

## Environmental and Social Action Plan (ESAP) for Sarimay-Dzhankedy Transmission (V2.1, April 2025)

Environmental and Social Action Plan (rev 2.1. 05/05/2025- updated to include the Sarimay SS expansion works)

### Abbreviations

Acronym	Definition
<b>CESMP</b>	Construction Environmental and Social Management Plan
<b>COD</b>	Commercial Operation Date
<b>CWMP</b>	Construction Waste Management Plan
<b>E&amp;S</b>	Environmental and Social
<b>EBRD</b>	European Bank for Reconstruction and Development
<b>EIA</b>	Environmental Impact Assessment
<b>EHS</b>	Environment, Health and Safety
<b>EP</b>	Environmental Permit
<b>EPC</b>	EPC (Contractor) Engineering, procurement, and construction (Contractor)
<b>ESAP</b>	Environmental and Social Action Plan
<b>ESIA</b>	Environmental and Social Impact Assessment
<b>ESG</b>	Environment, Social and Governance
<b>ESMP</b>	Environmental and Social Management Plan (prepared as part of the ESIA process)
<b>ESMS</b>	Environmental and Social Management System
<b>HR</b>	Human resources
<b>IFC</b>	International Finance Corporation
<b>ISO</b>	International Standards Organization
<b>KPIs</b>	Key Performance Indicators
<b>LARF</b>	Land acquisition and resettlement framework
<b>LRP</b>	Livelihood restoration Plan
<b>LTA</b>	Lenders Technical Advisor
<b>NEGU</b>	J.S.C NEGU (Owner)
<b>OHS</b>	Occupational Health and Safety
<b>OESMP</b>	Operation Environmental and Social Management Plan
<b>PIT</b>	Project Implementation Team (NEGU)
<b>PR</b>	Performance Requirements
<b>PS</b>	Performance Standards
<b>SEE</b>	State Ecological Expertise
<b>SEP</b>	Stakeholder Engagement Plan

### Status Key

Status	Definitions
Not due yet	ESAP action target date for completion is not passed
NEW Action	New action for the Sarimay SS. Not due at this time.
Closed	Action completed in full.
No information provided to support progression of this action – OPEN	During the S-D OHL Audit, information on this topic was requested but no information provided. Action is not progressed.
Partially completed.	During the S-D OHL Audit, some information related to this topic was provided/observed. Refer to S_D OHL audit report for further details.

## Environmental and Social Action Plan (ESAP) for Sarimay-Dzhankedy Transmission (V2.1, April 2025)

Table 1: ESAP, version 2.1 updated April 2025

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	Status April 2025
<b>0 Corporate actions</b>							
<b>0.1</b>	Develop and maintain a corporate EHS management system including corporate ESG Policy in line with international standards to enable the implementation of Project commitments on the Project.	Corporate reporting does not meet PR1 requirements	EBRD PR1 GIP	NEGU (Corporate) (operation) (own resources, supported by external consultants)	2 years post COD	Corporate EHS management system	Not due yet.
<b>0.2</b>	Develop and implement a corporate ESG reporting on corporate sustainability reporting. This will include information on ESG performance, KPIs, such as H&S, labor and gender reports and statistics outlining positive employment actions and mechanisms for promoting women or other “vulnerable” groups in the Company & other relevant sustainability indicators.	Corporate reporting does not meet PR1 requirements	EBRD PR1 GIP	NEGU (Corporate) (Own resources, supported by external consultants)	2 years post COD	Corporate ESG reporting procedure and 1st annual reports	Not due yet.
<b>1 Assessment and Management of Environmental and Social Impacts and Issues</b>							
<b>1.0</b>	Conduct E&S risk assessment to	Adequate ID of	EBRD PR1	Sarimay SS	Following	ES7 risk	NEW Action.

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	confirm construction risks and required mitigation measures., including H&S, environmental, community health and, safety and security risks)	E&S risks		Contractor	Contractor appointment and before start of construction works -	assessment appended to the Contract tender document	
1.1	i) Assign a dedicated E&S responsible person (including communication and labour specialist) 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) as they pertain to the a) S-D OHLT and b) the Sarimay SS expansion works.	Adequate E&S oversight for the construction and operation phase	EBRD PR1	NEGU PIT (EBRD PR1 NEGU (Regional Department) (operation)  (own resources, supported by external consultants)	ia) Construction - Financial Close ib) October 2025  ii) Operation Pre-COD	Dedicated E&S responsible person - Name and contact details.	a)S-D OHLT - CLOSED.  b)Sarimay SS - Open  ii) Operation - Open (not due)
1.2	Develop a project-level Environmental and Social Management System (ESMS) to oversee construction phase works for S-D OHLT and Sarimay SS, including E&S Policy, procedures, and forms for managing: <ul style="list-style-type: none"> <li>E&amp;S Policy</li> <li>Legislative compliance</li> <li>Roles and responsibility</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 PIT (own resources, supported by external consultants)	September 2025	Project ESMP (can be combined or separate for the Sarimay SS expansion works) and supporting procedures, forms and templates outlining the ESMS (reviewed and accepted by	No information provided to support progression of this action – OPEN

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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	Status April 2025
	for E&S management <ul style="list-style-type: none"> <li>• Operations ESMP</li> <li>• Training Plan (of PIT)</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>• Worker grievances</li> <li>• Subcontractors' EHS management and third-party safety practices in the ESMS</li> <li>• Occupational health and safety</li> </ul>					the Lender)  Appended to EPC Contract  ESMS Audit report	
1.3	Develop Owner Permit Matrix including:  Positive Conclusion of SEE for the national EIA report (Stage III) S-D OHL and Sarimay SS expansion works	Compliance with national legislation Approved EIA/OVOS	EBRD PR1 National Law and Regulation	NEGU PIT (development and construction) Regional NEGU department (operation)	Other permits prior to works on-site (construction) 30 September 2025	Permit matrix (Owners)  Positive Conclusion (s) of SEE for the national EIA report (Stage III)	No information provided to support progression of this action – OPEN  Positive conclusion - Open (not due)

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1.4	Verify EPC Contract includes provisions for compliance with Project E&S standards, including: <ul style="list-style-type: none"> <li>National Law</li> <li>EBRD ESP 2019</li> </ul>	Regulatory and Lender compliance	Uzbekistan Standards and EBRD ESP	NEGU PIT (own resources, external consultants)	30 June 2025	Signed EPC Contract  Signed Sub-contracts	No information provided to support progression of this action – OPEN
1.4a	Develop a Sarimay SS EPC Contract E&S Specification defining E&S obligations based on findings of the E&S assessment. Include the following obligations in the Contract E&S Schedule: <ul style="list-style-type: none"> <li>i) Laydown area to be within the fenced site boundary.</li> <li>ii) Perimeter fence to be completed before equipment delivery and construction works.</li> <li>iii) seek standardisation of materials and building elements into the design, e.g. the use of prefabricated components;</li> <li>iv) ii) Materials will be ordered to size and</li> </ul>	Regulatory and Lender compliance	Uzbekistan Standards and EBRD ESP	NEGU PIT (own resources, external consultants)	30 June 2025 (Sarimay SS works)	E&S Schedule part of EPC Contract.	NEW action.

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	<p>v) actual requirements to reduce overordering and potential wastage, source construction materials from suppliers with responsible sourcing certification.</p> <p>vi) Use local suppliers where possible.</p> <p>vii) Prohibit the use of ACMs, PCPs, lead-based paints, Pesticides, and herbicides defined under the Stockholm 3.3) Convention.)</p> <p>viii) Appropriate earthing, noise enclosures around the Site, reuse of all material on Site for levelling or landscaping, elevations support the natural relief, surface water run-off drainage to minimise erosion and</p>						

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	<p>permanent below-ground foul water \septic tank or oil separators.</p> <p>ix) Landscape planting design for compliance with national EIA.</p> <p>x) Design for correct earthquake zone specifications.</p> <p>xi) Areas such as compounds that may require additional security measures such as lighting, or closed-circuit television.</p>						
1.5	Establish construction phase ESMS for implementing the requirements of the ESIA and ESMP. (may be combined or separate for S-D OHTL and Sarimay SS, depending on contracting scope of work for 2 components)	E&S compliance	EBRD PR1 Aligned to ISO14001:2015 and & ISO 45000 (or equivalent certified integrated management systems)	Main Contractor (own resources, external consultants)	<p>42 days before site mobilization</p> <p>Close Lender corrective actions - 30 July 2025.</p>	E&S Policy, ESMS manual including supporting policies, procedures, and method statements reviewed and accepted by the Lender (e.g., aspects impact register and legal	Partially completed, refer to S-D OH Audit report for corrective actions.

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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	Status April 2025
						register, CESMP, etc.)	
1.6	Prepare / Update and implement a Construction Environmental and Social Management Plan (CESMP) (including any relevant supporting sub-plans as defined by ESIA and ESMP) (may be combined or separate for S-D OHTL and Sarimay SS, depending on contracting scope of work for 2 components). CESMP to include GIP for managing construction nuisance (AQ, noise), wastewater management, water use, community safety, management of contaminated land (where confirmed), access and egress, security, biodiversity management, land restoration, chance finds procedure for below ground excavation works)	Optimization of environmental and social management through a structured management plan	ESIA, ESMP EBRD PR1	Main Contractor (own resources, external consultants) /Sarimay SS Contractor	42 days before site/contractor mobilization.  Close Lender corrective actions - 30 July 2025	Documented CESMP	Partially completed, refer to S-D OHL Audit report for corrective actions.
1.7	As part of the Contractor CESMP (s), develop an EHS monitoring program (contractor and subcontractor activities) including: <ul style="list-style-type: none"> <li>OHS and E&amp;S statistics (as per ESMP, including waste)</li> </ul>	Optimization of environmental and social management through a formalized	EBRD PR1 EBRD PR3 EBRD PR4 National Air Pollution Control Regulation	Main Contractor (s) (own resources, external consultants) /Sarimay SS	42 days prior to site mobilization.  Close Lender corrective actions - 30 July 2025	E&S Monitoring Program Records of regular inspection and audits, including (but not limited to) observation/non-	Partially completed, refer to S-D OHL Audit report for corrective actions



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	<ul style="list-style-type: none"> <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> <li>GHG emissions (fuel and electricity use)</li> <li>Water use.</li> </ul> <p>Continual oversight in working areas, alongside regular inspection and audits.</p> <p>Verification of effective accident/incident reporting</p>	<p>system.</p> <p>Protection of environment and human health</p> <p>Reduced contractor-related EHS risks.</p> <p>Protection of company reputation</p>	National Water Pollution Control Regulation	Contractor		<p>conformity trackers, corrective action plans and evidence of actions being implemented.</p> <p>Records of contractor accidents/incident reporting.</p>	
1.8	<p>Appoint site E&amp;S team with relevant qualifications, defined roles and responsibilities, and authority.</p> <p>Site E&amp;S team to include: H&amp;S Manager, site environmental officer, Site H&amp;S officer (or combined EHS manager) for each Lot, HR officer, community</p>	Ensure implementation of E&S management plans	EBRD PR 1 (para 21)	Main Contractor (own resources, external consultants)	Close Lender corrective actions - 30 July 2025	<p>Organogram of reference/job descriptions for key roles</p> <p>CV for the designated person(s)</p> <p>Evidence of</p>	Partially completed, , refer to S-D OH Audit report for corrective actions.

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	liaison officer (CLO), Biodiversity monitor (site clearance and excavation works), project archaeologist.					appointment (contract)	
<b>1.8a</b>	Appoint HSE oversight for Sarimay SS Expansion works (HSE Manager and supporting HSE officers), Communication officer (may be combined with HSE Manager role)	Ensure implementation of E&S management plans	EBRD PR 1 (para 21)	Sarimay SS Contractor (own resources, external consultants)	October 2025.	Organogram of Terms of reference/job descriptions for key roles CV for the designated person(s) Evidence of appointment (contract)	NEW action.
<b>1.9</b>	Develop a Contractor Permit Matrix and obtain all required construction permits. (separately or combined for S-D OHTL and Sarimay SS)	National compliance	EBRD PR1 National Law and Regulation	Main Contractor (own resources, external consultants)	42 days prior to site mobilization (construction phase) [April 2025 - Close Lender corrective actions - 30 July 2025]	Permit matrix Evidence of all relevant permits.	No information provided to support progression of this action – OPEN
<b>1.10</b>	Organize E&S and OHS awareness training for all employees and sub-contractors. (separately or combined for S-D OHTL and Sarimay SS)	Optimization of environmental and social management through a formalized	EBRD PR1	Main Contractor (own resources, external consultants)	Construction phase [April 2025] - Close Lender corrective actions - 30 July 2025	Documented training plan (matrix), training program (timeline) and records of training taking place (attendance)	No information provided to support progression of this action – OPEN

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		system				Training records.	
1.11	<p>Prepare a Supply Chain Procurement Policy (SCPP). SCPP must</p> <ol style="list-style-type: none"> <li>1) 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>2) 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>3) Require all contractors and suppliers to be screened prior to their involvement in the Project (including H&amp;S and E&amp;S risks).</li> <li>4) Select contractors that demonstrate adequate</li> </ol>	Minimize E&S impacts in the supply chain.	EBRD PR1, (para 23) EBRD PR2	NEGU PIT (supported by a third-party consultant)	<p>Pre-EPC Contract Signature (<i>EPC contract Effective Date</i>)</p> <p>[April 2025 update] - September 2025.</p>	<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>	No information provided to support progression of this action – OPEN

**Environmental and Social Action Plan (ESAP) for Sarimay-Dzhankedy Transmission (V2.1, April 2025)**

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	Status April 2025
	<p>capability in EHS and labor management, including managing subcontractors.</p> <p>5) Require periodic EHS compliance audits or inspections to ensure compliance of the suppliers/contractors with applicable national legislation and the EBRD's</p> <p>2. Include SCPP in the EPC contract.</p>						
1.12	<p>Establish a Contactor Supply Chain Management Procedure which includes</p> <p>i) Screening protocol (suppliers and sub-contractors).</p> <p>ii) Require contractors to demonstrate credentials relating to the prohibition of forced and child labor in their supply chain and demonstrate health and safety standards</p>	Minimize E&S impacts in the supply chain.	ESIA, ESMP EBRD PR1 EBRD PR2	Main Contractor (own resources, external consultants)	<p>1. Pre-mobilization [April 2025 update] - September 2025.</p> <p>2. During the project lifetime checks are to be made before signing each sub-contractor's agreement</p>	<p>Supply Chain Management Procedure, including screening protocol.</p> <p>Due diligence and screening pre-qualification report (per contractor/supplier) against SCMP and screening protocol.</p>	No information provided to support progression of this action – OPEN

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	that align with GIP and robust labor management policies as part of the bidder selection process.					Evidence of back-to-back E&S commitments in agreements with suppliers/sub-contractors to ensure alignment with applicable project standards.	
1.12a	Provide supply chain audit for the supply of transformers for Sarimay SS Expansion.	Minimize E&S impacts in the supply chain.	ESIA, ESMP EBRD PR1 EBRD PR2	SS Contractor	November 2025	Transformer supply chain due diligence and screening report.	NEW action.
1.13	Develop Decommissioning ESMP (including OHS plan and other relevant topic-specific plans) (separately or combined for S-D OHTL and Sarimay SS).	Impact on environment and community during decommissioning	EBRD PR1	Decommissioning Contractor / NEGU	120 days pre-decommissioning	Decommissioning ESMP Decommissioning OHS Decommissioning sub-plans	Not due yet.
1.14	Provide evidence that the following have been included in the EPC Design Specification: <ul style="list-style-type: none"> <li>• Full tension stringing</li> <li>• 200m between receptors and OHTL centre line</li> <li>• Bird Flight Diverters on overhead or static lines of the OHTL following GIP</li> </ul>	Reduce E&S impacts through design	EBRD PR1 EBRD PR 6	NEGU PIT	30 September 2025	EPC Contract /Design drawings	Not confirmed.

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	<p>within high-risk portions of the lines<sup>1</sup></p> <ul style="list-style-type: none"> <li>Raptors safe towers<sup>2</sup></li> <li>Micro siting of pylons and access roads to avoid takys to the extent possible within the potential habitat of SEFG, Lepidium subcordatum to the extent possible</li> <li>No access track along the entire ROW. Use existing roads where possible to access the tower Work fronts.</li> </ul>						
1.15	<p>Provide evidence that the following have been included in the Master Schedule:</p> <ul style="list-style-type: none"> <li>Groundworks are performed outside the wet season.</li> <li>Restriction of</li> </ul>	Reduce E&S impacts through design	EBRD PR1 EBRD PR6	NEGU / S-D OHTL Main Contractor	<p>Pre-EPC Contract Signature (EPC contract Effective Date)</p> <p>April 2025 - Close Lender corrective</p>	S-D OHTL EPC Contract - Schedule	Non-compliant.

<sup>1</sup> All of Lot 2 (40.687271° 64.625539° to 40.620080° 64.705109°), westernmost 5 km of Lot 1 (41.097761° 61.969967° to 41.098389° 62.029836°), eastern 33% of Lot 1 (41.008969° 62.943141° to 40.870647° 63.386358°)

<sup>2</sup> Electrified cables suspended below, rather than above support structures, ≥2m of insulators at each attachment point of a powerline to a support structure, ≥2m separation between electrified cables, Jumper cables suspended below insulators/support structures

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	construction activity to the outside of April and May for Goitered Gazelle (GG) & Macqueen's Bustard (as per ESIA)				actions - 30 July 2025]		
1.16	The Project must undertake Quarterly Construction Monitoring audits of construction activities by Environmental, Health and Safety, Social, and Labor (EHSS) specialists. (separate or combined for the S-D OHLT and Sarimay SS)	Prevention of environmental damage, accident prevention, adequate labor working conditions, and cooperation with the administration. Supervision of implementation of environmental consent decisions for construction works	Good Practice EBRD: PRs Regulations Environmental Regulations Environmental Consent	Cost of Independent Environmental & Social Consultant,	During Construction [April 2025 update - Schedule to be confirmed by 30 September 2025]	Audit reports are to be provided to Lenders. (In addition to regular monthly monitoring reports).	No information provided to support progression of this action – OPEN
1.17	The Project shall be subject to an independent annual Operational Monitoring audit by Environmental, Health and Safety,	Confirm the implementation of biodiversity mitigation.	GIP EBRD: PRs National laws	Cost of Independent Environmental & Social	First-year post COD	Audit reports are to be provided to Lenders.	Not due yet.

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	Social, and Labor (EHSS) specialists.			Consultant,			
<b>1.18</b>	Conduct pre-construction survey work, including: i) Soil sampling around the Site. ii) Photographic record of current site status (noting site levelling works have already commenced).	E&S Assessment to support the protection of the environment and workers.	EBRD PR1	Sarimay SS Contractor	30 November 2025 (to record the status of post-site levelling works and handover to works under the financing scope)	Soil sampling report Photographic record of Site (at start of construction)	NEW action.
<b>2</b>	<b>Labor and Working Conditions</b>						
<b>2.1</b>	Provide a Human Resource (HR) Policy that aligns with the NEGU Project Labor Agreement, e.g., 2.2 below). <ul style="list-style-type: none"> <li>Working conditions</li> <li>Terms of employment</li> <li>Informing workers about their rights</li> <li>Child Labor</li> <li>Forced labor</li> <li>Equal opportunities/non-discrimination</li> <li>Workers organizations</li> </ul>	Ensure adequate workforce management in line with EBRD requirements and Law of the Republic of Uzbekistan (including labor conditions, social security, minimum wage, working hours, no	EBRD PR2 Labor Code of Uzbekistan	i) S-D OHTL and ii) Sarimay SS Contractor (own budget and resources)	i) 42 days before Site mobilization [April 2025 - Close Lender corrective actions - 30 July 2025]  ii) 30 November 2025	HR Policy Labor Management Plan Worker grievance mechanism	No information provided to support progression of this action – OPEN



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	<ul style="list-style-type: none"> <li>Worker's Accommodation Regulations and Workers' Accommodation: processes and standards; (A guidance note by IFC and the EBRD, September 2009)</li> <li>Occupational Health and Safety</li> <li>Grievance mechanism for all workers on the project site.</li> </ul>	child/forced labor etc.).					
2.2	Develop Project Labor Code of Conduct for signature by all employees working on the Project (S-D OHTL and Sarimay SS expansion work) and all Contractor and sub-contractors. To be appended to the EPC Contract.	Ensure adequate workforce management per EBRD requirements and the Law of the Republic of Uzbekistan.	EBRD PR2 Labor Code of Uzbekistan	NEGU PIT (supported by a third-party specialist)	i) Before EPC Contract signature for the duration of the Project. ii) 30 November 2025	Project Labor Code of Conduct aligned to EBRD PR2 and national Law appended to EPC Contract.	i) Labour code of conduct established for S-D OHTL - Closed. ii) NEW ACTION
2.3	Develop Local Employment and Procurement Plan, including Equal Opportunities Action Plan to promote good practices concerning gender and equal	Maximize local employment opportunities and gender balance in the	EBRD PR2 ILO Best Practices Labor Law Compliance	Main Contractor	i) 42 days before Site mobilization. [April 2025 update - Close Lender corrective actions -	Construction Labor statistics disaggregated by Gender and skill level.	No information provided to support progression of this action – OPEN

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	opportunities in the Contractors' workforce and include checks for child labor, forced labor, OHS and biodiversity risks in the supply chain.	workforce.	with national legislation		30 July 2025] ii) November 2025	Local Employment and Procurement Procedure	
2.4	Establish and disclose Worker Grievance Mechanism (WGM) for permanent and subcontracted employees.	Improved employee/subcontractor relationship and management	EBRD PR2 GIP	Main Contractor	Prior to any site works and continued for the lifetime of the Project. [April 2025 update - Close Lender corrective actions - 30 July 2025]	Documented WGM  Evidence of disclosure  WGM Log, including raised grievances and resolutions.	Partially completed.
2.4a	Expand S-D OHTL WGM to include Sarimay SS workers OR expand existing Sarimay SS WGM to workers on the Sarimay SS site and future Contractor workers.	EBRD PR2 GIP	EBRD PR2 GIP	NEGU	30 November 2025	Evidence of disclosure (TBTs, posters)	NEW action.
2.5	Perform labor monitoring on all contractors and sub-contractors following the protocol defined in Contractor LMP (as approved by the Lenders).	Ensure the cascading of PR2 requirements through the contracting chain.	EBRD PR2 Uzbek Labor Law	Main Contractor /Sarimay SS Contractor (via specialist labor auditor)	via annual reporting [April 2025 update - Close Lender corrective actions - 30 July 2025]	Labor audit report submitted twice per year and approved by Lenders	No information provided to support progression of this action – OPEN

### Environmental and Social Action Plan (ESAP) for Sarimay-Dzhankedy Transmission (V2.1, April 2025)

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	Status April 2025
<b>2.6</b>	Develop a Project Security Management Plan (SMP) <sup>3</sup>  Conduct reference checks on all security personnel and confirm required training.	Reduced security risks / keep the facilities secure.	EBRD PR2 EBRD PR 4	S-D OHL Main Contractor	42 days before Site mobilization  Prior to the appointment of security personnel [April 2025 update - Close Lender corrective actions - 30 July 2025]	Security Management Plan Training records.  Copies of reference checks.	No information provided to support progression of this action – OPEN
<b>2.6a</b>	Include a plan for Sarimay SS construction security arrangements in CESMP (see ESAP Action 1.6 above)	Reduced security risks / keep the facilities secure.,	EBRD PR2 EBRD PR 4	Sarimay SS Contractor	November 2025	CESMP, including a section on Security aligned with PR4.	NEW action.
<b>2.7</b>	Prepare a Worker and Security Guard Code of Conduct and require workers (and security personnel) to sign it during their site induction (including GBVH expectations).	Protection of workforce and local community members	ESIA, ESMP EBRD PR2	Main Contractor (supported by a specialist) (own budget and resources).	November 2025	Worker and Security Guard Code of Conduct  Signed Code of Conduct (for each worker)	No information provided to support progression of this action – OPEN
<b>2.7a</b>	All workers are to sign the Worker Code of Conduct (can be the same CoC used for the S-D OHTL; refer	Protection of workforce and local	ESIA, ESMP EBRD PR2	Sarimay SS Contractor	March 2026	Signed Code of Conduct (for each worker)	No information provided to support progression of this

<sup>3</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.

### Environmental and Social Action Plan (ESAP) for Sarimay-Dzhankedy Transmission (V2.1, April 2025)

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	Status April 2025
	to ESAP action 2.7 above)	community members					action – OPEN
2.8	Prepare an Accommodation Management Plan (AMP) per IFC/EBRD guidance on worker accommodation 2009.  Audit accommodation against IFC/EBRD guidance on worker accommodation 2009.	Provide adequate accommodation for workers in line with GIP welfare standards.	ESIA, ESMP EBRD PR2 EBRD and IFC 'Workers' Accommodation: Processes and Standards	S-D OHTL and Sarimay SS Main Contractor (support by specialist) (own budget and resources)	42 days before Site mobilization  Within 1 month of mobilization [April 2025 - Close Lender corrective actions - 30 July 2025]	AMP submitted for Lender's clearance  Accommodation monitoring report twice per year.	No information provided to support progression of this action – OPEN
2.9	Develop and implement a sexual harassment policy to prevent and address any form of violence or harassment, including any form of gender-based violence or harassment (GBVH). Training on this policy will be provided to all employees and contractors. Human resources personnel will also be trained on how to respond to incidents of GBVH.	Protection of workers and project stakeholders from GBVH risks and aligning the Project's GBVH policy with EBRD Requirements.	Good Practice EBRD: PR 1 / 2 / 4	NEGU (Internal Costs).	rior to Financial Close.  [April 2025 update - Close Lender corrective actions - 30 July 2025]	GBVH Policy, which all employees have access to.  Signed GBVH Policy (all workers)	No information provided to support progression of this action – OPEN
3	<b>Resource Efficiency and Pollution Prevention and Control</b>						
3.1	Develop a Waste Management Plan (WMP) for the construction phase. WMP must require Temporary Waste Storage Areas	Ensure wastes are managed following ESIA	ESIA, ESMP National Law EBRD PR3 Basel	Main Contractor (own budget and resources).	42 days prior to site mobilization / prior to start of construction	Documented WMP  Appropriate waste storage areas in	Partially completed, refer to S-D OHTL Audit report for

### Environmental and Social Action Plan (ESAP) for Sarimay-Dzhankedy Transmission (V2.1, April 2025)

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	Status April 2025
	following the technical specifications set by the Ministry and/or Municipality and requirements to obtain permit for the Temporary Waste Storage Areas where necessary and relevant requirements under national laws for transportation and disposal of waste <sup>4</sup> .	requirements and GIP (for hazardous waste disposal)	Convention	Sarimay SS contractor (own budget and resources)	(Sarimay SS works) - [April 2025 update - Close Lender corrective actions - 30 July 2025]  Temporary waste storage areas are to be established prior to waste being generated on-site	line with the regulations and this ESAP. Waste audit records	corrective actions.
<b>3.1a</b>	Confirm construction waste disposal handlers are licenced and align with GIP for storage and disposal of general and construction waste (including low-level hazardous waste). Where standards are not aligned with GIP, alternative waste disposal solutions must be contracted for disposal (this may result in waste requiring more specific segregation and transportation outside the region).	Ensure wastes are managed following ESIA requirements and GIP (for hazardous waste disposal)	EBRD PR3	Sarimay SS Contractor	[April 2025 - Close Lender corrective actions - 30 July 2025]	Waste facility audit report.	No information provided to support progression of this action – OPEN
<b>3.2</b>	As part of the Operational ESMP,	Ensure wastes	National Law	NEGU PIT in	Pre-COD.	Waste statistics	Not due yet.

<sup>4</sup> Temporary Waste Storage Areas should be appropriately fenced, have a concrete floor and roof for protection from rainfall, have separate areas for each type of waste and include necessary collection pits/secondary containment.

### Environmental and Social Action Plan (ESAP) for Sarimay-Dzhankedy Transmission (V2.1, April 2025)

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	Status April 2025
	define waste management strategy for Project O&M waste streams (S-D O&M works and Sarimay SS O&M works).  Waste audit to confirm operational waste management aligned with GIP.	are managed in accordance with ESIA requirements and GIP (for hazardous waste disposal)	GIP	coordination with NEGU Regional Department (own resources / external consultant)	One year post COD	Waste audit report.	
3.3	Develop hazardous material management plan (HMMP) (stand-alone or part of the CESMP, action 1.6 above)  - Develop an inventory of materials and chemicals construction works. Ensure that all Material Safety Data Sheet (MSDS) form available in local language in accordance with the relevant regulation. - Ensure implementation of ESIA mitigation measures to prevent pollution, including the storage requirements for hazardous materials.	Hazardous material control Compliance with national regulations	EBRD PR3 EBRD PR4	i)S-D OHTL Main Contractor (own budget and resources).  ii)Sarimay SS Contractor	42 days before Site mobilization [April 2025 update - Close Lender corrective actions - 30 July 2025]  30 November 2025	Documented HMMP (section of CESMP)  Developed chemical inventory.  Evidence of MSDS located where chemicals are handled and stored.  Records of visual checks and internal audits in storage areas. Appropriate secondary containment and spill kits for	No information provided to support progression of this action – OPEN

### Environmental and Social Action Plan (ESAP) for Sarimay-Dzhankedy Transmission (V2.1, April 2025)

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	Status April 2025
						chemical and oil drums storage/handling areas.	
3.4	Confirm EPC contract clause has prohibited use of hazardous substances highlighted in international obligations (asbestos, PCB containing materials, lead-based paints, certain pesticides and herbicides)”	Ensure hazardous material obligations are mandated for the Project	National Law, ESIA, ESMP, EBRD PR3, relevant international Conventions	NEGU PIT	Pre-NTP [April 2025 update - Close Lender corrective actions - 30 July 2025]	Relevant EPC Contract clauses	No information provided to support progression of this action – OPEN
4	<b>Health, Safety and Security</b>						
4.1	Establish a comprehensive Construction Health and Safety Management System (HSMS) occupational health and safety aligned with ISO45001 including Key Performance Indicator (KPI) system and ensure that it covers all subcontractors. Develop an accident investigation/analysis program and investigate lost time injuries in detail to prevent recurrence of such accidents. Key employees are recommended to attend root cause analysis training. Develop a near-miss reporting system to inform unsafe acts and	Increased health and safety performance during construction of the OHLT and substation works. Minimize OHS accidents and incidents.	ESIA, ESMP National Occupational Health and Safety Law EBRD PR4 GIP	S-D OHTL Main Contractor (own budget and resources)	42 days before Site mobilization [April 2025 update - Close Lender corrective actions - 30 July 2025]	OHSMS including OHS Policy is signed by leadership.  KPI system including subcontractor management.  Accident investigation/analysis reports.  Near-miss records.  Documented EHS	Partially completed, refer to S-D OHTL Audit report for corrective actions.

### Environmental and Social Action Plan (ESAP) for Sarimay-Dzhankedy Transmission (V2.1, April 2025)

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	Status April 2025
	conditions through near miss cards and need to raise awareness program. Develop EHS training matrix with EHS competencies needed for a type of job position.					training matrix.  Records of EHS training.	
4.1a	Conduct an OHS risk assessment for the Sarimay SS Expansion Works and develop required OHS MS.		ESIA, ESMP National Occupational Health and Safety Law EBRD PR4 GIP	Sarimay SS Contractor (own budget and resource)	30 November 2025.	Sarimay SS OHS risk assessment and OHS MS.	NEW action.
4.2	Develop Occupational Health and Safety Management Plan (OHSMP) separately for Lot 1, Lot 2 OHTL and Sarimay SS Expansion works, and each end-user works covering commissioning of live equipment.	Minimize H&S accidents and incidents	EBRD PR1 EBRD PR4 GIP for H&S. Occupational Health and Safety Law	Main Contractor (own budget and resources)	42 pre-mobilizations [April 2025 update - Close Lender corrective actions - 30 July 2025]	OHSMP (Lot 1, Lot 2, Sarimay SS Expansion works)	Partially completed, refer to S-D OHTL Audit report for corrective actions.
4.3	Confirm maintenance control program for mechanical equipment (such as ladders, lifting vehicles, telescopic platforms and 4x4 vehicles) is in place and correct where not.	Equipment Design and Safety	EBRD PR4	NEGU PIT (supported by third party) (own resources / external consultant)	Pre-COD -[April 2025 update - Close Lender corrective actions - 30 July 2025]	Maintenance Control procedures (for relevant topics)	No information provided to support progression of this action – OPEN
4.4	Prepare a Transportation	Reduce risks to	ESIA, ESMP	Main	42 days before Site	TMP reviewed and	No information



### Environmental and Social Action Plan (ESAP) for Sarimay-Dzhankedy Transmission (V2.1, April 2025)

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	Status April 2025
	Management Plan (TMP) (including road safety policy, 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).	community members and workers related to transportation of components and workers to construction camp and Workfront's	EBRD PR4	Contractor (own resources and budget)	mobilization [April 2025 update - Close Lender corrective actions - 30 July 2025]	accepted by Lenders	provided to support progression of this action – OPEN
4.4a	Conduct a traffic and transportation risk assessment / route survey for the delivery of transformers (abnormal load) and include any specific requirements in the CESMP.	Reduce risks to community members and workers related to transportation of components and workers to construction camp and Workfront's	ESIA, ESMP EBRD PR4	Sarimay SS Contractor	30 days prior to delivery of transformers [April 2025 update - Close Lender corrective actions - 30 July 2025]	Transformer delivery risk assessment and method statement. Delivery route assessment (transformers)	NEW action.
4.5	Prepare an emergency preparedness and response plan (EPRP). To include specific information on earthquakes, dust storms and, 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)  Sarimay SS Contractor	42 days before Site mobilization [April 2025 update - Close Lender corrective actions - 30 July 2025]	EPRP reviewed and accepted by Lenders  EPRP reviewed and accepted by Lenders	No information provided to support progression of this action – OPEN

### Environmental and Social Action Plan (ESAP) for Sarimay-Dzhankedy Transmission (V2.1, April 2025)

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	Status April 2025
4.6	Confirm the EPR provision in place for the operation phase as applicable to the Project and outline any supplementary recommendations e.g., relating to extreme heat, dust storms etc.	Protection of workforce and communities in the case of an emergency during operation phase specific to the environment of the Project	ESIA, ESMP EBRD PR4	NEGU PIT (own resources and budget)	Pre-COD [April 2025 update - Close Lender corrective actions - 30 July 2025]	EPR review report (operations) and action plan	No information provided to support progression of this action – OPEN
4.7	Develop operational OHS MS (for Sarimay SS) aligned with ISO 45001 (or equivalent).	Protection of workforce and communities in the case of an emergency during operation phase specific to the environment of the Project ESIA, ESMP EBRD PR4.	ESIA, ESMP EBRD PR4 NEG U PIT (own resources and budget)	NEGU PIT (own resources and budget)	30 November 2025	Operational OHS MS	Not due yet.
5	<b>Land Acquisition, Involuntary Resettlement and Economic Displacement</b>						
5.1	Implement defined livelihood restoration for the OHTL and Sarimay SS area following Land Acquisition and Livelihood	Land users and owners	ESIA, LARF National Land Law EBRD PR5	NEGU PIT (supported by specialist third party) (own)	30 June 2025	LARF monitoring report. Evidence of provision of	No information provided to support progression of this action – OPEN

### Environmental and Social Action Plan (ESAP) for Sarimay-Dzhankedy Transmission (V2.1, April 2025)

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	Status April 2025
	Restoration Framework (LARF) requirements and ESP PR5 (as updated in section 5.1b below).			resources, external consultants)		entitlements to PAPs and confirmation of no adverse impacts from displacement.	
<b>5.1a</b>	Conduct consultation to identify PAPs/PAHs with follow up engagement and census survey to confirm potential impacts on the livelihood of PAPs/PAHs.	Impact on Land users	ESIA/LARF National Law EBRD PR5 GIP	NEGU PIT	Prior to the financing decision [April 2025 update - Close Lender corrective actions - 30 July 2025]	Updated Sarimay transmission Project LARF	NEW action.
<b>5.1b</b>	Update LARF to include Sarimay SS project affected persons, including details,	<b>Impact on Land users</b>	ESIA/LARF National Law EBRD PR5 GIP	NEGU PIT	Prior to the financing decision - [April 2025 update - Close Lender corrective actions - 30 July 2025]	Updated Sarimay transmission Project LARF	NEW action.
<b>5.2</b>	Certify the implementation of LARF through a Completion Report that should be approved by Lenders.	Land users and owners	ESIA/LARF National Law EBRD PR5 GIP	NEGU PIT (supported by a specialist third party) in coordination with District Khokimiyat	Prior to the start of work on sections with PR5 impacts [April 2025 update - Close Lender corrective actions - 30 July 2025]	LARF completion report approved by Lenders  Completion report submitted via annual reporting	No information provided to support progression of this action – OPEN
<b>5.3</b>	Confirm land lease status for the Site is registered with the cadastral agency.	Impact on Landowners	ESIA/LARF National Law	NEGU PIT	Before the financing decision for Sarimay SS	Confirmed land allocation from the Cadastral	No information provided to support progression of this

### Environmental and Social Action Plan (ESAP) for Sarimay-Dzhankedy Transmission (V2.1, April 2025)

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	Status April 2025
			EBRD PR5 GIP /LARF National Law EBRD PR5 GIP		[April 2025 update - Close Lender corrective actions - 30 July 2025]	department.	action – OPEN
5.4	Define and disclose GM for PAPs (S-D OHTL and Sarimay SS site)	Impact on Land users	ESIA/LARF National Law EBRD PR5 GIP	NEGU PIT	Prior to financing decision -[April 2025 update - Close Lender corrective actions - 30 July 2025]	Updated Sarimay transmission Project GM (for PAPs).	No information provided to support progression of this action – OPEN
6	<b>Biodiversity Conservation and Sustainable Management of Living Natural Resources</b>						
6.1	Prepare rehabilitation plan (RP), including soil management, sedimentation control, and restoration requirements for OHTL.,	Minimize risk of soil degradation and compaction leading to erosion	ESIA, ESMP GIP	S-D OHTL Main Contractor / Sarimay SS ground works contractor (third party)	15 November 2025	SCRP (reviewed and accepted by the Lender)	i. Partially completed.  ii)NEW ACTION
6.1a	i) Establish on site precautions for avoidance of CAT. i) Rescue and Relocation Protocol (for CAT) based on need and in consultation with State inspectorate ii) install speed signs on main road to site and all temporary roads within the work area, iii) demarcate internal	Protect PBF's	PR6	NEGU with specialist ecological consultant	i)On-site precautions– 30 May 2025  ii)Survey and reporting completed by	Survey Report and population estimate	NEW Action

### Environmental and Social Action Plan (ESAP) for Sarimay-Dzhankedy Transmission (V2.1, April 2025)

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	Status April 2025
	access roads and post speed signage ii) Conduct CAT transect survey (1 herpetologist) in 5 km buffer zone around SS for Density assessment.				April 2026		
6.2	Develop Biodiversity Management and Monitoring Plan (BMMP) including NNL Calculation, Flora and Fauna Survey, Rescue and CAT Relocation Protocol (applicable to the SS). Covering OHTL and SS expansion site)	Protect PBF's and other habitat during construction works (e.g CAT)	ESIA, ESMP PR6	NEGU / Main Contractor (with specialist third party support)	42 days before Site mobilization [April 2025 update - July 2025 Update July 2026].	BMMP (inc. NNL Calculation and Plan) F&F Rescue and Relocation Protocol	No information provided to support progression of this action – OPEN
6.3	Perform pre-construction biodiversity survey (and seed collection) for <i>Lepidium subcordatum</i> and undertake plant replanting (feed into the BMMP).  Lepidium subcordatum transect survey in suitable habitat along OHTL	Impact on critical habitat, key biodiversity features	National Law, EBRD PR6, EU Habitats Directive	NEGU supported by qualified botanist.	42 days before Site mobilization. [April 2025 update – June-September 2025 OR 2026]  (Seed collection could be done in May-June but it requires the permission from MEEPCC)	Construction phase plant/fauna rescue/relocation report and update to BMMP for replanting.	No information provided to support progression of this action – OPEN
6.4	Perform pre-construction	Impact on	ESIA, ESMP,	i)NEGU /	April 2025 update	i) Map of closed	No information

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### Environmental and Social Action Plan (ESAP) for Sarimay-Dzhankedy Transmission (V2.1, April 2025)

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	Status April 2025
	<p>monitoring and relocation for reptiles (including SEFG), including a requirement to</p> <ul style="list-style-type: none"> <li>i) Create closed zones, at least temporary, for the period of construction where transport, livestock and people should not get into that can be used for the release of the geckos after relocation and if found during the excavation works</li> <li>• ii) SEFG nocturnal transect population survey /SEFG relocation (if closed zones in place) in 50-100 m buffer zone around poles in suitable habitat for Density assessment</li> <li>• iii) Long-term monitoring of the population after construction</li> </ul>	critical habitat, key biodiversity features	BMMP National Law, EBRD PR6, EU Habitats Directive	Main Contractor (specialist third party support) ii) NEGU in coordination with Ministry of Ecology (MoEc) and specialist team of 4 experts incl. 1 lead herpetologist and 3 experienced herpetologists)	<p>i) Before June 2025 – create “Closed zones”</p> <p>ii) SEFG survey (by MoEc) (end of June 2025) (or June 2026)</p>	<p>zones</p> <p>iiia) Survey methodology approved by MoEc</p> <p>iiib) Construction phase plant/fauna survey and rescue/relocation report</p>	<p>provided to support</p> <p>No information provided to support progression of this action – OPEN</p>
6.5	Prepare Southern Even Fingered Gecko (SEFG) Biodiversity Action Plan (BAP) – to include protocol for off-site SEFG habitat	Protection of flora and fauna	ESIA, ESMP EBRD PR6,	NEGU (third party specialist consultant) (budget for	Pre-financing [April update - i) July 2026	Biodiversity Action Plan (BAP) (as required)	No information provided to support progression of this action – OPEN

### Environmental and Social Action Plan (ESAP) for Sarimay-Dzhankedy Transmission (V2.1, April 2025)

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	Status April 2025
	rehabilitation for “net gain” (Lot 1 OHTL only) and implement.			preparation of the BAP and costs for implementation of the requirements)			
<b>6.6</b>	Install temporary fencing around takyr within 50m of works to exclude people, heavy machinery, equipment laydown, or any vehicles for (41 km segment in the eastern portion of Lot 1 only).	Impact on critical habitat, key biodiversity features – in particular protection of SEFG in close proximity to the direct construction area	National Law, EBRD PR6, EU Habitats Directive	Main Contractor	42 days before Site mobilization	Workfront method statement signed off by Bio monitor for each relevant Workfront in stated section)	Closed – Covered in 6.4 above (Closed zones)
<b>6.7</b>	Employ a biodiversity monitor to be present on-site during excavation works to assure compliance with construction phase mitigation measures, and to conduct daily searches of Work fronts and animal rescue from open trenches.	Impact on critical habitat key biodiversity features during foundation works.	ESIA, ESMP EBRD PR6	NEGU (budget for duration of foundation works)	42 days before Site mobilization [April 2025 update - 30 May 2025]	Signed Contract and CV	No information provided to support progression of this action – OPEN
<b>6.7a</b>	An ecologist must always monitor any interactions with reptiles during bunding excavation works	Impact on critical habitat, key	ESIA, ESMP EBRD PR6	Sarimay SS Contractor	November 2025	Signed contract and CV.	NEW action.

### Environmental and Social Action Plan (ESAP) for Sarimay-Dzhankedy Transmission (V2.1, April 2025)

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	Status April 2025
	or excavations to support Shallow concrete pad foundations.	biodiversity features during foundation works					
<b>6.8</b>	Implement rehabilitation planning and a five-year aftercare and monitoring program covering all temporarily disturbed areas (based on rehabilitation plan prepared under 6.1).	To ensure soil and associated vegetation cover is returned to its original state.	ESIA, ESMP EBRD PR6	Main Contractor  NEGU	Prior to COD  Annually from COD	Rehabilitation status report Annual rehabilitation status report	No information provided to support progression of this action – OPEN
<b>6.9</b>	Implement requirements for the Department of Ecology, Environmental Protection and Climate Change as set out in the SEE Positive Conclusion.	Biodiversity Conservation	National SEE Positive Conclusion EBRD PR6	Sarimay SS Contractor	Prior to COD	National Compliance Report (Stage III conclusion).	No information provided to support progression of this action – OPEN
<b>7</b>	<b>Cultural Heritage</b>						
<b>7.1</b>	Perform cultural heritage surveys for Lot 1 OHTL	Protection of unknown cultural heritage	EBRD PR1, 8 National Centre for Archaeology	Main Contractor supported by cultural heritage specialist (budget allocation in EPC Contract) Overseen by PIT	30 June 2025	Archaeological Survey Procedure and Report.	Survey work not performed for Lot 1, Lot 2 works not commenced at this time.
<b>7.2</b>	Maintain a 150 m buffer between known archaeological artefacts	Protection of known cultural	ESIA, ESMP EBRD PR1, 8	Main Contractor	30 June 2025	OHTL detailed design -	Lot 1 work not commenced at this



### Environmental and Social Action Plan (ESAP) for Sarimay-Dzhankedy Transmission (V2.1, April 2025)

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	Status April 2025
	(OHTL) (Lot 1)	heritage	National Centre for Archaeology	Overseen by PIT		determination of buffers and no-go zones	time.
7.3	Develop and implement chance finds procedure and watching brief - to include a requirement to notify Competent Authority (Cultural heritage) (OHTL) (All locations)	Protection of unknown cultural heritage	ESIA, ESMP National legislation EBRD PR1, 8	i)Main Contractor supported by cultural heritage specialist (budget allocation in EPC Contract) Overseen by PIT  ii)Sarimay SS Contractor	30 July 2025 (Lot 1 and Lot 2)  30 November 2025 (Sarimay SS)	Documented 'Chance Finds Procedure' (stand-alone or part of the CESMP).  Watching brief during works.  Training of Project employees in chance finds procedure (e.g., induction records)	No information provided to support progression of this action – OPEN
8	<b>Information Disclosure and Stakeholder Engagement</b>						

**Environmental and Social Action Plan (ESAP) for Sarimay-Dzhankedy Transmission (V2.1, April 2025)**

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	Status April 2025
8.1	<p>Implement the Stakeholder Engagement Plan (SEP) and ensure SEP is updated regularly but no later than twice a year.</p> <p>Assign a Community Liaison Officer to manage the delivery of SEP</p>	<p>Loose social license to operate</p> <p>Maintain effective relationships with stakeholders (including land users)</p>	EBRD PR10 EBRD PR5	NEGUU PIT supported by the Main Contractor (Costs associated with printing of any notification material leaflets, posters and performing SEP updates)	<p>i) 30 July 2025 and at least annually thereafter during construction. ii) CLO nominated – 30 July 2025</p> <p>iii) Consultation on local hiring policy – pre-mobilization</p>	<p>i) Reporting on stakeholder engagement activities appended to SEP and SEP update.</p> <p>Annual review and update to SEP (during construction)</p> <p>Stakeholder communication log with log of engagement and consultation (Appended to updated SEP above)</p> <p>ii) CLO assigned for client and Contractor</p>	No information provided to support progression of this action – OPEN

### Environmental and Social Action Plan (ESAP) for Sarimay-Dzhankedy Transmission (V2.1, April 2025)

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	Status April 2025
8.1a	Update Sarimay Transmission SEP to confirm stakeholders and PAPs for Sarimay SS (including engagement with stakeholders to confirm no historical potential for stakeholders with cultural attachment to the Sarimay SS site).	Maintain effective relationships with stakeholders (including land users)	EBRD PR8 EBRD PR10	Lender Advisor	30 September 2025	Updated SEP	Partially complete, refer to S-D OHTL audit report for corrective actions.
8.2	Implement Community Grievance Mechanism (including land users) <sup>5</sup> .	Maintain effective relationships with stakeholders (including land users)	EBRD PR10	PIT (construction) Regional Department NEGU (operation)	Pre-site mobilization (to be implemented for the project lifetime). [April 2025 update – Lender corrective actions by 30 July 2025]	Document Community Grievance Record of notification of contact information to all PAP (including those affected by livelihood restoration)	Partially complete, refer to S-D OHTL audit report for corrective actions..

<sup>5</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

### Environmental and Social Action Plan (ESAP) for Sarimay-Dzhankedy Transmission (V2.1, April 2025)

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	Status April 2025
						Mechanism Grievance Log Records of Engagement	
8.2a	Expand the Sarimay Transmission CGM to include stakeholders for Sarimay SS Expansion works, including disclosure of the contact information at the Samiray SS site.	Maintain effective relationships with stakeholders (including land users)	EBRD PR10	PIT (construction) Regional Department NEGU (operation)	November 2025	Evidence of disclosure in connection with Sarimay SS works.	NEW action.
8.3	Hold community awareness meetings to notify PAP (S-D OHL and Sarimay SS) of potential risks and associated actions identified in the ESIA (with particular attention to notifications regarding cultural and agricultural practices and engagement with vulnerable groups) and provide relevant community awareness training and information relating to EMF working under OHLs.	Maintain effective relationships with stakeholders (including land users)	ESIA, ESMP, SEP, EBRD PR10	NEGU PIT (Costs associated with printing of any notification material (Leaflets, posters)	42 days before Site mobilization	Evidence of community notifications (in SEP) and ongoing through the construction and operation phase as necessary.	Partially complete.