

Bash 500MW & Bash 52MW Wind Farms Republic of Uzbekistan



ESIA: Volume 3 –
Framework for
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Management

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LIST OF ABBREVIATIONS

ABBREVIATION	MEANING
5 Capitals	5 Capitals Environmental & Management Consultancy
ADB	Asian Development Bank
CESMP	Construction Environmental and Social Management Plan
EBRD	European Bank for Reconstruction & Development
EP	Equator Principles
EPAP	Equator Principles Action Plan
EPC	Procurement and Construction
ESAP	Environmental & Social Action Plan
ESIA	Environmental & Social Impact Assessment
ESMP	Environmental & Social Management Plan
ESMS	Environmental and Social Management System
GBVH	Gender Based Violence & Harassment
HSSE	Health, Safety Security and Environment
IFC	International Finance Corporation
MEEPCC	Ministry of Ecology, Environmental Protection and Climate Change
OESMP	Operation Environmental and Social Management Plan
PC	Project Company
PR	Performance Requirement
PS	Performance Standard
SCEEP	State Committee on Ecology & Environmental Protection
SEA	Sexual Exploitation & Abuse
SEP	Stakeholder Engagement Plan
SH	Sexual Harassment

1 INTRODUCTION

This document presents the Framework for Environmental & Social Management following on from the ESIA for the Bash 500 MW Wind Farm and Bash 52MW WF ESIA Addendum ("the Projects").

This framework has been informed by the outcomes of the ESIA and its Addendum and has been developed to establish structures for the management of Environmental and Social risks, impacts, opportunities and compliance associated with both the construction, commissioning and operational phases of the Project. The Framework is intended to outline systematic structures and management programmes that will comprise the respective construction, commissioning and operational phase Environmental and Social Management Systems (ESMS).

In order to implement the mitigation and management measures established in the ESIA (Volume 2) and the Addendum, specific management programmes will be developed to incorporate these mechanisms, as well as the requirements of the local regulator, Ministry of Ecology, Environmental Protection and Climate Change (MEEPCC) (formerly known as the State Committee on Ecology and Environmental Protection (SCEEP)) and the Projects' Lenders. Such documented information will be in the form of Projects-specific Construction Environmental and Social Management Plans (CESMPs) and Operation Environmental and Social Management Plan (OESMP) (and complimentary plans/procedures); to be developed prior to the commencement of construction, commissioning and operations respectively.

This framework has also been prepared to ensure alignment with applicable elements of the established ACWA Power Project Company E&S Policy template and related ESMS Implementation Manual, which is intended to ensure consistent and structured E&S project management between ACWA Power projects.

2 REQUIREMENTS FOR PROJECTS E&S MANAGEMENT

The following applicable requirements relate to the need for the Projects to implement formal or structured Environmental & Social Management Systems (ESMS), or related policies, management programmes and or other E&S management processes.

These requirements are applicable during all stages of project implementation, following planning and initial permitting (i.e. construction, commissioning, operations, decommissioning and closure).

2.1 National Level

The regulatory body in Uzbekistan responsible for the regulation of the activities within the country that relate to ecology, environmental protection and use of natural resources is the Ministry of Ecology, Environmental Protection and Climate Change (MEEPCC) (formerly known as the State Committee on Ecology & Environmental Protection (SCEEP)).

The main Environmental Protection Law in Uzbekistan is the Law on Nature Protection, 1992 as amended in 2019. This law provides legal, economic, and organisational basis for the conservation of the environment and the rational use of natural resources. The law also prohibits the implementation of any Project without approval from SCEEP now MEEPCC.

In their conclusions for the updated Bash 500MW & Bash 52MW National EIA Stage I Preliminary Statement of Environmental Impact, it is required that both Projects implement specific Environmental Management Plan and the Environmental Monitoring Plan.

2.2 Lenders Requirements

It is understood that ACWA Power are seeking projects finance from the following lenders:

BASH 500MW WF

- European Bank for Reconstruction and Development (EBRD) Environmental and Social Policy (2019) and Performance Requirements.
- Asian Development Bank (ADB).
- EPFI's who require compliance with IFC PS and World Bank EHS guidelines.

BASH 52MW WF

- European Bank for Reconstruction and Development (EBRD) Environmental and Social Policy (2019) and Performance Requirements.

2.2.1 EBRD

EBRD has an internal Environmental and Social Policy (2019) and a set of specific Performance Requirement (PRs) covering key environmental and social components for consideration, assessment and management in their investments. These reflect EBRD's commitments to promote EU environmental standards as well as the European Principles for the Environment in their investments.

Performance Requirement 1 (PR1) on Assessment and Management of Environmental and Social Impacts and Issues, sets the requirements for clients to establish and maintain an Environmental and Social Management System (ESMS) '*appropriate to the nature and scale of the project and commensurate with the level of its environmental and social impacts and issues in line with GIP. The objective of such a management system is to integrate the implementation of environmental and social requirements into a streamlined and coordinated process and to embed it in the main operational activities of the client assessment of impacts and issues.* In addition, projects are required to establish an overarching policy that defines the project's environmental and social objectives. Also, an ESMP will be developed based on the outcome of the ESIA and stakeholder engagement process.

2.2.2 ADB

ADB Safeguard Requirements 1: Environment outlines the requirements that clients are required to meet when delivering environmental safeguards for projects supported by ADB.

Under this Safeguard, projects are required to develop an Environmental Management Plan (EMP) and will include the 'proposed mitigation measures, environmental monitoring and reporting requirements, emergency response procedures, related institutional or organizational arrangements, capacity development and training measures, implementation schedule, cost estimates, and performance indicators'.

ADB Safeguard 2: Outlines the requirements that clients are required to meet in delivering involuntary resettlement safeguards to projects supported by ADB. This includes enhancement and/or restoration of the livelihoods of all displaced persons in real terms relative to pre-project levels; and to improve the standards of living of the displaced poor and other vulnerable groups; undertake meaningful stakeholder consultations and information disclosure; establishing a grievance mechanism; and implementation of the resettlement plan and monitoring.

ADB SOCIAL PROTECTION STRATEGY (2001)

The Project will comply with ADB Social Protection Strategy (2001) which is defined as the set of policies and programs designed to reduce poverty and vulnerability by promoting efficient

labour markets, diminishing people's exposure to risks, and enhancing their capacity to protect themselves against hazards and interruption/loss of income.

The Social Protection Strategy spells out the scope of social protection and commitment of the ADB to develop priority interventions in five major elements:

- Labour market policies & programs designed to generate employment, improve working conditions & promote the efficient operations;
- Social insurance programs to cushion the risks associated with unemployment, ill health, disability, work-related injury & old age;
- Social assistance and welfare service programs for the vulnerable groups with inadequate means of support, including single mothers, the homeless, or physical or mentally challenged people;
- Micro and area-based schemes to address vulnerability at the community level, including micro insurance, agricultural insurance, social funds and programs to manage natural disasters; and
- Child protection to ensure the healthy and productive development of children.

At the Project level the Strategy will be applicable in the following areas:

- Compliance with internationally recognised labour standards and requirements;
- Compliance with ILO core labour standards; and
- Ensure that appropriate actions are implemented to ensure ADB financed procurement of goods and services, contractors, sub-contractors etc are in compliance with core labour standards.

2.2.3 Equator Principles

It is understood that the Projects will seek financing from International Financial Institutions (IFIs) that are signatories of the Equator Principles (EP). The EP IFI's therefore require their borrowers to ensure compliance with the Equator Principles IV (2020).

Principle 4 (Environmental and Social Management System and Equator Principles Action Plan), requires the borrower to develop or maintain an Environmental and Social Management System (ESMS). Further, an Environmental and Social Management Plan (ESMP) is required to address issues raised in the assessment process.

2.2.4 IFC

Note: IFC is not involved in financing of these two Projects, however ACWA Power internal policy is to comply with the IFC Performance Standards and applicable WBG EHS Guidelines. As such, these requirements are stated in the ESIA and the Addendum.

In accordance with IFC PS1, the projects will, 'establish and maintain an ESMS appropriate to the nature and scale of the projects. The ESMS will incorporate the following elements: (i) policy; (ii) identification of risks and impacts; (iii) management programs; (iv) organizational capacity and competency; (v) emergency preparedness and response; (vi) stakeholder engagement; and (vii) monitoring and review.'

3 ENVIRONMENTAL & SOCIAL MANAGEMENT SYSTEM (ESMS)

The Projects ESMS will provide a systematic structure and approach to enable the effective implementation and management of environmental & social risks, impacts, opportunities and related compliance.

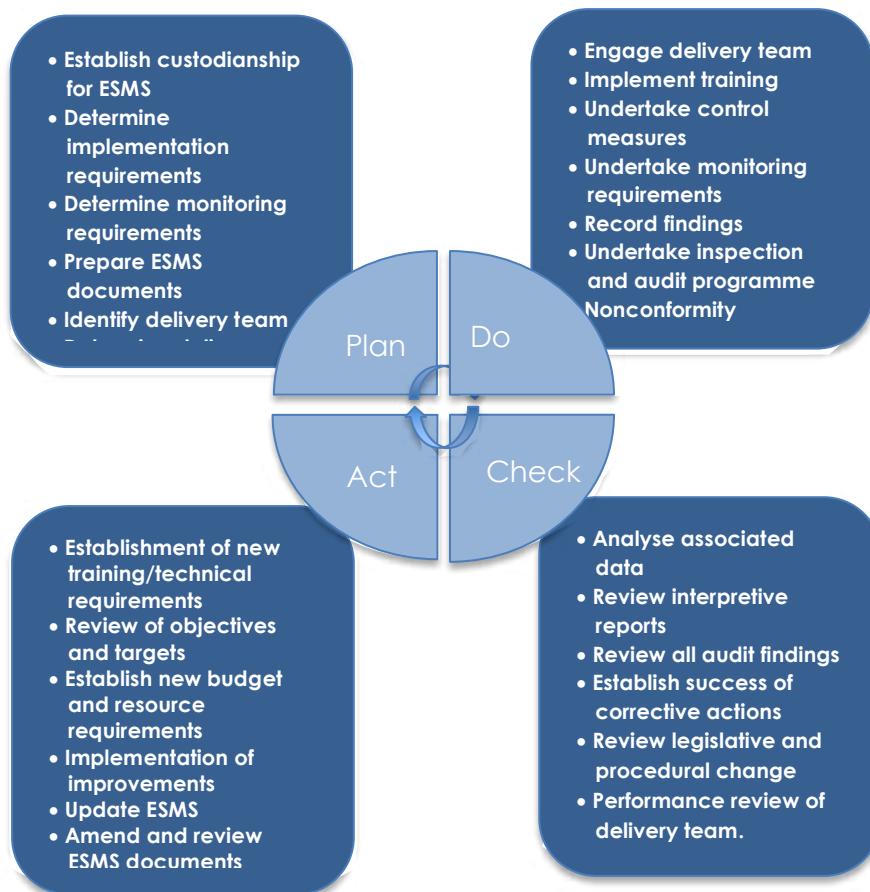
Effective management of environmental & social issues will include the following fundamental components as part of the robust ESMS:

- Projects specific policies related to the environmental and social considerations (including labour, HR and external stakeholders & affected communities).
- Projects'-based E&S Objectives, Targets & Programme.
- Applicable environmental & social legal requirements and other compliance obligations (such as those required by lenders);
- Environmental & Social aspects and potential impacts, as early as possible for construction, commissioning and operation phase planning, including the incorporation of environmental and social considerations into staffing requirements, process plans, programming, work orders, required authorisations, and site layout;
- Environmental & Social professionals, who have the experience, competence, and training necessary to assess and manage environmental impacts and risks, and carry out specialised environmental & social management functions including the preparation of Projects or activity specific plans and procedures that incorporate the technical requirements presented in this document;
- Prioritisation of management programmes/ strategies with the objective of achieving an overall reduction of risk to human wellbeing and the environment, focusing on the prevention of irreversible and / or significant impacts;
- Favouring strategies (where possible) that eliminate the cause of the impact at its source, for example, by selecting less hazardous materials or processes that avoid the need for environmental controls;
- When impact avoidance is not feasible, incorporating controls to reduce or minimise the possibility and/or magnitude of undesired consequences, for example, with the application of pollution controls to reduce the levels of emitted contaminants;
- Preparing workers, informing and co-operating with nearby communities and relevant stakeholders to respond to emergencies, accidents, including providing technical and financial resources to effectively and safely control such events, and restoring workplace and community environments; and

- Improving environmental performance (i.e. for continual improvement) through a combination of ongoing monitoring of facility performance and effective accountability.

Initial implementation of the ESMS will focus on setting and reviewing requirements, determining custodianship within the project team, identifying budgets, establishing target ranges for performance and establishing appropriate data gathering techniques and controls.

Performance ranges will be refined on a regular basis as more data becomes available, in turn enabling more accurate strategy development and benchmarking. As such, the ESMS documents will be treated as living documents, to be updated within a continuous process of improvement.



An outline implementation process for ESMS is illustrated in the figure below.

Figure 3-1 Implementation Process

3.1 ESMS Scope

The Projects will each develop and implement ESMSs for the respective construction and operational phases. The scope will need to include:

- Physical elements of the project to set the boundaries of the ESMS scope (i.e. this will include the projects physical footprint and applicable associated facilities);
- Project related activities being undertaken (and relevant to that phase of the project e.g. for construction, commissioning, operation, decommissioning and if necessary, post closure);
- Compliance with applicable national regulation, lender requirements and loan covenants (including from the ESAP);
- Detailed mitigation and management measures required following construction, commissioning and operational impacts identified from the ESIA;
- Roles and responsibilities for appropriate management organisational units;
- Key risks and management requirements related to primary supply chains (which can reasonably be managed), and;
- Requirements for monitoring and reporting, including measures for inspection, audit, review and preventative action.

3.2 Project Company E&S Management Structures

It is understood from ACWA Power that the Bash 500MW WF Project Company (FE “ACWA Power Bash Wind” LLC) and Bash 52MW WF Project Company (ACWA Power UKS Green H2) will share the same Environmental and Social teams. This team will be responsible for ensuring that the Projects are aligned with the national and lenders E&S requirements.

3.2.1 Project Company E&S Policy

ACWA Power has a template E&S Policy structure for Project Companies to ensure consistent policy development across its assets. Please refer to the ‘E&S Policy’ chapter below for further details.

3.2.2 Project Company: ESMS Implementation Manual



Besides the aforementioned E & S Policy template, the Project Companies will align their E&S management with the 'Project Company - Environmental and Social Management System: Implementation Manual. This manual is a corporate document issued to all Project Companies.

The purpose of the document is to provide guidelines to ensure that key elements related to Environmental & Social management are implemented consistently by established ACWA Power Project Companies at the projects that are under ACWA Power ownership or partnership.

3.3 Development of Construction Phase ESMS

As the overall accountable party for E&S compliance and management, the Project Companies will develop and implement the projects' specific E&S Policy (covering both Projects). However, the main construction phase ESMS will be developed and implemented by the Engineering, Procurement and Construction (EPC) Contractors. This will be contractually captured on in the EPC Contracts.

The construction phase ESMSs will align with the Project Companies E&S Policy requirements, this E&S Management Framework and the ACWA Power: Project Company's ESMS Implementation Manual.

The EPC Contractors' ESMSs will ensure coverage of all potential environmental and social risks, impacts, opportunities and related compliance associated that fall under the scope of the Projects' construction phase (including potential impacts related to sub-contractors and key E&S risks in supply chains that can be influenced). This will include commissioning activities and post-construction activities such as site demobilisation, restoration of land used during construction etc.

Note: The Bash 500MW WF EPC Contractor China Energy International Group Company (EEC) and Bash 52MW WF EPC Contractor HDEC, will each develop their own ESMS. In addition, the Project Company will ensure that the two EPC Contractors collaborate in the development and implementation of the ESMS especially in addressing cumulative impacts.

3.3.1 Bash 52MW WF EPC Contractor

The Bash 52MW WF EPC Contractor, HDEC has in place the ISO certification for the Environmental Management System (ISO 14001:2015) and the Occupational Health & Safety Management System (ISO 45001:2018) as shown in the figures below. Both certificates are valid until 11th October 2024.

Figure 3-2 Environmental Management System Certification (ISO 14001: 2015)



Figure 3-3 Occupational Health & Safety Management System Certificate (ISO 45001:2018)



3.4 Development of Operational Phase ESMS

The operational phase ESMS will be developed and implemented by the O&M Company and will align with the E&S Policy established by the Project Companies. This will be contractually captured on in the O&M Contract.

The O&M Company's ESMS will ensure coverage of all potential environmental and social risks, impacts, opportunities and related compliance associated that fall under the scope of the Projects' operational phase (including potential impacts related to sub-contractors and/or other suppliers that can be influenced).

Note: *It is understood from ACWA Power that the Bash 500MW WF and Bash 52MW WF will be operated by the same O&M team under First National Operation Maintenance Company (NOMAC). As such, the Project Companies will ensure that the O&M develops and implement an ESMS that covers both WFs.*

4 E&S POLICY

The Projects will need to develop clear statements that define policy, commitments and related objectives with regard to environmental and social issues/compliance and management which are projects specific.

4.1 Project Companies E&S Policy

ACWA Power has a template E&S Policy structure for Project Companies to ensure consistent policy development across its assets. It is designed to align with the overarching ACWA Power corporate level policies, whilst ensuring that legal and lender requirements are captured.

The Project Companies' shared E&S Policy will be prepared based on this template, which includes commitments to:

- Comply with relevant environmental & social legal, contractual, financing requirements and obligations. Including applicable international treaties and protocols, national legislation, permitting conditions and our lenders requirements.
- Implement a risk-based Environmental & Social Management System (ESMS) that aligns with good international practices and conforms with the IFC Performance Standards (as a minimum) and other applicable lender requirements for ESMS.
- Implement measures to manage and reduce natural resource consumption, whilst implementing specified management measures to prevent pollution that are consistent with assessment documentation, permitting and lender conditions.
- Engage with employees and stakeholders on environmental & social issues and implement a robust Grievance Redress Mechanism process for project staff and third-party stakeholders.
- Uphold, respect, protect and fulfil human rights in accordance with the International Bill of Human Rights and any other instruments of international human rights such as those relating to the rights of women and children.
- Employ staff on the basis of equal opportunities and non-discrimination, whilst adhering to the ILO Conventions stated in IFC PS2 for worker management.
- Ensure staff receive environmental & social information, training and instructions on environmental & social leadership applicable to their activities and duties.
- Not accept or tolerate GBVH/SEA/SH in any form
- Implement the GBVH/SEA/SH grievance mechanism and associated procedures and encourage reporting of such instances, providing support to those involved and ensuring their dignity, respect and confidentiality.

- Set indicators to promote and assure environmental & social performance of key supply chains and service providers.
- Implement systematic feedback systems to monitor, audit and report on environmental & social management and performance.
- Annually review this environmental & social policy statement and set performance and management targets to enable continual improvement within the ESMS to be achieved.

The policy will be signed by the top management of the project companies, displayed on site and will be circulated to Project contractors for their compliance.

4.2 Contracted Parties: E&S Policies

The EPC Contractors and O&M Company may also develop E&S Policies that align with the Project Companies' overarching projects specific E&S policy.

Where an E&S Policy is not developed by the Projects' contracted parties, the respective construction and operational phase ESMSs (developed by the contracted parties) will be spearheaded on the overarching E&S Policy of the Project Companies.

5 IDENTIFICATION OF LEGAL AND COMPLIANCE OBLIGATIONS

5.1 Identification of Legal Requirements

During the development of the ESMS, the applicable environmental and social legal requirements will be identified and documented, including:

- Uzbekistan Legislation and Regulations; and
- Applicable International Treaties and Conventions, signed and/or ratified by Uzbekistan.

5.2 Identification of ESIA Requirements

Volume 2 of the ESIA and the Addendum has developed Projects and/or site-specific mitigation, management & monitoring measures that must be incorporated into the respective construction, commissioning and operational phase of the projects.

Following approval of the EIA by the regulatory authority, the ESIA and its Addendum by projects' lenders, these stated measures are conditions of the approval.

5.3 Identification of Requirements from the Statutory Authority

The 'conclusions' (or other conditional requirements) issued by the Ministry of Ecology, Environmental Protection and Climate Change (MEEPCC) to the Projects EIA must be reviewed to ensure that all construction, commissioning and operational related conditions established are managed accordingly. Non-compliance with the MEEPCC conclusions may result in a breach of legislation and permitting requirements. The conclusions will be maintained as part of the ESMS.

5.4 Identification of Requirements from the Projects Lenders

5.4.1 Bash 500MW WF

In response to the ESIA, EBRD will establish an Action Plan that identifies Environmental and Social requirements for the project commensurate with or supplementary to the ESIA. This will be an Environmental & Social Action Plan (ESAP) while an Equator Principles Action Plan (EPAP) will be issued by financing institutions signatory to the Equator Principles. Requirements of the action plan will be a covenant of the Project loan. In addition, ADB will also establish Compliance Action Plans (CAP) in response to the ESIA.

During the development of the ESMS', EBRD's and ADB's action plans for the Project (and EPAP from EPFs) must be reviewed to ensure that all related conditions are included for compliance management. It is highlighted that non-compliance with the lenders' requirements could impact financial disbursement and other factors.

5.4.2 Bash 52MW WF

The Bash 52MW WF will adopt and implement all the mitigation, management measures and monitoring and reporting requirements as provided in the Bash 500MW ESIA package and the Addendum. As such, EBRD will decide on whether a separate ESAP will be established for Bash 52MW WF or the Bash 500MW WF ESAP will be updated to include the Bash 52MW WF requirements.

6 IDENTIFICATION OF RISKS, IMPACTS & OPPORTUNITIES

One of the principal stages in the development of the Projects' ESMSs will be the development of Projects specific aspects/risks register linking to potential environmental or social impacts associated with the relevant activities being undertaken at that phase of the project.

Once environmental & social aspects and associated risks have been identified and documented (i.e. specifically in accordance with the required construction methods statements or operational activities), associated controls will be developed that are commensurate to the level of anticipated severity, likelihood and any statutory or lender requirements. The identification of risks and impacts is expected to be primarily aligned with the items identified in the ESIA and the Addendum, but may include additional items relates to specific working methods.

When identifying the aspects/risks and associated environmental or social impacts the following will be taken into account:

- Risks, impacts and opportunities linked to the Projects activities;
- Change, including planned or new development and or new/modified activities;
- Abnormal conditions and reasonably foreseeable emergency situations;
- Projects timescales and potential impacts associated with seasonality;
- Stakeholder perception;
- Compliance obligations;
- Risks inherent in the supply chain in addition to those on-site; and
- Linkages with the Projects' Health and Safety Management Systems.

The identification of aspects/risks and impacts should be documented, linked to associated proposed controls and updated as and when the Projects or environmental & social circumstances change.

7 E&S MANAGEMENT PLANS & PROCEDURES

Once environmental & social aspects and associated risks have been identified and documented, associated controls will be developed that are commensurate to the level of anticipated severity, likelihood and any statutory or lender requirements. The identification of risks and impacts is expected to be primarily aligned with the items identified in the EIA/ESIA but may differ depending on specific working methods of the EPC Contractors / O&M Company.

7.1 E&S Management Plans (CESMPs and OESMP)

The key E&S management plans will be the CESMPs and OESMP; respective to construction and operations.

The CEMSPs and OESMP will comprise a stand-alone document structured to detail how environmental and social risks, impacts, opportunities and compliance will be managed and monitored. This shall be the top-level management plan document prepared by the EPC Contractors and O&M Company respectively. The CESMPs and the OESMP will be prepared by the EPC Contractors and O&M Company's E&S staff or by an E&S Consultant in order to ensure they are aligned with national and lenders' requirements.

The typical content of CESMPs/OESMP has been outlined below. This is not mandatory to be structured in this manner, but it is expected that the headings and sub-headings as a minimum are captured within the respective CESMP/OESMPs.

- INTRODUCTION
 - Background of Environmental Permitting
 - Objectives of the CESMP/OESMP
 - Scope of the CESMP/OESMP
 - Limitations
 - Structure of the CESMP/OESMP
- PROJECT DESCRIPTION
 - Project Rationale and Background
 - Project Location
 - Land Use and Potential Sensitive Receptors
 - o Land Ownership
 - o Land Use
 - Sensitive Receptors
 - Overview of Project Components
 - Overview of Associated Facilities

- Overview of Construction/Operational Works and Workforce Requirements
- Overview of Construction/Operational Facilities
- Project Schedule (for CESMP)
- REGULATORY FRAMEWORK
- Overview of Regulatory Framework and Compliance Obligations
 - o Regional and International Treaties and Conventions (the host country is a signatory of)
 - o Federal Legislation
 - o Lenders Requirements
 - o Environmental Standards
- ENVIRONMENTAL AND SOCIAL MANAGEMENT
- Summary of Environmental and Social Management System (ESMS)
- Reference to E&S Policies
 - o Applicable EPC/O&M Corporate Level E&S Policies
 - o Project Company E&S Policy Level
- Statement of other supporting/complementary Plans and Procedures
- Organisational Structure
 - o Host country regulator
 - o Lenders
 - o Project Company
 - o EPC Contractor/O&M Company
 - o Sub-contractors
- HSE Roles and Responsibilities
- Environmental Awareness and Training
 - o Environmental & Social Induction Training
 - o Toolbox Talk Environmental & Social Training Sessions
 - o CESMP/OESMP Training
- Competency Needs and Records
- Internal and External Communications
 - o Internal Communication
 - o External Communication
 - o Liaison with Regulator
- Inspections and Audits
 - o Daily and Weekly Inspections
 - o Internal Audits
 - o Annual Internal Audits
 - o External Audits
- Non-conformity, Corrections and Corrective Action
 - o Non-Conformity, Investigation and Response
 - o Incident Definition, Reporting, Investigation and Response

- Corrections and Corrective Actions
- Control of Records
- MITIGATION, MANAGEMENT AND MONITORING
- Terrestrial Ecology
- Air Quality
- Noise & Vibration
- Soil, Geology, Groundwater and Surface Water
- Traffic & Transportation
- Infrastructure & Utilities
- Archaeological and Cultural Heritage
- Landscape and Visual Amenity
- Shadow Flicker
- Socio-Economic
- Solid Waste & Wastewater Management
- Community Health, Safety & Security
- Labour & Working Conditions
- Influx Impact Assessment
- Human Rights Impact Assessment
- Climate Affairs
- MONITORING SUMMARY
- EMERGENCY PREPAREDNESS AND RESPONSE OVERVIEW
- APPENDICES.

Other key plans to be implemented include:

- Resettlement Action Plan (RAP).
- Stakeholder Engagement Plan (SEP)

7.2 Supporting/Complimentary Plans & Procedures

In alignment with the expected Projects impacts (based on ESIA Volume 2 and the ESIA Addendum), the following table provides a list of plans and procedures that are expected as a minimum to be linked to the CESMPs and/or OESMP. This includes some key requirements for inclusion to each plan.

Table 7-1 ESIA Required Plans and Procedures for Bash 500MW & Bash 52MW WFs

PLAN / PROCEDURE	PROJECT PHASE	PURPOSE AND KEY REQUIREMENTS	BASH 500MW & BASH 52MW WFs REQUIREMENTS
Biodiversity Action Plan / Species Action Plan	Pre-Clearance, Pre-Construction, Construction, Operation & Decommissioning	<p>The BAP/SAP presents an overall picture on species specific baseline information and mitigation for project impacts to achieve Net Gains (NG) and No Net Loss (NNL):</p> <ul style="list-style-type: none"> Species Action Plans, for CH species Asian Houbara and Southern Even-fingered Gecko with strategy for NG Species Action Plans for PBF species with strategy for NNL <p>The plan clearly outlines requirements that will be in place for construction, operation and decommissioning works, to protect species of conservation concern. The plans will include:</p> <ul style="list-style-type: none"> Overview of the species of concern List of protocols and procedures to be taken related to biodiversity protection Establishment of buffer Zones Trainings for Staff to increase awareness of prohibited actions related to biodiversity Monitoring Program Reporting Requirements Roles and Responsibilities 	<p>This plan will be updated to include the requirements for Bash 52MW WF. The Project Companies E&S team will ensure that the EPC Contractors (CEEC and HDEC) Ecologists coordinate the implementation of this plan especially in areas where their activities overlap.</p> <p>In order to ensure this, a joint taskforce will be formed between the EPCs' E&S teams and the Project company in order to coordinate implementation and monitoring efforts.</p> <p>The operational phase for both Projects will be under the same Project Companies' E&S and O&M teams.</p>
Flora Conservation Action Plan	Pre-Construction & Construction,	<p>This plan provides the mitigation measures that will be implemented to ensure conservation of sensitive flora species that may be impacted by the project construction. As per the species-specific protocols outline in the plan the project footprint will be surveyed for the collection of seeds for replantation and specimens for translocation.</p>	<p>This plan will be updated to include the requirements for Bash 52MW WF. The Project Companies E&S team will ensure that CEEC and HDEC Ecologists coordinate the implementation of this plan especially in areas where their activities overlap.</p> <p>In order to ensure this, a joint taskforce will be formed between the EPCs' E&S teams and the</p>

PLAN / PROCEDURE	PROJECT PHASE	PURPOSE AND KEY REQUIREMENTS	BASH 500MW & BASH 52MW WFs REQUIREMENTS
			Project company in order to coordinate implementation and monitoring efforts.
Reptile Relocation Plan	Pre-Construction & Construction	The Reptile Relocation Plan outlines the pre-construction survey, identification of release sites and relocation methodology as well as the specification for livestock and tortoise exclusion fencing required to mitigate construction impacts on two reptile species of concern; the Southern Even-fingered Gecko and the Russian Tortoise.	<p>This plan will be updated to include the requirements for Bash 52MW WF. The Project Companies E&S team will ensure that CEEC and HDEC Ecologists coordinate the implementation of this plan especially in areas where their activities overlap.</p> <p>In order to ensure this, a joint taskforce will be formed between the EPCs' E&S teams and the Project company in order to coordinate implementation and monitoring efforts.</p>
Breeding Birds Protection Plan	Pre-Construction & Construction	Breeding Bird Protection Plan provides the mitigation measures for the protection of sensitive breeding bird species that may be impacted from the project construction	<p>This plan will be updated to include the requirements for Bash 52MW WF. The Project Companies E&S team will ensure that the CEEC and HDEC Ecologists coordinate the implementation of this plan especially in areas where their activities overlap.</p> <p>In order to ensure this, a joint taskforce will be formed between the EPCs' E&S teams and the Project company in order to coordinate implementation and monitoring efforts.</p>
Biodiversity Management Plan (BMP)/Biodiversity Monitoring and Evaluation Plan (BMEP)	Pre-construction, Construction, Commissioning & Operation	<p>The BMP outlines the mitigations and specific actions to be implemented in order to reduce the impacts to the biodiversity during the pre-construction, construction, commissioning and operational phases.</p> <p>The plan contains the Biodiversity Monitoring & Evaluation Programme (BMEP) which captures the monitoring and adaptive evaluation requirements, roles and responsibilities of entities involved.</p>	<p>This plan will be updated to include the requirements for Bash 52MW WF. The Project Companies E&S team will ensure that the CEEC and HDEC Ecologists coordinate the implementation of this plan especially in areas where their activities overlap.</p> <p>In order to ensure this, a joint taskforce will be formed between the EPCs' E&S teams and the</p>

PLAN / PROCEDURE	PROJECT PHASE	PURPOSE AND KEY REQUIREMENTS	BASH 500MW & BASH 52MW WFs REQUIREMENTS
			<p>Project company in order to coordinate implementation and monitoring efforts.</p> <p>The operational phase for both Projects will be under the same Project Companies' E&S and O&M teams.</p>
Compensation Offset Plan	Post-construction	<p>The purpose of the plan is to outline in detail the compensation offsets against all identified impacts of high significance to Critical Habitat species Southern Even Fingered Gecko and Asian Houbara</p>	<p>This plan will be updated to include the requirements under bash 52MW WF.</p> <p>It is noted that the operational phase for both Projects will be under the same Project Companies' E&S and O&M teams.</p>
Restoration Action Plan	Post-construction	<p>The purpose of the plan is to provide the methodology for post-construction restoration of laydown and other areas for re-wilding and restoration of native habitat types.</p> <p>The requirements will include the areas to be restored as well as the required monitoring post-restoration.</p>	<p>A Restoration Action Plan Framework is in place to guide the EPC on how to prepare the Restoration Action Plan. This framework will be updated to include the Bash 52MW requirements.</p> <p>The Project Companies E&S team will ensure that the CEEC and HDEC Ecologists coordinate the implementation of this plan especially in areas where their activities overlap.</p> <p>In order to ensure this, a joint taskforce will be formed between the EPCs' E&S teams and the Project company in order to coordinate implementation and monitoring efforts.</p>

PLAN / PROCEDURE	PROJECT PHASE	PURPOSE AND KEY REQUIREMENTS	BASH 500MW & BASH 52MW WFs REQUIREMENTS
Collision Risk Management Plan	Pre-operation and Operation	<p>This plan outlines the site-wide species specific Shut Down on Demand (SDOD) mitigation strategy provided by Identiflight, an automated camera based SDOD system and also provides the adaptive cut-in speed curtailment programme for bats.</p> <p>It includes:</p> <ul style="list-style-type: none"> • Mitigation measures for reducing collision risk to birds and bats • Potential Biological Removal Thresholds • Shut Down on Demand (SDOD) • Cut-in Speed Curtailment • Adaptive Management • Fatality Monitoring • Reporting requirements • Roles and responsibilities. 	<p>This plan will be updated to include the requirements under bash 52MW WF.</p> <p>It is noted that the operational phase for both Projects will be under the same Project Companies' E&S and O&M teams.</p>
Post-construction Fatality Monitoring (PCFM)	Operation	<p>Monitoring will be undertaken to capture data on mortalities and provide adaptive management if needed. The monitoring will be continued for up to 5 years or until the risk is considered 'negligible' in consultation with the lenders.</p> <p>This plan outlines the on-going monitoring and management plan for bird mortality along the WTGs and overhead transmission lines. It includes:</p> <ul style="list-style-type: none"> • Methodology for monitoring bird mortality along OHTL corridor; • Thresholds for sightings/mortality counts that will trigger adaptive management and/or compensatory measures • Monitoring program • Reporting requirements. • Roles and Responsibilities 	<p>This plan will be updated to include the requirements under bash 52MW WF.</p> <p>It is noted that the operational phase for both Projects will be under the same Project Companies' E&S and O&M teams.</p>

PLAN / PROCEDURE	PROJECT PHASE	PURPOSE AND KEY REQUIREMENTS	BASH 500MW & BASH 52MW WFs REQUIREMENTS
Livestock Management Plan	Construction & Operation	To provide management measures for livestock carcasses to minimise food availability to vultures in the project footprint thereby reducing attraction of these bird species and risk to these bird species. The plan also include mitigation and management measures to avoid adverse impact to the livelihood of herders who use the site.	<p>This plan will be updated to include the requirements under bash 52MW WF.</p> <p>It is noted that the operational phase for both Projects will be under the same Project Companies' E&S and O&M teams.</p>
Waste Management Plan	Construction, Commissioning & Operation	To identify site specific requirements for waste and wastewater treatment, containment of wastes (segregation, storage area specifications and locations), collection methodologies & transport (identification of licensed contractors and the process to engage), treatment/disposal (identification of licensed treatment and disposal sites), record keeping and reporting requirements related to waste and wastewater. To include measures to limit instances of contamination to soils and groundwater.	<p>While the Bash 52MW WF EPC Contractor (HDEC) is expected to prepare a Project specific WMP, the EPC will coordinate with the Bash 500MW WF EPC (CEEC) to assess the cumulative impacts of the waste generated by the projects on local waste facilities.</p> <p>This will require the Bash 52MW WF to undertake a waste facilities capacity assessment before the start of the construction phase.</p>
Occupational Health & Safety Plan	Construction, Commissioning & Operation	<p>Identify the required controls for worker health and safety during the construction, commissioning and operational phases. As a minimum, this plan will include:</p> <ul style="list-style-type: none"> • Means of identifying and minimising, so far as reasonably practicable, the causes of potential hazards to workers. • Provision of preventive and protective measures, including modification, substitution, or elimination of hazardous conditions or substances. • Provision of appropriate equipment to minimise risks, and requiring and enforcing its use. • Training of workers, and provision of appropriate incentives for them to use and 	<p>CEEC and HDEC will coordinate their H&S efforts during the construction and commissioning phases of the Project. This will include regular meetings between the respective HSSE teams in order to ensure that any risks to the workers are identified and addressed. This will also include the required coordinated efforts in relation to emergencies and in areas where construction activities overlap.</p>

PLAN / PROCEDURE	PROJECT PHASE	PURPOSE AND KEY REQUIREMENTS	BASH 500MW & BASH 52MW WFs REQUIREMENTS
		<p>comply with health and safety procedures and protective equipment.</p> <ul style="list-style-type: none"> • Documentation and reporting of occupational accidents, diseases and incidents. • Emergency prevention, preparedness and response arrangements. 	
Emergency Preparedness and Response Plan	Construction, Commissioning & Operation	<p>To identify the contingencies put in place for a variety of potential emergency situations relevant to the construction, commissioning & operational phases. The plans will outline the response mechanisms, roles and responsibilities, training requirements, internal communication, equipment and relevant engagement with external stakeholders.</p> <p>Requirements for on-site equipment will be established based upon the potential emergency risks, including training provisions for site personnel in regard to such equipment. This plan is to include spill response and contingency in the event of accidental leaks and spills.</p>	<p>While HDEC will be required to have a separate EPR in place for Bash 52MW WF, CEEC and HDEC will identify the additional requirements based on their activities occurring concurrently. Based on this, both EPCs will ensure that their EPRs capture these requirements, shared responsibilities including stakeholder engagement, monitoring and reporting etc.</p>
Hazardous Material Storage Plan	Construction, Commissioning & Operation	<p>The plan will identify locations for hazardous material storage, storage requirements (specifications of bunds and buildings/warehouses to ensure environmental and H&S protection, segregation requirements etc.) and handling procedures to minimise environmental risk. The plan will outline record keeping as per chain of custodies, requirements for MSDS and roles & responsibilities. Staff involved in chemical management, procurement or overseeing on-site deliveries shall be specified in the plan and provided with training for the provisions of this plan (all training to be linked to the training plan).</p>	<p>CEECC and HDEC E&S teams will coordinate in the storage of their hazardous materials in order to minimise environmental risks.</p>

PLAN / PROCEDURE	PROJECT PHASE	PURPOSE AND KEY REQUIREMENTS	BASH 500MW & BASH 52MW WFs REQUIREMENTS
Environmental & Social Monitoring Plan	Construction, Commissioning & Operation	<p>Monitoring is required to demonstrate compliance with national environmental & social standards and lender requirements. The monitoring plan is to specify monitoring requirements for all ESIA parameters (as specified in ESIA Volume 2 – as a minimum). The plan will therefore need to include:</p> <ul style="list-style-type: none"> • What parameters need to be monitored and measured and at what locations. • The methods for monitoring measurement, analysis and evaluation to ensure valid results. • The criteria against which compliance and performance should be measured. • When and at what frequency monitoring needs to be performed. • How the results from monitoring and measurement should be analysed and evaluated (independent or internal). 	<p>The E&S Monitoring for both Bash 52MW and Bash 500MW WFs will be the same. As such, the joint E&S task force will be required to coordinate the monitoring and reporting requirements especially where their activities overlap and in relation to cumulative impacts i.e., ecological monitoring, air quality monitoring along the access roads etc.</p> <p>The roles and responsibilities under the coordinated monitoring and reporting will be provided to the lenders one month after the construction of Bash 52MW WF starts.</p> <p>The O&M will ensure that the plan prepared during the operational phase includes the requirements for both projects.</p>
Traffic & Transportation Management Plan	Construction, Commissioning & Operation	<p>The plan will identify any specific requirements for heavy, or oversize loads, including timings of deliveries, specific routes (to minimise disruption), engagement mechanisms with external transport authorities (as per the SEP, e.g. local government). To include measures to minimise congestion, fuel use and risks to the public and site staff. Deliveries will be guided by a Traffic Management Plan.</p>	<p>The Bash 500MW and bash 52MW will develop and implement a joint Traffic & Transportation Management Plan. The plan will be prepared in accordance with IFC General EHS Guideline, outline how turbine components will be delivered to the site and outline how construction traffic will be jointly managed to limit impacts upon local communities, personnel, and other road users including management of damage to local roads.</p> <p>The O&M will ensure that the plan prepared during the operational phase includes the requirements for both projects.</p>
Archaeological Chance Find Procedure	Construction	<p>To identify the process for identifying and responding to a potential find of archaeology in</p>	<p>Each EPC Contractor will develop this procedure based on the footprint of each project. However,</p>

PLAN / PROCEDURE	PROJECT PHASE	PURPOSE AND KEY REQUIREMENTS	BASH 500MW & BASH 52MW WFs REQUIREMENTS
		the construction working area. It will include the process for halting works in that area, sectioning off potential artefact and external communication with relevant regional authorities as consistent with SEP.	both Projects will use the same Archaeological expert (from the local authority) if and when needed. This will ensure that both Projects are consistent in their requirements.
Cultural/Archaeological Management Plan	Construction & Operation	The Plan will be prepared to include the locations of known archaeological finds, procedures to ensure their protection, required buffer zones, reporting protocols for any damage to these sites etc.	<p>Each EPC Contractor will develop this plan based on the footprint of each project.</p> <p>It is noted that the O&M team will be the same for both Projects and only one plan will be prepared to include the requirements for both projects.</p>
Working Conditions and Terms of Employment Procedure	Construction, Commissioning & Operation	<p>The EPC contractor and O&M Company will provide a plan detailing how working conditions and terms of employment are compliant with national labour, social security and occupational health and safety laws.</p> <p>The EPC Contractor and O&M Company will ensure that the following documents are prepared prior to the employment of workers.</p> <ul style="list-style-type: none"> • Employment agreements and recruitment policies; • Equal opportunities and non-discrimination policy (incorporating maternity policies and policies associated with GBVH); and • Child and forced labour policies / procedures (covering recruitment fees and arrangements, as well as 	<p>Each EPC Contractor will develop this procedure based on the workforce. However, the plans prepared will be aligned with the national and lenders requirements.</p> <p>The O&M will ensure that the plan prepared during the operational phase includes the requirements for both projects.</p>

PLAN / PROCEDURE	PROJECT PHASE	PURPOSE AND KEY REQUIREMENTS	BASH 500MW & BASH 52MW WFs REQUIREMENTS
		document (e.g. passport) retention.	
Human Resources Policy (and related Procedures)	Construction, Commissioning & Operation	Human resource policies and procedures will be adapted appropriate to the size of the workforce required for operation and maintenance requirements. Policies and procedures must be prepared to demonstrate consistency with the requirements of national legislation and lenders requirements.	Each EPC Contractor and the O&M will ensure that their policies and procedures align with the national legislation and lenders requirements.
Workers Accommodation Plan	Construction	This plan will outline the process and standards for the accommodation for the Project workforce. It will include accommodation areas directly managed by the Project, or rented/shared to accommodate direct Project employees and/or temporary or other contract staff (dedicated to the project). Accommodation areas in use by subcontractor companies/staff (where staff are dedicated for the Project) will also be included.	Each EPC Contractor will develop this procedure based on the workforce. However, the plans prepared will be aligned with the national and lenders requirements.
Stakeholder Engagement Plan (SEP)	Construction, Commissioning & Operation	To identify project stakeholders, identify communication protocols for engagement with stakeholders. To identify frequency or event-based communication with stakeholders (i.e. for emergencies and specific grievances). To detail the grievance mechanism, or provide a reference to a separate grievance mechanism for external parties.	Both projects will implement the same SEP as approved by the lenders. As such, the implementation of the SEP will be under the Joint E&S taskforce as provided in the updated SEP.
Resettlement Action Plan	Construction & Operational Phase	Project Company, EPC Contractor & O&M Company will ensure the implementation of the RAP through: <ul style="list-style-type: none">• Implementation of the RAP.• Compliance monitoring	The Projects Companies E&S team will ensure the implementation of the RAP Addendum. In addition, the team will ensure that an anticipated impacts from both Projects are identified and corrective action taken immediately.

PLAN / PROCEDURE	PROJECT PHASE	PURPOSE AND KEY REQUIREMENTS	BASH 500MW & BASH 52MW WFs REQUIREMENTS
		<ul style="list-style-type: none"> Unanticipated impacts especially during the construction phase. 	
Grievance Mechanism	Construction, Commissioning & Operation	<p>To be included within or be linked to the SEP. To identify the procedure for external parties and all site staff to be able to raise issues, concerns and opportunities for improvement for any aspect of their employment on the project including issues relating to GBV/H and sexual exploitation.</p> <p>The mechanism shall be easily accessible (including for any vulnerable groups), non-discriminatory and provide a transparent process to raise concerns or complaints, which may be issued in an anonymous nature. The mechanism shall specify the roles and responsibilities of internal staff with regard to the grievance mechanism and the procedure for responding to received grievances, including the timeline for response, engagement mechanisms and record keeping.</p>	<p>A joint task force will be established to address external grievances received from stakeholders.</p> <p>In addition, the Project Companies' E&S team will set up an online tracker that will require the EPCs to upload internal and external grievances received in real time. This will be critical in ensuring all the grievances are addressed in a timely manner.</p>
Human Rights Policy	Construction, Commissioning & Operation	<p>The statement policy will:</p> <ul style="list-style-type: none"> Be approved at the most senior level of the company; Informed by relevant internal and external expertise; Stipulate the EPC's & O&M's human rights expectations of personnel, local communities, sub-contractors and other suppliers directly linked to the construction and operational phase of the project; Be publicly available and communicated internally and to the relevant stakeholders; Be reflected in the other policies and procedures to embed it throughout their construction and operational phase activities. 	<p>The Human Rights Policy will be updated to include the requirements for Bash 52MW WF.</p>

PLAN / PROCEDURE	PROJECT PHASE	PURPOSE AND KEY REQUIREMENTS	BASH 500MW & BASH 52MW WFs REQUIREMENTS
SEA & SH Prevention & Response Action Plan	Construction, Commissioning & Operation	<p>This plan will include specific arrangements for the Project by which SEA/SH risks will be addressed. It will include as a minimum:</p> <ul style="list-style-type: none"> • Awareness raising strategy which describes how workers (regardless of rank) and local communities will be sensitized to SEA/SH risks, and the workers responsibilities; • How the Project will provide information to employees and the communities on how to report cases of SEA & SH to through the Project's Grievance Mechanism. • The process of notifying the EPC Contractor & O&M of allegations; and • SEA/SH support groups/service providers to which survivors can be referred to and the corresponding contact details. <p>The plan will also include an Accountability & Response Framework which details how allegations of SEA/SH will be handled, including the investigation procedures and disciplinary actions for violation. It will also include procedures that clearly lay out confidentiality requirements and other safety and ethical principles for dealing with SEA/SH cases.</p>	<p>The Project Companies E&S teams will update the SEA & SH Prevention & Action Plan (and other GBVH related procedures and plans including the GBHV Grievance Mechanism) to include the Bash 52MW WF. In addition, the requirements of these procedures will be provided to the EPC Contractors and joint training provided as applicable under the Gender Action Plan.</p> <p>The Project Companies will also ensure that the GBVH requirements are implemented by the O&M during the operational phase of the projects.</p>
Gender Based Violence & Harassment (GBVH) Policy	Construction, Commissioning & Operation	<p>The purpose of this policy will be to develop a safe, supportive, non-discriminatory workplace for all employees and create a common awareness and understanding that Gender Based Violence & Harassment, Sexual Exploitation & Abuse and Sexual Harassment have no place in this project. It will aim to create a clear system for reporting, company response and company/legal sanctions for such behaviour.</p>	<p>The GBVH Policy will be updated to include the requirements for Bash 52MW WF.</p>

PLAN / PROCEDURE	PROJECT PHASE	PURPOSE AND KEY REQUIREMENTS	BASH 500MW & BASH 52MW WFs REQUIREMENTS
Security Plan	Construction & Operation	<p>The security plan will be based on a security risk assessment of the reasonably foreseeable security risks (linked with security risks in the Emergency Preparedness and Response Plan), and tailored with the necessary management provisions, staffing requirements, equipment, training and defined processes to implement effective mitigation to manage or prevent these risks. The security plan will ensure applicable alignment to the necessary codes of conduct required by law enforcement under the United Nations principles for Law Enforcement Officers.</p>	<p>Even though each Project will have its own Security Plan, the EPC Contractors will be required to coordinate the implementation of these plans and training requirements for all security personnel. This will be undertaken through the Joint E&S taskforce that will ensure any risks as a result of both projects are identified and corrective action taken.</p> <p>In addition, the Projects Companies E&S team will ensure that the bash 52MW WF Security Management Plan is informed by the lessons learnt under the Bash 500MW WF.</p>
Community Response Action Plan	Construction & Operation	<p>This plan will define the site action to support community stakeholders in planning, responding and recovering from the COVID-19 outbreak especially when outbreaks are directly linked to the Projects workers.</p>	<p>According to WHO, COVID-19 is now considered an established on-going health issue but it no longer constitutes as public health emergency of international concern¹. A precautionary approach is still required in order to safeguard the health and safety of local communities.</p> <p>As such both EPC Contractors will develop and implement the same Community Response Plan under the coordination of the Joint E&S taskforce.</p>

¹ [https://www.who.int/news/item/05-05-2023-statement-on-the-fifteenth-meeting-of-the-international-health-regulations-\(2005\)-emergency-committee-regarding-the-coronavirus-disease-\(covid-19\)-pandemic](https://www.who.int/news/item/05-05-2023-statement-on-the-fifteenth-meeting-of-the-international-health-regulations-(2005)-emergency-committee-regarding-the-coronavirus-disease-(covid-19)-pandemic)

PLAN / PROCEDURE	PROJECT PHASE	PURPOSE AND KEY REQUIREMENTS	BASH 500MW & BASH 52MW WFs REQUIREMENTS
			This will ensure there is a coordinated effort in case of any outbreaks.
Local Recruitment Plan	Before start of Construction & Operation	This plan will provide set of actions for the recruitment of local workforce. The plan will detail the procedure for effective recruitment of local staff, the positions that could be filled by unskilled, semi-skilled and skilled local workforce, mechanisms that will be in place to ensure there is non-discrimination of women in assessing recruitment procedures and the training to be provided for each job role.	The Projects Companies E&S team will ensure that the Bash 52MW WF local recruitment plan is informed by the lessons learnt under the recruitment undertaken for the Bash 500MW WF. This will support in enhancing the benefits to the local workforce.
Influx Management Plan	Construction	The EPC Contractor will develop an Influx Management Plan to provide a clear set of actions that will be undertaken for the management and mitigation, monitoring and evaluation of impacts related to worker influx in the Project area.	The Projects Companies E&S team will support both EPC Contractors (CEEC & HDEC) in updating the existing Bash 500MW WF Influx Management Plan to include both Projects. The updates will reflect the lessons learnt from the on-going construction activities, grievances received in relation to the conduct of workers etc under the under Bash 500MW WF and how the impacts of additional workers will be addressed.
Local Content Plan	Construction	This plan will clearly identify the Project commitment to purchasing goods and services (where practicable without compromising on the quality and standard requirements for the Project). It will also set expectations with regards to the extent goods and services can be purchased from the local market in order to benefit local businesses without potentially leading to higher prices for local consumers. This plan will be shared with local businesses interested in providing goods and services to the Project.	The Projects Companies E&S team will ensure that the Bash 52MW WF Local Content Plan is informed by the lessons learnt under the Bash 500MW WF. This will support in enhancing the benefits to the local goods suppliers and service providers.
Labour Management Plan	Construction & Operation	This plan will set out responsibilities and management practices associated with the	Bash 52MW WF will develop its own labour and management plan. This will also be informed by

PLAN / PROCEDURE	PROJECT PHASE	PURPOSE AND KEY REQUIREMENTS	BASH 500MW & BASH 52MW WFs REQUIREMENTS
		<p>management of labour during construction and operational phase of the Project.</p> <p>It will also ensure that all personnel involved in the construction and operation of the Project EPC, subcontractors and O&M comply with the Project Company's obligations on labour management and in line with national and lenders requirements.</p>	<p>the requirements under Bash 500MW and any lessons learnt.</p>
Supply Chain Management Plan	Before the start of Construction	<p>This plan includes:</p> <ul style="list-style-type: none"> The requirement for Project Company's HR policy and procedures and worker Code of Conduct will be applied to all suppliers; The pre-qualification assessment & process to be undertaken prior to engaging core suppliers; Monitoring/audits to be undertaken to evaluate labour chain issues, suppliers' compliance and adequacy of implemented measures, etc. 	<p>The Bash 500MW WF SCMP will be updated to include requirements for the Bash 52MW WF.</p>
E&S Supplier and Vendor Management Plan	Before the start of construction	<p>ACWA Power/ Project Company will develop an E&S Supplier and Vendor Management Plan for suppliers and contractually require the EPC Contractors to undertake supplier/vendor E&S risk assessment for their suppliers and review potential supplier/vendor labour issues and risks.</p>	<p>To be updated to include the requirements under Bash 52MW WF.</p>
Water Management Plan	Prior to construction	<p>The water management plan will provide the water management strategy during the construction phase of the project.</p> <p>The plan will outline the measures required for the effective management of water resources and the measures to be implemented by the EPC Contractor & its sub-contractors to reduce</p>	<p>The Bash 52MW EPC Contractor will undertake a water availability assessment (depending on where the water will be sourced) to make sure that this does not impact other users. This assessment will also include cumulative impacts of the Bash 500MW WF and other proposed development projects that may also depend on similar water sources.</p>

PLAN / PROCEDURE	PROJECT PHASE	PURPOSE AND KEY REQUIREMENTS	BASH 500MW & BASH 52MW WFs REQUIREMENTS
		potential impacts to water resources in the project area. The plan will also outline monitoring requirements to ensure.	This assessment will inform the Water Management Plan.
Contractor Management Plan	Prior to construction	ACWA Power/Project Company will develop the CMP for managing and monitoring the E&S performance of the EPC Contractor and their sub-contractors in line with the E&S commitments.	To be updated to include the requirements under Bash 52MW WF.
De-commissioning Plan	De-commissioning	Decommissioning Plan will be developed 12 months prior to decommissioning, and this will include detailed methods for material re-use, recycling and disposal of wastes.	This plan will be developed to include de-commissioning requirements for both Bash WFs.

7.2.1 E&S Management Plans Prepared During ESIA Disclosure Period

The following plans (as provided in table 7-1) were prepared during the Bash 500MW WF ESIA disclosure period:

- Biodiversity Action Plan;
- Flora Conservation Action Plan;
- Reptile Relocation Plan;
- Breeding Birds Protection Plan;
- Biodiversity Management Plan/Biodiversity Monitoring & Evaluation Plan (BMEP);
- Compensation Offset Plan;
- Collision Risk Management Plan;
- Post-Construction Fatality Monitoring Plan;
- Livestock Management Plan; and
- Supply Chain Management Plan.

The plans below were prepared as part of the ESIA disclosure package:

- Stakeholder Engagement Plan;
- This includes details on the grievance mechanism.
- Resettlement Action Plan.

It is noted that the above plans have been updated to include the requirements for Bash 52MW WF.

7.2.2 Other Recommended Plans and Procedures

Besides the required ESIA plans and procedures stated above, the following plans and procedures are also recommended for development and implementation as part of the ESMS for both Projects.

Table 7-2 Recommended Plans and Procedures for Bash 500MW WF & Bash 52MW WF

PLAN / PROCEDURE	PROJECT PHASE	PURPOSE AND KEY REQUIREMENTS
Pollution Prevention and Response Plan	Construction, Commissioning & Operation	Identify site specific requirements for the prevention of pollution and how to manage pollution incidents. To include the identification of high-risk areas on a plan and the location of spill kits (and contents of spill kits). To identify required contact details in the event of an incident and contractors that are available on a quick

PLAN / PROCEDURE	PROJECT PHASE	PURPOSE AND KEY REQUIREMENTS
		<p>response contract to assist with clean up. Where necessary this should link with the SEP for any external communications.</p> <p>To identify staff that require training in regard to the plan. The plan should include provisions for recording of any incidents in a separate register, to ensure close out and implementation of corrective and preventative actions.</p>
Site Inspection & Audit Plan & Procedure	Construction & Operation	<p>To specify the timing and frequency of inspections (e.g. daily, weekly walkovers) and audits (including internal & external independent audits for the lenders as appropriate).</p> <p>To detail the methodology of such inspections and audits to ensure Environmental and Social Issues required in Uzbekistan required by project lenders are adequately covered.</p> <p>For internal audits, the procedure should identify the audit scope (site, laydown areas, accommodation areas, subcontractor areas etc.), audit criteria (e.g. CESMP, OESMP, ESMS), selection process for audit evidence, reporting format and auditor competence requirements.</p> <p>The Procedure should specify definitions of non-conformance, observations and best practices, as well as detailing the mechanisms for issuance and follow up of Non-Conformance reports, including time periods for action and the implementation of corrective and/or preventative measures.</p> <p>The process to engage with the external independent lenders' auditors should also be listed and linked with the SEP as appropriate.</p>
Material handling and Storage Procedure	Construction, Commissioning & Operation	<p>Should identify locations for material storage, storage requirements and handling procedures to minimise environmental and H&S risks. As appropriate this plan should be linked to or inclusive of the Hazardous Material Storage Plan and H&S Plan. Specific method statements regarding the handling of materials shall be detailed, as well as training requirements for staff involved in such activities.</p>
Fuel & Chemical Unloading Procedure	Construction, Commissioning & Operation	<p>To identify locations for fuel and chemical unloading, associated training requirements and associated pollution attenuation/spill response equipment that are to be in place regarding any unloading of fuel to larger tanks or chemicals to storage areas on-site. This should be linked or inclusive to the pollution prevention plan.</p>
Environmental & Social Training Plan	Construction, Commissioning & Operation	<p>To identify specific staff members for training and the type (i.e. classroom, practical, toolbox talks) how/when this is to be delivered, the frequency of training and whether follow up training provisions are required. The training should be linked to the specific content of the listed plans and procedures, or key risk activities that may be identified from on-site method statements.</p>

8 MONITORING

Environmental monitoring is required during both construction, commissioning and operation to evaluate whether the projects are in compliance with the applicable national regulations/standards and applicable lender requirements.

8.1 Monitoring Requirements from the ESIA & Addendum

The specific Environmental & Social Monitoring Plan(s) to be developed for construction, commissioning and operation shall include measures recommended in parameter specific chapters of ESIA Volume 2 and its Addendum and supplemented by detailing:

- What parameters need to be monitored and measured and at what locations;
- The methods for monitoring measurement, analysis and evaluation to ensure valid results;
- The criteria against which compliance and performance should be measured;
- When and at what frequency monitoring needs to be performed;
- How the results from monitoring and measurement should be analysed and evaluated (independent or internal); and
- Roles and responsibilities under the Joint E&S taskforce as applicable.

The outcomes of the monitoring regime should ensure:

- The timing of monitoring and measurement is coordinated with the need for analysis and evaluation of results;
- The results of monitoring and measurement are reliable, reproducible and traceable; and
- Analysis and evaluation are reliable and reproducible and enable the project to report trends.

8.2 Monitoring Data

Monitoring results will be compared against relevant standards, permit requirements, required thresholds, received complaints, audit findings, CESMPs and OESMP requirements. The Environmental and Social Management team for the EPC Contractors or O&M Company will need to define appropriate action to follow in the instance that any exceedances in monitoring limits are confirmed or adverse impacts identified, including:

- Communication protocol in the event that an exceedance is identified;
- Internal review process of recently performed maintenance and inspection;

- Review of previous monitoring data to identify any potential associated variations or trends in results;
- Recommendations for quarantine of equipment or change in work practices; and
- Review of monitoring frequency to ensure the issue does not re-occur.

Note: The above actions will be coordinated between the EPC Contractors (CEEC and HDEC) in areas where the construction activities overlap or where monitoring is coordinated through the Joint E&S taskforce.

The repetition of measurements is an essential part of monitoring as it detects changes over time and should alert to potentially positive or negative effects of an activity. Adverse effects should trigger a review of mitigation measures and determination of the likely source of the impact. Should no effect be detected it may demonstrate a lack of effect, success of mitigation measures or the requirement to continue monitoring over a longer period of time.

Data from the monitoring for comparison against baseline and all previous monitoring efforts to identify trends in condition and make inferences on the success of implemented mitigation measures.

9 ORGANISATIONAL CAPACITY

9.1 Roles and Responsibilities

The ESMS will require competent personnel and sufficient allocation of resources to ensure effective implementation in practice.

9.1.1 Project Developer

The Project Developer will engage an E&S Manager and a Biodiversity Manager that will oversee the implementation of both projects. This is required at the corporate level. The E&S Manager will be responsible for the implementation of all environmental & social monitoring requirements while the Biodiversity Manager will be responsible for all Biodiversity monitoring and management requirements.

The roles & responsibilities of the corporate level E&S management team are outlined below:

E&S MANAGER

- Ensure that Projects Companies Environmental & Social staff are recruited as per applicable competency requirements in the ACWA Power PC ESMS Manual.
- Ensure all the management plans herein (refer to chapter 7) and within the ESAPs are prepared and implemented within the required timelines in accordance with national and lenders requirements.
- Manage training requirements for Projects Companies Environmental & Social staff to ensure they are trained in accordance with their responsibilities, that they have awareness of internal corporate ACWA Power Policy commitments, the ACWA Power PC ESMS Manual (and how it is implemented), project specific obligations from the ESIA, other associated E&S package documents, including the lenders ESAP(s).
- Review and approve Projects Companies E&S Policies and other documents comprising the ESMS at each project.
- Ensure the Projects Companies staff are appropriately reviewing and approving the ESMS documents prepared by the EPC Contractors and O&M Company and that these are in accordance with the necessary content requirements as per the ESIA and its Addendum, ESAP(s) and other E&S obligations.
- Undertake periodic internal inspections of the Projects sites and formal audits against defined audit criteria (to include but not be limited to the aforementioned obligations).
- Issue internal findings related to internal inspections and audits, including issuance of internal non-conformances.

- Review and approve corrective action plans with respect to issued non-conformances prepared by the Projects Companies, EPC Contractors or O&M Company.
- If necessary, to have oversight of the Projects Companies in the process for E&S incident reporting, investigation and follow-up.
- Review and approve corrective action plans with respect to incident response by the Projects Companies, EPC Contractors or O&M Company.
- Maintain oversight of all received labour and community (or other external party) grievances and to ensure the Projects Companies are recording and responding appropriately in accordance with the defined ESMS processes for grievance redress.
- Collate periodic E&S reports (including E&S monitoring data) from the Projects Companies and to ensure that data is being submitted to ACWA Power corporate via the 'Synergy Life' portal.
- Review submitted E&S data to identify issues related to compliance, or potential E&S risks that require management or other actions.
- Notify and update applicable ACWA Power corporate management as appropriate in regard to particular issues (e.g. long-standing non-conformances, E&S incidents and sensitive grievances).
- Ensure attendance at site and in meetings with lenders, regulators and third-party E&S audit teams for visits and other discussions alongside the Projects Companies staff.
- As applicable review and approve reports prepared by the Projects Companies that are to be submitted to external parties (such as lenders and regulators).

BIODIVERSITY MANAGER

- Provide technical leadership in planning, management, and implementation of biodiversity conservation and management activities at multiple Wind Farm sites.
- Represent ACWA Power on Scientific Advisory Committee during meetings with regards to adaptive management and communication with third parties.
- Undertake monitoring and evaluation of ongoing biodiversity conservation and management activities to track progress.
- Coordinate preparation of policy recommendations and position papers to strengthen biodiversity conservation to achieve targets for No Net Loss and/or Net Gain of species identified in the BAP and associated Plans.
- Prepare Executive Reports for ACWA Power and Lenders.
- Prepare annual and quarterly work plans, budgets, and technical reports on biodiversity conservation and management activities as part of the overall Biodiversity program planning and reporting cycle.

- Coordinate with E&S Manager on implementation of relevant environmental and social management plans.
- Visit the Wind Farm sites during construction and operational phases to review ongoing biodiversity monitoring and management programmes being undertaken by EPC/PC/O&M and evaluate adequacy of resources.
- During operation, the Biodiversity Manager will be responsible for contracting Wind Wildlife Specialist as needed to support with fatality monitoring, shut down on demand, etc.
- The Biodiversity Manager will be responsible for contracting a field team responsible for carcass search and livestock management implementation.

9.1.2 Projects Companies (Accountable Party)

The Bash 52MW WF and Bash 500MW WF Projects Companies will share the same E&S team. As such, the designated E&S Manager will have the overall accountability for environmental and social management, compliance and implementation of related policies for both Projects.

The roles & responsibilities of the Projects Companies E&S team under both Projects are outlined below:

E&S MANAGER

- Manage the implementation of the project's ESMS to ensure EPCs and O&M Company meet ACWA Power and lenders requirements/obligations.
- Ensure the EPCs and O&M Company E&S Policy aligns with ACWA Power's corporate level policy and captures lenders requirement in relation to environmental & social issues related to the project.
- Monitor the implementation of all environmental & social monitoring requirements during the construction and operational phase through inspections and audits.
- Review and approve the ESMS documents prepared by the EPC Contractors and O&M Company and ensure that these are in accordance with the necessary content requirements as per the ESIA and its Addendum, ESAP(s) and other E&S obligations.
- Coordinate with the EPC Contractors and O&M Company to ensure that audits and inspections are being undertaken accordingly and inform the corporate level E&S Manager of any non-compliances.
- Have oversight of the EPC Contractors and O&M Company in the process for E&S incident reporting, investigation and follow-up.
- Notify and update the corporate level E&S Manager in regard to particular issues (e.g. long-standing non-conformances, E&S incidents and sensitive grievances).

- Review and approve corrective action plans with respect to issued non-conformances prepared by the EPC Contractors or O&M Company.
- Set up and manage the Joint E&S Taskforce between the Projects Companies E&S team and that of CEEC and HDEC. This will also include ensuring that the roles and responsibilities of the taskforce are clearly defined and executed.
- Implementation of the RAP in line with the requirements within the Project specific RAP and its Addendum. The implementation of the RAP will be in coordination with the following Project personnel (as provided in the RAP):
 - Project Company Deputy CEO;
 - Business Development Team (Uzbekistan);
 - RAP Implementation Team (which will include qualified resettlement/social experts);
 - Financial Dept.; and
 - Human Resource Manager.

Social Manager

- Implementation of all aspects of the SEP to ensure that the Project is compliant with lenders requirements. This will be undertaken in coordination with the CLO.
- Implementation, monitoring and reporting of the Resettlement Action Plan (RAP) and the Addendum.
- Support the CLO in meeting their duties in coordination with the E&S Manager.
- Ensure the implementation of GBVH plans and procedures including overseeing the training of GBVH focal point persons in coordination with a GBVH expert.
- Support the CLO in implementing the project's grievance mechanism including responding to grievances within the specific timeframes, registering and tracking grievances through the grievance log.
- Initiate grievance investigations in coordination with the CLO and identify key people to support investigations based on the nature of the complaint made e.g. construction manager, E&S Manager, security manager Project Company and EPC HSE managers, EPCs E&S Managers, CLO(s), EPC Human Resource Manager, Project Company CEO, and the EPC Contractor CEO.
- Ensure that the EPCs are implementing their social related plans and undertaking the required trainings, consultations, reporting etc within the required timelines. This includes oversight of their implementation, monitoring, and reporting requirements.
- Share information about the project in an accurate and timely manner and in a way that can be easily understood by workers and external stakeholders especially the local communities.
- Provide capacity building, support, and guidance, and oversee the work of, the community coordinators and grievance redressal request personnel.
- Preparation and organisation of community meetings e.g. advertising, ensuring invitations are issued on time and to all applicable groups, prepare materials,

arranging venues, equipment, and refreshments, distribute and obtain feedback forms.

- Updating the relevant social documents such as the SEP, RAP, Community Development Plan etc. in line with the review requirements.
- Provide daily, weekly, and monthly progress reports to E&S Manager and CEO on consultation activities, grievances, and commitments in coordination with the CLO.
- Undertake monitoring in line with the requirements set out in the Projects' Environmental and Social Management System (especially the SEP & RAP). This could include helping to administer monitoring questionnaires, analyse monitoring results and submit monitoring reports to E&S Manager. This will be undertaken in coordination with the CLO.
- Urgently report to E&S Manager, CEO, Project Director any instances of community unrest, protests and other serious incidents if made aware through stakeholder channels of communication. Etc. This will be undertaken in coordination with the E&S Manager and CLO.
- Fulfil any additional responsibilities delegated under the Joint Task Force.

COMMUNITY LIAISON OFFICER

- Understand what the communities' expectations, needs, interests, concerns, and levels of influence are. Maintain and update the stakeholder analysis in the Stakeholder Engagement Plan, as well as the stakeholder engagement programme as required.
- Understand how project activities might impact the well-being of the nomadic herders and residents of the local villages.
- Implement the stakeholder engagement programme as outlined in the SEP.
- Share information about the project in an accurate and timely manner and in a way that can be easily understood by everyone.
- Engage in discussions with and obtain feedback from all community stakeholder groups.
- Identify and respect the needs of the different stakeholder groups especially vulnerable groups. Where applicable approaches for engaging with vulnerable stakeholders should be modified to meet their needs.
- Assist in the preparation and organisation of community meetings e.g. advertising, ensuring invitations are issued on time and to all applicable groups, prepare materials, arranging venues, equipment and refreshments, distribute and obtain feedback forms.
- Ensure that the nomadic tribes seasonally using the project area have similar opportunities for information sharing and engagement with the project as the local villages.

- Provide or organise community health and safety training and awareness sessions with local communities (as outlined in SEP).
- Maintain records of stakeholder engagement in the consultation log.
- Accurately record all community views and concerns .
- Develop and maintain commitments register. Be responsible for tracking that the project meets the commitments it has made to its stakeholders.
- Implement the project's grievance mechanism including responding to grievances within the specific timeframes, registering and tracking grievances through the grievance log.
- Explain to all stakeholder groups how the project's grievance mechanism works. Particular attention must be paid to making sure that all nomadic tribes have received and understand the grievance process.
- Ensure there are anonymous grievance boxes, which it will be your responsibility to empty frequently, located in all local communities and at the entrance of the project site.
- Participate as a core member of the project's Grievance Redressal Committee.
- Provide daily, weekly, and monthly progress reports to E&S Manager, Social Manager and CEO on consultation activities, grievances, and commitments.
- Escalate communications from non-governmental organisations (NGOs) or the media to the local authorities as required.
- Contribute to local hiring decisions by ensuring that the local recruitment process is clearly communicated to all stakeholder groups.
- Provide support to local community members with information about job opportunities and share insights on potential training needs of the local workforce.
- Conduct consultations with the local communities on CSR programs and coordinate with the Social Manager in the implementation of the same based on the Projects' obligations.
- Fulfil any additional responsibilities delegated under the Joint Task Force.

Note: Refer to the Bash 500MW WF RAP (Chapter 9) on the Roles and Responsibilities of other Project personnel including other stakeholders involved in the implementation of the RAP.

The Projects Companies will ensure that the EPC Contractors and O&M Company allocate sufficient resources in the recruitment of competent E&S personnel and in addressing HSE related issues.

9.1.3 EPC Contractors / O&M Company (Responsible Party)

It is expected that the Projects Companies will contractually delineate responsibility for environmental & social management and compliance to the EPC Contractors/O&M Company for the respective project phases.

It is therefore expected that the EPC Contractors and O&M Company will specify certain roles and responsibilities for ESMS implementation to Project staff, as recommended below.

9.1.3.1 Management Team

In order to effectively implement the Project ESMS, management will need to:

- Experienced, trained & qualified in EHS;
- Fully support and active oversight in the implementation of the PC E&S Policy and the internally developed ESMS;
- Ensure that the PC E&S Policy is included/referenced as part of sub-contractor agreements;
- Promote a positive environmental & social culture and good practices by personal example and leadership;
- Ensure compliance with safeguard conditions for commencing works in areas with involuntary resettlement issues/impacts and ensure timely implementation of corrective actions in case of non-compliance and grievances.
- Review and approve EPC Contractors / O&M Company environmental and social management budgets, resourcing and staffing;
- Ensure resources (human and financial) are allocated appropriately in practice to manage the ESMS;
- Conduct regular site tours that include a specific focus on E&S elements;
- Ensure that the Joint E&S taskforce is set up and executing its responsibilities;
- Promote discussion of E&S management at team meetings; and
- Monitor and report on environmental management and performance.

9.1.3.2 Responsible for Environmental & Social Management

The EPC Contractors and O&M Company will need to delegate responsibility for implementation of the ESMS and wider environmental and social management and compliance to a full-time member(s) of staff at the Projects sites.

The E&S Manager (under each EPC Contractor and O&M) will be the primary project contact beneath the Projects Companies to implement the ESMS and will report to management, who will further report to the Projects Companies.

A guide for the applicable Environmental & Social responsibilities of this role are listed below:

E&S MANAGER

- Ensure that the E&S management plans and policies provided herein and within the ESAP are prepared and implemented in accordance with the lenders' requirements.

- Fully support the implementation of the PC E&S Policy;
- Prepare, implement and manage the EPC Contractor / O&M Company project specific ESMS;
- Engage with the PC HSE Manager regularly in regard to E&S management;
- Oversee and ensure execution of the environmental and social management programmes by other project parties (such as sub-contractors and key suppliers);
- Review EPC Contractor/ O&M Company personnel, qualifications, competency and environmental performance;
- Monitor the Project to ensure environmental and social compliance (including for sub-contractors and supplier - as per the scope of the ESMS);
- Advise management on matters pertaining to the environmental and/or social elements;
- Investigate environmental and social issues, incidents and non-conformances, implement corrective actions and report those to the management/relevant authorities;
- Maintain applicable environmental and social records as required by the ESMS (e.g. incident registers, NCR reports, corrective action reports, grievance register etc.);
- Ensure monitoring programmes are implemented by qualified personnel and report the results to the Project management for review and as a basis for continuous improvement;
- Display and monitor site bulletin boards to ensure they remain 'live' and 'up-to-date' with relevant environmental & social information;
- Coordinate, plan, formulate and/or deliver environmental and social induction training to all project personnel (including subcontractors) as well as regular toolbox talk environmental training sessions;
- Organise programmes and activities to promote environmentally responsible conduct in the prevention of injury, ill health and environmental impact throughout the workforce;
- Stop any unsafe activity which is not compliant with environmental legislation or lender requirements, and correct such work practice and/or conditions before allowing work to resume/commence;
- Act as point of contact for any sub-contractor with regard to environmental issues;
- Ensure that each sub-contractor is aware, compliant and implementing the requirements of the ESMPs;
- Review subcontractor's personnel, qualifications, competency and environmental performance;

- Undertake regular internal ESMS audits to assess compliance and implement corrective & preventative actions – audits are to include all sub-contractors at the project; and
- Execute their role under the Joint E&S taskforce (this will be applicable during the construction phase).

HSE ENGINEER OR E&S ENGINEER

- Fully support the implementation of the PC E&S Policy;
- Implement and assist management of the EPC Contractor / O&M Company project specific ESMS;
- Work with and engage with the EPC/O&M HSE/E&S Manager regularly in regard to E&S management;
- Actively ensure that environmental and social management programmes by other project parties are being undertaken as per project requirements (such as sub-contractors and key suppliers);
- Monitor the Project to ensure environmental and social compliance (including for sub-contractors and supplier - as per the scope of the ESMS);
- Advise HSE/E&S Manager on matters pertaining to the environmental and/or social elements;
- Actively investigate environmental and social issues, incidents and non-conformances, implement corrective actions;
- Maintain applicable environmental and social records as required by the ESMS (e.g., incident registers, NCR reports, corrective action reports, grievance register etc.);
- Ensure monitoring programmes are undertaken and reported;
- Prepare and monitor site bulletin boards to ensure they remain 'live' and 'up-to-date' with relevant environmental & social information;
- Alongside the HSE/E&S Manager, coordinate, plan, formulate and/or deliver environmental and social induction training to all project personnel (including sub-contractors) as well as regular toolbox talk environmental training sessions;
- Undertake programmes and activities to promote environmentally responsible conduct in the prevention of injury, ill health and environmental impact throughout the workforce;
- Stop any unsafe activity which is not compliant with environmental legislation or lender requirements, and correct such work practice and/or conditions before allowing work to resume/commence;
- Alongside the HSE/E&S Manager, act as point of contact for any sub-contractor with regard to environmental issues;
- Monitor on a daily basis that sub-contractor is aware, compliant and implementing the requirements of the ESMPs;

- Alongside the HSE/E&S Manager, review subcontractor's personnel, qualifications, competency and environmental performance; and
- Alongside the HSE/E&S Manager, undertake regular internal ESMS audits to assess compliance and implement corrective & preventative actions – audits are to include all sub-contractors at the project.

Note:

1. *Each EPC Contractor will have a full time E&S team that includes the E&S Manager, CLO & Ecologist as a minimum. The E&S teams will be members of the Joint E&S taskforce which will be constituted by the Projects Companies E&S team.*
2. *Each EPC Contractor must employ a full-time Ecologist with the sole responsibility of managing biodiversity-related management and monitoring plans. During active seasons of Russian Tortoise and Southern Even-fingered Gecko, whenever ground-breaking works will take place, a full-time herpetologist must be on site to assist with fauna identification, capture and relocation.*

9.2 Joint E&S Taskforce

The construction phase of the Bash 500MW and Bash 52MW WFs will be undertaken by different EPC Contractors (CEEC and HDEC). Therefore, it will be important for the Projects Companies E&S team to ensure that there is a coordinated effort in the implementation of the ESIA and its Addendum requirements including the E&S management plans/procedures. This will also ensure effective stakeholder engagement and the implementation of the grievance redress mechanism.

9.2.1 Roles & Responsibilities of the Joint E&S Taskforce

- Coordinating in all aspects relating to the development and implementations of the applicable E&S Management Plans/Procedures i.e., SEP, GBVH Plans and Procedures etc;
- Coordinating the training requirements such as those relating to security personnel, GBVH, Emergency Response, Community health & safety, transportation etc.
- Coordinating the E&S monitoring and reporting requirements for the Projects in order to avoid duplication of efforts or discrepancies in the KPIs used, differences in monitoring locations and equipment etc;
- Creating and reviewing a shared training and grievance database and debriefing on the process of conducting the training required and addressing the grievances received;

-
- Coordinating and agreeing on the content of reporting to external stakeholders in coordination with top management; and
 - Identifying new risks and implementing required management measures.

The Joint E&S taskforce will include the EPC Contractors E&S teams (E&S Managers, CLOs and Ecologist) and the Projects Companies E&S teams. The Project Companies E&S Manager will head the Proposed taskforce and ensure that it executes its roles and responsibilities.

Figure 9-1 Organizational Chart (Bash 500MW WF)

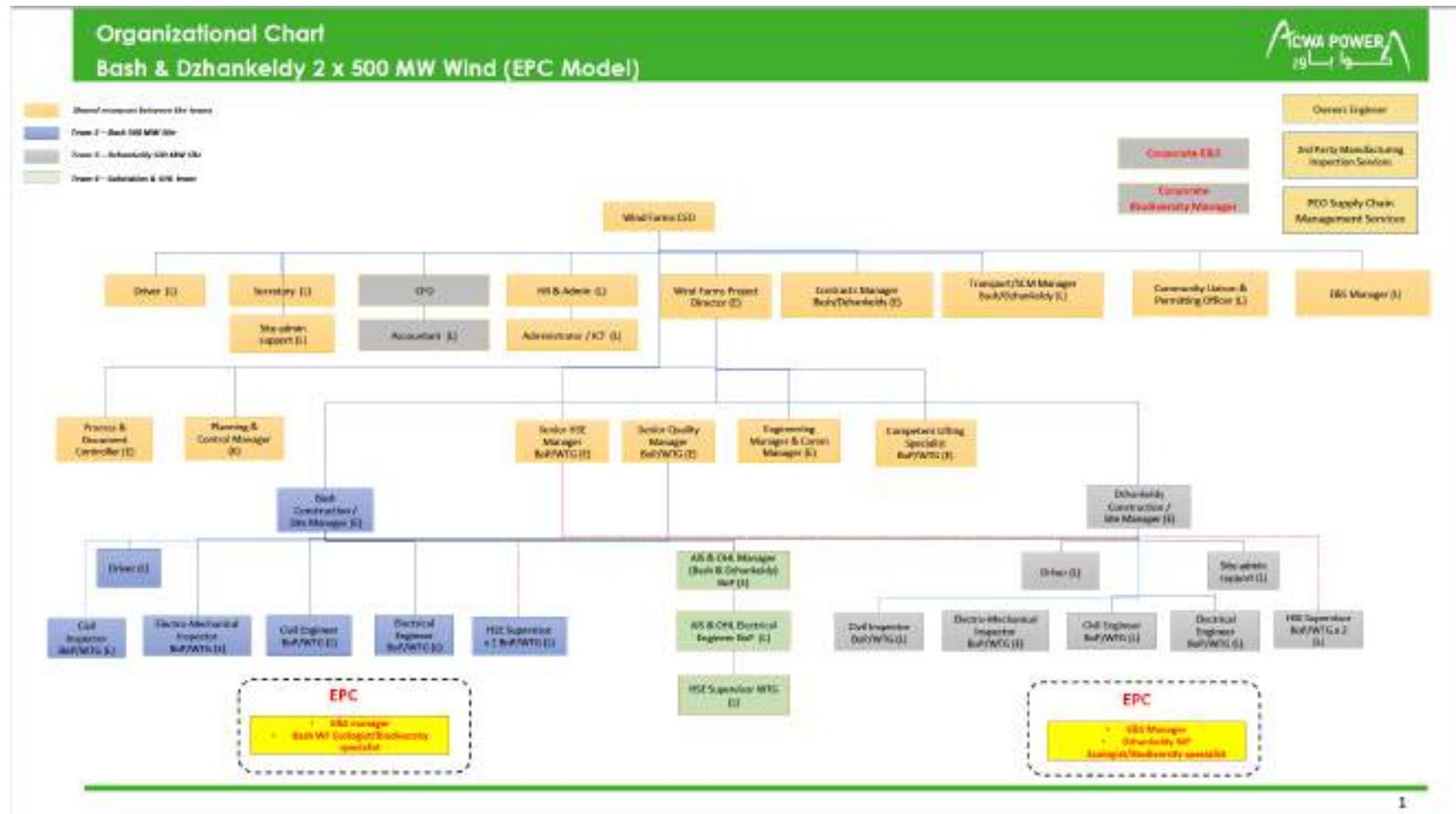
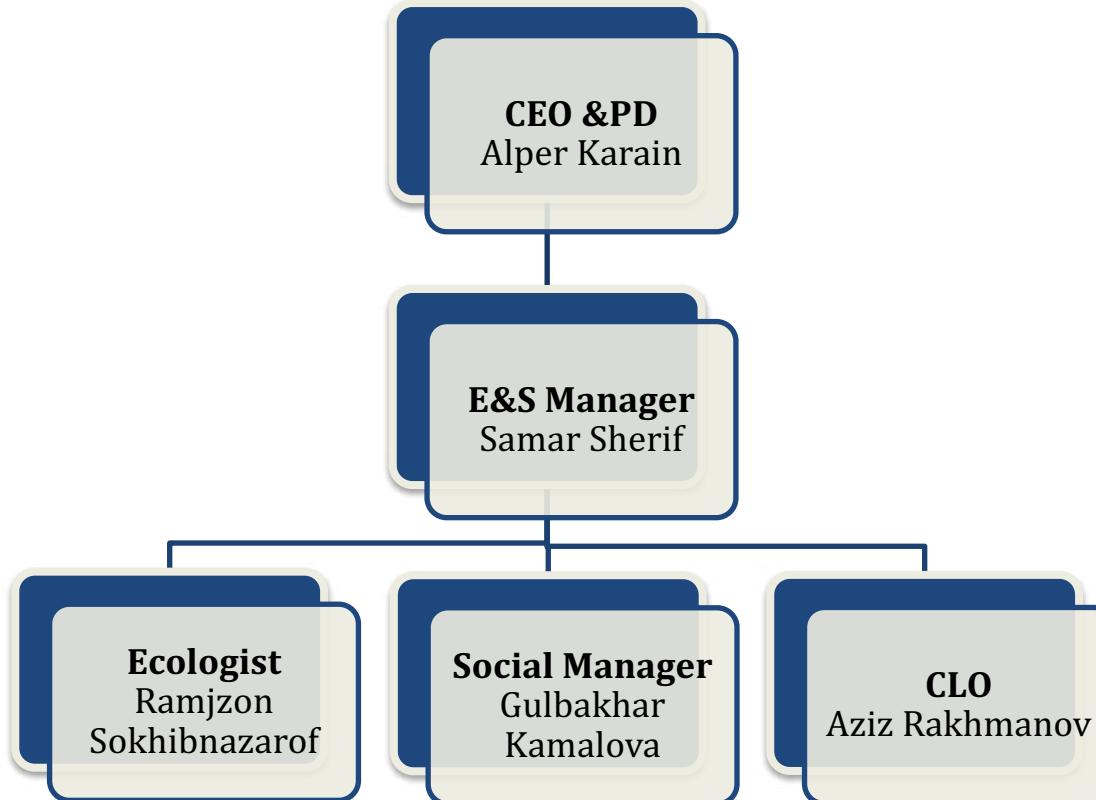


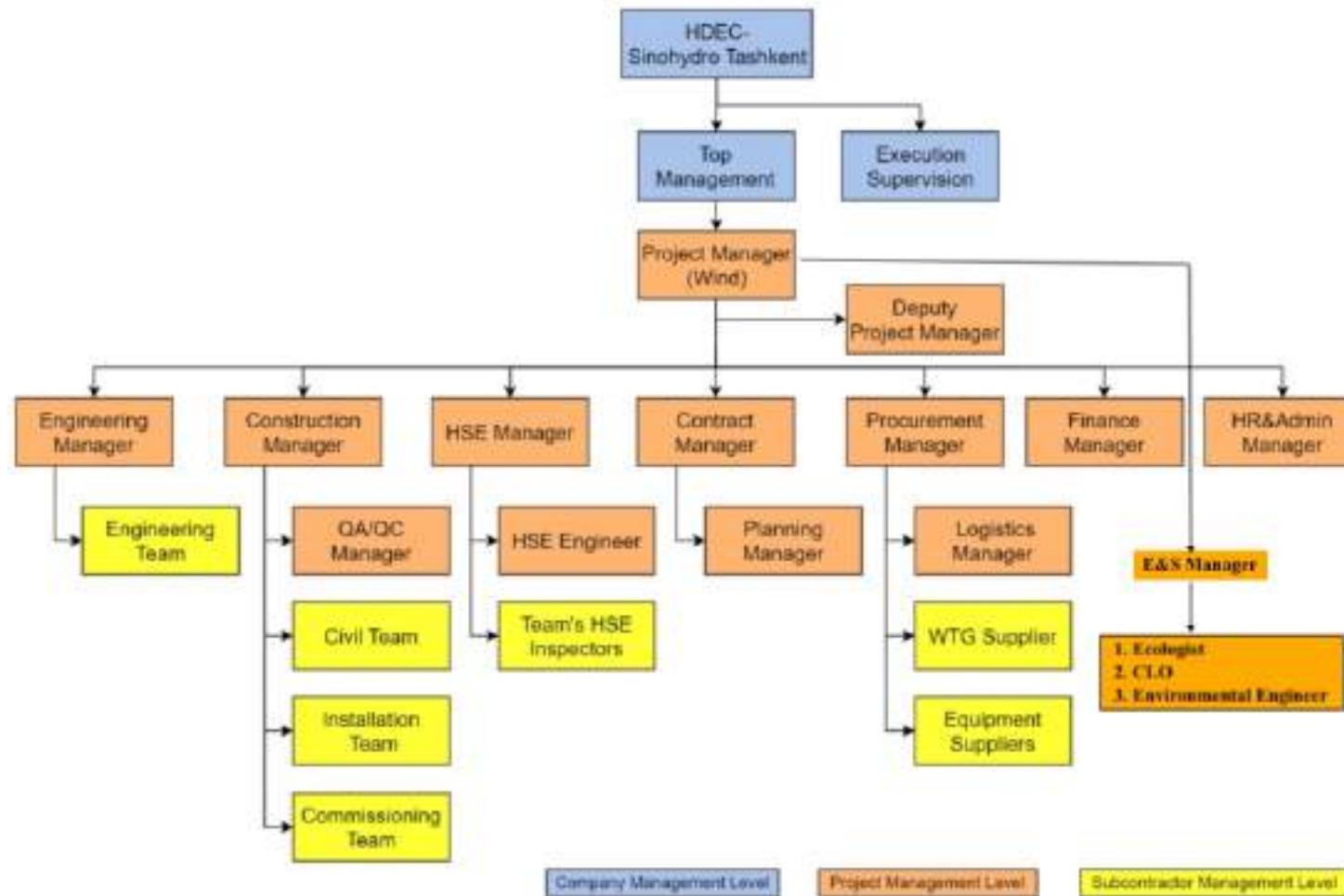
Figure 9-2 Organizational Chart Project Company (Bash 52MW WF- Similar for Bash 500MW WF)



Source: Bash WFs Project Company

The above E&S team will be dedicated to the Bash 500 & Bash 52MW WF apart from the E&S Manager who will also oversee the implementation of E&S requirements for the ACWA Power Dzhankeldy 500MW WF.

Figure 9-3 Organizational Chart EPC Contractor (Bash 52MW WF HDEC Team)



Source: HDEC

9.3 Environmental & Social Awareness and Training

E&S implementation will not be effective unless the projects workforce is aware of their specific responsibilities regarding environmental protection and social safeguarding. It is therefore necessary for the EPC Contractors/O&M Company to ensure that the workforce is trained appropriately according to the relevant elements of the project ESMS.

Tailored training requirements relevant to elements of works will need to be developed and defined as part of the ESMS (e.g. personnel associated with waste management should require training on relevant components of the waste management plan).

9.3.1 Type of Training Sessions

The EPC Contractors/O&M Company (and as applicable the Sub-contractors) will deliver applicable elements of E&S training within:

- Induction Training
 - To the entire workforce, to include key environmental and social components linked to the E&S Policy and developed ESMS; that are applicable to all employees.
- Tool-Box Talk
 - Environmental & Social tool-box talk training sessions on regular basis to remind workers of E&S considerations when undertaking normal day-to-day activities; and
- Specific training sessions on ESMS and E&S Management Plans
 - To ensure staff are competent to implement the ESMS, or undertake activities that may have inherent E&S risks or potential impacts to receptors. All staff with specific responsibilities and with authority to implement mitigation measures and monitoring/audit commitments should be trained in regard to such plans/procedures.
 - The training requirements for elements that require coordination through the Joint E&S taskforce will include GBVH, GRM, security personnel, community related engagements etc.

9.3.2 Planning of Training

In order to record identified training needs, the EPC Contractors/O&M company will develop and maintain a project environmental training matrix (falling under wider HSE training) to identify the training type and frequency required for each staff role. The EPCs will also develop a joint training matrix as applicable through the Joint E&S taskforce for the Projects.

A training plan/programme will also be prepared to set out the frequency of training requirements.

All training material will be prepared in advance and documented. It will be prepared in English language and applicable local languages or those languages that apply to the engaged workforce. Where necessary translators may be required for specific sessions.

All the training requirements will be logged on a joint on-line platform created by the Project Companies E&S team.

9.3.3 Content of Training Sessions

INDUCTION TRAINING

During project inductions, all project workforce and visitors will receive an element of Environmental and Social induction classroom training, which as a minimum will include an overview of:

- PC E&S Policy;
- Labour management;
- Contact details for the EPC Contractors/O&M Company E&S Manager and E&S Engineer;
- Main topics of E&S risk/impact (which will include critical habitat/sensitive species, waste, archaeological buffer zones, hazardous materials, receptors or communities and vulnerable groups including herders under Kokcha LLC & Agitma village);
- Environmental incident response and internal reporting requirements including who shall be contacted in the instance of an incident;
- Duty of care, highlighting that all staff have a responsibility to carry out their duties in accordance with the PC E&S Policy and related ESMS and to report any and all environmental incidents.

The induction shall make it clear that interference with any wildlife or archaeological remains shall be strictly prohibited. The training session will also highlight the importance of maintaining environmental & social awareness; the seriousness of environmental & social requirements and that compliance is a condition of employment.

TOOLBOX TALK ENVIRONMENTAL & SOCIAL TRAINING SESSIONS

This will be varied depending on the risks, impacts, opportunities and compliance related to specific activities by construction/operational teams, but may include the following (provided as examples):

- Air quality emissions and control measures for vehicles, plant and equipment drivers/operators;
- Dust control and dust mitigation techniques for heavy vehicles' drivers and dust generating equipment operators;
- Erosion and sediment control for operators of earth moving equipment;
- Hazardous materials handling including handling, transportation and storage of hazardous materials as well as maintenance and refuelling of vehicles and machinery;
- Spill prevention and response for personnel involved in the storage of fuel and other hazardous materials;
- Ecologically significant fauna and mitigation measures for all construction personnel. This includes the actions to be implemented in case of trapped or injured fauna etc.
- Noise control and mitigation measures for vehicles, plant and equipment drivers/operators;
- Traffic control and mitigation techniques for vehicle drivers (e.g. cars, buses, heavy goods vehicles, etc.);
- Waste management and chemicals and hazardous materials management, including transportation and disposal for all construction personnel;
- Emergency management and incident response for all construction personnel;
- Grievance procedure including methods to submit a complaint, review and response period; and
- Gender Based Violence & Harassment (GBVH) including Sexual Exploitation & Abuse (SEA) reporting system and company/legal sanctions for such behaviour.

SPECIFIC TRAINING SESSIONS ON ESMS AND E&S MANAGEMENT PLANS

Training sessions on the ESMS or specific activities or plans/procedures will need to be tailored and delivered to staff based on their specific content and key considerations. As a minimum, training will be provided for the following management plans/procedures due to the specific risks associated with these aspects:

- All ecological plans & procedures. This is due to the ecological sensitivity of the Projects site;
- Archaeological Chance Find Procedure;
- Cultural/Archaeological Management Plan;
- SEA & SH Prevention & Response Action Plan; and
- Gender Based Violence & Harassment Policy.

The training sessions above (and any additional requirements based on the E&S Management Plans/Procedures) will be undertaken through the Joint E&S taskforce.

9.3.4 Training Records

Further to the training being undertaken the environmental training records will identify as a minimum:

- Description and purpose of training;
- Date and location;
- Trainer and attendees (with attendance signatures);
- Photos or other documents as attachments to evidence the training.

A consolidated record of training undertaken by all workers will be maintained and will be comparable against the training matrix.

All the training records will be logged on a joint on-line platform created by the Projects Companies E&S team.

10 AUDIT PROGRAMME

Auditing is an integral requirement of any management system and should be considered as a continual process to ensure the successful implementation of the ESMS.

10.1 Internal Audits

The ESMS will establish, implement and maintain an internal audit programme that identifies the frequency, methods, responsibilities, planning requirements and reporting of audits and inspections.

When establishing an audit and inspection programme, the organisation should consider the potential frequency and significance of environmental and social risks relative to the construction and operational phase and adjust the audit scope and frequency accordingly.

When developing and undertaking audits the following will need to be established:

- Define scope, audit criteria and the objectives of each audit;
- Select audit staff competent in the audit process and subject matter; and
- Ensure that audit results are reported to relevant senior management.

The audits will be undertaken on a quarterly basis during the construction/commissioning phase and annually during the operational phase.

10.2 ACWA Power Corporate Audits

It is expected that the ACWA Power corporate HSSE team will audit the Projects' management system on an annual basis as a minimum.

10.3 Lenders Monitoring and Reporting

Monitoring requirements will be established with the lenders and monitoring reports will be provided and reported to the lenders. These reports are likely to be based upon site visits to evaluate the implementation of both the ESAP(s) (a covenant to the loan), and the suitability & effective of the established ESMS in practice. The frequency for these will be stated in the ESAP(s).

In addition, a RAP implementation Compliance Report will be prepared prior to the commencement of works in areas impacted by involuntary resettlement (economic & physical displacement) for the Wind Farm and along the OHTL. Additional monitoring will be continued throughout the Project construction phase as per the requirements within the Project specific RAP.

11 NON-CONFORMITY AND CORRECTIVE ACTION

All non-conformances identified during audits, inspections and monitoring activities will be recorded and followed up as non-conformity. Clear processes for actions are stated in the Projects Companies ESMS Implementation Manual and will be followed.

Non-conformances are instances where Projects compliance obligations (such as a legal requirement, or ESMS requirement) are not being fulfilled, or cannot be evidenced. Examples of non-conformity include, but are not limited to:

- Breach of an environmental standard;
- Commencement of works without an approved risk assessment and method statement that covers environmental issues identified herein;
- No review of risk assessment and method statements following any significant changes in requirements that could adversely impact the environment;
- Appointment of a waste transport/disposal service provider that is not appropriately licensed;
- Failure to comply with waste storage/disposal requirements as identified by risk assessment and/or method statement;
- Failure to comply with chemical storage and/or handling requirements;
- Un-containable or uncontrollable spills of fuels or chemicals;
- Undertaken works outside the scope defined within the risk assessment and method statement;
- Discharge of untreated, contaminated waste water to the environment;
- Commencement of site clearance and construction works within the involuntary resettlement areas; and,
- Grievances received in relation to physical and economic impacts (impacts within the RAP or unanticipated impacts).

Each non-conformance and near miss will be recorded utilising a developed reporting process. All non-conformances and near misses shall include the following information:

- Location and description of the non-conformance and the criteria/requirement that has been breached;
- The proposed corrective action including who holds responsibility for undertaking this action;
- The proposed preventative action to ensure against reoccurrence of the non - compliance;
- Any required monitoring and follow up; and

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- Key performance indicators and a deadline for the successful completion of the corrective and preventive action.

11.1 Corrective Action

Any situation or condition that is non-conforming or otherwise poses an imminent risk to the environment, or social welfare should be immediately resolved.

It is expected that a corrective action plan will be developed to respond to individual NCRs. The corrective action plan shall include determination of root cause, proposed actions, timelines, required resources and any changes needed to ESMS documentation. The corrective action plan should be approved by a responsible person for managing the ESMS.

Records of implemented corrective actions shall also be maintained.

If a situation or condition cannot be corrected immediately, temporary measures such as necessary for the protection of the environment should be implemented. However, NCRs relating to involuntary resettlement will require that physical works in areas of impact be stopped immediately until the full implementation and reporting of the corrective action plan.

12 EMERGENCY PREPAREDNESS AND RESPONSE

The likelihood of an E&S incident can be minimised by effective risk management planning and development of applicable response plans as part of an ESMS.

All risk assessments and method statements will need to include consideration of the potential for environmental incidents. Suitable incident response equipment, should be maintained at appropriate locations for both Project sites and Projects staff be suitably trained to use such equipment and respond to such emergencies.

The Projects will each prepare and implement an Emergency Preparedness and Response Plan to include requirements for co-ordination between themselves (CEEC and HDEC) with the applicable external agencies (i.e. emergency services), impacted stakeholders and statutory authorities in the instance that a pollution incident occurs.

The plan(s) will identify procedures for reasonably foreseeable emergency situations. As per the ACWA Power Projects Companies ESMS Implementation Manual, this is required to include drills at the Projects sites and any relevant training to specifically involved personnel.

When establishing the Emergency Preparedness and Response Plan(s), the following should be considered for each Project and cumulatively for both Bash 500MW and Bash 52MW WFs:

- The most appropriate method for responding to an emergency situation;
- Internal communication process;
- External communication process;
- The action required to prevent or mitigate environmental impacts;
- Mitigation and response actions to be taken for different types of emergency situations;
- The need for post-emergency evaluation to determine and implement corrective and preventative actions;
- Periodic testing of planned emergency response actions;
- Training of emergency response;
- A list of key personnel and aid agencies, including contact details (such as fire department, spillage clean-up services);
- Evacuations routes and assembly points; and
- The possibility of the need for mutual assistance from neighbouring organisations/projects.

12.1 Incidents

Incident investigation and analysis will need to be undertaken in co-ordination with the provision of Element 10 established in the ACWA Power HSSE Management System Framework. In summary, this requires clear processes for incident reporting, response, investigation, analysis, follow up and documentation.

13 STAKEHOLDER ENGAGEMENT

The project has developed a SEP, which will be implemented during both construction, commissioning and operations. This will also need to be updated and made applicable prior to the operational phase. The SEP includes a suitable grievance mechanism to allow local community complaints to be raised in a clear process.

Note: All processes relating to Stakeholder Engagement should refer to the Project Specific Stakeholder Engagement Plan (SEP).

Stakeholder engagement can be described as a systematic effort to understand and involve stakeholders and their concerns in the Project activities and decision-making processes. Stakeholders are defined as any group or individual who can affect, or can be affected by, the Project.

The main objectives for stakeholder engagement are:

- To inform the relevant stakeholders about the Project;
- To capture views and concerns of the relevant stakeholders with regard to the project;
- To enhance ownership of the project within the host community;
- To provide a basis for stakeholder participation in impact identification and mitigation.

For Projects that have environmental and social impacts, consultation is not a single conversation but a series of opportunities to create understanding about the Project among those that are likely to be affected or might have an interest in it, and to learn how these stakeholders view the project and its related risks, impacts, opportunities, and mitigation measures. Listening to stakeholder concerns and feedback can be a valuable source of information to help identify environmental and social risks (real and perceived) and improve project management.

13.1 Grievance Mechanism

13.1.1 Worker Grievances

The SEP includes a grievance procedure for workers to raise workplace concerns. The procedure includes an appropriate level of management and address concerns promptly, using an understandable and transparent process that provides timely feedback to those concerned, without any retribution. The mechanism allows for anonymous complaints to be raised and addressed.

The grievance mechanism must not impede access to other judicial or administrative remedies that might be available under the law or through existing arbitration procedures, or substitute for grievance mechanisms provided through collective agreements.

All staff will need to be informed of the grievance procedure during their induction to the projects and the procedure will be made readily available and easily accessible.

13.1.2 Third-Party Grievances

The SEP also includes a procedure for third-party grievances that establishes methods to receive and register communications from third-party (Project Affected Persons and Interest based stakeholders). This includes:

- A method to screen and assess the issues raised and determine how to address them;
- A method to provide, track, and document responses, if any; and
- A method to adjust the ESMS management program, as appropriate, in response to external grievances.

The grievance procedure shall be reviewed and updated (as applicable) to ensure it remains scaled to the risks and adverse impacts of the project and include consideration of any affected stakeholders.

It must seek to resolve concerns promptly, using an understandable and transparent consultative process that is culturally appropriate and readily accessible, and at no cost and without retribution to the party that originated the issue or concern. The mechanism should not impede access to judicial or administrative remedies.

14 COMMUNICATION

The ESMS will establish, implement and maintain processes needed for internal and external communication relevant to environmental and social performance of the Projects.

Lines of communication relevant to the construction phase will be clearly defined within the CESMPs whilst lines of communication relevant to the operational phase will be clearly defined within the OESMP.

Associated processes will establish:

- What will be communicated
- When it will be communicated
- With whom to communicate
- How to communicate
- Coordination between CEEC and HDEC

When establishing communication processes relevant to the ESMS, particular note will be made to

- Compliance obligations, including any reporting requirements to the statutory environmental authority
- Reporting requirements required by the Project lenders.

15 DATA MANAGEMENT AND RECORD KEEPING

The implementation of the ESMS will generate data, that will be required to be managed. The appropriate management of records is a requirement of any successful ESMS and can be used to track progress, review effectiveness and demonstrate compliance.

As such, the Projects Companies E&S team will create an online data base that is accessible to the Joint E&S taskforce and to the O&M. The data base will include collation of the records including (but not limited to) the following:

- Environmental and Social induction and training records;
- Relevant records of competence/qualifications;
- Accident Investigation Reports;
- Past stakeholder engagement consultations outcomes based on the SEP consultation timetable (Minutes of Meetings, concerns raised and who they were addressed, attendance sheets etc);
- Grievance register;
- Internal Audits reports (including close - out);
- Non-Conformance Reports;
- Incident Reports;
- Environmental & Social Inspection & Audit Reports (including corrective action reports);
- Environmental & Social Monitoring Results;
- Waste Manifest Forms and Chain of Custodies;
- Environmental & Social Risk Assessments and Method statements;
- Equipment & Social Inspections/Certifications;
- Independent Audit Reports for Lenders (including corrective action reports); and
- Emergency events.

Such records will need to be included on the ESMS register and updated as applicable.

16 BUDGET ALLOCATION

To ensure the implementation of the environmental and social mitigation, management and monitoring measures, the following budgets have been allocated to the Bash 500MW and Bash 52MW WFs.

Table 16-1 Allocated E&S Budgets for Bash 500MW & Bash 52MW WFs

E&S ELEMENT	BUDGET ALLOCATED (USD)
Bash 500MW WF	
Collision Risk Management Plan (CRMP) bat detection Bash 500 & Bash 52MW	59,302
Flora conservation & BAP	6,300
Livestock management plan (Bash 500MW & Bash 52MW)	54,420
Breeding birds nest surveys & BAP (Bash 500 & Bash 52)	10,600
Reptile relocation including BAP	47,540
Post-construction fatality monitoring plan for Bash 500MW & Bash 52MW (2026 – 2028)	2,125,000
Compensation of PAPs	610,004
Skills development program of 120 young people for 5 years (next three years 2026-2028)	95,000
Community Development Program (Year 1)	125,000
Community Development Program (Year 2)	125,000
Skill development for 120 young people for 5 years (Year 1)	25,000
Skill development for 120 young people for 5 years (Year 2)	25,000
Material aid for vulnerable groups (year 1)	8,125
Material aid for vulnerable groups (year 2)	8,125
Cultural events (New Year, 8 th March, 21 st March, Independence Day etc.) (Yr. 1)	5,000
Cultural events (New Year, 8 th March, 21 st March, Independence Day etc.) (Yr. 2)	5,000
Unforeseen expenses (Yr. 1)	25,000
Unforeseen expenses (Yr. 2)	25,000
Total	3,384,416
Bash 52MW WF	
Reptile Relocation	10,000
Flora Conservation	10,000
Material Aid & charity to vulnerable groups	15,000
Skill development program for 60 young people	25,000
Total	60,000
Grand Total	3,444,416

17 REVIEW

Projects ESMS documentation will be 'living' and will need to be reviewed and updated in relation to changes in projects circumstances, activities, environmental sensitivities and future requirements defined by respective regulatory authorities and Project Lenders.

The ESMS should be regularly reviewed according to any changes in construction, commissioning or operational activities, new (applicable) regulation and in response to results from monitoring, audits and inspection.

Reviews should be undertaken at a frequency to ensure adequacy of the ESMS and to ensure that all potentially significant adverse impacts are identified and that associated control measures are appropriate to the Projects.