

No.	Action required	Environmental and social risks (liability/benefits)	Requirements (legislative, EBRD PR, best practice)	Resources, investment needs, responsibility	Timeframe	Target and evaluation criteria for successful implementation
<b>CORPORATE ESAP</b>						
<b>C1.1</b>	Develop a Project E&S screening and assessment procedure that reflects lender requirements and national EIA requirements for application on all projects.	Inadequate assessment of risk leading to E&S impacts noncompliance.	EBRD PR1	NEGU /Donor funding supported by third party specialists.	End of 2024	E&S screening and assessment
<b>C1.2</b>	Develop a corporate level ESMS aligned with ISO14001 to implement operational E&S obligations and oversee construction requirements. (see also Project ESAP 1.4)	Inadequate assessment of risk leading to E&S impacts noncompliance.	EBRD PR1	NEGU /Donor funding supported by third party specialists.	February 2025	ESMS manual and supporting documentation, procedures, forms and templates
<b>C1.3</b>	Develop a corporate E&S policy <sup>1</sup> (or series of policies covering relevant topics) (see also Project ESAP 1.4)	Lack of a strong vision	EBRD PR1	NEGU /Donor funding supported by third party specialists.	End of 2024	E&S Policy
<b>C1.4</b>	PIU to include at least an E&S safeguard specialist for all construction projects	Competent E&S professionals overseeing all work to minimize E&S risk	EBRD PR1	NEGU /Donor funding supported by third party specialists.	End of 2024	Corporate E&S Organogram PIU terms of Reference
<b>C1.5</b>	Define E&S roles and responsibilities in the JSC NEGU organization chart. Minimum responsibilities should be	Competent E&S professionals overseeing all work to minimize E&S risk	EBRD PR1	NEGU /Donor funding supported by	End of 2024	Corporate E&S Organogram

<sup>1</sup> E&S used here concerns environment, health and safety, social, section and labour.

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	included in organizational capacity in the JSC NEGU: <ul style="list-style-type: none"> <li>- Sustainability champion</li> <li>- Corporate Social and Stakeholder Engagement Manager</li> <li>- Corporate Environmental and Social (E&amp;S) Manager</li> <li>- Corporate Health, Safety, and Security (HSS) Manager</li> </ul> (ESAP Action 1.5).			third party specialists.		
<b>C1.6</b>	Develop a standard E&S schedule for all contracts and tender documentation outlining minimum requirements for contractor management system aligned with PR1 to 10 and GIP. (see also Project ESAP 1.0)	Inadequate transfer of responsibility down the contracting chain can lead to E&S risk and issues.	EBRD PR1	NEGU /Donor funding supported by third party specialists.	June 2024	Standard E&S schedule
<b>C1.7</b>	Conduct due diligence of all suppliers to update the approved supplier list based on the capability to manage E&S risk. (see also Project ESAP 1.15)	Inadequate subcontractor management can lead to E&S risk and issues	EBRD PR1	NEGU /Donor funding supported by third party specialists.	End of 2024	Supply chain risk screening and due diligence report (all tier 1 and tier 2 suppliers)
<b>C1.8</b>	Develop of Corporate level Supply Chain Procurement Policy (SCPP) as part of the ESMS. The following documents are recommended as a minimum:	Inadequate subcontractor management can lead to E&S risk and issues	EBRD PR1	NEGU /Donor funding supported by third party specialists.	End 2024	Corporate Supply Chain Sub-contractor Pre-qualification Procedure

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	<ul style="list-style-type: none"> <li>- Corporate Supply Chain Sub-contractor Pre-qualification Procedure <sup>2</sup></li> <li>- Corporate Supply Chain Procurement Policy (SCPP) (including screening protocols for suppliers and sub-contractors)</li> <li>- Corporate Supply Chain Management Plan (see also Project ESAP 1.15)</li> </ul>					<p>Corporate Supply Chain Procurement Policy (SCPP)</p> <p>Corporate Supply Chain Management Plan</p>
<b>C1.9</b>	Develop and implement a standardized corporate Environmental and Social Monitoring Procedure as part of the corporate ESMS.	Effective monitoring can identify compliance issues and drive continuous improvement	EBRD PR1	NEGU /Donor funding supported by third party specialists.	June 2024	corporate Environmental and Social Monitoring Procedure
<b>C1.10</b>	Prepare a corporate E&S monitoring report for all the JSC NEGU (and their subcontractor) activities.	Effective monitoring can identify compliance issues and drive continuous improvement.	EBRD PR1	NEGU /Donor funding supported by third party specialists.	February 2024	Annual E&S monitoring report (all assets)

<sup>2</sup> Corporate Supply Chance Procedure should elaborate the process for; (1) Minimum requirements to be set for selection; (2) Corporate EHS terms defined to include EPC/Main contractor/Subcontractor/suppliers agreements; (3) Process for screen suppliers' performance prior to involvement to project; and (4) Periodic EHS compliance audit/inspections to be required.

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<b>C1.11</b>	Prepare an annual Social Responsibility <sup>3</sup> (CSR) report that follows the sustainability reporting framework provided by GRI Standards	Effective monitoring can identify compliance issues and drive continuous improvement	EBRD PR1	NEGU /donor funding is supported by third-party specialists.	February 2024	annual Social Responsibility <sup>4</sup> (CSR) report
<b>C1.12</b>	Develop a low carbon strategy and climate mitigation action plan and perform annual reporting.	Reduce carbon emissions and alignment with Uzbekistan climate policy	EBRD PR1	NEGU /donor funding is supported by third-party specialists	June 2024	Low carbon strategy and climate mitigation action plan
<b>C1.13</b>	Engage specialist third party to perform Quarterly Construction Monitoring audits (third-party audits) of construction activities by Environmental, Health and Safety, Social, and Labor (EHSS) specialists		EBRD PR1	NEGU /donor funding is supported by third-party specialists	June 2024	Contract for quarterly monitoring (operational assets)
<b>C2.1</b>	Develop a corporate Human Resource (HR) Policy (suite of policies) combining existing HR related documentation to cover all requirements as outlined in national labor laws, ILO conventions and EBRD PR 2 requirements. The HR policies should set out JSC NEGU approach to	Good human resources management, including freedom of association and the right to collective	EBRD PR2	NEGU /donor funding is supported by third-party specialists	June 2024	Corporate HR Policy

<sup>3</sup> This report can also be called "Non-financial Reporting" or "Environmental, Social and Governance (ESG) Reporting".

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	managing the workforce across the Company (see project ESAP 2.1)	bargaining, are key ingredients to the sustainability of business activities.				
<b>C2.2</b>	Define standard worker contract (s) for use by all NEGU employees that includes information regarding working conditions and workers' rights and acts as an example of minimum requirements for subcontractor contracts. This must include requirements to the prohibition of child and forced labor.	workforce is a valuable asset which requires sound worker-management relationship set out in worker contracts.	EBRD PR2	NEGU /donor funding is supported by third-party specialists	June 2024	Standard Worker contract
<b>C2.3</b>	JSC NEGU to develop a non-discrimination code of conduct (as part of the HR Policy) including as a minimum policies to prohibit making employment decisions based on personal characteristics, such as gender, race, nationality, ethnic origin, religion or belief, disability, age or sexual orientation, unrelated to inherent job requirements. ii) base the employment relationship on the principle of equal opportunity and fair treatment and will not discriminate with respect to all aspects of the employment relationship, including recruitment and hiring,	ensure fair treatment, non-discrimination, and equal opportunities of workers in accordance with the decent work agenda <sup>24</sup> ;	EBRD PR2	NEGU /donor funding is supported by third-party specialists	June 2024	Non-discrimination code of conduct

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	compensation (including wages and benefits), working conditions and terms of employment, access to training, promotion, termination of employment or retirement, and discipline, iii) actively seek opportunities to improve employment for women across the Company and ensure non-decimation policies. (see Project ESAP 2.6)					
<b>C2.4</b>	Develop a procedure on Worker Organizations and Collective Bargaining (trade unions), including specific instructions on workers' rights to elect workers' representatives, form or join workers' organizations of their choosing and engage in collective bargaining in accordance with National Law. (see Project ESAP 2.6)	Compliance with national labour and employment laws and any collective agreements to which the client is a party	EBRD PR2	NEGU /donor funding is supported by third-party specialists	June 2024	Worker Organizations and Collective Bargaining procedure
<b>C2.5</b>	Develop an employee handbook to be shared with all workers to explain the welfare facilities, policies on working hours, leaves, determination of wages and wage increase, benefits and allowance, grievance mechanism, conditions of works, termination process, and code of conducts	Establish, maintain and improve a sound worker management Relationship in a transparent and consistent manner.	EBRD PR2	NEGU /donor funding is supported by third-party specialists	June 2024	employee handbook

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C2.6	Develop a corporate Worker Accommodation procedure. The procedure should adopt minimum requirements set out in IFC/EBRD Workers' accommodation: process and standard and integrate national fire and life safety obligations. (see Project ESAP 2.6)	protect women and men at work, including vulnerable workers such as young workers, persons with disabilities, migrant workers and refugees, workers engaged by third parties, and workers in the client's supply chain	EBRD PR2	NEGU /donor funding is supported by third-party specialists	June 2024	corporate Worker Accommodation procedure
C2.7	Develop corporate retrenchment policy with reference to GIIP <sup>5</sup> including requirements to: <ol style="list-style-type: none"> <li>1. Analyze the alternatives to retrenchment.</li> <li>2. Ensure the selection process for retrenchment will be transparent, based on fair, objective, consistently applied criteria, and subject to an effective grievance mechanism</li> </ol>	protect women and men at work, including vulnerable workers such as young workers, persons with disabilities, migrant workers and refugees, workers engaged by third parties, and workers in the client's supply chain	EBRD PR2	NEGU /donor funding is supported by third-party specialists	June 2024	corporate retrenchment policy

<sup>5</sup> EBRD Retrenchment Guidance (April 2010) on retrenchment and restructuring - labour and community

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	<p>3. Provide reasonable notice of changes to employment conditions to the unions concerned, to workers and their representatives and, where appropriate, to relevant public authorities.</p> <p>4. develop and implement a retrenchment plan to assess, reduce and mitigate the adverse impacts of retrenchment on workers/employees, in line with national Law and good international industry practice. Where needed, EBRD Retrenchment Guidance (April 2010) <sup>6</sup> on retrenchment and restructuring - labour and community issues should be followed.</p>					
<b>C2.8</b>	Establish a documented procedure setting out a standardized worker's grievance mechanism to be available to all NEGU personnel corporate and for roll out in specific projects (construction) available to all subcontractors (staff or	Ensure that accessible and effective means to raise and address workplace concerns are available to	EBRD PR2	NEGU /donor funding is supported by third-party specialists		Worker's grievance mechanism

<sup>6</sup> <https://www.ebrd.com/downloads/about/sustainability/retrenchment.pdf>



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	contract), allowing anonymous complaints.	workers.				
<b>C2.9</b>	Develop corporate Subcontractor Management Policy (part of corporate ESMS, ESAP action 1.2) that may be appended to all subcontractor contracts.	Proactively identify and manage risks associated with the recruitment, engagement, and demobilization of project workers by third parties	EBRD PR2	NEGU /donor funding is supported by third-party specialists	June 2024	corporate Subcontractor Management Policy
<b>C3.1</b>	Develop a corporate Resource Efficiency, Minimization and Monitoring Procedure (construction and operation) and implement it for the new Projects	Avoid, minimize and manage project-resource use (e.g. energy, water)	EBRD PR3	NEGU /donor funding is supported by third-party specialists	June 2024	corporate Resource Efficiency, Minimization and Monitoring Procedure
<b>C3.2</b>	Develop corporate Waste Management Procedure (operation and construction) to be implemented on all projects as part of the ESMS. (see Project ESAP 3.1)	Avoid, minimize and manage project-related GHG emissions	EBRD PR3	NEGU /donor funding is supported by third-party specialists	June 2024	corporate Waste Management Procedure
<b>C3.3</b>	Develop greenhouse gas (including SF6 use and losses) and climate-reporting procedure aligned with TCFD.	Avoid, minimize and manage project-related GHG emissions	EBRD PR3	NEGU /donor funding is supported by third-party specialists	June 2024	Greenhouse gas (including SF6 use and losses) and climate-reporting procedure
<b>C3.5</b>	Perform asset wide Asbestos survey/inventory to identify known and suspected ACMs.	avoid, minimize and manage the risks and impacts	EBRD PR3	NEGU /donor funding is supported by	June 2024	Asbestos survey/inventory

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		associated with hazardous substances and materials		third-party specialists		
<b>C3.6</b>	Perform an asset wide PCB survey to identify known and suspected PCBs.	avoid, minimize and manage the risks and impacts associated with hazardous substances and materials	EBRD PR3	NEGU /donor funding is supported by third-party specialists	June 2024	asset wide PCB survey
<b>C3.7</b>	Develop an ACM action plan to include a phase-out program in the use of asbestos	avoid, minimize and manage the risks and impacts associated with hazardous substances and materials	EBRD PR3	NEGU /donor funding is supported by third-party specialists	June 2024	ACM action plan
<b>C4.1</b>	JSC NEGU should develop and implement a Health and Safety Management System (HSMS) aligned with ISO 45001 (or equivalent certified integrated management systems). (see project ESAP 4.1)	Implement a management system can protect and promote the health, safety and security of workers, by ensuring safe, healthy and secure working conditions.	EBRD PR4	NEGU /donor funding is supported by third-party specialists	February 2024	Corporate Health and Safety Management System (HSMS)
<b>C4.2</b>	Define maintenance control procedure for mechanical equipment (such as	The client has the primary responsibility to provide safe and	EBRD PR4	NEGU /donor funding is supported by		

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	ladders, lifting vehicles, telescopic platforms and 4x4 vehicles)	healthy conditions for their workers and informing, instructing, training, supervising and consulting workers on health and safety.		third-party specialists		
<b>C4.3</b>	Prepare a hazardous materials management procedure (see project ESAP 3.3)	Prevent or reduce the potential for worker and project-affected community exposure to hazardous materials.	EBRD PR4	NEGU /donor funding is supported by third-party specialists		
<b>C4.4</b>	Develop an information awareness campaign to raise awareness among PAPs of potential risks and associated actions when working near overhead lines or substations. e.g., EMF, working under OHTL, agriculture, and OHTLs	The client will communicate with project-affected communities and other relevant stakeholders, as appropriate, on mitigation measures and plans	EBRD PR4	NEGU /donor funding is supported by third-party specialists		
<b>C4.5</b>	Perform asset-wide natural hazard risk assessment and feed results into emergency planning provisions.	Avoid and/or minimize risks caused by natural hazards or land use changes to which the project	EBRD PR4	NEGU /donor funding is supported by third-party specialists		

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		activities may contribute.				
<b>C4.6</b>	Develop a corporate-level Emergency Preparedness and Response Procedure (s) (EPRP) that can be implemented at different assets (e.g. OHTL, substations) and for different scenarios.	Prevent major accidents or limit their risks on workers, project-affected communities in a consistent and effective manner	EBRD PR4	NEGU /donor funding is supported by third-party specialists		
<b>C4.7</b>	Develop a corporate-level Security Management Procedure, setting out the requirements for the preparation of project security management plans for specific assets.	Where risks have been identified, adequate security management arrangements will be implemented in accordance with GIP to manage these risks	EBRD PR4	NEGU /donor funding is supported by third-party specialists		
<b>C4.8</b>	Prepare a Worker and Security Guard Code of Conduct (for signature by all workers and security personnel)	Require security personnel to act within the applicable law and any requirements set out in PR 2.	EBRD PR4	NEGU /donor funding is supported by third-party specialists		
<b>C5.1</b>	Develop LARF applicable to all assets to be applied at project level and to include supplementary entitlements over and above national law (e.g. in relation to	Mitigate unavoidable adverse social and economic impacts from involuntary	EBRD PR5	NEGU /donor funding is supported by third-party specialists		

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	informal land users). The LARF should cover <ul style="list-style-type: none"> <li>- Avoidance or Minimization of Displacement</li> <li>- Avoidance of Forced Eviction</li> <li>- Negotiated Settlements</li> <li>- Consideration of Vulnerable Groups</li> <li>- Consideration of Gender Aspects</li> <li>- Socio-economic Surveys</li> <li>- Census, Inventory of Affected Assets and Cut-off Date</li> <li>- Valuation of Affected Lands and Assets</li> <li>- Eligibility Classification</li> <li>- Compensation and Benefits for Affected Persons</li> <li>- Voluntary Land Donations</li> <li>- Loss of Community Facilities, Utilities and Public Amenities</li> <li>- Stakeholder Engagement</li> <li>- Grievance Mechanism</li> <li>- Planning and Implementation</li> </ul>	resettlement on affected persons by: (i) providing timely compensation for loss of assets at full replacement cost <sup>54</sup> ; and (ii) ensuring that land acquisition, restrictions on land use, other assets and natural resources and involuntary resettlement activities				

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	<ul style="list-style-type: none"> <li>- Organizational capacity and commitment</li> <li>- Monitoring and Evaluation</li> <li>- Physical Displacement and Resettlement Assistance (if required)</li> <li>- Economic Displacement and Livelihood Improvement or Restoration (if required)</li> </ul>					
<b>C6.1</b>	<p>Develop Corporate biodiversity management and mitigation procedures to ensure that the below requirements are considered during the development, construction and operational stages of a project:</p> <ul style="list-style-type: none"> <li>- Assessment of E&amp;S risks and impacts</li> <li>- Identification of measures for the protection and conservation of biodiversity, Priority biodiversity features and critical habitats</li> <li>- Identification of impacts to legally Protected and Internationally</li> </ul>	Protect and conserve biodiversity using a precautionary approach.	EBRD PR6	NEGU /donor funding is supported by third-party specialists		

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	<p>Recognized Areas of Biodiversity Value</p> <ul style="list-style-type: none"> <li>- Identify potential invasive alien species (if needed)</li> <li>- Consider the impact on ecosystem services</li> <li>- Supply Chains</li> <li>- All the mitigation measures must be included in the relevant Project ESMPs.</li> </ul>					
<b>C8.1</b>	<p>Develop cultural heritage procedures requiring the assessment of cultural sensitivities before any O&amp;M work or construction works take place. CHP to include a standard Chance Find Procedure. The procedure should allow the Contractor to stop work and consult with relevant authorities in case of any archaeological finds for the all-new Projects. Ensure that the accident reporting log and investigation system are in place.</p>	<p>Support the protection and conservation of cultural heritage</p>	<p>EBRD PR8</p>	<p>NEGU /donor funding is supported by third-party specialists</p>		
<b>C10.1</b>	<p>Develop a corporate Stakeholder Engagement and can consultation procedure that requires all projects to either develop a standalone SEP OR to</p>	<p>Stakeholder engagement is central to building strong,</p>	<p>EBRD PR10</p>	<p>NEGU /donor funding is supported by</p>		

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	implement minimum requirements as set out in the corporate SEP to ensure that meaningful consultation of affected persons and communities, including host communities, should be organized by each project throughout the process of resettlement planning and implementation in accordance with principles and processes outlined in EBRD PR10 <sup>7</sup> .	constructive, and responsive relationships which are essential for the successful management of a project's environmental and social risks and impacts		third-party specialists		
<b>C10.2</b>	Ensure that an experienced Community Liaison Officer (CLO) is appointed where necessary in the all-new projects. (see project ESAP 8.1)	Designate specific personnel for the implementation and monitoring of stakeholder engagement activities	EBRD PR10	NEGU /donor funding is supported by third-party specialists		
<b>C10.3</b>	Establish a corporate-level grievance mechanism (including land users). To ensure a systematic stakeholder engagement programme throughout the project lifecycle. The grievance mechanism must keep strict data confidentiality, including all applicants' personal information. Where preferred,	Be aware of and respond to stakeholders' concerns related to the project in a timely manners.	EBRD PR10	NEGU /donor funding is supported by third-party specialists		

<sup>7</sup> <https://www.ebrd.com/news/publications/policies/environmental-and-social-policy-esp.html>



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	complainants can submit their grievances anonymously. After receiving and registering a grievance, an applicant will receive written notification within two days, including the proposed timeline for the investigation. A response to the complaint will be provided within two weeks of its submission.					

Project Level ESAP						
PR1						
1.0	Prepare a Project E&S schedule. The E&S schedule must be appended to the EPC Contract and all Tier 2 EPC Contracts below. E&S schedule must set out Project requirements against the following subheadings with explicitly reference to the requirement of the IFC PSs and relevant GIIP. The topics to be elaborated in the E&S schedule are: General ESHS management, management plans requirements, ESHS staffing,	Regulatory and Lender compliance	Uzbekistan Standards and EBRD ESP,  Refer to C1.6.	ESIA Consultant to prepare, NEGU to append E&S schedule to relevant contracts.	Pre – financial close	E&S schedule signed off by the Lenders

	requirements for assessing E&S risks, ESHS training, hazardous materials, waste management, biodiversity management, occupational health and safety, emergency response, security, labour welfare aligned with IFC PS2, ESHS inspections and auditing, ESHS reporting including labour reporting (inc. incident reporting, community relations, local hiring, code of conduct, Environmental, Health, and Safety Non-Conformities and Penalties, documentation and compliance records. The E&S schedule will also append the Client CESMP.					
<b>1.1</b>	EPC Contract must include a dedicated E&S schedule as defined in 1.0 above :	Regulatory and Lender compliance	Uzbekistan Standards and EBRD ESP	NEGU PIU (own resources, external consultants)	Pre-EPC Contract Signature (EPC contract Effective Date)	Evidence included in EPC Contract Evidence includes in Tier 2 contracts.
<b>1.2</b>	Develop Project Environmental Design Document setting out requirements to be included	Reduce E&S impacts through design	EBRD PR1 EBRD PR 6	NEGU PIU	Pre-EPC Contract Signature (EPC contract Effective Date)	EPC Contract /Design drawings

	<p>in the EPC Design Specification including:</p> <ul style="list-style-type: none"> <li>• Full tension stringing</li> <li>• 200m between receptors and the OHTL center line</li> <li>• Bird diverters (ESAP 6.3)</li> <li>• Raptor friendly poles (ESAP 6.4)</li> <li>• Micro siting of pylons and access road to avoid Takys (ESAP action 6.5)</li> <li>• ecological officer to be present on-site during excavation</li> <li>• All quantitative (numeric) and qualitative standards e.g. noise, air quality, wastewater discharges, secondary containment measures, accommodation_. The project adopted standards will be based on the most stringent among applicable national requirements, ENRD PRs and relevant WBG guidelines</li> </ul>					
<b>1.3</b>	Demonstrate the main Contractor certified to ISO	E&S compliance	PR1	Main Contractor (own resources,	Pre-financial close	ISO certification (ISO14001 and ISO45001)

	14001 and ISO45001 (or equivalent).			external consultants)		
<b>1.4</b>	<p>Develop and implement a project-level Environmental and Social Management System (ESMS) appropriate to the nature of the risks, including:</p> <ul style="list-style-type: none"> <li>• E&amp;S Policy</li> <li>• Legislative compliance monitoring</li> <li>• Risk assessment and control</li> <li>• Roles and responsibility for E&amp;S management</li> <li>• Operations ESMP</li> <li>• Training and competence management</li> <li>• Inspections and audits</li> <li>• Monitoring and reporting</li> <li>• Internal and external communication (as per Stakeholder engagement (as per SEP) (inc. grievance management)</li> <li>• Subcontractors' EHS management and third-party safety practices in the ESMS</li> </ul>	Optimization of environmental and social management through a formalized system	EBRD PR1 Aligned to ISO14001:2015 (or equivalent certified integrated management systems)	NEGU PIU (own resources, supported by external consultants)	Pre-financial close	NEGU ESMS manual includes supporting policies, procedures, and method statements reviewed and accepted by the Lender (e.g., aspects impact register and legal register.
<b>1.5</b>	Establish Contractor ESMS inclusive of policy statements, management and monitoring	E&S compliance	EBRD PR1 Aligned to ISO14001:2015	Main Contractor (own resources,	60 days before site mobilization	E&S Policy, ESMS manual including supporting policies,

	measures, and aspect-specific management plans applicable to the EPC activities and tailored to the project's construction methodology, engineering design and commissioning phase.		and & ISO 45000 (or equivalent certified integrated management systems) Owner CESMP ESIA and supporting documents	external consultants)		procedures, and method statements reviewed and accepted by the Lender (e.g., aspects impact register and legal register.
<b>1.6</b>	<p>Develop and implement a construction Environmental and Social Management Plan (C-ESMP) to oversee construction phase works, including policies, procedures, and forms for managing:</p> <ul style="list-style-type: none"> <li>• E&amp;S Policy</li> <li>• Legislative compliance</li> <li>• Roles and responsibility for E&amp;S management</li> <li>• Operations ESMP</li> <li>• Training Plan (of PIU)</li> <li>• Inspections and audits</li> <li>• Monitoring and reporting</li> <li>• Internal and external communication (as per Stakeholder engagement (as per SEP) (inc. grievance management)</li> </ul>	Optimization of environmental and social management through a formalized system	EBRD PR1 Aligned to ISO14001:2015 (or equivalent certified integrated management systems)	NEGU PIU (own resources, supported by external consultants)	Pre-financial close	Project ESMS manual, construction ESMP and supporting procedures, forms and templates

	Subcontractors' EHS management and third-party safety practices in the ESMS.					
<b>1.7</b>	<p>Develop and implement a construction Environmental and Social Management Plan (CESMP) and supporting topic-specific management plans for implementing the Owner's requirements.</p> <ul style="list-style-type: none"> <li>• Occupational health and safety plan (ESAP action 4.1)</li> <li>• Emergency preparedness and control plan (ESAP action 4.3)</li> <li>• Vegetation Clearance Plan (ESAP 6.6)</li> <li>• Waste management plan (ESAP action 3.2)</li> <li>• Water Resource Management Plan (ESAP action 4.1)</li> <li>• Chance finds procedure (ESAP action 7.1)</li> <li>• Worker Accommodation Management Plan (ESAP action 2.7)</li> </ul>	Optimization of environmental and social management through a formalized system	EBRD PR1 Aligned to ISO14001:2015 (or equivalent certified integrated management systems) Owner C-ESMP	Main Contractor	Drafted before any site-mobilization	Contractor CESMP and supporting plans, procedures, forms and templates

	<ul style="list-style-type: none"> <li>• Biodiversity Management Plan (ESAP action 6.7)</li> <li>• Traffic and transportation management plan (ESAP action 4.2)</li> <li>• Pollution prevention and control (air, noise, dust, water use, water runoff, spill cleanup and control)</li> <li>• Labor Management Plan (including local employment protocol)</li> <li>• Worker Accommodation Plan (ESAP action 2.7)</li> <li>• Hazardous material management plan (HMMP) (ESAP action 3.3)</li> <li>• Security Management Plan (ESAP action 4.4)</li> </ul>					
<b>1.8</b>	Develop Owner Permit Matrix	Compliance with national legislation Approved EIA/OVOS	EBRD PR1 National Law and Regulation	NEGU PIU (development and construction) Regional NEGU department (operation)	Positive conclusions from SEE at financing  Other permits before works on-site (construction) and before COD	Permit matrix (Owners)

<b>1.9</b>	<p>Obtain relevant permits, including:</p> <p>A) Positive Conclusion of SEE for the national EIA report (Stage I and/or Stage II)</p> <p>B) Positive Conclusion of SEE for the national EIA report (Stage III)</p>	<p>Compliance with national legislation</p> <p>EBRD PR1</p>	<p>EBRD PR1</p> <p>National Law and Regulation</p>	<p>NEGU PIU (own resources, external consultants)</p>	<p>Positive conclusions 60 days before COD.</p>	<p>Evidence of all relevant workplace openings and work permits</p> <p>Positive conclusions from SEE Stage 1</p> <p>Positive Conclusion of SEE for the national EIA report (Stage III)</p>
<b>1.10</b>	<p>Develop a Contractor Permit Matrix and obtain all required temporary construction permits.</p>	<p>National compliance</p>	<p>EBRD PR1</p> <p>National Law and Regulation</p>	<p>Main Contractor (own resources, external consultants)</p>	<p>60 days before site mobilization (construction phase)</p>	<p>Permit matrix</p> <p>Evidence of all relevant permits</p>
<b>1.11</b>	<p>Develop E&amp;S, OHS and labor monitoring plan setting out requirements for monitoring the following:</p> <ul style="list-style-type: none"> <li>• OHS and E&amp;S statistics (as per owner CESMP)</li> <li>• Biodiversity mitigation and management</li> <li>• Labor working conditions and procurement (including worker grievances)</li> <li>• Labor accommodation</li> <li>• Potential pollutant sources</li> <li>• Security</li> </ul>	<p>Optimization of environmental and social management through a formalized system.</p> <p>Protection of environment and human health</p> <p>Reduced contractor related EHS risks</p> <p>Protection of company reputation</p>	<p>EBRD PR1</p> <p>EBRD PR3</p> <p>EBRD PR4</p> <p>National Air Pollution Control Regulation</p> <p>National Water Pollution Control Regulation</p>	<p>Main Contractor (own resources, external consultants)</p>	<p>60 days before site mobilization</p>	<p>E&amp;S Monitoring Program</p> <p>Records of regular inspection and audits, including (but not limited to) observation/non-conformity trackers, corrective action plans and evidence of actions being implemented</p> <p>Records of contractor accidents/incident reporting.</p>



	Continual oversight in working areas, alongside regular inspection and audits. Verification of effective accident/incident reporting					
<b>1.12</b>	<b>Company E&amp;S resourcing</b> - Assign a dedicated E&S responsible person for overseeing E&S obligations of this Environmental and Social Action Plan (ESAP) construction and operational Environmental and Social Management Plan (CESMP & OESMP) (including SEP).	Adequate E&S oversight for the construction and operation phase	EBRD PR1	NEGU PIU (construction)  (Own resources, supported by external consultants)	Pre-mobilization	Dedicated E&S responsible person - name and contact details.
<b>1.13</b>	<b>Contractor EHS resourcing</b> - Appoint site HSE team with relevant qualifications, defined roles and responsibilities, and authority Site E&S team to include: H&S Manager, Site environmental officer, Site H&S officer, HR Manager Community liaison officer (CLO), Biodiversity monitor (site clearance and excavation works).	Ensure implementation of E&S management plans	EBRD PR 1 (para 21)	Main Contractor (own resources, external consultants)	60 days before site mobilization	Organogram of Terms of reference/job descriptions for key roles CV for the designated person(s) Evidence of appointment (contract)
<b>1.14</b>	<b>EHS Resourcing (Operations)</b> - The Company will employ an ESHS Manager to implement	Adequate E&S oversight for the	EBRD PR1	NEGU (Regional Department) (operation)	Pre-COD	Dedicated E&S responsible person

	the operational ESMP supported by adequate support staff to ensure E&S oversight of their activities and implement applicable project commitments.	construction and operation phase		(Own resources, supported by external consultants)		- name and contact details.
<b>1.15</b>	<p><b>Supply chain management</b> - Prepare Supply Chain Procurement Policy (SCPP). SCPP must:</p> <ul style="list-style-type: none"> <li>• set out minimum requirements for the selection of all sub-contractors based on the questionnaires and assessment of the past HSE records and compliance</li> <li>• Define strict environmental and EHS terms for supplier/contractor into the EPC tender addressing forced labor, child labor, health and safety standards, E&amp;S standards and labor management policies;</li> <li>• require all contractors and suppliers to be screened before their involvement in the project</li> </ul>	Minimize E&S impacts in the supply chain	EBRD PR1, (para 23) EBRD PR2	NEGU PIU (supported by a third party consultant)	Pre-EPC Contract Signature (EPC contract Effective Date)	<ol style="list-style-type: none"> <li>1. Documented SCPP</li> <li>2. Evidence of SCPP appended to EPC Contract (construction)</li> <li>3. SCPP appended to any O&amp;M supply contracts (operation)</li> </ol>

	(including H&S and E&S risks); <ul style="list-style-type: none"> <li>• select contractors that demonstrate adequate capability in EHS and labor management, including managing subcontractors;</li> <li>• require periodic EHS compliance audits or inspections to ensure compliance of the suppliers/contractors with applicable national legislation and the EBRDs.</li> </ul>					
<b>1.16</b>	Develop Operational ESMP (including OHS plan and other relevant topic-specific plans)	Impact on environment and community during decommissioning	EBRD PR1	NEGU	60 days pre-hand-over.	Operational ESMP Operational sub-plans
<b>1.17</b>	Develop Decommissioning ESMP (including OHS plan and other relevant topic-specific plans)	Impact on environment and community during decommissioning	EBRD PR1	Decommissioning Contractor / NEGU	120 days pre-decommissioning	Decommissioning ESMP Decommissioning sub-plans
<b>2</b>	<b>Labor and Working Conditions</b>					
<b>2.1</b>	<b>Human Resources Management</b> The Company will provide an HR Policy <sup>8</sup>	Ensure adequate workforce management in line	EBRD PR2 Labor Code of Uzbekistan	NEGU	Pre-financial close	HR Policy

<sup>8</sup> Key areas to be covered by HR policy are the company's approach to managing workers and its commitment to meet national law and the EBRD Performance Requirements. It must include a clear statement on worker rights, rights related to hours of work, wages, overtime, compensation, and benefits, the right for each work to have a contract, requirements for collection of employee data, the worker grievance mechanism and forms of conflict resolution and discipline.

	(see corporate ESAP C2.1)	with EBRD requirements and the law of the Republic of Uzbekistan (including labor conditions, social security, minimum wage, working hours, no child/forced labor etc.).				
2.2	<b>Human Resources Management</b> - The Contractor will provide corporate level HR Policy. <sup>9</sup> (see corporate ESAP C2.1)	Ensure adequate workforce management in line with EBRD requirements and the law of the Republic of Uzbekistan (including labor conditions, social security, minimum wage, working hours, no child/forced labor etc.).	EBRD PR2 Labor Code of Uzbekistan	Main Contractor (supported by specialist) (own budget and resources)	60 days before Site mobilization	HR Policy

<sup>9</sup> Key areas to be covered by HR policy / Project labour commitment code are the company's approach to managing workers and its commitment to meet national law and the EBRD Performance Requirements. It must include a clear statement on worker rights, rights related to hours of work, wages, overtime, compensation, and benefits, the right for each work to have a contract, requirements for collection of employee data, the worker grievance mechanism and forms of conflict resolution and discipline.

<p><b>2.3</b></p>	<p><b>Site Human Resources Management</b> - Provide Project Labor Management Plan (LMP), including worker grievance mechanism and protocol for disclosure of WGM to permanent and subcontracted employees. on-site (must enable anonymous grievances to be submitted)</p>	<p>Ensure adequate workforce management in line with EBRD requirements and the law of the Republic of Uzbekistan (including labor conditions, social security, minimum wage, working hours, no child/forced labor etc.).</p>	<p>EBRD PR2 Labor Code of Uzbekistan</p>	<p>Main Contractor (supported by specialist) (own budget and resources)</p>	<p>60 days before Site mobilization</p>	<p>Labor Management Plan, including Worker grievance mechanism</p>
<p><b>2.4</b></p>	<p><b>Local Employment</b> - include local employment protocol in LMP to promote employment of workers from villages within 15 km of the OHLT route and to include a mechanism for promoting the Equal Opportunities Action Plan to promote good practices concerning gender and equal opportunities in the Contractors' workforce.</p>	<p>Maximize local employment opportunities and gender balance in the workforce.</p>	<p>EBRD PR2 ILO Best Practices Labor Law Compliance with national legislation</p>	<p>Main Contractor</p>	<p>60 days before Site mobilization</p>	<p>Construction Labor statistics are disaggregated by gender and skill level.  Local Employment and Procurement Procedure</p>
<p><b>2.5</b></p>	<p><b>Labor conditions</b> - hire an experienced independent third party to undertake quarterly labor audits on all sub-contractors following</p>	<p>Ensure the cascading of PR2 requirements through the contracting chain.</p>	<p>EBRD PR2 Uzbek Labor Law</p>	<p>Main Contractor (or specialist labor auditor)</p>	<p>Within one month of the appointment of each contractor and sub-contractor on-site</p>	<p>Labor audit report.</p>

	protocol defined in Contractor LMP (as approved by the Lenders)					
<b>2.6</b>	<b>Code of conduct</b> - Prepare a Worker Code of Conduct and require workers (and security personnel) to sign it during their site induction (this must include GBVH expectations) (see corporate ESAP C2.3)	Protection of workforce and local community members	ESIA, ESMP EBRD PR2	Main Contractor (supported by specialist) (own budget and resources)	60 days before Site mobilization COC signed within two weeks of the appointment of each contractor and sub-contractor on-site	Worker and Security Guard Code of Conduct  Signed Code of Conduct (for each worker)
<b>2.7</b>	<b>Accommodation management</b> - Prepare an Accommodation Management Plan (AMP) setting out the minimum requirements for all accommodation (camp and paid for), including a requirement to locate all equipment/work fronts, camps, stringing positions <b>at least 200 m</b> from all sensitive receptors and to include provision for a weekly accommodation inspection. (see corporate ESAP C2.6)	Provide adequate accommodation for workers in line with GIP welfare standards.	ESIA, ESMP EBRD PR2 EBRD and IFC 'Workers' Accommodation: Processes and Standards	Main Contractor (support by specialist) (own budget and resources)	60 days before Site mobilization	Document AMP

2.8	Conduct quarterly accommodation audits. (see corporate ESAP C2.6)	Provide adequate accommodation for workers in line with GIP welfare standards.	ESIA, ESMP EBRD PR2 EBRD and IFC 'Workers' Accommodation: Processes and Standards	Main Contractor (support by specialist) (own budget and resources)	Quarterly	Accommodation audit report (covering all accommodation types provided by Contractor)
<b>3</b>	<b>Resource Efficiency and Pollution Prevention and Control</b>					
3.1	Develop a construction Waste Management Plan (WMP) (this must include management of Temporary Waste Storage Areas at tower locations/laydown areas and end disposal options. (see corporate ESAP C3.2)	Ensure wastes are managed following ESIA requirements and GIP (in particular for hazardous waste disposal)	ESIA, ESMP National law EBRD PR3 Basel Convention	Main Contractor (own budget and resources)	60 days before site mobilization	Documented WMP
3.2	Develop construction water resource management plan (WRMP) including requirements to: <ul style="list-style-type: none"> <li>• Prohibit groundwater abstraction</li> <li>• Prohibit abstraction from water pipelines or water point sources along the Sarimay-Uzunkuduk-Muruntau road.</li> <li>• Prohibit placement of temporary worksites within 50 m of the water supply points or surface water features.</li> </ul>	Hazardous material control Compliance with national regulations	EBRD PR3 EBRD PR4	Main Contractor (own budget and resources)	60 days before Site mobilization	Documented WRMP accepted by Lenders

	)						
<b>3.3</b>	<p>Develop a construction hazardous material management plan (HMMP) including requirements to (see corporate ESAP C4.3):</p> <ul style="list-style-type: none"> <li>• Develop an inventory of materials and chemicals in construction works. Ensure that all Material Safety Data Sheet (MSDS) forms are available in the local language following the relevant regulation.</li> <li>• Ensure implementation of ESIA mitigation measures to prevent pollution, including the storage and segregation requirements for hazardous materials.</li> </ul>	Hazardous material control Compliance with national regulations	EBRD PR3 EBRD PR4	Main Contractor (own budget and resources)	60 days before Site mobilization	Documented HMMP accepted by Lenders	
<b>4</b>	<b>Health, Safety and Security</b>						
<b>4.1</b>	Develop a site-specific Occupational Health and Safety (OHS) management system, including procedures of a scale appropriate to the scope of work and the risks associated with each stage of the project construction. (see corporate ESAP C4.1)	Minimize accidents and incidents	H&S and	EBRD PR1 EBRD PR4 GIP for H&S Occupational Health and Safety Law	Main Contractor (own budget and resources)	60 pre-mobilization	OHSMP



4.2	Prepare a traffic and transportation Management Plan (TMP) (including road safety policy, access road requirements to minimize disturbance in local communities, practices and procedures, driver code of conduct, monitoring and training requirements including a defensive, off-road and antiskid driving training program for own drivers and sub-contractors drivers)	Reduce risks to community members and workers related to the transportation of components and workers to the construction camp and Workfront's	ESIA, ESMP EBRD PR4	Main Contractor (own resources and budget)	60 days before Site mobilization	TMP reviewed and accepted by Lenders
4.3	Prepare an emergency preparedness and response plan (EPRP). To include specific information on dust storms, medical service procedures, protocol for evacuation of injured personnel, drills and training requirements	Protection of workforce and communities in the case of an emergency	ESIA EBRD PR4	Main Contractor (own resources and budget)	60 days before Site mobilization	EPRP reviewed and accepted by Lenders
4.4	Security Management - Develop a Project Security Management Plan (SMP) <sup>10</sup>	Reduced security risks / keep the facilities secure	EBRD PR2 EBRD PR 4	Main Contractor	60 days before Site mobilization	Security Management Plan
5	<b>Land Acquisition, Involuntary Resettlement and Economic Displacement</b>					

<sup>10</sup> As relevant the SMP to include requirements for relevant training to security personnel on conflict resolution, crowd management, restraint and cautious exercise of the security activity, proportional use of force (if allowed) and basics of human rights, reference checks to ensure that candidates do not have any criminal record or record of abuse or violation of human rights.

5.1	Appoint third party to prepare a Livelihood Restoration Plan (LRP) following the compensation and entitlement matrix outlined in the Project Land Acquisition and Livelihood Restoration Framework (LARF). LRP to include a monitoring and evaluation framework for implementation.	Protection of land users and owners along the OHTL ROW and temporary works area	ESIA, LARF National Land Law EBRD PR5	NEGU PIU (supported by a specialist third party) (own resources, external consultants)	Pre-financing	LRP reviewed and accepted by lenders
5.2	Discharge all preconstruction requirements outlined in the LRP before construction, including compensation payments for formal landowners, information landowners and land users, and any livelihood restoration as defined in the LRP.	Protection of land users during the construction phase	ESIA/LARF National Law EBRD PR5 GIP	NEGU PIU (supported by a specialist third party) in coordination with District Khokimiyat	60 days before Site mobilization	LRP preconstruction closeout report approved by Lenders
5.3	Appoint third party specialist to conduct quarterly monitoring and evaluation (M&E) of LRP implementation.	Optimization of social management through a formalized system	ESIA, /LRP (to be developed) EBRD PR5	NEGU PIU is supported by third party specialists (Budget – own resources, external consultants)	A) Construction phase - quarterly (or until completion of all LRP obligations) b) a resettlement close-out audit to ensure resettlement implementation is being undertaken in accordance with the	LRP Monitoring and evaluation reports

					requirements outlined in LRP and remain consistent with PR5.	
<b>5.4</b>	Conduct awareness-raising activities with local farmers, herders and community members to reduce exposure when grazing livestock in the ROW.	Ensure return to livelihood activity (grazing/farming) under the line following the completion of construction	ESIA, LARF EBRD PR5	NEGU PIU ( supported by third party specialists (Budget – own resources, external consultants)	Within three months of completion of construction works	Evidence of event (e.g. leaflets, notifications, meetings)
<b>6</b>	<b>Biodiversity Conservation and Sustainable Management of Living Natural Resources</b>					
<b>6.1</b>	Preconstruction sensitive plant survey ( <i>Acanthophyllum cyrtostegium</i> , <i>Tulipa lehmanniana</i> , <i>Lepidum subcordatum</i> , other UZRDB category 1 or 2 species <sup>11</sup> ) including construction phase seed collection and replanting program	Impact on critical habitat, key biodiversity features	National Law, EBRD PR6, EU Habitats Directive	Main Contractor / NEGU PIU	60 days before Site mobilization	Construction phase plant /fauna rescue/relocation report
<b>6.2</b>	Restriction of construction activity to outside of April and May, in the nesting period for MacQueen's Bustard (applies to the eastern half of the OHTL	Minimize risk of impact to avifauna	ESIA, ESMP GIP, PR6	Main Contractor	60 days before Site mobilization	OHTL tower specification (reviewed and accepted by the Lender)
<b>6.3</b>	Install Bird Flight Diverters on overhead or static lines of the	Minimize risk of impact to avifauna	ESIA, ESMP GIP, PR6	Main Contractor / NEGU PIU	60 days before Site mobilization	OHTL tower specification (reviewed and

<sup>11</sup> The Spring / summer flora survey (planned 2024) will be used to update this ESIA and provide further clarity on the distribution of any additional UZRDB category 1 or 2 species in the ROW.

	OHTL following GIP within high-risk portions of the lines: <ul style="list-style-type: none"> <li>o westernmost 5 km of the OHTL;</li> <li>o a 7 km stretch of OHTL centred on Lake Pustynnoe</li> </ul>					accepted by the Lender)
<b>6.4</b>	Adopt "Raptor safe" pylon designs for the entire OHTL: <ul style="list-style-type: none"> <li>o electrified cables suspended below, rather than above support structures;</li> <li>o ≥2m of insulators at each attachment point of a powerline to a support structure;</li> <li>o ≥2m separation between electrified cables;</li> <li>o jumper cables suspended below insulators/support structures</li> </ul>	Minimize risk of impact to avifauna	ESIA, ESMP GIP, PR6	Main Contractor / NEGU PIU	60 days before Site mobilization	OHTL tower specification (reviewed and accepted by the Lender)
<b>6.5</b>	Conduct Micro siting of pylons and access roads to avoid takys to the extent possible within the potential habitat of SEFG.  Conduct micro siting of pylons and access roads to avoid Tulipa lehmanniana, Lepidum subcordatum, Acanthophyllum cyrtostegium, and any other UZRDB plants of conservation	Minimize risk of impact to SEFG.	ESIA, ESMP GIP, PR6	Main Contractor / NEGU PIU	60 days before Site mobilization	Mapping of takys and OHTL towers (reviewed and accepted by the Lender)

	categories 1 or 2, if discovered in preconstruction surveys, to the extent possible.					
<b>6.6</b>	Prepare a vegetation clearance plan (VCP), including soil management sedimentation control.	Minimize risk of soil degradation and compaction leading to erosion	ESIA, ESMP GIP	Main Contractor	60 days before Site mobilization	SCP (reviewed and accepted by the Lender)
<b>6.7</b>	Develop and implement a Biodiversity Management Plan (BMP), including off-site vegetation restoration/rehabilitation plan to compensate for all permanent habitat loss generated by the Project, noting that some species are defined as PBF and therefore subject to the "no net loss" mitigation standard.	Protect PBF's and other habitat during construction works	ESIA, ESMP PR6	Main Contractor	60 days before Site mobilization	BMP (reviewed and accepted by the Lender)
<b>6.8</b>	Install temporary fencing around takyr within 50 m of works to exclude people, heavy machinery, equipment laydown, or any vehicles.	Impact on critical habitat, key biodiversity features – in particular, protection of SEFG close to the direct construction area	National Law, EBRD PR6, EU Habitats Directive	Main Contractor (ecological officer)	Before mobilization of work activities at each tower location.	Activity Method statement. Evidence of sign-off of each tower Workfront by the ecological officer.
<b>6.9</b>	Employ an ecological officer to be present on-site during excavation to assure compliance with construction phase mitigation measures and conduct daily searches of	Impact on critical habitat key biodiversity features during foundation works.	ESIA, ESMP EBRD PR6	Main Contractor (budget for the duration of foundation works)	60 days before Site mobilization	Signed Contract and CV

	Work fronts and animal rescue from open trenches.					
<b>6.10</b>	Implement a Five-year aftercare and monitoring program covering all temporarily disturbed areas.	To ensure soil and associated vegetation cover is returned to its original state.	ESIA, ESMP EBRD PR1	Main Contractor (immediate restoration and replanting)  NEGU (ongoing aftercare)	Annually, from the finalization of conductor stringing	Annual rehabilitation status report
<b>6.11</b>	Conduct post-construction bird fatality (PCBF) monitoring form collisions and electrocutions along the entire line for the first three years of Project operation with specific field and analytical methodologies applied to correct for well-known biases in carcass searching data, including searcher efficiency (detectability), carcass removal (scavenging), and crippling bias.	Collision impact on bird species	ESIA, ESMP EBRD PR6 Good Practice Handbook and Decision Support Tool (IFC/EBRD) – 2023.	NEGU	Annually, from energisation.	Bird Fatality Monitoring Report
<b>7</b>	<b>Cultural Heritage</b>					
<b>7.1</b>	Develop and implement chance finds procedure to include a requirement to notify Competent Authority (Cultural heritage) (OHTL)	Protection of unknown cultural heritage	ESIA, ESMP National legislation EBRD PR1, 8	Main Contractor supported by cultural heritage specialist (budget allocation in EPC Contract) Overseen by PIU	60 days before Site mobilization or any site clearance works (whichever is earlier) for the duration of foundation works	Documented 'Chance Finds Procedure'  Evidence of training, e.g. (induction / Toolbox talk)
<b>8</b>	<b>Information Disclosure and Stakeholder Engagement</b>					

<p><b>8.1</b></p>	<p>The project will appoint a suitably qualified community liaison team to be able to implement the Stakeholder Engagement Plan, LALRP, Community Grievance Mechanism and other key community related management plans. (see corporate ESAP C10.2)</p>	<p>Protect social license to operate.</p>	<p>EBRD PR10 EBRD PR5</p>	<p>NEGU PIU</p>	<p>60 days before Site mobilization</p>	<p>CVs and ToR of CLO team acceptable to IFC</p>
<p><b>8.2</b></p>	<p>Implement the Project Stakeholder Engagement Plan (SEP) and update it at least annually.</p>	<p>Protect social license to operate.  Maintain effective relationships with stakeholders (including land users)</p>	<p>EBRD PR10 EBRD PR5</p>	<p>NEGU PIU supported by the Main Contractor (Costs associated with printing of any notification material leaflets, posters and performing SEP updates)</p>	<p>A)pre-construction stakeholder engagement and information disclosure activities as outlined in the SEP,  b) Consultation throughout construction  c) Consultation on local hiring policy – pre-mobilization</p>	<p>Monthly reporting on stakeholder engagement activities (e.g. in monthly progress report) (construction)  Stakeholder communication log  Stakeholder grievance log</p>

<p><b>8.3</b></p>	<p>Implement Community Grievance Mechanism (including land users)<sup>12</sup></p> <p>Develop Grievance Form</p> <p>Develop Grievance Log<sup>13</sup></p> <p>See corporate ESAP (C10.3)</p>	<p>Maintain effective relationships with stakeholders (including land users)</p>	<p>EBRD PR10 EBRD PR5</p>	<p>NEGU PIU (construction) Regional Department NEGU (operation)</p>	<p>Pre-site mobilization (to be implemented for the duration of the project lifetime)</p>	<p>Document Community Grievance Record of notification of contact information to all PAP (including those affected by livelihood restoration) Mechanism Grievance Log Records of Engagement</p>
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<sup>12</sup> This should include clear means of registering complaints, an action process to resolve them, and recording of complaints and their resolution and mechanism to oversee contractor management of grievances as outlined in the SEP to ensure conformance.

<sup>13</sup> Grievance Log must enable specific data on type of grievances received, status (open/closed), gender disaggregated data for complainants.



<p><b>8.3</b></p>	<p>Implement a stakeholder communication program and community grievance mechanism (operation) See corporate ESAP (C10.1)</p>	<p>Protect social license to operate.  Maintain effective relationships with stakeholders (including land users)</p>	<p>EBRD PR10 EBRD PR5</p>	<p>NEGU PIU</p>	<p>Consultation throughout construction and operation  Consultation on local hiring policy – pre-mobilization</p>	<p>Annual review and update to SEP (operation)  Stakeholder communication log  Stakeholder grievance log</p>
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