspection and submit the report to EHS Manager for approval; ■ Coordinate with CSR Specialist to disclose the SMP and the Projects' External Grievance Mechanism to surrounding communities of the Projects and/or other interested parties (e.g. police, the forest security personnel); ■ Coordinate with Security Manager to complete Security Incident Report (Appendix J) and submit to EHS Manager for approval; and ■ Conduct induction and refresher training on security management for the employee.
Security Contractor	<ul style="list-style-type: none"> ■ Appoint a Security Manager to be in charge of overall management of security service at the Projects site; ■ Implement the SMP and manage security issues associated with the Projects site, which shall include but will not be limited to the following: <ul style="list-style-type: none"> – Implementation of access control systems relating to employees, visitors and vehicles; – Maintenance of all records on visitors and exit passes;

Roles	Responsibilities
	<ul style="list-style-type: none"> – Provision of proportional responses to security risks and threats in areas of responsibility; – Provision of security management service for 24 hours a day, 7 days a week, 365 days a year; – Provision of security equipment and facilities to security guards; and – Compliance with Labor Code 2019 and relevant labor regulations.
Security Manager of Security Contractor ("Security Manager")	<ul style="list-style-type: none"> ■ Report security incidents to Security Leader and Security Contractor; ■ Coordinate with Security Leader to identify all security risks appearing at the Projects site; ■ Coordinate with Security Leader and local authorities in investigation and improvement of security issues; ■ Lead and ensure all security incidents are investigated and corrective action plan are implemented; ■ Coordinate with Security Leader to conduct weekly and random inspection on security facilities and equipment; ■ Coordinate with Security Leader to complete Security Incident Report (Appendix J) and submit to EHS Manager for approval; ■ Prepare and submit monthly security report to the Security Leader; ■ Consider and, where appropriate, investigate all allegations of unlawful or abusive acts of security, taking actions (or urge appropriate parties to take action) to prevent recurrence; ■ Ensure all the security guards are provided with suitable trainings and training records are kept available at the Projects site; ■ Coordinate with Security Leader to manage relations with Public Security; ■ Arrange work shift for security guards following labour regulations; and ■ Participate in Annual Internal Security Audit and external security audit (if any) at the Projects site. ■ Conduct induction and refresher training on security management and requirements for the security guards
Security guards of Security Contractor ('security guards')	<ul style="list-style-type: none"> ■ Be aware and comply with security requirements in the SMP and other security procedures; ■ Control security issues at the Projects site; ■ Attend all training assigned to security guards; ■ Retain all security records for auditing purposes; and ■ Report to Security Manager any security incidents that occurred.
Security control room staff of Security Contractor	<ul style="list-style-type: none"> ■ Monitor all security operations; ■ Process all visitor applications; ■ Provide emergency response to incidents; ■ Control mobile roving patrols for the Projects operation site; ■ Provide direct link between incident commanders; ■ Support to call out emergency services;

Roles	Responsibilities
	<ul style="list-style-type: none">■ Provide communication link between the Projects and polices;■ Complete daily records and archive of data;■ Provide security support to specific requests as directed; and■ Record all calls and walkie-talkies communications for emergency incidents.
CSR Specialist of the Wind Farm Level Team ('CSR Specialist')	<ul style="list-style-type: none">■ Support Security Leader to disclose the SMP and the Projects' External Grievance Mechanism to surrounding communities of the Projects and/or other interested parties (e.g. police, the forest security personnel).
All employees, including the Wind Farm Level Team's employees	<ul style="list-style-type: none">■ Participate in related trainings;■ Comply with requirements in the SMP; and■ Cooperate with the employer and others to enable them to fulfil their legal obligations.
Visitors	<ul style="list-style-type: none">■ Follow all security requirements when working at the Projects site.

6. SECURITY MANAGEMENT

Security Leader and Security Contractor in consultation with the local police shall implement a security procedure that identifies and responds to different situations of threats to security in a manner appropriate to the level of threat and with respect for human rights. This shall be based on local information, government concerns, and direct information obtained.

6.1 Security Risk

A preliminary review of security risks identified the following risks but not limited to during the operation phase of the Projects:

- Internal risks:
 - Disruption to the workforce resulting from confrontations by individuals at the Projects site;
 - Theft (by the Wind Farm Level Team's employees or Security Contractor's personnel);
 - Strike (by the Wind Farm Level Team's employees); and
 - Harassment (especially gender-based harassment), unethical, or inappropriate behavior by security guards to the Projects' employees or local communities.
- External risks:
 - Theft (by local communities);
 - Protests (by communities); and
 - Unauthorized access to the Project site.

The Projects' security risks are assessed and scored (from 1 to 5) based on its likelihood and severity of impacts. After that, The Projects can use the resulting simple grid (Figure 6.1) to help guide and prioritize addressing the most imminent and severe security risks.

The security risks during the operation phase with its score are summarized in Appendix B. Security Leader shall coordinate with the Wind Farm Level Team and Security Contractor to undertake an updated security risk assessment: (i) prior to the commencement of major changes at operation planning (e.g. rearrange of the operation layout) and (ii) after the occurrence of major security issues; and update this SMP to take into account the need to ensure the respect for human rights and the protection of the local community as well as its own employees, assets and reputation.

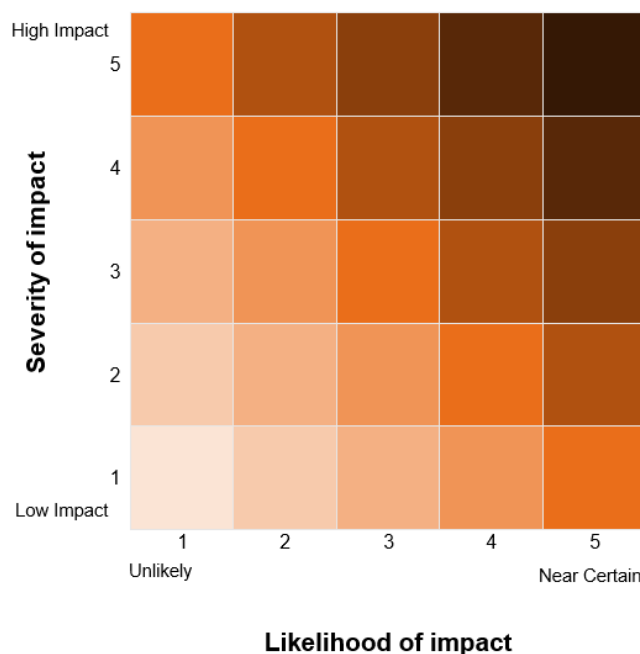


Figure 6.1 Heat Map to Prioritize Security Risks for Mitigation

6.2 Security Management and Mitigation Measure

6.2.1 Physical Security

The Wind Farm Level Team shall be responsible for coordinating with Security Contractor in providing all necessary facilities and equipment related to security management during the operation phase to ensure all security issues are managed and responded to in a timely manner. The facilities and equipment needed at the Projects operation site include but not limited to the following:

6.2.1.1 Surveillance/Electronic Security Systems

6.2.1.1.1 CCTV and Control Room

Closed-circuit television (CCTV) system shall be installed at the Projects operation site for continuous monitoring of security issues inside and outside the operation area. CCTV shall be installed at entrance gates, storage areas, working areas, along the access roads, and parking areas (if provided). However, CCTV is not allowed to be installed in private areas such as employees' rooms, toilets, etc. to monitor personal activities. CCTV cameras shall be positioned where there is enough lighting and the lighting does not create 'white-out glare'.

CCTV system is connected and transfers data to a CCTV control room where the database and monitoring screen are installed. CCTV recordings shall be kept at least for 30 days. The Security Contractor shall appoint staff to manage the CCTV control room 24/7. An alternate electrical power system shall be installed to ensure uninterrupted operation of electronic security systems in the event of a power outage.

The roles and responsibilities of the security control room staff shall comprise of the following:

- Monitor all security operations;
- Process all visitor applications;
- Immediately communicate to the relevant person (e.g. Security Manager, Security Leader) in the event of incidents;

- Control mobile roving patrols for the Projects operation site;
- Provide a direct link between incident commanders;
- Support to call out emergency services;
- Provide a communication link between the Projects and police;
- Complete daily records and archive of data;
- Provide security support to specific requests as directed; and
- Record all calls and walkie-talkie communications for emergency incidents.

The minimum equipment requirements of the security control room will comprise of the following:

- One (1) telephone for emergency calls; and
- Walkie-talkie communication system.

6.2.1.1.2 Security Stations

To ensure security at the Projects operation site, a security station shall be provided at each entrance gate and storage area. At each station, a security guard shall be appointed to manage the delegated area 24/7. The emergency contact list (Table 6.1 and Table 6.2) shall be posted at each security station in order to ensure that the security guards know how to coordinate with other relevant employees/ departments for emergency response in case security incidents/ accidents happen at the Projects operation site.

6.2.1.1.3 Patrol

A patrol of the area surrounding the operation (including turbines and the Operation House) site shall be conducted by security guards every two hours. A walkie-talkie shall be provided to patrol security guards to accommodate their duties.

6.2.1.2 Security Barriers

6.2.1.2.1 Fences

The Projects shall provide and maintain fenced and secured compounds at Operation House.

6.2.1.2.2 Locking Devices

Locking devices (e.g. padlocks) shall be provided for all doors to prevent unauthorized person access to the turbines and other Projects' properties.

6.2.1.2.3 Gates

Gates shall be provided at each entrance to limit authorized person access to Projects area (by the access roads) and Operation House. Locking devices (e.g. padlocks) shall be installed at the gate during non-working hours. Employees and visitors are only allowed to enter the Project operation site through the designated gate.

6.2.1.3 Lighting System

A lighting system shall be sufficiently available at entrances, exits, along the access roads, and in parking areas (if provided) to detect movement during periods of darkness. Motion-activated lights can be installed for an even bigger impact.

Emergency lighting of adequate intensity shall be installed and automatically activated upon failure of the principal artificial light source. Emergency lighting systems shall be inspected and maintained

weekly by a security contractor. Refer to the Project's Biodiversity Management Plan for requirements of providing artificial lighting during the operation phase.

6.2.2 Access Control

Children are prohibited to access any operation sites.

Considering the COVID-19 situation, access control to the Projects site must be managed adequately at the gates. Refer to the Project's Emergency Preparedness and Response Plan for Operation for detailed management measures.

Where security management requires body check of employees/visitors, the Projects shall ensure gender sensitivity is respected by providing security guards of the same gender.

6.2.2.1 Employee Access

Security guards shall be appointed to control access and egress of the Wind Farm Level Team's employees to the Project operation sites via employee badges, which include the employee's photo. In addition to that, a biometric system (i.e. fingerprint system) will also be considered for employee access control. Individuals who are not provided with an approved employee badge/fingerprint shall not be permitted entry.

6.2.2.2 Visitor Access

Visitors shall be subject to a security check when entering the Projects operation sites to ensure that no weapon is being carried. Visitors shall be required to provide their identification (ID), record on Visitor logbook (Appendix C) and provide information of contact point prior to access to the Project operation site. The contact point shall pick up visitors at the entrance and escort them during the work at the Projects operation site for safety and security purposes. Visitors will be provided with a numbered visitor badge and will be required to display it at all the time of the visit. Visitors shall return the visitor badge to the security guard when they leave the Projects' operation site and shall also complete their accessing's information (e.g. time out and signature) in the visitor logbook and retrieve their ID.

All visitors must leave the Projects operation site by 10:00 pm.

6.2.2.3 Vehicle Access

Security guards shall check vehicles from top to bottom prior to accessing to the Projects operation site. Information related to vehicles shall be recorded correctly and sufficiently in the Vehicle Logbook (Appendix D) by security guards and signed by the driver.

6.2.3 Material Control

All properties/materials in and out of the Projects site and Operation House shall be accompanied by an approved Material Gate Pass (MGP). Employees in charge of material management of the Projects shall be responsible for the approval of MGP. No materials shall be permitted to access or leave the operation site without the appropriate documentation.

The MGP shall cover the following information (Appendix E):

- Number of MGP;
- List all materials by item, a description of the material and serial numbers;
- Quantity/ volume of material;
- Date of materials entry/exit;
- Reason of materials entry/exit; and
- Department in charge of materials.

The MGP shall consist of the following:

- One original (kept in the department managing the materials); and
- Two copies (one kept by security guards at the entrance and one kept by the driver).

The driver at the security gate shall submit a copy of the MGP to the security guards. The security guards shall conduct a search of all vehicles and the items they carry before accessing or exiting the Projects site.

The security guard will record all the information relating to the material access/exit, including:

- MGP number;
- Vehicle plate number;
- Driver information (full name, identity card number); and
- Entry and Exit time.

Any vehicle attempting to access/leave the Projects site and Operation House with materials without a completed MGP shall be stopped and refused access/exit.

6.2.4 Managing Relations with Public Security and Emergency Service

Security Leader and Security Manager are encouraged to reach out to authorities (e.g. local police, the forest security personnel, local emergency service), preferably in advance of any issue, to understand potential deployments and, to the extent possible, to promote appropriate and proportional use of force. It involves simply making introductions to the local police commander and initiating a discussion about when and how authorities are likely to respond to incidents at the Projects or involving the Projects personnel.

Security Leader and Security Manager shall closely consult with local authorities in developing security action plans for scenarios that security guards may be faced with.

Security Leader and Security Manager shall maintain contact and communication through check-ins with public security forces to help the company be confident that police will respond quickly and professionally if an incident occurs, or that suspects (including community members) are caught trespassing or stealing will be treated fairly in police custody.

6.3 Security Contractor Management

The Wind Farm Level Team shall be responsible for hiring a competent Security Contractor who is in charge of security issues at the operation site. The Security Contractor engaged by the Wind Farm Level Team shall meet all the requirements mentioned from Item 6.3.1 to Item 6.3.6.

6.3.1 Security Contractor Selection

6.3.1.1 Screening of Security Contractor

Security Leader shall search relevant information about the reputation of Security Contractors on public information sources or learn from Security Contractors' stakeholders and local courthouses and fill in the screening checklist (Appendix E) for a preliminary assessment. To determine the quality of past works (i.e. child labour, forced labour, past abuses, punished or fined due to violation of legal requirements, violation of human rights, had a serious health and safety accident), ascertain whether there has been security accidents/incidents that happened to the contractors when they worked for other projects. The Security Contractors shall maintain a trustworthy and dependable reputation. In addition to that, Security Leader shall check the availability of local Security Contractors and shall coordinate with Human Resources Department to ensure the selection of Security Contractor is in line with the Local Recruitment and Procurement Plan.

6.3.1.2 Evaluation of Security Contractor

The Security Leader shall send a list of documents required to be submitted by Security Contractors (Appendix G). Security Contractors must demonstrate that their competencies meet the selection criteria by providing evidence to the Security Leader. Then, an inspection by the Security Leader shall be conducted to verify the information provided in the questionnaire and assess the compliance level of Security Contractors prior to selection. Only Security Contractor who have met all requirements will be selected.

Security Contractor providing any security services to the Projects operation site shall meet the following competency requirements:

- Security Contractor is functional to provide security services in compliance with legal requirements;
- Security Contractor has experience in providing similar services related to the Projects operation;
- Security Contractor shall have a comprehensive security policy and procedures that could be applied to the Projects;
- All the security guards working at the Projects operation site are trained to ensure their competency and professionalism in handling security issues at the Projects operation site; and
- Security Contractor engaged to provide security services to the Projects shall ensure that there has been no evidence to show any abuses to their employees, breach to individual human rights, or violation of Vietnam labour regulations. Review of Human Resource (HR)-related documents shall be conducted by Wind Farm Level Team personnel, who has a good understanding of labour regulations, to verify and confirm the compliance of the Security Contractors prior to engagement.

6.3.1.3 Contractual Arrangement

Security Contractor will not be selected if they fall into one of the below non-conformities:

- Did not obtain Certificate of satisfaction of security and other conditions;
- Does not have security guards trained and certified by a competent police authority;
- Punished or was fined due to violation of legal requirements;
- Had historical misconducts in terms of child labour, forced labour, and major health and safety; and
- History of abuse or human rights violations.

Refer to Appendix H for the requirement that shall be incorporated in the contract with Security Contractor.

Prior to commencing work at the Projects' operation site and in the event of changing workforce, the Security Contractor shall submit to the Projects the following documents:

- Security guard's profiles who will work at the Project site, including Copy of ID, security guard certificates granted by a competent police authority, background checked with confirmation of local authority, valid labour contract with Security Contractor, health examination records, occupation health and safety training records (if any), fire-fighting training records (if any);
- Code of conduct training records to all security guards who will work at the Projects operation site.

6.3.2 Term of Operation

6.3.2.1 Requirement of Security Guards

Security guards shall be Vietnamese citizens at the age of 18 or above; having clear records, good political credentials and moral sense, having graduated from secondary schools or above, capable of civil acts, and having good health that meet the requirements for security works.

6.3.2.2 Code of Conduct

The following codes of conduct are applicable for the security guards:

- Shall not accept bribes at any time;
- Shall remain alert and observe all activities in areas under their control;
- Directly report all incidents or violations to the Security Manager;
- Shall have no conflict of interests or hold a criminal record of any kind;
- Shall not threaten, assault, or coerce the Project employees, visitors and communities in any way;
- Shall be willing to work in the event of emergencies;
- Be physically fit and able to perform all duties, roles, functions of security activities;
- Have professional dress and deportment;
- Be free from any communicable diseases;
- Shall not participate in the possession, purchase, trade, collection, hunting, or poaching of wildlife or forest resources;
- Shall immediately proceed to the emergency response and inform the related emergency response team for the primary emergency response team during emergency cases;
- Shall provide preventive and defensive services, protecting company employees, facilities, equipment, and operations wherever they are located;
- Shall have no law-enforcement authority and will not encroach on the duties, responsibilities, and prerogatives reserved for public security forces;
- Aware of culturally-specific gender issues in order to react to the Wind Farm Level Team's employees and communities, and enhance local acceptance of the presence of security personnel; and
- Respect human rights (Refer to the Projects' Labour Management Plan) and make clear that arbitrary or abusive use of force is prohibited.

6.3.2.3 Use of Force

Security guards are permitted to use force only as a matter of last resort and only for preventive and defensive purposes in proportion to the nature and extent of the threat, and in a manner that respects human rights (Refer to the Projects' Labour Management Plan).

All security guards shall be properly trained on using force effectively, proportionally, and with respect for human rights. In the event a security guard is required to use force against the individual, the security guard shall:

- Attempt non-violent means first and only use force when necessary;
- Use only the minimum of force required, to effect the purpose and keep it proportional to the threat;
- Operate strictly within the law and the authority is given to them to use force;
- Clearly prioritize the prevention of injuries or fatalities and peaceful resolution of disputes;
- Render medical aid to an injured person, including offenders;
- Report any use of force as soon as possible to Security Manager and Security Leader; and
- The use of force may need to be justified in any later hearing. The Security Manager will have the responsibility of presenting the justification following any reportable incidents.

6.3.3 Equipment

No one in the guard force is allowed to carry firearms as per legal requirements in Vietnam². The Security Contractor shall be responsible for providing all security-related equipment under their areas of control at the Projects operation site. This will include, but will not be limited to the following:

- Uniforms for all security guards. The uniforms provided to security guards shall include trousers, shirts, shoes, hats, shoulder loops, etc. in according to legal requirements³;
- Sufficient communication equipment including walkie-talkies;
- Transportation for conducting security patrols and responding to security incidents or accidents;
- Portable lights supporting for patrol at night (with extra batteries);
- Speakers;
- Raincoats;
- Motorcycle or bicycle (when necessary) for use to patrol the Projects area;
- Electric batons, metal batons, rubber batons, armor, cut resistant gloves approved by the local authorities⁴; and
- Personal Protective Equipment (PPE) such as high-visibility clothing, safety shoes, hard hat, etc. according to the Project's health and safety regulations.

All security facilities and equipment (Appendix H) shall be regularly checked, inspected, and maintained to ensure they are in normal operation conditions and ready for use in emergency cases. Security Contractor shall appoint employees for this task and all inspection and maintenance records shall be documented and retained at the Projects operation site for monitoring and auditing purposes.

6.3.4 Security Incident Reporting, Investigating, and Resolving

The Security Incident Reporting, Investigating, and Resolving Process is generally designed for different levels, corresponding to the scale and seriousness of security issues. Therefore, classification of security issues is an important initial step. The Security Incident Reporting, Investigating, and Resolving Process will be updated by the EHS Manager, implemented accordingly (Figure 6.2), and discussed further in the following paragraphs:

² Circular No. 17/2018/TT-BCA, Article 9

³ Circular No. 42/2017/TT-BCA, Article 9.

⁴ Circular No. 17/2018/TT-BCA, Article 9.

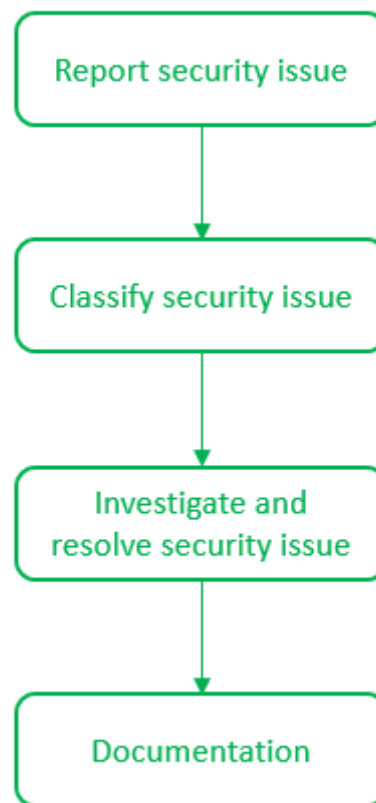


Figure 6.2 Security Incident Reporting, Investigating and Resolving Process

Step 1: Report security issue

When a security issue is identified, security guards or employees who identify the security issue shall immediately inform the Security Manager and Security Leader directly or by phone (Refer to Table 6.1 for Internal contact point in case of security incidents). If the security issue is out of control of the Security Manager and Security Leader, the Security Leader shall escalate the information to the EHS Manager or the Wind Farm Director for further advice and instructions to control the issue.

The Security Leader and the Security Manager shall be responsible for providing the security contact list (Table 6.1 and Table 6.2) at the Project's operation site and ensure all security guards understand how to communicate when a security issue happens. The security contact list could be integrated into the contact list for other kinds of emergencies developed by the Security Leader.

Table 6.1 Internal Contact Point in Case of Security Incidents

No.	Name	Position	Phone number
1.		EHSS Manager	
2.		EHS Deputy Manager	
3.		EHSS Staff	
4.		Wind Farm Director	
5.		EHS Manager	
6.		Security Leader	
7.		Security Manager	

No.	Name	Position	Phone number
8.		Department Managers (to be specified)	

Note: It will be updated by the Projects during operation when such information is available.

Table 6.2 External Contact Point in Case of Emergency

No.	Unit (police/ authorities)	Contact Person	Address	Email	Phone number
1.	Communal Police				
2.	District Police				
3.	Provincial Police				
4.	The forest security personnel				
5.	Ambulance				
6.	Fire fighter police of Quang Tri province				

Note: It will be updated by the Projects during operation when such information is available.

Step 2: Classify security issue

Security Leader shall review and classify the security issue whether it can be investigated and resolved using an internal process or if it must be reported to local authorities for further investigation and resolution. If the issue needs support from local authorities, the Security Leader shall seek the approval from EHS Manager to report the issue to local authorities.

Step 3: Investigate and resolve security issue

- For internal process: A Security Committee, members typically include the Security Leader, EHS Manager, Security Manager, other related managers (as needed) shall be established when a security incident occurs. The Security Committee shall investigate and consult with relevant personnel and/or community/ local authority to understand clearly and fully the situation of the security incident. If required, a meeting can be organized with relevant employees for the collection of detailed information, clarification, discussion, and consultation. Minutes of the consultation session shall be recorded in the Security Incident Report (Appendix J). The Security Leader shall coordinate with Security Manager to complete the Security Incident Report and submit to the EHS Manager for approval. In case that the resolution leads to disciplinary actions or compensations for the damage (if any), the disciplinary process and compensations shall follow the Project's Labour Management Plan and related legal requirements.
- For external process (by local authorities): EHS Manager shall coordinate with the local authorities in the investigation and resolution process, then record recorded in the Security Incident Report (Appendix J) and submit to the EHS Manager for approval.

Step 4: Documentation

- All follow-up actions shall be tracked in the Security Incident Report. Security records shall be kept for at least five (5) years; and
- Security Leader and Security Manager is responsible for maintaining all records relating to security issue.

6.3.5 Training

In relation to the Projects, the security contractor shall engage and deploy fully trained security guards, with the required qualifications and experiences to fulfill their responsibilities. Therefore, Security Contractor shall be responsible for providing security guards with appropriate training, including refresher courses to ensure their competencies (Refer to Section 8.1.1 for details information).

6.3.6 Discipline

EHS Manager and security contractor shall use the circumstances described in Appendix H as a basis for the removal of security guards from the Project:

Such dismissal from the Project will comply with Labour Code 2012. Dismissed security guards may have the right to appeal in accordance with the Employee Grievance Procedure.

6.4 Grievance Mechanism

Refer to the Employee Grievance Mechanism (2020) for internal grievance and Stakeholder Engagement Plan (2020) for external grievance related to security issues during the operation phase of the Projects.

7. MONITORING AND REPORTING

7.1 Monitoring

Monitoring is a critical component to prevent issues from becoming problems in the first place and to ensure that action plans are implemented and procedures are being followed. The monitoring program related to the SMP is presented in Table 7.1 and implementation follows the requirements.

Any major non-compliance (e.g. issues that could lead to a significant failure of structures, fatal accident, major injuries, authorities' notice/prosecution, or delay in project schedule) shall be corrected within one working day. Minor non-compliance issues (e.g. issues that do not lead to a breach of statutory requirements, bodily injuries/damage to properties, the environment, and surrounding communities) shall be corrected within one week.

Table 7.1 Monitoring Program

Action	Performance Indicators	Monitoring Protocol	Responsibilities	Monitoring Records
Internal monitoring	Status of security facilities and equipment	Weekly	<ul style="list-style-type: none"> ■ Security Contractor; and ■ Security Leader; and ■ EHS Manager. 	<ul style="list-style-type: none"> ■ Record of checking security facilities and equipment.
Internal	No. of security incidents	Daily monitoring, but reports can be consolidated Monthly	<ul style="list-style-type: none"> ■ Security Contractor; ■ Security Leader; and ■ EHS Manager. 	<ul style="list-style-type: none"> ■ Security incident report; ■ Visitor logbook; and ■ Vehicle logbook.
	Security performance related to human rights	Daily monitoring, but reports can be consolidated Monthly	<ul style="list-style-type: none"> ■ Security Contractor; ■ Security Leader; and ■ EHS Manager. 	<ul style="list-style-type: none"> ■ Grievance records.
	<ul style="list-style-type: none"> ■ No. of security guards signed labor contract; ■ Working hours and overtime hours of security guards; ■ No. of security paid under regional minimum wage; ■ No. of security guards registered with Social, health and unemployment insurance; and ■ No. of employees receiving security training. 	Monthly	<ul style="list-style-type: none"> ■ Security Contractor; ■ Security Leader; and ■ EHS Manager. 	<ul style="list-style-type: none"> ■ Labor contracts; ■ Timesheets; ■ Payrolls; ■ Social, health and unemployment insurance; and ■ Induction training records.
	<ul style="list-style-type: none"> ■ Status of security facilities and equipment; ■ No. of security incidents; ■ Security performance related to human rights; ■ No. of security guards signed labor contract; ■ Working hours and overtime hours of security guards; ■ No. of security paid under regional minimum wage; 	Annually	<ul style="list-style-type: none"> ■ EHSS Staff; and ■ EHSS Deputy Manager. 	<ul style="list-style-type: none"> ■ Record of checking security facilities and equipment; ■ Security incident report; ■ Visitor logbook; ■ Vehicle logbook; ■ Grievance records; ■ Labor contracts;

Action	Performance Indicators	Monitoring Protocol	Responsibilities	Monitoring Records
	<ul style="list-style-type: none"> ■ No. of security guards registered with Social, health and unemployment insurance; ■ No. of employees receiving security training; ■ No. of security guards who were not provided sufficient annual leave; ■ Type of training provided to security guards; and ■ No. of security guards receiving training. 			<ul style="list-style-type: none"> ■ Timesheets; ■ Payrolls; ■ Social, health and unemployment insurance; and ■ Induction training records; ■ Annual leave records; and ■ Security guards training records.
External monitoring	<ul style="list-style-type: none"> ■ Status of security facilities and equipment; ■ No. of security incidents; ■ Security performance related to human rights; ■ No. of security guards signed labor contract; ■ Working hours and overtime hours of security guards; ■ No. of security paid under regional minimum wage; ■ No. of security guards registered with Social, health and unemployment insurance; ■ No. of employees receiving security training; ■ No. of security guards who were not provided sufficient annual leave; ■ Type of training provided to security guards; and ■ No. of security guards receiving training. 	Subject to Lender requirements	<ul style="list-style-type: none"> ■ EHSS Staff; and ■ EHSS Manager. 	<ul style="list-style-type: none"> ■ Record of checking security facilities and equipment; ■ Security incident report; ■ Visitor logbook; ■ Vehicle logbook; ■ Grievance records; ■ Labor contracts; ■ Timesheets; ■ Payrolls; ■ Social, health and unemployment insurance; and ■ Induction training records; ■ Annual leave records; and ■ Security guards training records.

7.2 Audit

7.2.1 Internal Audit

Apart from daily inspection, internal audits at planned intervals will be scheduled to ensure appropriate preventive actions being taken as planned, and corrective actions being carried out on a timely basis. Internal auditing program shall be performed as in Table 7.2 and below details:

- Security Leader shall coordinate with Security Manager to conduct the weekly and random inspection on security facilities and equipment (Appendix I); and
- EHSS Staff shall conduct the monthly inspection and random inspection on security facilities and equipment (Appendix I), and Annual Internal Security Management Audit to ensure the performance of the Projects complies with Applicable Standard.

At any stage of operation or other work, if the Wind Farm Level Team has not taken appropriate action to achieve compliance with E&S requirements after repeated notices of violation and warnings of non-compliance, and significant E&S impacts are occurring or imminent, the Project Owner will issue an order to stop work until E&S performance is brought under control and up to acceptable standards. The activity is permitted to resume upon receipt of approval from the Project Owner only. The Wind Farm Level Team shall attend all inspections and audits.

Table 7.2 Internal Auditing Program

No.	Audit/Inspection	Responsibilities	
		PCC1	The Wind Farm Level Team
1.	Weekly inspection		x
2.	Monthly inspection	x	
3.	Annual audit	x	
4.	Random inspection	x	x

7.2.2 External Audit

In addition to internal audits, the Project is also subject to external audits conducted by relevant stakeholders. These audits may include but not limited to:

- Planned and unplanned audits or inspections undertaken by local authorities;
- Routine audits requested by Lenders or their agents.

7.3 Reporting

7.3.1 Internal Reporting

After each internal inspection and audit, an internal report shall be completed and communicated to all relevant parties. Security Leader shall prepare and submit weekly and random inspection report on security facilities and equipment to EHS Manager for review and approval; while EHSS Staff with prepare and submit monthly inspection and random inspection on security facilities and equipment, and Annual Internal Security Management Report to EHSS Deputy Manager.

Internal reporting is defined as a communication between the Project Owner, the Wind Farm Level Team. The internal reporting during operation may include, but not limited to:

- Summary of security incidents; and
- Review of actions taken and status.

7.3.2 External Reporting

In addition to internal reporting, the Projects are required to submit periodic monitoring reports to:

- Lenders; and
- Local authorities.

The Project Owner shall submit environmental and social monitoring reports to Lenders in accordance with an agreement with Lenders on interval and contents of the report.

8. TRAINING AND DISCLOSURE

8.1 Training and Communication

8.1.1 Training

The Project Owner is committed to providing appropriate training to all personnel and ensures that the Wind Farm Level Team are also providing the same level of training to their personnel (including Managers, Supervisors, and Employees) so that these people have the skills and knowledge necessary to implement and fulfill their obligations required by the SMP during operation.

In addition to environmental and social training, the Wind Farm Level Team and subcontractors shall work with the Project Owner's EHSS Team to develop a training program for security management. This training/ communication on security management can be combined as part of other training on environmental and social management. Training contents shall be tailored to trainees' scope of work.

To improve security management skills and knowledge, the EHS Manager, Security Leader, and Security Manager shall closely coordinate with local police in order to attend available professional training courses in terms of security management organized by local authorities. In addition to that, online training courses available on IFC website related to security management and human rights will also help the managers fully understand the Applicable Standards and well-manage security issues at the Project.

Table 8.1 Security Training Matrix

Trainee	Training content	Training form	Training frequency		Training record
			Initial training	Refresher training	
Security guards	<ul style="list-style-type: none"> ■ General regulatory requirements (e.g. Human rights-related themes, Criminal Law, Civil Law and Labour Code); ■ Code of conduct; ■ Use of security and safety equipment; ■ Communication skills; ■ Conflict management skills; ■ General information about the Project (e.g. layout, organization charge (including the person in charge of security issues)), site rules and relevant regulations of the Project, etc.; ■ Security Management Plan/ Procedures of the Project; ■ Emergency Preparedness and Response Plan of the Project; ■ Emergency communication route for security issues; ■ Employee Grievance Mechanism; and ■ Rules, regulations and information concerning restrictions related to hunting and poaching, as well as the punishment that can expected if any staff or worker or other person associated with the Project violates rules and regulations. 	In-house training	Prior to working at the Projects	Bi-annual	<ul style="list-style-type: none"> ■ Training materials; and ■ List of participants (including the participants' signatures).

Trainee	Training content	Training form	Training frequency		Training record
			Initial training	Refresher training	
	<ul style="list-style-type: none"> ■ Security professional training; ■ Occupational Health and Safety training; ■ Basic life support and first aid; and ■ Fire-fighting. 	External training	Prior to working at the Projects	<ul style="list-style-type: none"> ■ As per new requirements of laws; ■ Annual; and ■ Every 2 years. 	Certificate of training.
All employees, including including the Wind Farm Level Team's and its subcontractor's employees	<ul style="list-style-type: none"> ■ Security Management Plan and their roles and responsibilities on security management; ■ Requirements on reporting security issues; ■ Code of Conduct; ■ Employee grievance mechanism. ■ Emergency communication procedures 	In-house training	Prior to working at the Projects	Bi-annual	<ul style="list-style-type: none"> ■ Training materials ■ List of participants (including the participants' signatures).

8.1.2 Communication

This SMP and the employee grievance mechanism shall be disclosed to the Wind Farm Level Team.

Any grievances raised by employees and relevant stakeholders shall be logged and followed up in accordance with the Projects' employee grievance mechanism.

The Wind Farm Level Team shall keep employees informed about the Projects' response to their concerns or complaints.

Requests for information from news agencies or other individuals shall be forwarded in the first instance to the Security Manager and then to EHS Manager and the Wind Farm Director for appropriate actions.

8.2 Community Disclosure

The Security Leader shall coordinate with the CSR Specialist to disclose the SMP and the Projects' Stakeholder Engagement Plan (including external grievance mechanism) to surrounding communities of the Projects and/or other interested parties (e.g. police, the forest security personnel). The disclosure process shall be in line with the Projects' Stakeholder Engagement Plan.

In addition, the Wind Farm Level Team and subcontractors shall consult with surrounding communities about any concerns or issues related to security management.

Any grievances lodged by the communities shall be logged and followed up in accordance with the Projects' Stakeholder Engagement Plan.

Affected communities shall be kept informed about actions taken to address their concerns through the most suitable ways, which can be in the form of:

- Town hall meetings at the local municipality or civic centre;
- Meetings with representatives of the affected stakeholders;
- Letters to representatives of the affected stakeholders and complainants; and
- Phone calls.

9. MANAGEMENT REVIEW

The SMP is a living document and shall be continually updated and improved. The Project Owner shall review and, if necessary, revise the SMP at least semi-annually (operation), annually (operation), or:

- When there is any change(s) in the organisational structure;
- When there is any change in applicable requirements and standards;
- When there is any significant change in work process or activity; or
- When new information on E&S risks is made known.

The review shall consider the following, but not limited to:

- Internal and external audit findings;
- Monitoring records;
- Grievances records; and
- Incident reports.

10. RECORDS AND DOCUMENTATION

The control of documents and records related to security management shall be conducted in accordance with the relevant document and records control requirements of the Project Owner.

The Project Owner, the Wind Farm Level Team, and subcontractors shall retain the following documents and records:

- Visitor logbook (Appendix C);
- Vehicle logbook (Appendix D);
- Screening checklist of Security Contractor (Appendix F);
- List of documents required to Security Contractor and evidence of compliance, including relevant training records (Appendix G);
- Record of checking security facilities and equipment (Appendix H);
- Security incident report (Appendix J);
- Material Gate Pass records (Appendix E);
- Induction training records;
- Communication records related to the SMP to all relevant stakeholders;
- Internal and external audit/inspection records;
- Monthly security report of Security Contractor to the Projects; and
- External report (if applicable).

All records are required to be filed for at least five years or as per regulatory requirements, whichever is more stringent and kept in safe storage accessible only to authorized personnel.

Records shall be made available for inspection and audit by the Wind Farm Level Team and Project Owner or its agents upon request.

APPENDIX A THE PROJECTS' MAP

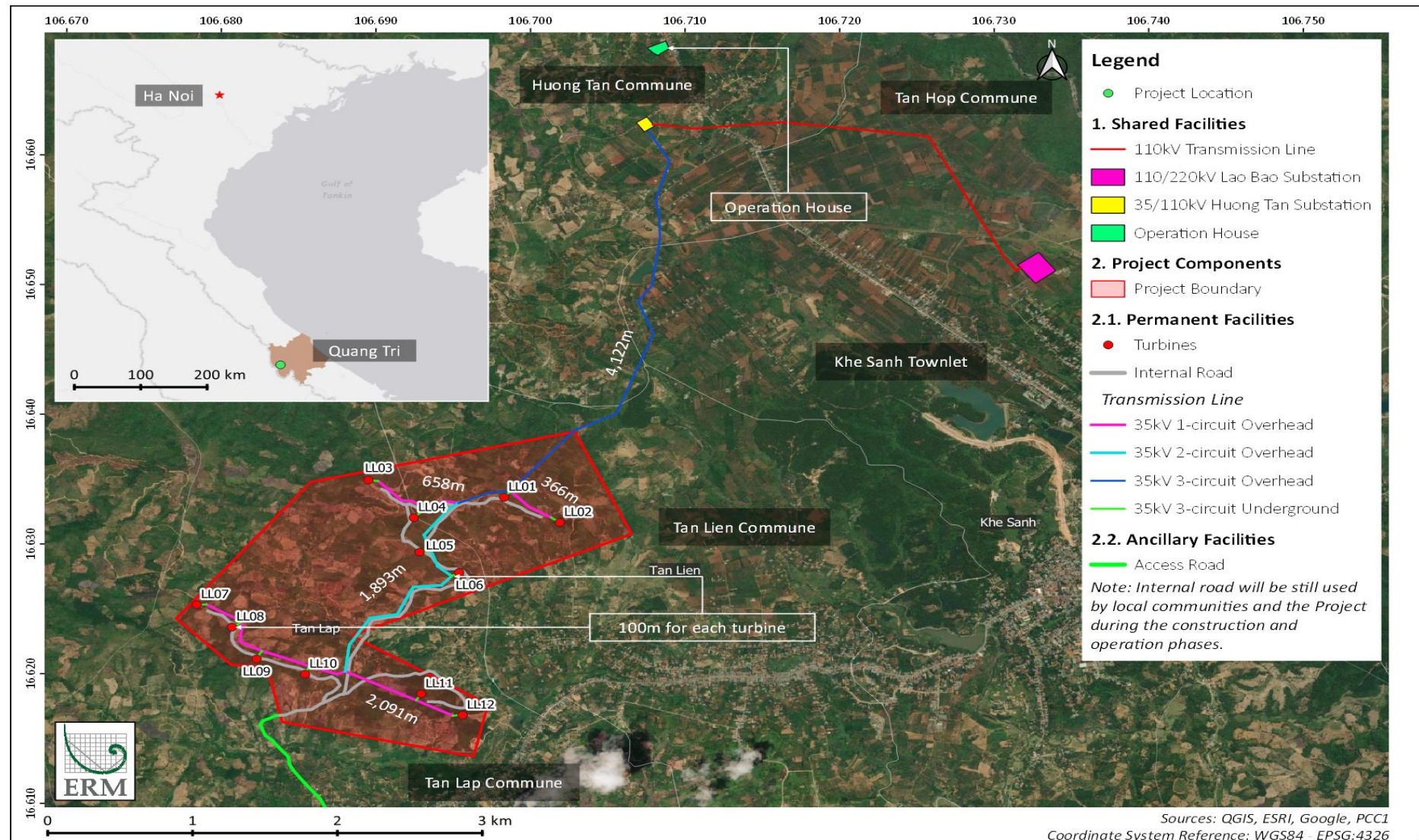


Figure A.1 Lien Lap Wind Power Project Layout

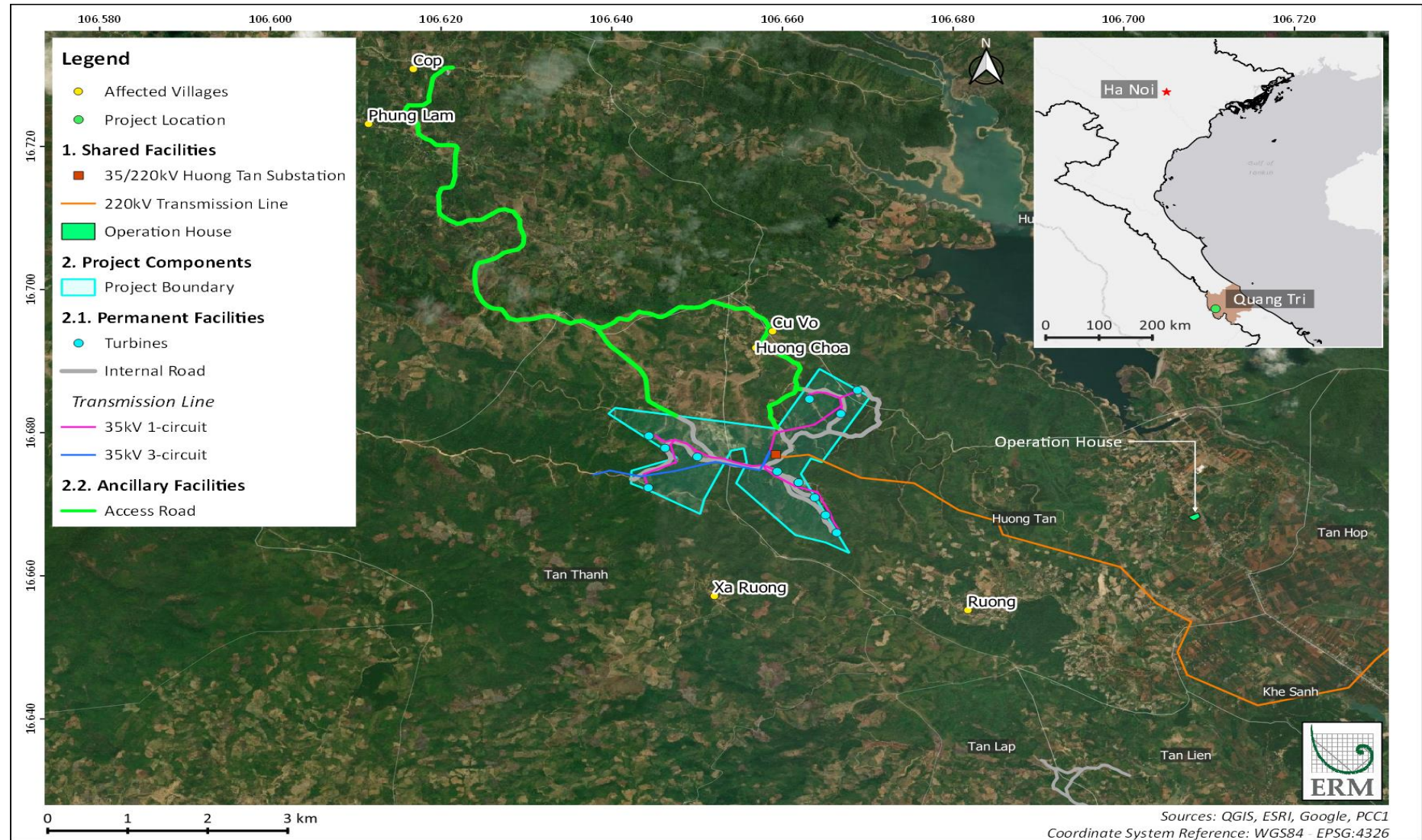


Figure A. 2 Phong Huy Wind Power Project Layout

SECURITY MANAGEMENT PLAN – OPERATION PHASE

Lien Lap, Phong Huy, Phong Nguyen Wind Power Projects

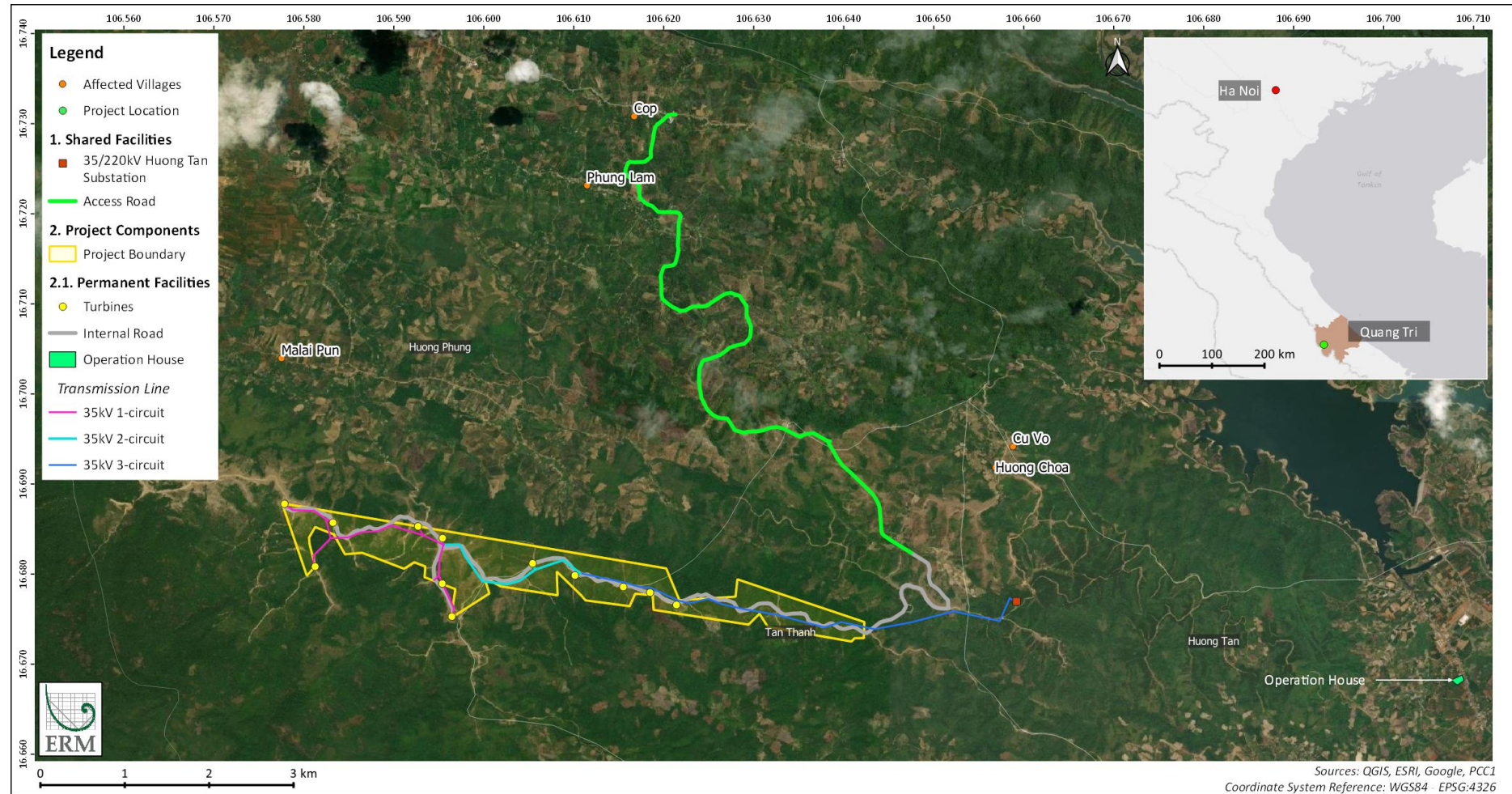


Figure A. 3 Phong Nguyen Wind Power Project Layout



Figure A. 4 Operation House's Layout

APPENDIX B SUMMARY SECURITY RISK DURING OPERATION PHASE

SECURITY MANAGEMENT PLAN – OPERATION PHASE

Lien Lap, Phong Huy, Phong Nguyen Wind Power Projects

No.	Security Risk	Likelihood	Security Response	Impact on the Project	Severity	Impact on community	Severity	Mitigation
1.	Disruption to the workforce resulting from confrontations by individuals at the Project operation site	1	Security guards will help to calm the confrontations and protect other people	Disruption to operation, particularly staff access to site; possible injury to employees	3	Injuries sustained from any use of force (justified or otherwise) against a protest; community resentment toward company	3	■ Security force management requirements
2.	Strike (by the Wind Farm Level Team's and the Projects' employees)	1	Access controls to prevent unauthorized people; security guards will help to protect the Projects' and the Wind Farm Level Team's employees and properties.	Disruption to operation, particularly employees access to site; possible injury to employees	3	Injuries sustained from any use of force (justified or otherwise) against a protest; community resentment toward company	3	■ Security force management requirements
3.	Harassment (especially gender based harassment), unethical, or inappropriate behavior by security guards to the Wind Farm Level Team's employees or local communities	2	Presence of security forces generates potential threat	Limited immediate impact; potential secondary impact to operation and/or reputation from community reaction	1	Verbal harassment and/or physical violation of community members, particularly women	4	■ Security force management requirements, e.g. establish safeguards to avoid gender-based violence and sexual harassment in the working place, as well as local area and/ or residence accommodation of workers.
4.	Theft (by the Wind Farm Level Team's employees, Security Contractor's	3	Access controls to prevent theft; security guards may apprehend suspected thieves and turn them over to authorities	Loss of company property; potential danger to employees if thieves take property by force	2	Alleged thieves risk injury or mistreatment during apprehension and/or detention	2	■ Physical security facilities and equipment; ■ Security supervision and control;

SECURITY MANAGEMENT PLAN – OPERATION PHASE

Lien Lap, Phong Huy, Phong Nguyen Wind Power Projects

No.	Security Risk	Likelihood	Security Response	Impact on the Project	Severity	Impact on community	Severity	Mitigation
	personnel and local communities)							<ul style="list-style-type: none"> ■ Security force management requirements
5.	Protests (by communities)	1	Prevent or control access to site; public security may respond physically if protest becomes violent	Disruption to operations, particularly staff access to site and transportation; possible injury to employees	2	Injuries sustained from any use of force (justified or otherwise) against a protest; community resentment toward company	4	<ul style="list-style-type: none"> ■ Physical security facilities and equipment; ■ Security supervision and control; ■ Security force management requirements
6.	Unauthorized access to the Project operation site	3	Access controls to prevent access, including clear signage; guards may confront people attempting to walk through operation sites	Potential safety hazard and disruption to operation	1	Frustration among community that pre-existing access/transit routes are no longer available; injuries sustained by community members entering hazardous areas of the site	1	<ul style="list-style-type: none"> ■ Physical security facilities and equipment; ■ Security supervision and control; ■ Security force management requirements

APPENDIX C TEMPLATE OF VISITOR LOGBOOK

VISITOR LOGBOOK

No.	Name of Visitor	Visitor's Company	No. of Visitor's Identification/ Citizen Identity Card	Contact Point	Purpose of Visit	No. of Visitor's Badge	Date of visit	Time in	Time out	Signature of Visitor
1.										
2.										
3.										
4.										

APPENDIX D TEMPLATE OF VEHICLE LOGBOOK

VEHICLE LOGBOOK

No.	Name of Driver	Driver's Company	No. of Driver's Identification	No. of vehicle's license plate	Contact Point	Purpose of access	In		Out		Signature of Driver
							Date	Time	Date	Time	
1.											
2.											
3.											
4.											

APPENDIX E TEMPLATE OF MATERIAL GATE PASS

MATERIAL GATE PASS

Name of Contractor/Subcontractor:

Vehicle Number:

Name of Driver:

Date:

Time:

No. of Driver's

Identification:

Material/ Equipment enumerated below has been approved to be in/out from the Projects site

No.	Item Description	Quantity	Remark

EHS Manager:

Full name and Signature

Security guard:

Full name and Signature

Department Manager:

Full name and Signature

Transporter:

Full name and Signature

APPENDIX F SCREENING CHECKLIST OF SECURITY CONTRACTOR

SCREENING CHECKLIST OF SECURITY CONTRACTORS

Name of Security Contractor:

Date of screening:

Screened by:

No.	Aspect	Source ⁵	Status (Yes/ No)	Notes
1.	Complaints / Issues / Records of child labour			
2.	Complaints / Issues / Records of forced labour			
3.	Complaints / Issues / Records of sexual harassments or abuses			
4.	Punished or fined due to violation legal requirements			
5.	Violated human rights			
6.	Complaints / Issues / Records of serious health and safety accident			

⁵ Provide link of detections

APPENDIX G LIST OF DOCUMENTS REQUIRED FROM SECURITY CONTRACTOR

LIST OF DOCUMENTS REQUIRED FROM SECURITY CONTRACTOR

No.	Documents	Status		Notes
		Yes	No	
1.	Business license			
2.	Certificate of satisfaction of security			
3.	Company profile which includes company's experiences for providing similar services related to the Project operations			
4.	Security policy and procedures			
5.	List of employees of business establishments subject to security requirements (Form DK11 of Circular No. 42/2017/TT-BCA) and their background checked by local police			
6.	Logbook of security guard training (Form DK28 of Circular No. 42/2017/TT-BCA)			
7.	Security guard certificates granted by competency local authority			
8.	Report on fulfilment of security requirements (Form DK13 of Circular No. 42/2017/TT-BCA)			
9.	Security service business management book (Form DK27 of Circular No. 42/2017/TT-BCA)			
10.	Grievance records in the past three years (if any)			
11.	Occupational accident records in the past three years (if any)			
12.	Punishment or fine records due to violate legal requirements (if any)			

Provided by (Signature and full name)	Checked by (Signature and full name)	Approved by (Signature and full name)
(Position)	EHS Manager	EHS Director
Date:	Date:	Date:

APPENDIX H CONTRACTUAL REQUIREMENTS WITH SECURITY CONTRACTOR

The following requirements shall be included in the contract with security contractor, but not limited to:

- Security contractor shall be in compliance with the below requirements during its contract with the Project:
 - Compliance with national and local laws and regulations, and ADB Safeguards;
 - Compliance with HR policy and procedures' requirements defined by the Projects; and
 - Measurement, monitoring, and reporting of the Project's Labour Management Plan implementation, progress, and performance.
- A security guard shall be removed from the Project if he violates one of the below actions:
 - Leaving a post or duty without appropriate reliefs;
 - Theft, which includes unauthorized use of project equipment or facilities such as telephones, internet facilities or services, and information technology equipment;
 - Acceptance of gifts, gratuities that may compromise duties and responsibilities;
 - Insulting or offensive behaviours;
 - Consumption of alcohol or illegal substances or being under the influence of either while on duty;
 - Making false reports or knowingly omitting information in a report;
 - Sleeping on duty;
 - Wilful disobedience of instructions or neglecting duty;
 - Participating in the possession, purchase, trade, collection, hunting, or poaching of wildlife or forest resources;
 - Making any statements or comments verbally or in writing to any news agencies, media, or other individuals relating to the Project's activities, which can affect negatively to the Project;
 - Wilful or carelessly permitting violations to project rules or directives; and
 - Abusing or violating human rights.
- During its contract with the Project, the security contractor shall be removed from the Project if the security contractor violates one of the below actions:
 - Punished or fined due to violation of legal requirements;
 - Misconduct in terms of child labour, forced labour, and major health and safety; and
 - Abused or violated human rights.
- Any non-compliance of the security contractor with the Project's Security Management Plan shall be subjected to corrective actions and compensations to the Project for such damage (if any) according to the legal requirement.

APPENDIX I LIST OF SECURITY FACILITIES AND EQUIPMENT

LIST OF SECURITY FACILITIES AND EQUIPMENT

No.	Facilities/ Equipment	Status
1.	CCTVs	
2.	Control room	
3.	Telephones for non-emergency calls	
4.	Telephone for emergency calls	
5.	IT equipment	
6.	Walkie-talkie communications devices	
7.	Fences	
8.	Locking devices	
9.	Security station	
10.	Lighting system	
11.	Uniforms for security guards	
12.	Portable lights	
13.	Emergency lighting systems	
14.	Speakers	
15.	Electric batons, metal batons, rubber batons, armour, cut resistant gloves approved by the local authorities	
16.	Visitor badge	
17.	Visitor logbook	
18.	Vehicle Logbook	
19.	Material Gate Pass	
20.	Internal contact points	
21.	External contact points	
22.	Security training records	

Prepared by
(Signature and Full name)

(Position)

Date:

Approved by
(Signature and Full name)

(Position)

Date:

APPENDIX J SECURITY INCIDENT REPORT

SECURITY INCIDENT REPORT

Reference #:

Date and time of incident:

Location of incident:

Individuals involved (include contact details):

No.	Full name	ID/ Employee's ID	Position	Contact (phone /address)	information number
1.					
2.					
3.					

Description of the incident (including situation leading up to the incident):

Security incident investigation and consultation:

Assessed consequences to the Project and to community members (include a description of injuries or damage sustained, if applicable):

Management actions:

Individuals involved (Signature and Full name) (Position) Date:	Prepared by (Signature and Full name) (Position) Date:	Approved by (Signature and Full name) (Position) Date:
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