Bilasuvar 445 MW_{ac} Solar PV Azerbaijan

Environmental and Social Impact Assessment – **Volume 3:** Framework For E&S Management

October 2024

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2	Social Capital
3	Natural Capital
4	Manufactured Capital
5	Human Capital

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LIST OF ABBREVIATIONS

ABBREVIATION	MEANING
5 Capitals	5 Capitals Environmental & Management Consultancy
ADB	Asian Development Bank
c HSSE-MS	Construction Health, Safety, Social and Environmental Management System
E&S	Environmental and Social
EBRD	European Bank for Reconstruction and Development
EIA	Environmental Impact Assessment
EMP	Environmental Management Plan
EPC	Engineering, Procurement and Construction
ESAP	Environmental & Social Action Plan
ESG	Environmental, Social and Governance
ESIA	Environmental & Social Impact Assessment
ESP	Environmental Social Policy
ESF	Environmental and Social Framework
ESS	Environmental and Social Standards
EU	European Union
GBVH	Gender Based Violence & Harassment
GIP	Good International Practice
H&S	Health and Safety
HSSE	Health, Safety Security and Environment
HSSE-MS	Health, Safety, Social and Environmental Management System
HSE	Health, Safety and Environment
LLA	Land Lease Agreement
MENR	Ministry of Ecology and Natural Resources
MSDS	Material Safety Data Sheet
NCR	Non-Conformance Report
IFC	International Finance Corporation
ILO	International Labour Organisation
OH&S	Occupational Health and Safety
O&M	Operation and Maintenance
o HSSE-MS	Operational Health, Safety, Social and Environmental Management System
PS	Performance Standard
PR	Performance Requirements
SEA	Sexual Exploitation & Abuse
SEP	Stakeholder Engagement Plan
SR	Safeguard Requirements
SH	Sexual Harassment

1 INTRODUCTION

This document presents the Framework for Environmental & Social Management following on from the Environmental and Social Impact Assessment (ESIA) for the Bilasuvar Solar PV Plant in the Bilasuvar district of the Shirvan-Salyan Region of Azerbaijan ("the Project").

This framework has been informed by the outcomes of the ESIA (Volume 2) and has been developed to establish structures for the management of Environmental and Social (E&S) 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 Health, Safety, Social and Environmental Management System (HSSE-MS).

In order to implement the mitigation and management measures established in the ESIA (Volume 2), specific management programmes will be developed to incorporate these mechanisms, as well as the requirements of the local regulator, the Ministry of Ecology and Natural Resources (MENR) and the Projects' Lenders. Such documented information will be in the form of Project-specific Construction and Operation phase HSSE-MS; to be developed prior to the commencement of construction and operations respectively.

2 REQUIREMENTS FOR PROJECT E&S MANAGEMENT

The following applicable requirements relate to the need for the Project to implement formal or structured HSSE-MS, 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 President of the Azerbaijan Republic introduced a law on Environmental Impact Assessment (EIA) in June 2018, which was approved by the Decree No.193, dated 13 July 2018. According to this law, to coordinate the planned activity with the State Ecological Expertise of MENR, it is necessary to develop and submit the EIA report to the representatives of MENR. The purpose of the law is to create the legal basis for the environmental impact assessment of public and private projects to ensure the prevention or reduction of negative impacts on the environment and public health at the earliest stages. The development of the EIA report is mandatory.

2.2 Lenders Requirements

it is understood that Masdar is seeking an amount of project finance from financial Institutions (together "lenders"), potentially including commercial banks that are Equator Principles Financial Institutions (EPFIs) and Development Finance Institutions (DFIs), which could include:

- Asian Development Bank (ADB)
- Asian Infrastructure Investment Bank (AIIB)
- European Bank for Reconstruction and Development (EBRD)
- International Finance Corporation (IFC)

2.2.1 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 Requirement 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.

2.2.2 AIIB

AIIB's 2022 Environmental and Social Framework (ESF) is a system that supports AIIB and its clients in achieving environmentally and socially sustainable development outcomes. It does so by integrating good international practice on environmental and social planning and management of risks and impacts into decision-making on, and preparation and implementation of, AIIB supported Projects.

The ESF is comprised of four complementary parts: (a) Introduction; (b) Vision Statement; (c) the Environmental and Social Policy; and (d) a Glossary.

The Environmental and Social Policy comprises mandatory environmental and social requirements for each Project and is accompanied by three associated mandatory Environmental and Social Standards (ESSs) setting out requirements applicable to Bank Clients on.

ESS1: Environmental and Social Assessment and Management; relates to the requirements for environmental and social management throughout the Project lifecycle.

2.2.3 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 requires Clients to establish and maintain an Environmental and Social Management System ((ESMS)[1] *'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, and ESMP will be developed based on the outcome of the ESIA and stakeholder engagement process.

[1] Note that, instead of an ESMS, Masdar has in place a Health, Safety, Social and Environmental Management System (HSSE MS) to support projects in enhancing IFI and GIIP compliance.

2.2.4 IFC

The IFC Performance Standards (PS) are a key component of the IFC's Sustainability Framework and directed towards clients (i.e. party responsible for implementing and operating the project that is being financed), providing guidance on how to identify risks and impacts. The IFC Performance Standards are designed to help avoid, mitigate, and manage risks and impacts throughout the life of a project as a way of doing business in a sustainable way, including stakeholder engagement and disclosure obligations of the client in relation to project-level activities.

In accordance with IFC PS1, the project will need to: '*establish and maintain an ESMS appropriate to the nature and scale of the project. 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 HEALTH, SAFETY, SOCIAL AND ENVIRONMENTAL MANAGEMENT SYSTEM

The Project HSSE-MS 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 HSSE-MS:

- Project specific policies related to the environmental and social considerations (including labour, Human Rights and external stakeholders & affected communities).
- Project-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 Project 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 HSSE-MS 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 HSSE-MS documents will be treated as living documents, to be updated within a continuous process of improvement.

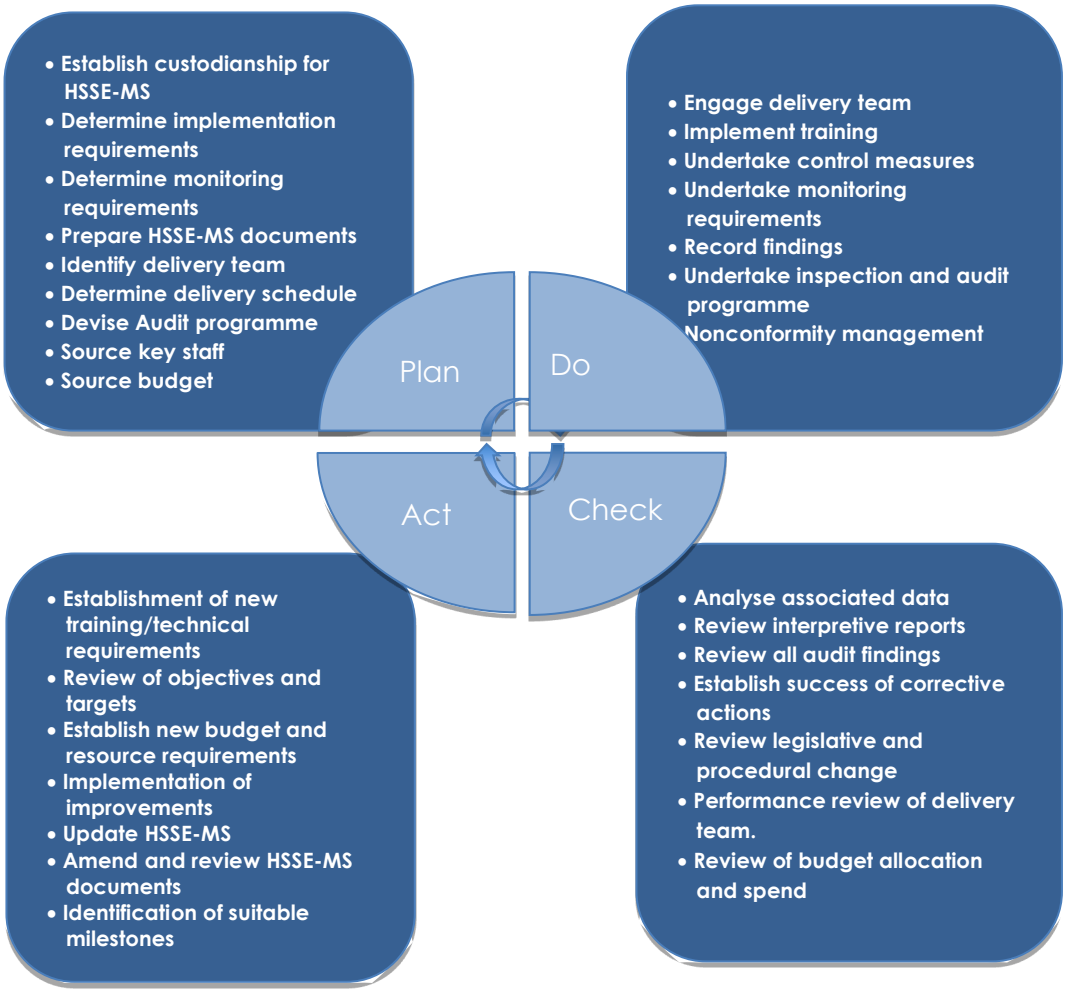

Figure 3-1 Implementation Process

3.1 HSSE-MS Scope

The Project will develop and implement HSSE-MS for the respective construction and operational phases. The scope will need to include:

- Physical elements of the project to set the boundaries of the HSSE-MS 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;
- Training and development programs for all personnel involved in the project, and throughout project lifecycle;
- 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 E&S Management Structures

The Project Company will be established a special purpose vehicle as the Project Company. At the time of writing the name of the Project Company has not been confirmed. .

The Project Company will be the owner of the Project, the holder of licenses and permits and ultimately the recipient of project finance. The Project Company will enter into various agreement including a Power Purchase Agreement, Land lease Agreement (LLA) and an EPC Contract.

The Project Company will be ultimately accountable for E&S compliance and oversight of the Project at all stages (pre-construction, constructing, commissioning, and operation, decommissioning), however, there will be contractual delegation of E&S management during the construction and operational phase to the EPC Contractor.

At the time of writing, the Engineering, Procurement and Construction (EPC) Contractor and the Operations and Maintenance (O&M) Company have yet to be confirmed.

3.3 Development of Construction Phase HSSE-MS

As the overall accountable party for E&S compliance and management, the Project Company will develop and implement the project specific E&S Policy. However, the main construction phase HSSE-MS will be developed and implemented by the EPC Contractor. This will be contractually captured in the EPC Contract.

The construction phase HSSE-MS will align with the requirements outlined in IFC Performance Standard 1, EBRD Performance Requirement 1, ADB Safeguard Requirement 1, AIIB ESS1 and relevant the supporting Guidance Notes.

The EPC Contractor's HSSE-MS will ensure coverage of all potential environmental and social risks, impacts, opportunities and related compliance associated that fall under the scope of the Project's 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.

3.4 Development of Operational Phase HSSE-MS

The operational phase HSSE-MS will be developed and implemented by the O&M Company as the operator and will align with the E&S Policy established by the Project Company.

Additionally, the operational HSSE-MS will need to align with the requirements outlined in IFC Performance Standard 1, EBRD Performance Requirement 1, ADB Safeguard Requirement 1, AIIB ESS1 and relevant the supporting Guidance Notes.

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

4 E&S POLICY

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

4.1 Project Company HSSE Policy

To align with key outcomes and requirements identified in the ESIA, the Project-specific E&S Policy, which will be aligned with Masdar's HSSE-MS E&S Policy Template, will include commitments to (note that the list is not exhaustive):

- Comply with applicable national and local HSSE laws and regulations, permitting requirements, applicable international conventions, international requirements, and Project specific HSSE obligations.
- Ensure a positive contribution to local development.
- Set up a grievance mechanism for workers and the community to express concerns without retaliation.
- Recognise the importance of women in development, consider gender-specific impacts and risks and promote women's rights.
- Prohibit child and forced labour.
- Promote a safe, equal, and inclusive workplace, ensuring a work environment free of harassment or discrimination.
- Target zero harm to the environment through prevention of environmental incidents.
- Protect and conserve biodiversity.
- Avoid pollution of water, air and land.

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

4.2 Contracted Parties: E&S Policies

The EPC Contractor and the O&M Company may also develop E&S Policies that align with the Project Company's overarching project specific E&S policy.

Where an E&S Policy is not developed by the EPC Contractor, the respective construction and operational phase HSSE-MS (developed by the contracted parties) will be spearheaded by the overarching E&S Policy of the Project Company.

5 IDENTIFICATION OF LEGAL AND COMPLIANCE OBLIGATIONS

5.1 Identification of Legal Requirements

During the development of the HSSE-MS, the applicable environmental and social legal requirements should be identified and documented, including:

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

5.2 Identification of ESIA Requirements

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

Following approval of the ESIA by the regulatory authority, and the ESIA by the project lenders, these stated measures become conditions of the approval.

5.3 Identification of Requirements from the Statutory Authority

The approval (or other conditional requirements) issued by MENR to the Project ESIA must be reviewed to ensure that all construction, commissioning and operational (related conditions established are managed accordingly. Non-compliance with the conclusions may result in a breach of legislation and permitting requirements. The approvals shall be maintained as part of the HSSE-MS.

5.4 Identification of Requirements from the Project Lenders

Following the E&S due diligence process, the lenders 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 ESAP. Requirements of the action plan will be a covenant of the Project loan. During the development of the HSSE-MS the action plan for the Project 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.

6 IDENTIFICATION OF RISKS, IMPACTS & OPPORTUNITIES

One of the principal stages in the development of the Project's HSSE-MS will be the development of a Project 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 should 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, 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 Project's 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 Project 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 ESIA but may differ depending on specific working methods of the EPC Contactor / O&M Company.

7.1 HSSE-MS

The key E&S management systems will be the Construction HSSE MS (cHSSE MS) and Operation HSSE MS (oHSSE MS).

The cHSSE MS and oHSSE MS will comprise a series of Plans that detail how environmental and social risks, impacts, opportunities and compliance will be managed and monitored. The cHSSE MS and the oHSSE MS will be prepared in order to ensure EPC Contractor and O&M Company are aligned with national and lenders' requirements. The systems are living documents and can be revised where needed during the project phases.

7.2 Supporting/Complimentary Plans & Procedures

In alignment with the expected Project impacts (based on ESIA Volume 2), the following table provides a list of plans and procedures that are expected as a minimum to be linked to the cHSSE MS and/or oHSSE MS.

Table 7-1 Description of HSSE Management Plans and Responsibility for Implementation

PLAN / PROCEDURE	PURPOSE AND KEY REQUIREMENTS	LEAD IMPLEMENTATION
Site Mobilization Plan	The Site Mobilization Plan is prepared as part of the HSSE in order to drive compliance with E&S obligations during the initial site mobilization phase (site clearance, construction of temporary site facilities, etc.). The plan describes the E&S procedures and plans to be implemented by the EPC Contractor during the site mobilization phase to ensure all risks and impacts are properly managed and handled during this initial stage.	EPC Contractor
HSSE Manual	The HSSE MS drives compliance with E&S obligations for the construction phase through identifying: 1. the overall structure and outline for the ESMS implemented for the construction phase, by all involved counterparts to include the Developer, company, contractors and other; 2. HSSE policies and commitment requirements; 3. Structure of the key HSSE procedures and plans to be implemented to ensure all risks and impacts are properly managed; and, 4. the institutional framework and	Project Company & EPC Contractor

PLAN / PROCEDURE	PURPOSE AND KEY REQUIREMENTS	LEAD IMPLEMENTATION
	responsibilities to ensure that such procedures and plans are implemented effectively and efficiently.	
Subcontractor and Supplier Management Plan	The Subcontractors and Suppliers Management Plan (SSMP) is to be implemented by the EPC Contractor before and during the construction phase of the Project as part of the ESMS, with the objective of ensuring that Subcontractors and suppliers hired for the project comply with the project E&S requirements.	EPC Contractor
Training Management Plan	The main objective of the Training Management Plan is to identify the training needs in terms of environmental, social, health and safety topics relevant to the project and provide training requirements and schedule/matrix of training for the range of employees involved in the project during the construction phase	EPC Contractor
Stakeholder Engagement Plan (SEP)	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.	Project Company
External Grievance Mechanism	***Note:*** *Incorporated into 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 GBVH and sexual exploitation. The mechanism shall be easily accessible (including for any vulnerable groups if any), 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.	Project Company
Resettlement Action Plan	Plan for the resettlement of formal or informal persons/land users that are adversely affected by the Project to mitigate and fully compensate for physical and economical displacement impacts.	Project Company
Community Development Plan	Identifies the overall development needs, management and implementation of development initiatives for local communities.	Project Company
Labour and Working Conditions Management Plan	Identifies the main labour requirements and risks associated with the project during the construction phase and determines the relevant management measures to address labour issues and achieve compliance with project obligations and ESMS. In addition, this plan in specific also includes the worker grievance mechanism.	EPC Contractor
Worker Accommodation Management Plan	This Plan details the specifications for Worker Accommodation when employed on the Project during the construction phase. It includes specifications for the design and management of worker accommodation to	EPC Contractor

Plan / Procedure	Purpose and Key Requirements	Lead Implementation
	which contractors (and any sub-contractors) shall comply when housing their workforce.	
Occupational Health & Safety Plan	Establishes a set of guidelines and procedures that clearly describe the manner in which construction activities will be carried out to ensure employee safety and safeguarding of personnel and property for both routine and non-routine activities. The objective is to prevent all OHS incidents to the greatest extent possible for all employees and ensure environmental protection at the place of work; zero fatal accident and lost time accidents; and full compliance with legal and contractual requirements	EPC Contractor
Emergency Preparedness and Response Plan	The objective of this plan is to establish a series of organization, operational and preventive measures in the event of an emergency that are adapted to the circumstance of such situations, which in turn will ensure the safety of workers, the environment and potentially communities.	EPC Contractor
Traffic and Transportation Management Plan	The Traffic and Transportation Management Plan (TTMP) implemented during the construction phase of the Project to avoid traffic and transport related risks both to project workers and communities during construction, promote safe driving awareness among the project staff, and establish best practices on vehicle management.	EPC Contractor
Security & Human Rights Management Plan	The objective of this Plan is to identify the security measures that will be implemented onsite for mitigating security risks and ensure that a responsible approach towards security management is implemented to protect stakeholders and workers from human rights abuses	EPC Contractor
Hazardous Material and Waste Management Plan	The main objective of the Hazardous Materials, Waste and Wastewater Management Plan, is to identify the types and quantities of hazardous materials sourced and natural resources used, and waste and wastewater generated at the project site during construction phase, and to describe the procedures and responsibilities for the management, transport, storage and disposal of these materials, substances, and waste products.	EPC Contractor
Water Management Plan	The water management plan identifies sources of water supply for the Project, estimation of required quantities, and procedures the sustainable use and management of water resources used throughout the construction phase of the Project.	EPC Contractor
Biodiversity Management Plan	The BMP ensures the protection of biodiversity resources including habitat, fauna, flora, and avifauna during the construction phase of the Project.	EPC Contractor
Emissions Management Plan	The plan outlines how a construction project will avoid, minimize and mitigate its environmental impact and ensures that environmental aspects not covered by other plans (soil, hydrology, dust, noise, etc.) are managed in compliance with the Project's HSSE obligations.	EPC Contractor
Chance Find Procedure	Identifies procedures to be implemented during the construction phase of the Project where there is potential for as-yet undiscovered archaeological remains to occur (i.e. chance finds) underground during the construction phase of the project.	EPC Contractor

Plan / Procedure	Purpose and Key Requirements	Lead Implementation
Gender Management Plan	This plan defines the process of planning and designing the implementation of the Project during construction from a gender perspective and ensures that gender equality measures are mainstreamed throughout the ESMS.	EPC Contractor
Permits Register	Outlines the status, timelines and responsibilities for Project permits, including those stipulated by the Environmental Statutory Authority responsible to issue the environmental permit to be implemented for the Project which are a condition under which the environmental permit is issued, other Project construction permits, EPC permits and subcontractor permits.	EPC Contractor
Dewatering Management Plan	The dewatering management plan is required if dewatering will be required. Its key purposes include ensuring worksite safety, protecting the environment, complying with regulations, maintaining structural integrity, and managing water discharge.	EPC Contractor
Ecological Chance Find Procedure	The ecological chance find procedure will be applicable to both the construction and operation phase. It will detail the process in identifying and responding to an ecological chance find, whether that be a live animal or evidence of a mortality.	EPC Contractor

8 MONITORING

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

8.1 Monitoring Requirements from the ESIA

The specific 'Environmental & Social Monitoring Plan' to be developed for construction and operation shall include measures recommended in parameter specific chapters of ESIA Volume 2 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.
- 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 should be compared against relevant standards, permit requirements, required thresholds, received complaints, audit findings, cHSSE MS and oHSSE MS requirements. The Environmental and Social Management team for the EPC Contractor and relevant staff assigned for the same responsibility at 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.

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 will be compared against baseline conditions 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 HSSE-MS will require competent personnel and sufficient allocation of resources to ensure effective implementation in practice.

9.1.1 Project Company

The Project Company will have overall responsibility for E&S compliance. Therefore, the Project Company will need to delineate responsibility for implementation of the HSSE-MS and wider environmental and social management and compliance to a full-time member(s) of staff at the Project site.

The staff may be the H&S Manager or the E&S Manager, a member of the HSSE/HSE Team or a specific Environmental & Safety Officer. Regardless of the 'title' of this role, this person will be the primary project contact to implement the HSSE-MS and will report to project management.

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

ENVIRONMENTAL AND SOCIAL MANAGER (OR COMMENSURATE POSITION)

- Fully support the implementation of the E&S Policy;
- Prepare, implement and manage the EPC Contractor/O&M Company project specific HSSE-MS;
- Engage with the project management regularly in regard to E&S issues, risks and compliance 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 HSSE-MS);
- 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 HSSE-MS (e.g. incident registers, Non-Conformance Report (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 HSSE-MS;
- Review subcontractor's personnel, qualifications, competency and environmental performance; and
- Undertake regular internal HSSE-MS audits to assess compliance and implement corrective & preventative actions – audits are to include all sub-contractors at the project.

ENVIRONMENTAL AND SOCIAL ENGINEER / OFFICER

- Fully support the implementation of the E&S Policy;
- Implement and assist management of the EPC Contractor / O&M Company project specific HSSE-MS;
- Work with and engage with the EPC/O&M Company 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 HSSE-MS);
- Advise 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 HSSE-MS (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 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 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 HSSE-MS;
- Alongside the E&S Manager, review subcontractor's personnel, qualifications, competency and environmental performance; and
- Alongside the E&S Manager, undertake regular internal HSSE-MS audits to assess compliance and implement corrective & preventative actions – audits are to include all sub-contractors at the project.

9.1.2 EPC Contractor (Responsible Party)

It is expected that the Project Company will contractually delineate responsibility for environmental & social management and compliance with the EPC Contractor during construction.

To fulfil its E&S obligations, the EPC contractor will appoint a dedicated team who will address and manage E&S related matters during construction. This will primarily include an E&S Manager who will be responsible for day-to-day management, monitoring and maintenance of E&S (including labour welfare unless a dedicated human resources staff is appointed) performance during construction and commissioning activities. Additional related roles will include Health and Safety Manager, Human Resources Manager, H&S / Environment Officers.

Further details related to organisational structure and roles and responsibilities will be included in the cHSSE MS.

9.1.3 O&M Company (Responsible Party)

It is expected that the Project Company will contractually delineate responsibility for environmental & social management and compliance with the O&M Company during operation.

To fulfil its E&S obligations, the O&M Company will appoint a dedicated team who will address and manage E&S related matters during operation. This will primarily include a relevant position who will be responsible for day-to-day management, monitoring and maintenance of E&S (including labour welfare unless a dedicated human resources staff is appointed) performance during construction and commissioning activities.

A proposed project organisation chart is to be developed for the operational phase. Further details related to organisational structure and roles and responsibilities will be included in the oHSSE MS.

9.2 Environmental & Social Awareness and Training

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

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

9.2.1 Type of Training Sessions

The EPC Contractor/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 HSSE-MS; that are applicable to all employees and project visitors.
- Daily Tool-Box Talks:
  - Environmental & Social toolbox 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 HSSE-MS and E&S Management Plans:

- To ensure staff are competent to implement the HSSE-MS, 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.

9.2.2 Planning of Training

In order to record identified training needs, the EPC Contractor/O&M Company will develop and maintain a project environmental training matrix (falling under wider HSE-related training) to identify the training type and frequency required for each staff role.

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.

9.2.3 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:

- E&S Policy;
- Contact details for the EPC Contractor/O&M Company E&S Manager and E&S Engineer;
- Most significant E&S risk/impacts;
- 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 E&S Policy and related HSSE-MS and to report any and all environmental incidents; and
- Details of the grievance mechanism.

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.

DAILY 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;
- 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 HSSE-MS AND E&S MANAGEMENT PLANS

Training sessions on the HSSE-MS 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:

- Grievance Mechanism Procedure;
- Labour and Working Conditions;
- Worker Accommodation Facilities;
- Stakeholder Engagement;
- Traffic & Transportation Management Plan;

- Archaeological Chance Find Procedure;
- GBVH, SEA & SH Prevention & Response Action Plan; and
- Gender Based Violence & Harassment Policy.

9.2.4 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.

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 HSSE-MS developed by the EPC Contractor and O&M Company, respectively.

10.1 Internal Audits

The HSSE-MS 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.

HSSE audits will be undertaken on a monthly basis during the construction/commissioning phase. The HSSE-MS will outline the frequency of different walkovers, inspections, audits etc.

10.2 Corporate Audits

It is expected that the Masdar / SOCAR Green corporate HSSE teams 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 (a covenant to the loan), and the suitability & effective of the established HSSE-MS in practice.

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. This will be undertaken by both the EPC Contractor and O&M Company, respectfully.

- Non-conformances are instances where Project compliance obligations (such as a legal requirement, or HSSE-MS 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; and,
- Discharge of untreated, contaminated wastewater to the environment.
- 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
- 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 by the EPC contractor (during construction) and the O&M Company (during operations) to respond to individual non-conformances. The corrective action plan shall include determination of root cause, proposed actions, timelines, required resources and any changes needed to HSSE-MS documentation. The corrective action plan should be approved by a responsible person for managing the HSSE-MS.

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.

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 HSSE-MS.

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 on site and Project staff be suitably trained to use such equipment and respond to such emergencies.

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

The plan will identify procedures for reasonably foreseeable emergency situations. This should include drills at the Project site and any relevant training to specifically involved personnel.

When establishing the Emergency Preparedness and Response Plan, the following should be considered:

- The most appropriate method for responding to an emergency situation;
- Internal and 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

ENVIRONMENTAL INCIDENTS

An environmental incident is a planned or unplanned event or set of circumstances, as a consequence of which a social issue/disruption, pollution or an adverse environmental impact has occurred or is occurring.

Regardless of the cause, this may include incidents that are due to negligence, are accidents and/or are caused by external parties or natural hazards. Environmental incidents are important and may have consequences including claims for liability; adverse publicity and public reaction; reputational damage; actual environmental damage & associated remediation costs; and prosecution from external parties or authorities.

An environmental incident is an event that aligns with any one of the following:

- An environmental or social related event that triggers emergency response procedures.
- An environmental or social related event that either impacts or requires third parties/nearby communities to take actions to avoid impacts.
- An environmental or social related event that requires response actions from external parties (such as emergency services or specialists).
- An event that results in pollution/degradation to the natural environment, sensitive habitats, or has potential effects upon nearby sensitive receptors.
- An environmental-related event that causes injury or death to humans or animals.
- An event that causes property damage or destruction (including tangible and intangible cultural heritage).

SOCIAL INCIDENTS

A social incident refers to a major community grievance or community protest that may require temporary work stoppage on the part of the EPC Contractor, and/ or may require the involvement of relevant authorities (e.g., Local Government Authorities and law enforcement). Major community grievances could include issues such as Gender-Based Violence (GBV), Sexual Exploitation and Abuse (SEA) and other criminal forms of abuse. Community protests are instances of public demonstrations within host communities with a severe impact on the welfare of the workforce, one or more community member, communal property, Project property or public infrastructure. Such incidents may necessitate the implementation of applicable emergency response procedures.

LABOUR INCIDENTS

A labour incident may include a major worker grievance or labour strike and or labour protest at site, which may (or may not) require the involvement of relevant authorities (e.g., regulatory agencies and law enforcement). Major worker grievances can be defined as those pertaining to issues such as forced labour, child labour and criminal forms of abuse (including sexual and physical abuse). Labour strikes refer to work stoppages organized by workers to prompt managerial action towards the amelioration of labour conditions through collective agreements. Such incidents may necessitate the delivery of renewed labour negotiation, legal action, relief or negotiations to remedy any of the Project's major impacts on labour welfare.

SECURITY INCIDENTS

Security incidents are events involving criminal activity such as (but not limited to) one or more of the following offences:

- Theft of equipment and/or tools;
- Theft of materials from the site or off-site project storage areas;
- Vandalism;
- Arson;
- Breaches of security into existing buildings or partially completed project areas;
- Attacks on construction workers;
- Trespassing;
- Cyber-attack or disabling closed circuit television (CCTV) security systems.

HEALTH AND SAFETY INCIDENTS

Health and safety incidents can be defined as project-related accidents involving one or more of the following:

- Fatalities
- Disabling injuries
- Lost time incidents
- Medical treatment cases
- First aid injuries
- Occupational illnesses
- Road traffic accidents & Property damage
- Restricted work cases
- Near misses

The Health and Safety Manager will develop a template for recording and detailing follow up actions for health and safety incidents/accidents.

12.1.1 Corrective and Preventive Action for Environmental, Social, Labour and Security Related Incidents

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

It is expected that a corrective action plan will be developed to respond to individual non-conformances. Preventive measures to avoid incidents from recurring will include determination of root cause, proposed actions, timelines, required resources and any changes needed to HSSE-MS documentation. The corrective action plan and preventive measures will be approved by a responsible person for managing the HSSE-MS. Records of implemented corrective actions will also be maintained.

If a situation or condition cannot be corrected immediately, temporary measures such as necessary for the protection of the environment, community and/or labour force will be implemented.

Some E&S incidents may require emergency response procedures to be triggered. All actions related to such actions should be defined in the applicable 'Emergency Preparedness and Response Plan'.

Where emergency response procedures are not triggered, as a minimum the project management shall be alerted immediately.

All classified E&S incidents (includes labour and security incidents) require investigation, root cause analysis and corrective action, in a systematic response structure to ensure effectual response and to prevent reoccurrence.

When it is safe to do so and after any necessary immediate actions are taken, an incident investigation shall be conducted. Depending on the severity of the incident, this may require assistance from external or independent parties.

All incident investigations and reports shall be documented and may require internal HSSE-MS to be updated. Depending on the incident, this may require upgrades to equipment, or entail edits to management plans, procedures and may require training.

12.1.2 Incident Reporting and Investigation

It is common for regulators to be informed and provided with reports on incidents as soon as possible in case actions on the part of the regulator are required. It is of importance that the timeline for reporting to regulators is known and accounted for in incident response processes, stakeholder engagement plans, or other external communication protocols.

The EPC Contractor/O&M Company shall establish a process in the OH&S management plan for investigating, analysing and reporting health and safety accidents and incidents (including high potential near misses), plus following up to close out with corrective and preventative actions when and where applicable. The person(s) directly involved in the incident or, if this is not possible, any witnesses of the incident must report incidents to their supervisor or manager without delay.

Investigations shall be carried out by competent personnel from the EPC Contractor / O&M Company and its subcontractors (if applicable), and any investigation may be attended by the Project Company (or a representative appointed by the Project Company). When an incident has resulted in harm or property damage then an Incident Report shall be completed by the person(s) witnessing the event and the field H&S personnel.

Community protests and labour strikes will be reported internally to the Project Company and a decision will be made by the Project parties whether to involve external authorities.

Security incidents will be reported to the Project at the earliest opportunity.

Lenders may require immediate or periodic reporting in regard to incidents. The processes and requirements for this reporting will typically be stated in the Project Loan Agreement and/or ESAP if applicable.

12.1.3 Health and Safety Performance Monitoring and Reporting

The EPC Contractor/O&M Contractor's team led by the H&S Manager (or commensurate staff) shall continuously monitor HSE management, compliance and performance of all personnel and subcontractors and prepare periodic reports.

The EPC Contractor/O&M Company will develop and implement a program of monitoring and reporting activities based on the level of Occupational, Health and Safety risk.

Monitoring reports shall include a list of the identified risks and non-compliances, measures taken to control these and a tracking mechanism to ensure close out of items as part of the Project's non-conformance management process. An environment will be created to facilitate H&S Observations (HSO) and near miss reporting that is non-threatening nor will result in negative consequences for the reporting person. Personnel that report an H&S

Observation/near miss will be encouraged to provide their name in case additional follow up is needed as per the template for HSO reporting. However, there may be instances where a HSO report will be submitted anonymously. HSO reporting is an important leading indicator that will be actively tracked by the EPC Contractor/O&M Company.

13 STAKEHOLDER ENGAGEMENT

The project has developed a Stakeholder Engagement Plan (SEP), which will be implemented during both construction, commissioning and operations. As a live document this will need to be updated as and when is necessary to ensure the document remains valid with respect to the Project and the applicable stakeholders. The SEP includes a suitable grievance mechanism to allow local community complaints to be raised in a clear process. The SEP outlines the local disclosure requirements for each stage of the Project.

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.

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 project and the procedure will be made readily available and easily accessible.

13.1.2 External Grievances

The SEP also includes a procedure for external grievances that establishes methods to receive and register communications from external parties (e.g. 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 HSSE-MS 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 HSSE-MS will establish, implement and maintain processes needed for internal and external communication relevant to environmental and social performance of the Project relevant to the phase of the project and the allocated responsibilities.

Lines of communication relevant to the construction phase will be clearly defined within the cHSSE-MS whilst lines of communication relevant to the operational phase will be clearly defined within the oHSSE-MS.

Associated processes will establish:

- What will be communicated
- When it will be communicated
- With whom to communicate
- How to communicate
- When establishing communication processes relevant to the HSSE-MS, 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 HSSE-MS will generate data, that will be required to be managed. The appropriate management of records is a requirement of any successful HSSE-MS and can be used to track progress, review effectiveness and demonstrate compliance.

The HSSE-MS relevant to both the construction and operational phases should include the 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;
- 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 HSSE-MS register and updated as applicable.

16 REVIEW

Project HSSE-MS 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 HSSE-MS should be regularly reviewed, at least annually, 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 HSSE-MS and to ensure that all potentially significant adverse impacts are identified and that associated control measures are appropriate to the Project.