Azeri WPP Environmental and Social Management Plan (ESAP)

No	Action	Environmental & Social Risks (Liability / Benefits)	Requirement (Legislative, Performance Requirement, Best Practice	Responsibility / Resourcing	Timetable	Target and Evaluation Criteria for Successful Implementation
PR 1	Assessment and Management of Environmental and Social (E&S) Impacts and Issues					
1-1	a) Obtain all necessary environmental and construction permits, including those that are required to be renewed. If there are any design changes, amend or obtain new permits to cover the changes in the Project, if necessary. Maintain an environmental, social and construction permits register and update it as necessary throughout the lifetime of the project. a) Obtain operational permits (if required)	Compliance with MNER environmental permitting requirements.	PR1 – Environmental and social assessment Legislative requirement	ACWA	a) 2 months prior to construction b) Prior to operation	a) Permits register including evidence of construction permits obtained. b) Permits register including evidence of operational permits obtained.
1-2	E&S Commitments Register: ACWA to develop an E&S commitments register as per the ESIA, ESMMP and relevant management plans as well as the national legal requirements prior to Construction and submit it to Lenders.	Compliance with ESIA, ESMMP and legal E&S commitments	PR1 – Environmental and social assessment Legislative requirement	ACWA	Prior to construction	E&S Commitments Register accepted by Lenders.
1-3	a) ACWA will develop, maintain and implement an overarching Environmental and Social Management System (ESMS) for the lifecycle of the Project (construction and operations), appropriate for the scale & complexity of the project, aligned with Lender requirements, including the following elements: i. Project specific E&S Policy including commitments to compliance with Lender requirements.	Commitments to compliance with lender standards Appropriate E&S management during Project construction and operation.	PR1 – Environmental and Social Policy Environmental and Social Management Systems Best practice	ACWA EPC contractor	a) i)-iv) Prior to financial close, v) prior to construction b) Prior to EPC mobilising to site c) 2 months prior to full plant COD d) According to timescales for	a) (i)/(ii) Provide and maintain Project E&S policy / acceptance by Lenders. (iii) Provide detailed project management organogram (iv) Provide ESMS handbook / manual (v) Provide E&S Monitoring, auditing and reporting framework.

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	ii. The Engineering, Procurement and Construction (EPC) contractor and Operations and Maintenance (O&M) contractor will develop their own Project E&S policy consistent with ACWA Power and the Project E&S policy. iii. Project E&S management structure supported by a detailed organogram of Project management roles and responsibilities, describing the interfaces between the Project Company[1], the EPC contractor and subcontractors during construction and the Operations and Maintenance (O&M) contractor during operations. iv. An ESMS Handbook or Manual that references all of the E&S management plans and procedures associated with the Project with the respective timeframe and budget for the development and implementation of the management plans. v. Project E&S monitoring, auditing, and reporting framework, with roles and responsibilities clearly defined, covering: • ESAP updates prior to key milestones • Provisions for remedial actions, if required • Approach to and templates for monthly E&S construction reports to be prepared				CESMP and OESMP above e) Prior to construction. f) Ongoing .	b) (i) Provide CESMP (ii) Provide E&S Manager appointment latter and CV. c) Provide OESMP d) All listed plans provided and referenced in CESMP and OESMP e) Provide Project DCMP f) Provide required information on human right, supply chain, labour etc in annual sustainability reports.

[1] Project Company' refers to ACWA's Special Purpose Vehicle (SPV) set up for the Project.

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	by the EPC and its subcontractors on the ESMS implementation, including H&S, security, EPC performance monitoring results, Resettlement Action Plan (RAP) implementation, Labour Management Plan implementation, and demonstrating compliance with conditions of national environmental authorisation and lender requirements. • Quarterly external E&S audit report during construction and bi-annual E&S audit reports during the operational phase, undertaken by Lender's advisor. b) EPC contractor shall (i) develop a Construction Environmental and Social Management Plan (CESMP) / Construction ESMS Manual, defining Project E&S objectives and principles and incorporate all necessary policies, procedures, and plans required, including those described within the project Environmental and Social Impact Assessment (ESIA) (ii) appoint competent and qualified E&S manager, who will be responsible for implementation of the relevant ESAP and ESIA provisions, liaison with ACWA's corporate E&S person and overall oversight of the project E&S performance. c) The Operations and Maintenance Contractor shall develop an Operational Environmental and Social Management Plan (OESMP) and supplementary					

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	management plans. The OESMP will include a suite of sub-plans, which will address relevant E&S risks. d) The CESMP and OESMP will be supported by the following plans and procedures, including: • Contractor Management Plan • Labour Management Plan • Worker Code of Conduct • Supply Chain Management Plan • Workforce Accommodation Plan • Worker Grievance Mechanism • Security Management Plan • Local Recruitment Plan • Environmental Monitoring Plan • Waste Management Plan • Water Management Plan • Hazardous Substances Management Plan • Emergency Response Plan • Occupational Health and Safety Plan • Community Health and Safety (CHS_ Plan • Traffic and Transport Management Plan • Biodiversity Management Plan • Biodiversity Action Plan • Cultural Management Plan • Community Grievance Mechanism • Gender-Based Violence and Harassment (GBVH) Prevention and Response Plan • Demobilization Plan All plans to include monitoring and auditing requirements and KPIs, as appropriate. e) Develop and implement a Designed Change management Procedure (DCMP) where there are					

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	any design, technical or resource changes throughout the lifecycle of the Project to ensure mitigation of any related EHSS impacts. The DCMP to include provisions for the public disclosure of material issues associated with design changes (if any) and reporting to lenders periodically in each phase of the Project. f) Implement corporate E&S Policies, including human rights and supply chain and provide information on the project in the annual sustainability reports, including progress of implementation of the project Action Plans on issues related to risks to or impacts on workforce and affected communities as well as on issues that the consultation process or grievance mechanism have identified as a concern to those stakeholders.					
1-4	Develop and implement a Project Early Site Mobilisation Plan during the early site preparation works, addressing all relevant E&S aspects including but not limited to: • Worker health and safety; • Waste management; • Labour and working conditions; • Supply chain management plan and Supplier risk assessment for all contractors and suppliers	Mitigate site specific E&S risks and impacts during early site preparation works	PR1, PR3, PR4	ACWA	Prior to Initial Site Preparation Activities[2]	Acceptance of the Early Site Mobilisation Plan

[2] Early site mobilization includes site studies (including but not limited to biodiversity, topographic and geotechnical studies), the construction of the temporary site facilities and site access, improvements to rented worker accommodation facilities, installation of telecommunication equipment, and vegetation clearance or fencing as relevant in areas where reptile relocation has been completed. Works on the installation of wind turbines and wind power generation ancillary facilities -including but not limited to transport of wind turbine components to the site, construction of turbine foundations, cable trenches, substation, transmission lines or any other activity related to the energy production infrastructure of the wind power plant are not considered early site works and shall trigger the requirements for the start of construction.

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	• Temporary worker accommodation; • Worker and stakeholder grievance management; • Stakeholder engagement; • Emergency preparedness and response; • Biodiversity: reptile relocation, breeding bird protection, flora conservation; • Community health and safety • Organisational capacity and competency; and • Training, monitoring and reporting.					
1-5	Cascade down project commitments to EPC and O&M contractors through the following: • Ensure environmental and social risks and impacts are fully considered and integrated within the EPC and sub-contractor pre-qualification, selection, onboarding, management and monitoring phases; • include the mitigation measures, including design-based measures, surveys and monitoring requirements outlined in the ESIA, ESMMP, ESAP and E&S Management Plans including LRP and SEP into contracts with EPC. • ACWA legally require EPC/O&M contractors to include Project's E&S requirements into its subcontractors to comply with the lender requirements. • Undertake the tender process for the construction works to identify and select a Contractor who has the required EHSS	Commitments to compliance with lender standards Appropriate E&S management during Project construction and operation.	PR1– Organisational capacity and commitment Environmental and Social Management Systems Best practice	ACWA EPC Contractor	Tender details: Prior to issue of tender / RfP / job advertisements for EPC / O&M contractor / key E&S personnel Contractual details: Prior to signing of contracts by EPC contractor, O&M contractor and their subcontractors) Management Plan details: Prior to relevant phase of Project (construction / operation).	Contractor, subcontractor RfPs / tendering documents including E&S provisions reflecting ESIA / ESAP requirements. Job descriptions for key E&S contractor personnel reflecting requirements / roles and responsibilities included within ESIA, ESMMP. Requirements of ESIA, ESMMP, ESAP, E&S management plans captured within EPC contract. EPC & O&M contractors' sub-contracts to include E&S requirements as appropriate. E&S training plan (see 1-10 below) Sub-contractor monitoring requirements to be included in

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	performance standards, resources, accidents statistics, management systems and policies. • Include in tendering documents the requirement for the Contractor to develop procedures / method statements for the project to manage the EHSS issues as set out in the ESMMP and Contractor Management Plan . • Ensure that HSE responsibilities of the relevant departments involved in onboarding, management and monitoring of sub-contractors for the Project (such as procurement, finance, H&S,E&S etc) are carried out as in the plan.					E&S management plans, as appropriate (see 1-3(d) above).
1-6	Provide budget for implementation of Project E&S management, broken down into constituent key elements, such as LRP, SEP, biodiversity management, social investment, production and implementation of construction E&S management plans. Social investment budget to be included. Budget to be independent of CAPEX/OPEX and unaffected by other Project budgetary requirements. Set aside minimum 10% contingency for each constituent element.	Appropriate E&S management during Project construction and operation.	PR1 – Environmental and Social Management Systems Best practice	ACWA	Prior to Financial Close for construction related costs and 3 months prior to operations for operational costs.	Provide E&S management budget breakdown. Agreement with Lenders that E&S and LRP budgets are independent of other Project budgetary requirements.
1-7	**Contractor Performance Monitoring** a) Develop, maintain and implement a Contractor Management Plan defining ACWA approach to managing the E&S performance of their contractors, subcontractors, and other third parties during the various phases of the project. The contractor	E&S performance management	PR1 – Environmental and Social Management Systems	ACWA	a) Prior to financial close b) Prior to construction	a) Contractor Management Plan and Audit programme in ESMS / acceptance by Lenders.

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	management approach will be consistent with the general principles described within IFC Good Practice Note: Managing Contractors' Environmental and Social Performance and will include a program for audit of E&S performance of EPC contractors and subcontractors, specifying frequency of audit (at least monthly during construction phase), reporting and roles and responsibilities. b) Maintain and record regular EHSS inspections of contractors including environmental, social, occupational health and safety (OHS) performance, labour management and supply chain management. c) Set-up, maintain and continually review an EHSS Incident Reporting Procedure to maintain records of monitoring, accidents, and incidents, as required in the ESMMP. d) Notify the Lenders on material issues (e.g., labour strikes, occupational incidents, and fatalities) including third party incidents within the timeline agreed in the financial agreement.				c) Prior to construction d) Within 48 hours from identification	b) Form of Contractor Performance Reports and inspection reports c) Form of EHSS reports and inspection reports d) Incident/issue alert
1-8	Prepare an addendum to the ESIA to meet lenders requirements in the event that material change in project design, extension and any associated facilities become part of the Project with significant EHSS risks that warrant an EHSS assessment and/or an ESIA in accordance with lenders requirements, if required.	E&S risk management to fulfil lender requirements	PR1 – Environmental and Social Management Systems	ACWA	2 weeks prior to construction	Material Change Addendum added to ESIA
1-9	a) ACWA shall appoint to the Project Company the following E&S personnel:	Capacity within EPC contractor to fulfil E&S requirements.	PR1 – Organisational capacity and commitment	ACWA	a) Prior to Financial Close b) Biodiversity Manager TOR	a) CVs, letters of appointment, of appointed Project

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	i. E&S Manager who has overall responsibility for environmental and social management, compliance and implementation of the ESMS; ii. Social Manager iii. Community Liaison Officer (including a female CLO) iv. Human Resources Manager The E&S positions shall be retained by the Project Company throughout Project Construction and Operations. b) For the operational phase, ACWA shall appoint and retain a Biodiversity Manager and sufficient support staff to implement project commitments. c) ACWA will also appoint and maintain an independent ornithological expert (IOE) as outlined in section 6 with the authority and means to order shut down on demand when needed. d) ACWA shall require its EPC contractor to appoint and retain appropriate counterparts to its E&S staff including: i. E&S Manager ii. H&S Manager iii. Community Liaison Officer The EPC Contractor shall ensure that there is at least one (1) dedicated competent safety professional at a ratio of one (1) for every forty (40) personnel at the site.	Allocation of responsibility for implementation of E&S and labour requirements and capacity of appointed HSE personnel. E&S management during operational phase	Environmental and Social Management Systems Best practice		and CV approved by lenders 1 month prior to construction. Appointment - 6 month prior to first WTG group commissioning c) IOE appointment 3 months prior to commissioning d) Prior to mobilisation to site e) Prior to advertising posts	Company E&S manager, CLO and HR manager. b) TOR and CV of Biodiversity Manager, appointment approved by Lenders. Contracts finalized before start of construction phase. c) IOE appointment d) Letters of appointment of EPC E&S personnel e) Job description and CVs of HSES personnel, approved by Lenders.

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	e) ACWA shall provide job descriptions for all Project Company and EPC contractor key HSES personnel for Lender approval, including requirements for HSE and social qualifications and relevant experience of internationally funded projects. CVs of shortlisted E&S personnel to be provided to Lenders for prior review and comment.					
1-10	Ensure WTG supplier provides appropriate QHSE policies for the Project, to satisfaction of Lenders.	Commitments to compliance with lender standards	PR1 – Environmental and Social Policy Environmental and Social Management Plan	ACWA	2 weeks prior to manufacturing of WTG.	Provide and maintain appropriate QHSE policy
1-11	EHSS Trainings: a) ACWA to develop and implement a training plan throughout construction and operation for the relevant HSES and construction teams as per ESMMP to ensure are fully trained and equipped prior to construction. b) ACWA and EPC to conduct EHSS workshop(s) to provide training on contractor obligations and responsibilities of contractors on EHSS requirements prior to commencement of construction works and during construction based on a training needs assessment. c) ACWA to ensure EPC and its sub-contractors develops and implements training plans for their HSES teams on E&S requirements to ensure effective implementation of the ESIA and E&S management plans throughout construction.	E&S Training	PR1 – Environmental and Social Policy Environmental and Social Management Plan	ACWA	a) Prior to construction b) Periodically during construction c) Prior to construction / ongoing during construction d) Prior to operation	a) Training plans developed and submitted to the lenders prior to construction and operation phases b) Training records such as list of training provided and list of participants etc c) Contractor / subcontractor training plans and records for construction phase d) Training records for operation

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	d) ACWA to ensure an operational phase EHSS training plan is developed and implemented					
1-12	ACWA to appoint and facilitate the Independent Environmental and Social Consultant (IESC)'s E&S monitoring visits at site to verify the compliance of Project with lenders requirements . The IESC's monitoring and reporting will include: i. Construction Phase: Quarterly EHSS performance site visits and monitoring reports on CESMP implementation and construction progress to lenders; and ii. Operation Phase: Bi-annual EHSS performance monitoring site visits and reports on Operation Environmental and Social Management Plan (OESMP) implementation during the first five years of operation to lenders.	Independent reporting of E&S performance / compliance with Lender standard / requirements.	PR1 - Project monitoring and reporting Best Practice	ACWA	2 months prior to financial close	Appointment letter for LESA. i. Quarterly EHSS Monitoring Reports to be prepared and submitted to the Lenders by IESC following each site visit during construction ii. EHSS Monitoring Reports to be prepared and submitted bi-annually during operations
1-13	Implement mitigation measures with a specific focus relating to vulnerable stakeholders, as indicated in the ESIA/ESMMF such as LRP and SEP and other applicable polices and plans such as the GBVH Policy, Community health and safety management plan, Security Management Plan, Influx Management Plan and Working Conditions and Terms of Employment Procedure. Report on implementation of these mitigation measures in line the E&S reporting requirements presented in action 1-3 above.	Appropriate identification of &S impacts and mitigation measures	PR1 - Environmental and Social Management Systems Best practice	ACWA EPC contractor O&M company	Prior to construction and throughout	Implementation of and reporting on mitigation measures specific to vulnerable stakeholders.

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PR 2	Labour and Working Conditions					
2-1	a) ACWA to revise and implement a Corporate Human Resources (HR) Policy which will also be applicable to project as per the provisions outlined in the ESMMF, in line with EBRD's PR 2 requirements including commitments on fundamental principles related to workers' rights to form and join workers' organizations collective bargaining, equal opportunities and non-discrimination, grievance mechanism, ban of child and forced labour, respect to privacy right of workers, zero tolerance to retaliation against workers, sexual harassment and gender-based violence, provision of a safe and healthy work environment, maximizing local employment and dismissal and retrenchment process requirements b) Disclose this HR Policy to all Project workers and provide trainings to workers on their rights and Code of Conduct principles. c) ACWA will ensure that all employees, including contractor and sub-contractor employees will be provided with a written contract of employment specifying working hours, salary, annual leave, dismissal process, responsibilities of employer and employees, and right to join trade unions.	Effective worker management to reduce the risk of violation of workers' rights, worker dissatisfaction and strikes.	PR2 - Management of worker relationships Best Practice	ACWA EPC contractor O&M company	a) Prior to construction b) Prior to construction c) Prior to construction	a) Provision of Corporate HR Policy, accepted by Lenders. b) Evidence of disclosure of the HR Policy to Project workforce. c) Evidence of contractual requirements for EPC contractor, O&M company and subcontractors in alignment with the Project HR Policy.
2-2	a) Ensure that the HR Policy of ACWA adopted by the EPC contractor/O&M company and subcontractors are aligned to the Project's Policy and apply to all workers, including subcontractors' workers, through legally binding agreements prior to construction.	Effective worker management to reduce the risk of violation of workers' rights, worker dissatisfaction and strikes.	PR2 - Management of worker relationships PR2 Non-discrimination and equal opportunity	ACWA EPC contractor O&M company	a) Prior to construction and operation b) Implementation – throughout	a) Evidence of adoption of HR policies that are aligned to the Project's policy by EPC contractor/O&M company and subcontractors.

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	b) Develop and implement a Working Conditions and Terms of Employment Procedure in line with PR 2 requirements and ESIA commitments, detailing: • Provision of terms of employment and worker grievance mechanism to workers. • Measures to facilitate local recruitment. • Prohibition of child and forced labour. • Commitments related to retrenchment and decommissioning c) Develop and implement Worker Code of Conduct (including worker conduct within the Project accommodation facilities and covering gender-based violence and reprisal risks etc.)	Ensure locals have opportunity to gain from employment opportunities. Minimise H&S risks to local community	PR2 - Workers Accommodation Best Practice		the Project lifecycle c) Prior to construction	b) Development of the Working Conditions and Terms of Employment Procedure including all appropriate measures, accepted by Lenders. Evidence of disclosure of the Procedure to Project workforce. c) Provision of Worker Code of Conduct and approval by Lenders.
2-3	ACWA to develop and disclose its Human Rights Policy and Supplier Code of Conduct including but not limited to provisions on the respect of workers' rights, including those in the supply chain, and communicate this policy internally and externally through its website, and integrate this policy into contracts with the EPC, their sub-contractors and suppliers/contractors.	Effective worker management to reduce the risk of violation of workers' human rights.	PR2 - Management of worker relationships Best Practice	ACWA	Prior to construction	Evidence of development and disclosure of human rights policy to EPC contractor/O&M company, subcontractors and suppliers.
2-4	a) ACWA to develop and implement a gender-based violence and harassment (GBVH) policy and disclose it to its employees, contractors, suppliers and public. b) Conduct a GBVH risk assessment for construction and operation phases. Based on the findings, develop and implement a time-bound GBV prevention and response action plan	Elimination of gender-based violence and harassment to the extent possible by development proactive management and prevention strategies to deal with GBVH.	PR 2 and PR 4 Best Practice	ACWA	Prior to construction	a) GBVH Policy b) GBVH risk assessment for (i) construction and (ii) operations phase b) GBVH action plan with an implementation schedule for (i) construction and (ii) operations phase and including mapping of

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	c) Develop and implement a GBVH incident reporting procedure and train employees, including contractors. d) Implement a confidential grievance mechanism for making reports (including anonymous reports) on sexual harassment e) Assign and train GBVH focal points (including women) to deal with GBVH related incidents and grievances. f) Develop response measures and support mechanisms for survivors. g) Ensure these requirements are also embedded into HR policies and procedures of the EPC contractor and its sub-contractors					local health clinics that are capable and trained to receive survivors of GBV. c) GBVH incident reporting procedure and training materials. d) Grievance mechanism for reporting sexual harassment e) CV of GBVH focal point staff and training plan f) Response and support procedures g) EPC and subcontractors' policies / procedures including GBVH.
2-5	Conduct quarterly labour audits at each site during construction phase by independent, competent labour experts to ensure compliance of the EPC contractor and its subcontractors against legislations and PR 2 and PR4 OHS requirements.	Management of labour risks during construction	PR 2 and PR 4	ACWA	Quarterly during construction	Labour audit reports Results will be shared with the Bank as part of E&S progress update reports.
2-6	Develop and implement a Supply Chain Management Plan (SCMP) which would cover following provisions: ACWA will contractually require EPC contractor to: – Establish a responsible sourcing policy for the project; disclosure of the supplier policy to suppliers and wider community through website; a supplier selection criteria and procedure and ensure traceability from EPC and wind turbine suppliers through maintenance of	Effective oversight of labour rights within the primary supply chain, to reduce labour violations and abuse of human rights.	PR2 Supply chain	ACWA	Prior to construction And onwards	Contractual provisions for establishment and implementation of a responsible sourcing policy for the project, accepted by Lenders. Provision of Supply Chain Management Plan acceptable to the Lenders

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	a register of all Project primary suppliers up to key material level. – Ensure all primary suppliers (including the WTG and their sub- suppliers) adopt self-declarations and codes of conduct regarding prohibition of any forms of forced and child labour in their operations prior to any engagement with them. – Ensure adequate legal covenants added to map and complete risk assessment of all primary suppliers of the EPC including turbine suppliers; and provide an evidence of risk assessment and gaps identified by a competent external supply chain expert to ACWA. – A corrective action plan (CAP) to be developed and implemented in a timely manner including pre-identified non-compliances in SGS report and those that will be identified in future supply chain risk assessments. CAP and the timeline will need to be approved by Lenders. – Dis-engagement clauses to be added to the agreements with EPC and their suppliers in case of material non-compliance with key provisions listed in the responsible supplier policy. In case of failure to comply with the supplier policy requirements, then disengagement clause shall be implemented in line with the timelines provided to the Lenders. – Dis-engagement clauses to be added to the agreements with EPC and their suppliers in case of material non-compliance with key provisions listed in the responsible supplier policy. In case of failure to comply with the supplier policy					Supplier code of conduct disclosed by ACWA and the WTG Evidence of self-declarations and codes of conduct adopted by EPC and core suppliers. Corrective Action Plan to address non-compliances in the suppliers as an annex to the SCMP. Evidence of ongoing monitoring of core suppliers' compliance with Project commitments, as per frequency established in the Supply Chain Management Plan. Reports on the Monitoring outcomes and corrective actions to the Lenders. ACWA and WTG Vendor to ensure disclosure of brief information on the supplier risk assessments, monitoring activities, key outcomes, and actions taken through their sustainability reports.

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	requirements, then disengagement clause shall be implemented in line with the timelines provided to the Lenders. – Implement a continuous monitoring and audit programme for suppliers to ensure ongoing compliance with Project requirements, including definition of the frequency of monitoring and issues to be monitored, focusing on child and presence of forced labour etc. – The E&S Supplier Management Plan shall include quarterly reporting. – EPC to provide immediate notifications to the ASCWA (and ACWA to the Lenders) if/when forced/child labour risks or allegations are raised in relation to its core suppliers. – ACWA to define clear roles and responsibilities and allocate competent resources within Project Company and EPC to manage and mitigate supply chain risks and issues. – ACWA to ensure WTG supplier follows the commitments made in their Letter of Commitment provided to the Lenders including but not limited to the following commitments: • commitment to avoid forced and child labour in existing and any future/new facilities, regardless of their location of WTG Vendor for international or national projects.					

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	• commitment that Supplier Code of Conduct requirements will be implemented in all their existing and future operations • commitment that they will improve their current supply chain management system which would include effective implementation of the provisions in this ESAP at minimum • commitment that the list of suppliers that were pre-assessed (37), are to be involved in production/assembly of turbines will be locked contractually and any new or replacement suppliers should go through a separate due diligence process to confirm no association with forced labour risks.					
2-7	Develop a Workforce Accommodation Plan compliant with the applicable IFC/EBRD Guidelines. This plan needs to include: • EHS (including fire safety) and hygiene standards to be applied as part of the external accommodation selection criteria and monitoring including provision of first aid, clean water supplies and waste management, among others. • Specific benchmarks concerning areas such as space / density, ratio to be applied for number of toilets and showers, separate washroom facilities for women workers at site (where	Effective management of labour accommodation to reduce unsafe and unsanitary living conditions.	PR2 - Worker accommodation EBRD/IFC Worker Accommodation Guidelines Best practice	ACWA EPC Contractor	Prior to construction	Provision of a Workforce Accommodation Plan. Apply the selection criteria defined in the Plan for selection of external accommodation. Conduct monitoring of the facilities as per the frequency to be identified in the Plan.

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	possible), drinking water and provision of recreational facilities if applicable. • Mitigation measures for COVID-19 risks and a clear protocol of actions in case of positive cases being identified on site, including provisions to reduce psychological effects on workers in case of quarantine and isolation requirements. • Design of camps that are gender inclusive to avoid any potential risks to female workers including separate washroom facilities for women workers at site (where possible). • Aspects that will be checked during accommodation monitoring and measures to be taken in case of any non-compliances.					
2-8	Develop and implement a Worker Influx Management Plan in line with IFC's handbook for addressing project-induced in-migration with a set of actions and indicators for mitigation of impacts related to worker influx in the Project area including but not limited to impact on local community infrastructure, housing market, potential community conflict, misconduct of workers, any potential GBVH risks etc..	To ensure proper assessment and management of the impacts resulting from the presence of the Project and related jobseekers in the area.	PR2 – Worker accommodation Best practice	ACWA EPC	Prior to construction	Provision of Worker Influx Management Plan. Implementation of Worker Influx Management Plan with impacts assessed and monitored based on the frequency to be established in the Plan.
2-9	Establish and implement a Worker Grievance Mechanism (WGM) covering all EPC and subcontractor workers in line with PR 2, with an appropriate and prompt level of management and understandable and transparent process that	Enable Project to address worker concerns and promote good workforce relationships	PR2 – Grievance Mechanism Best practice	ACWA EPC contractor	Prior to construction	Workers Grievance Mechanism submitted and accepted to Lenders. Implementation verified through evidence including

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	provides timely feedback, without any retribution and reprisal risks. ACWA and contractors will disseminate information about its use to the workforce (in the languages understood by the workers). ACWA and EPC will appoint and train grievance officers separately to coordinate the implementation of the WGM.			Subcontractors		training registers, grievance boxes and grievance registers.
2-10	Develop and implement a Security Management Plan compliant with the Voluntary Principles on Security and Human rights in line with lender requirements, to include details on: • Procedure for conducting a security risk assessment for Project sites (and determine the need for firearm equipment if applicable). • Due diligence and background checks to be undertaken as part of security recruitment process. • Zero tolerance policy against retaliation by security providers to be disclosed. • Type and frequency of training to be provided for security personnel, including in use of force and conflict mediation, gender awareness module and equipment to be provided • Code of conduct for security providers that aligns with international standards, required to be signed by all security employees. • Process for reporting and investigating security incidents	Appropriate restriction of site access to ensure safety of public and workforce and integrity of site infrastructure. Ensure compliance with international standards on security provision. Facilitate means to address grievances related to conduct of security personnel.	PR2 - Security personnel requirements PR4 – Health and Safety Best practice as typified by the Voluntary Principles on Security & Human Rights and the IFC Good Practice Handbook: Use of Security Forces: Assessing and Managing Risks and Impacts	EPC Contractor	Prior to construction	Provision of Security Management Plan including security risk assessment. Security Code of Conduct. Evidence of regular monitoring of provision of security services provided.

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	• Facilitation of community and worker grievance mechanisms as means to submit grievances related to conduct of security personnel Monitor activities of the security provider on regular basis through labour audits as per action 2-5 above					
2-11	Develop and implement a Local Recruitment Plan that ensures equal opportunities are provided to local men and women, and priority is given to affected vulnerable groups including IDPs in the Project's employment, training and promotions, through details on the following: • Sex-disaggregated local employment targets/KPIs for skilled, semiskilled and unskilled workforce • Methods of disclosure of job opportunities to local communities • Process for local people hired on a short-term basis during construction to obtain permanent contracts during the operational phase • Provisions to facilitate recruitment and upskilling of women and other vulnerable groups through initiatives to encourage their application to jobs. Detail skills development of local workers in the Plan, with the following aspects: • Identification of skills and labour needs • Existing skills capacity gaps, training demand analysis and selection criteria for participants • Tailored skills development programmes in the construction phase, so that local workers are	Enhance job opportunities and skills development for local communities.	Best practice	EPC Contractor	Prior to construction	Local Recruitment Plan developed. Evidence of ongoing disclosure of job opportunities and provision of skills development for local community members.

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	ready to take advantage of operational phase employment opportunities All on-the-job and technical training will be provided free of charge by the contractor or subcontractors.					
2-12	ACWA to ensure that all employees, including contractor and subcontractor employees are provided with a written contract of employment specifying the key working conditions (such as working hours, salary, annual leave, etc.). Develop and maintain employee records/documentation of the EPC Contractor and its subcontractors in line with the legislations and PR2.	Risks of violations of the local labour law and non-compliances with the applicable international standards	PR2 Management of worker relationships Best practice	ACWA EPC Contractor	Prior to construction	Templates of work contracts available for review among all contractors and subcontractors.
2-13	Provide paid internship for students, as well as scholarships for young women to cover their tuition fees for Renewable Energy courses. This should be done in partnership with local universities and Vocational Educational Training institutions.	Skills development	EBRD Equality of Opportunity Strategy	ACWA	5 years from the Project's signing	At least 25 students (at least 40% females)
2-14	Increase female representation across management positions	Promotion of women's increased participation in management positions in the sector.	EBRD Strategy for the Promotion of Gender Equality	ACWA	3 years from the Project's signing	At least 5 percentage point increase in the share of women in management positions, to reach 15%.
PR 3	Resource Efficiency and Pollution Prevention and Control					
3-1	Develop and implement Environmental Monitoring Plan for construction phase of the Project, including methodology for air quality monitoring.	Minimisation of noise / air quality impacts on sensitive receptors.	PR3 – Resource Efficiency and Pollution	ACWA	Prior to construction	Provision of Environmental Monitoring Plan for construction phase.

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	The Plans will include applicable standards that the Project should be in compliance with. Ensure any new batch plant and overall construction process operations are in compliance with noise and air quality limits, with mitigation and monitoring measures applied. Batching plant will be installed at minimum distance of 500m from worker accommodation and local communities.		Prevention and Control – Air Quality impacts Best Practice	EPC Contractor O&M Company		Installation of batching plant minimum of 500m from sensitive receptors.
3-2	a) Develop and implement a water availability assessment plan with particular focus on the viability of the proposed batching plant's water source. Assessment should verify whether increases in groundwater abstraction attributed to the project will impact third 'parties' access to water and include cumulative impacts, including other proposed development projects that are envisioned to be dependent on the same water supply. Assessment should include water use for fire protection in calculations for required water during operation and construction phases b) Include water management plan within project CESMP, including expected water use and sourcing for various project elements during construction a, measures to minimise water usage. c) Update water management plan for operational phase.	Minimisation of water use by project.	PR3 – Resource efficiency - Water Best Practice	a) ACWA / EPC Contractor b) EPC Contractor	a) and b) finalized 1 month prior to construction c) prior to commissioning.	a) Provide water availability assessment plan and approval by Lenders. b) inclusion of water use management plan within project CESMP. c) water use management plan updated for operational phase.

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3-3	Ensure minimised impact on the water quality associated with access road crossing of Sumgaitchai river and associated mitigation measures to minimise potential contamination during bridge construction. Develop and implement drainage network design plan and Erosion and Sediment Control Plan to establish management control to prevent sediment runoff and flooding prior to clearance of site, taking into consideration the existing natural flow of surface water.	Minimisation of impacts on water quality by project activities	PR3 – Water Best Practice	ACWA EPC Contractor	Prior to bridge construction	Provision of assessment of water quality impacts of bridge construction . Supervise the process and provide report to Lenders on implementation Provision of Drainage Network Design Plan and Erosion and Sediment Control Plan and obtain Lender's approval.
3-4	a) Assess suitability of local waste facilities, in particular with respect to wastewater disposal capacity and hazardous waste. ACWA will only approve for use facilities that appropriately licensed by government regulatory body and operated to acceptable standards of safely for human health and the environment. b) Provide and implement a project Waste Management Plan (WMP or a plan containing all relevant waste management measures) detailing provision for waste management on site such as the separation and recycling of waste and including facilities for waste streams (to the extent it is available and feasible) and training requirements. The plan should also cover appropriate wastewater management / treatment / disposal and management of medical waste (particularly in context of COVID19). c) Conclude an agreement with an authorised local waste collection and disposal agency.	Minimisation of waste streams through coordinated practices. Promote community health and safety.	PR3 – Waste Management Best Practice	ACWA EPC Contractor	1 month prior to construction	a) Assessment of waste disposal and treatment facilities. b) Provide Project Waste Management Plan and approval by Lenders.. c) Provision of agreement local waste collection and disposal agency.

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3-5	Develop and implement project dust control procedures to be included in the Project Construction Environmental Management Plan (CEMP)/ Construction ESMS. The procedure should identify specific measures to be implemented on site, such as damping of internal routes, speed limits, minimising site clearing, revegetation of cleared areas, limiting dust generating activities during strong winds etc.	Management of dust impacts to workers and communities	PR3 / 4	EPC contractor	Prior to construction	Dust management plan and implementation reports.
3-6	Develop and implement a Hazardous Substance Management Plan.	Avoid H&S and environmental impacts related to hazardous materials.	PR3 – Safe use and management of hazardous substances and materials PR4 – Hazardous materials safety	EPC contractor	Prior to construction	Provision of Hazardous Substance Management Plan, and approval by Lenders.
3-7	Develop and maintain an Emergency Response Plan (ERP) and Spill Response and Contingency for construction and operational phases.	Minimisation of impacts on soil and groundwater	PR3 – Pollution Prevention and Control –Soil and Groundwater	ACWA EPC Contractor O&M Company	Prior to construction Prior to operation	Provision of Construction phase Emergency Response Plan (ERP) and Spill Response and Contingency. Update for operational phase.
PR 4	Health and Safety					
4-1	Develop and implement Project specific OHS Plan, defining the requirements to be implemented across the project and applicable to all workers, including (sub)contractors. Ensure that EPC and O&M contractor develop and implement site-specific Occupational Health and	Minimise H&S risks to workers.	PR4 – Occupational Health and Safety Best Practice	ACWA EPC Contractor	Prior to construction Implementation – throughout the Project construction stage	Provision of OHS Plan & associated procedures and approval by Lenders.

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	Safety (OHS) management system, including an OHS management plan and associated procedures of a scale appropriate to their scope of work. The requirements defined within these documents will apply to all project workers, including sub-contractors.				Prior to operation Implementation – throughout the Project operation stage	Operations OHS MP approved by Lenders
4-2	Develop and implement Community Health and Safety (CHS) Management Plan/ Community H&S measures, to consider community-related health, safety (signalling, trespassing, hazardous materials management, traffic management) and security risks including communicable diseases risks (i.e., COVID-19/STI/HIV etc), gender, GBVH and reprisal risks to affected people and vulnerable groups.	Minimise H&S and security risks to local community	PR4 – Community Health and Safety / Exposure to Disease Best Practice	ACWA EPC contractor	Prior to construction Updated CHS Plan/ measures prior to operation Implementation – throughout the Project lifecycle	Provision of: CHS Plan/ CHS measures, Communicable Diseases Management Plan and Worker Code of Conduct and approval by Lenders.
4-3	Develop and implement detailed project Traffic and Transportation Management Plan (TTMP) aligned with applicable national and international requirements/GIIP developed in consultation with local authorities and communities, including proposed delivery routes and number of vehicle movements taking into consideration the recommendations of the logistics study carried out by the EPC Contractor (additional study will be required if the turbine supplier changes). TTMP requirements to be clearly communicated, accepted and implemented by the Transporter/Turbine Supplier/EPC Contractor and all subcontractors.	Minimisation of impact of construction traffic on health and safety of workers and community. Minimise community H&S risks.	PR4 – Traffic and Road Safety Best Practice	EPC contractor	6 weeks prior to construction Implementation – throughout the Project operation stage	Provision of TTMP, agreed with Lenders, WTG supplier, local authorities and communities.
4-4	Undertake assessment of capacity of the local emergency services, identifying potential	Minimise risks associated with wildfire and other		ACWA	Prior to construction	Emergency Response Plan provided in ESMS, including assessment of capacity of the

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	requirement for establishment of supplementary site-based emergency response capabilities. Outcomes of assessment and any supplementary emergency response measures should be included in Emergency Response Plan to be provided for the Project. Develop adequate measures to address wildfire risks (as well as any other risk considered as relevant) inside ACWA's Emergency Management Plan and/or stand-alone Natural Disasters Response Plan to be developed.	potential natural disasters	PR4 – Emergency Preparedness and Response	EPC contractor	 Prior to operation	local emergency services, and approval by Lenders. Emergency Response Plan updated for operational phase.
4-5	<u>Incident and Accident Register</u> ACWA to ensure EPC and contractors maintain and regularly review the Incident and Accident Register to record OHS accidents, incidents and near misses throughout the duration of the Project. Inform lenders on material incidents and fatalities as per Loan Agreement requirements.	Minimise H&S risks to workers.	PR4 – Occupational Health and Safety Best Practice	ACWA	Prior to construction Implementation – throughout the Project lifecycle.	Incident and Accident Register within ESMS
PR 5	Land Acquisition, Involuntary Resettlement and Economic Displacement					
5-1	Allocate adequate resources to ensure timely implementation of the LRP. Conduct LRP implementation monitoring in line with the monitoring programme established within the LRP. ACWA to ensure additional measures for vulnerable groups are carefully implemented and reported as part of LRP implementation.	Ensure restoration or, where possible, improvement of the livelihoods and standards of living of displaced persons to pre-displacement levels	PR5 - Resettlement and Livelihood Restoration Planning and Implementation	ACWA	Provision of monitoring reports as per frequency to be established in the LRP	Format of LRP implementation report agreed with Lenders; LRP implementation monitoring reports submitted as per established frequency.

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5-2	Maintain regular meetings with Azerenergy and other relevant local authorities for effective LRP implementation and monitoring both for Wind farm and OHTL. Any complaints and vulnerabilities shall be addressed immediately in line with the LRP and SEP.	Ensure restoration or, where possible, improvement of the livelihoods and standards of living of displaced persons to pre-displacement levels	PR5 - Resettlement and Livelihood Restoration Planning and Implementation	ACWA	Periodically up to 2 years following completion of LRP activities	Minutes of meetings with Azerenergy and other relevant local authorities related to LRP.
5-3	Conduct a third party LRP Completion Audit to assess if all the LRP provisions have been met in line with the PR 5 requirements 2 years after completion of the LRP implementation and no later than commencement of operation. Audit ToR and third party auditor will be agreed with the lenders prior to the completion audit.	Ensure restoration or, where possible, improvement of the livelihoods and standards of living of displaced persons to pre-displacement levels	PR5 - Resettlement and Livelihood Restoration Planning and Implementation	ACWA	2 years after the completion of LRP activities, prior to operational phase	ToR for the consultant agreed with Lenders; LRP completion audit conducted by an independent third-party consultant. Audit report submitted to lenders prior to operational phase
PR 6	Biodiversity and Living Natural Resources					
6-1	Develop and implement a Biodiversity Action Plan (BAP) for the operational phase. Operational BAP documents to be subject to continual review and update throughout the operational phase of the project. Review and updates should be informed by the results of operational monitoring.	Management of potential impacts on biodiversity / maximising enhancement opportunities	PR6 -Biodiversity Conservation - The Protection and Conservation of Biodiversity	ACWA and Biodiversity specialists	Prior to operation	Final version of standalone operation BAP and BMEP submitted and acceptable to Lenders 2 months prior to operation. Updated BAP documents to be circulated to the Lenders where necessary.
6-2	ACWA will appoint a qualified Independent Ornithological (for bird and bat) Expert (IOE) on a non-objection basis by the Lenders to provide independent expert advice on the seasonal bird and bat activity and carcass monitoring reports and provide input as per the active turbine management strategy of the Project. The IOE will have the	Management of potential impacts on biodiversity	PR6 - Biodiversity Conservation - The Protection and Conservation of Biodiversity	ACWA and biodiversity specialist	Prior to commissioning	TOR for internationally-recognized IOE submitted and acceptable to Lenders 12 months prior to commissioning. Selection of internationally recognized IOE agreed with

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	authority and means to order shut down on demand when needed. The IOE will be appointed by ACWA throughout the Project loan duration. The IOE scope will be reviewed with the Lenders every 3 years, and extended with same or new tasks", with the following under timetable: ACWA will appoint qualified in-country experts to undertake all operational monitoring as set out in the PCFM and Operational BAP (BMEP). The IOE will be retained for the lifetime of the project and will provide technical support to the local consultancy on PCFM analysis and reporting, training and capacity building. The contract will include two (2) site visits per year for the first five years of operation to conduct independent verification of the PCFM program. An operational PCFM protocol document based on the PCFM Handbook (EBRD 2023) should be produced including details of 1. a five-year PCFM programme for the WF and 2. a two-year PCFM programme for the OHTL, including monthly searches along the length of OHTL. An operational CRMP should also be produced detailing the key mitigation measures for the project including: • implementation of a state-of-the art camera-led shutdown-on-demand system – Identiflight – to avoid bird collisions via upfront curtailment of the sensitive bird species (Steppe Eagle, Egyptian Vulture, Cinereous Vulture, Griffon Vulture, Bearded Vulture)					Lenders 3 months prior to commissioning and IOE to be in place for the lifetime of the project. Contract with wind wildlife consultancy and local ecological consultancy finalized 6 months prior to commissioning.

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	• experimental curtailment for bats during active seasons • acoustic monitoring of bats through operations • confirmation of the adaptive management approach that may trigger additional mitigations should No Net Loss thresholds be exceeded for both birds and bats.					
6-3	In combination with the Operation BAP (6.1), Monitoring Protocol Documents specific to operational phase (outwith CRMP/PCFM) should be included in the BAP (BEMP) and should include operational surveys for breeding birds (including raptors), bats, herptiles, habitats and flora and should be based on Best Practise Documents (e.g. SHN, Birdlife International, EUROBAT, BCT). Operational surveys are required to determine that NNL to PBF species has been achieved and to support the conclusions that the Habitat Restoration and Rehabilitation has been successful. Survey results (e.g. bat acoustic monitoring) should be used to refine mitigation measures,	Management of potential impacts on biodiversity	PR6 - Biodiversity Conservation - The Protection and Conservation of Biodiversity	ACWA and biodiversity specialist	Prior to commissioning	Draft version of specific operational monitoring documents submitted to lenders 3 months prior to commissioning. Final version of operational monitoring documents submitted and acceptable to lenders 2 months prior to commissioning. Bi-annual monitoring reports should be produced for at least the first five years of operation, after which a review of the monitoring results should be completed and survey effort modified or ceased depending on outcomes and protocols as set out in the AMMP.
6-4	Scientific Advisory Body (SAB): Retain/engage experts (e.g., ornithologists) to review the monitoring results and suggest adaptive	Management of potential impacts on biodiversity	PR6 -Biodiversity Conservation - The Protection and	ACWA	6 months after start of operations	TOR for SAB submitted and acceptable to lenders 8 months prior to operations.

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	management and monitoring measures based on the monitoring findings. The Scientific Advisory Body should be made up of Lenders and Owner/Operator Biodiversity Managers and Experts.		Conservation of Biodiversity			Selection of SAB participants agreed with lenders 6 months prior to operations. SAB contract 3 months prior to operations. First meeting with SAB 6 months after operations.
6-5	Design and implementation of bird markers on the Overhead Power Lines (OHL) and the Project should provide documentation stating that agreement has been secured between the Project and Off-taker that the Project will provide BFDs for the entire length of the OHTL and that these will be installed during construction of the transmission line. BFDs should be checked during monthly OHL PCFM searches, to ensure they are still functioning as designed and any defective / broken BFDs will be included in the bi-annual reporting to show the effectiveness of these measures at reducing collisions. Use underground power lines on site at the wind farm	Reduce risk of bird collision with power lines. Ensure adequate ecological supervision during in the design and construction of power lines.	PR6 -Biodiversity Conservation - The Protection and Conservation of Biodiversity Best practice	ACWA	Prior to installation of OHL	Implement adequate avian protection measures for power lines. Confirmation of committed to and installed mitigation measures should be communicated to the lenders. Results of ongoing monitoring of the BFDs should be included in Bi-Annual Biodiversity Reporting
6-6	The IdentiFlight System and Cameras must be installed, operational and tested at least three months prior to the start of generation.	Reduce bird collision risk	PR6 -Biodiversity Conservation - The Protection and Conservation of Biodiversity Best practice	ACWA	3 months prior to generation.	Confirmation of installation and results of camera testing should be provided to the lenders

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6-7	Biodiversity Offset Plan should be finalised detailing results of additional Lesser Kestrel surveys and should include location and number of nesting boxes to be installed to achieve no net loss of Lesser Kestrel. Updated offset plan should also include KPI against which the success of the scheme will be measured.	Ensure no net loss of Lesser Kestrel	PR6 -Biodiversity Conservation - The Protection and Conservation of Biodiversity Best practice	ACWA	3 months prior to generation.	Updated Biodiversity Offset Plan provided to the Lenders
PR 8	Cultural Heritage					
8-1	Develop and implement a Cultural Management Plan including the Chance Find Procedure as per the ESMMF and in line with PR 8, incorporating the recommendations of the Institute of Archaeology and Ethnography of Azerbaijan National Academy of Sciences (ANAS). Ensure availability of local authority archaeological expert (under Institute of Archaeology & Ethnography of Azerbaijan) to be present on site in event of chance archaeological finds. Ensure requirements of Cultural Heritage Management Plan and chance finding procedures are embedded into management systems of EPC contractor and any sub-contractors engaging in groundworks and trainings are provided to the workforce prior to construction.	Preservation of potentially unidentified cultural heritage items. Manage project delay risks.	PR8 - Chance find procedures Best Practice	ACWA EPC contractor	Prior to construction	Chance Find Procedure and Cultural Management Plan developed. Confirmation from Institute of Archaeology & Ethnography of Azerbaijan of availability of local expert in case of archaeological chance finds Training registers showing disclosure of the documentation to the Project workforce.
PR 10	Information Disclosure and Stakeholder Engagement					
10-1	Implement the SEP specific to the Project to ensure effective communication of the investment plans, potential/actual E&S impacts and mitigation measures during construction and operation to communities with a specific focus on vulnerable groups through public meetings, publications and corporate websites. ACWA shall identify and address	Timely and consistent consultation and engagement throughout Project implementation.	PR10 – Stakeholder Engagement Best practice	ACWA	As per timeframes detailed in the SEP	Stakeholder Engagement Tracker updated on ongoing basis with details on stakeholders identified and engaged, and consultation and disclosure activities undertaken as per the SEP with

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	potential reprisal risks to Communities, CSOs who are raising concerns/or opposing to the project. ACWA to update SEP on annual basis to ensure any new PAPs and interested stakeholder groups are also engaged throughout the project lifecycle as and when necessary. Publish annual summary of avian monitoring on Project websites.					documented evidence produced, e.g. meeting minutes, registers. SEP updated according to established timeframes.
10-2	Implement the Community Grievance Mechanism during construction and operation, in line with the key principles agreed in the disclosed grievance procedure. ACWA to publicly declare their zero-tolerance policy against any form of reprisal/retaliation against project stakeholders due to their engagement, feedback, or complaints related to the project activities and operations. ACWA to take all necessary measures specified in the ESIA, management plans to avoid and /or address any incidents through effective implementation of the policy.	Effective management of complaints	PR 10	ACWA and EPC/subcontractors	Throughout the project lifecycle	Grievance tracker to be submitted to the Banks Evidence of complaint close-out forms
10-3	Develop and implement a community development plan (CDP) through a transparent and participatory process with local stakeholders and communities. The process for the development of the CDP shall include as a minimum a needs assessment, to ensure that the Plan addresses relevant community needs, and a risk and vulnerability assessment, to ensure that all potential direct and indirect risks are considered in relation to all CDP actions. The CDP	Benefits to local communities.	Best practice	ACWA	CDP – 3 months after the financial close	CDP Committee established. Community Development Plan - within 3 months after financial close. Evidence of implementation in semi-annual social reports.

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	shall explicitly consider the impact of proposed community development activities on vulnerable groups and ensure that measures are put in place to mitigate vulnerability. Establish a Community Development Committee for participatory planning and CDP oversight.					