

## Draft Environmental and Social Action Plan

NO.	ACTION	REQUIREMENT (LEGISLATIVE, LENDERS, BEST PRACTICE)	RESPONSIBILITY	TIMING	TARGET AND EVALUATION CRITERIA FOR SUCCESSFUL IMPLEMENTATION	COMMENTS
Assessment and Management of Environmental and Social Impacts and Issues						
1.1	<p><i>Environmental and Social Assessment</i> – Project Companies to prepare and submit to the national regulator the Stage III national EIA (for all components under the remit of the Project Companies) for approval prior to the Projects commencing operations.</p> <p>The Project Companies to liaise with NEGU to ensure that the national mandatory EIAs for the LILOs are obtained by NEGU before to the relevant stages of construction/completion of their components.</p>	National legislative requirements; IFC PS 1; ADB SPS Safeguard Requirement (SR) 1, EBRD PR 1.	Project Companies - supported by external (EIA/ESIA) consultants as required	Prior to the start of the operational phase for the Stage III EIA approvals For NEGU-led components regulatory EIAs in place before commencement of relevant activities (e.g. construction and operation).	Regulator approved Stage III national EIA NEGU-related EIA components approvals obtained	
1.2	<p><i>Environmental and Social Management System (ESMS)</i> – An ESMS applicable for each of the Projects' development phases [<i>Construction ESMS and Operations ESMS</i>] will be developed which draws upon/consolidates existing E&amp;S policies and procedures from the relevant parties (e.g. EPC contractor, ACWA, etc.) where relevant. (This must also include will also need to cover the decommissioning phase at later stage.)</p> <p><b>Construction Phase ESMS:</b> Project Companies shall ensure all E&amp;S requirements are cascaded down to the EPC contractor and their sub-contractors. E&amp;S conditions are included in contracts and for the EPC contract (and key-subcontractors) are reviewed and approved by LESA and Lenders prior to first disbursement. Ensure all EPC contractor and sub-contractor site-specific E&amp;S management plans, policies, procedures as listed in the Project ESMS are developed or updated prior to construction and are consistent with the Project ESMS. The E&amp;S budget for implementation of Project E&amp;S management, shall be broken down into constituent key elements of the ESMS, such as the LALRPs, resources and logistics, shall be sufficiently and explicitly budgeted for. The Project Companies shall include clauses in the EPC contract to require the EPC to provide sufficient resources to ensure implementation of the E&amp;S requirements.</p> <p><b>Operational Phase ESMS:</b> Ensure the Project Company and the O&amp;M Contractor develops an Operational ESMS. This will include a suite of sub-plans, which will address relevant E&amp;S risks and impacts associated with operations and allocate operational stage staffing (including E&amp;S personnel) consistent with the Project ESMS for the construction phase; reviewed by the Project Companies. This will also ensure the continuation of the Biodiversity Management Plan (BMP), Biodiversity Monitoring and Evaluation Plan (BMEP), Biodiversity Action Plan (BAP), Post Construction Fatality Monitoring (PCFM) need to be carried over to O&amp;M phase and adopted. A Project Operation ESMP (OESMP) should be prepared and will serve as compliance requirements for the O&amp;M Company (and be included in the O&amp;M contract). The E&amp;S management plans and supporting procedures specific to operations phase shall be reviewed and approved by the Company and Lenders' E&amp;S Adviser (LESA) prior to commissioning of the Projects.</p> <p>Ensure that O&amp;M allocates adequate budget and resources for E&amp;S management and to hire competent E&amp;S staff and conducts E&amp;S training. The ESMS will be supported by the</p>	IFC PS 1; EBRD PR 1.	EPC Contractor and Operations & Maintenance (O&M) Company: develop the consolidated ESMS ACWA Power corporate, Project Companies (supported by external (EIA/ESIA) consultants as required) – review and approve the ESMS developed by the EPC Contractor and O&M Company	Construction phase ESMS in place before construction starts  Operational phase E&S requirements included in the O&M Company contract. ESMS to be cleared by Lenders by 3 months prior to the start of the operational phase.	Construction and operational phase ESMS, with site-specific provisions.  All requisite E&S management plans in place.  Evidence of sufficient and allocated budget, organisational chart, allocated resources, training plan and key training conducted, monitoring and auditing plan, system of monitoring, evaluation and continuous improvement in place.	

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	<p>sub-plans and procedures as set out in the ESIA, cleared by LESA and Lenders. All plans to include monitoring and auditing requirements and KPIs, as appropriate. Review the ESMS plans at least annually and update as needed.</p> <p><b>Note: There are items below which are cross referenced to the Construction and Operational Phase ESMSs indicated in square brackets.</b></p>					
1.3	<p><i>Environmental and Social Policy – [Construction and Operational ESMS Component].</i> Update the Projects' E&amp;S Policy to include document number and date, and ensure that the Project Company's senior management signed the policy. The E&amp;S Policy should be communicated to stakeholders, including but not limited to the 's employees, contractors and subcontractors and external stakeholders.</p>	IFC PS1; ADB SR1; EBRD PR 1.	ACWA Power corporate, Project Companies	As part of the construction and then operational phase ESMS	Project E&S Policy (and other supporting policies described in ESIA and as needed)	
1.4	<p>Develop a permit and compliance register <i>[Construction and Operational ESMS Components]</i> to include the various permits and approvals, submissions required by the Projects, include relevant conditions including renewal (if required) for the Projects (including those E&amp;S permits/approvals that are held by subcontractors and contractors).</p>	IFC PS1; ADB SR1; EBRD PR 1.	ACWA Power corporate, Project Companies	Prior to financial close (and prior to NTP), and then ongoing throughout the lifetime of the project.	Project Permit and Compliance Register.	ACWA have this.
1.5	<p><i>Organisational Capacity - Resources – [Construction ESMS Component].</i> Recruit EHS and Social personnel for the Projects, including, but not limited to:</p> <ul style="list-style-type: none"> <li>• A dedicated HSSE / E&amp;S Manager for the Projects.</li> <li>• A dedicated H&amp;S Manager and dedicated H&amp;S staff for the Projects.</li> <li>• A dedicated Social (Resettlement) Manager, and dedicated Community Liaison Officers (CLOs) (minimum of five with at least two female) for the Projects;</li> <li>• Dedicated biodiversity manager and ecologist/ biologist to manage the implementation and monitoring of the BMP and other biodiversity-related management plans, especially with regards to no net loss and net gain requirements for Natural Habitat, Critical Habitat and Priority Biodiversity Features. The Biodiversity Manager and the Ecologist will be supported by the EPC contractor's ecologists and local specialists to be engaged to carry out the required tasks.</li> <li>• Engage a competent gender/Gender Based Violence and Harassment (GBVH) advisor prior to main construction activities. Gender/GBVH expert will provide training and support the Social Manager and CLOs for community-related GBVH issues and Projects' HR Manager who will be responsible for assessment and addressing retaliation, harassment risks and issues at all project sites and worker accommodation.</li> <li>• Assign two of the female CLOs to execute portions of social management plans including Gender Management Plan, stakeholder engagement and grievance management for female affected people and community members.</li> </ul> <p>E&amp;S roles for the EPC Contractor will also need to be fully appointed, including HR Manager, HR, H&amp;S and E&amp;S as distinct managers, CLOs, ecologists, and supporting staff commensurate to the number of workers on-site for construction phase.</p>	IFC PS 1; ADB SPS SR1; EBRD PR 1.	Project Companies	Resources to be hired according to the timeline for development of the construction and operational phase ESMS	<p>Appointed E&amp;S personnel and E&amp;S organisational chart for both Project companies and EPC contractor.</p> <p>Construction phase monitoring by LESA to determine adequacy of resourcing and need for any additional capacity.</p>	
1.6	<p><i>Organisational Capacity and Commitment – Training Plan– [Construction and Operation ESMS Component].</i> Develop training plan as part of the Construction and Operations ESMS, in line with the ESIA/ESMP requirements, for Project employees and EPC contractor and subcontractor personnel, as appropriate. This should include:</p> <ul style="list-style-type: none"> <li>• Role/position;</li> <li>• Syllabus/type of training;</li> </ul>	IFC PS 1; ADB SPS SR1, EBRD PR 1.	Project Companies	As part of the construction and operational phase ESMS	E&S training plans	

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	<ul style="list-style-type: none"> <li>Duration; and</li> <li>Frequencies (including any refresher training).</li> </ul> <p>The training plan shall be tailored according to roles on the Project (including specific training for specialised roles, i.e. Biodiversity Manager, Social (Resettlement) Manager, CLOs as required).</p> <p>Training should prioritise all pre-construction/pre-clearance activities.</p> <p>Ensure all parties (including EPC contractor and subcontractor HSE and other staff of the Projects) complete the training which is provided by Project Company's E&amp;S staff prior to construction.</p> <p>Company shall regularly assess effectiveness of training provided by EPC contractor /sub-contractors throughout construction phase and require adjustments to the training plan based on risks of the Projects, non-compliances, incidents and "lessons learnt" during implementation of the Projects.</p>					
1.7	<p><i>Contractor and Supplier Management Plan – [Construction ESMS Component].</i> Project Companies to develop a contractor and supplier management plan (as part of the Construction ESMS) including reporting requirements and frequency.</p> <p>Project E&amp;S legal (including Lender) obligations shall be cascaded to contractors and suppliers and form part of their contract documents.</p> <p>Project Companies to integrate labour and H&amp;S requirements into the contractor and supplier management plan, including the requirements that all contractors and sub-contractors employ workers in line with the Applicable Standards, and contractually require compliance from third parties providing labour to them. The contractor and supplier management plan shall also specify on-site roles and responsibilities to manage all identified labour risks along with defined reporting requirements on labour and OHS. Reference shall be made to the IFC guidance <i>Good Practice Note: Managing Contractors' Environmental and Social Performance</i> may be a useful additional resource.</p>	IFC PS1; IFC PS 2; ADB Social Protection Strategy (2001); ADB Gender and Development Policy (1998); EBRD PR 1	Project Companies	As part of the construction phase ESMS	Contractor and supplier management plan	
1.8	<p><i>Project Monitoring and Reporting – [Construction and Operation ESMS Component].</i> Project Companies to establish an E&amp;S monitoring plan (as part of the Construction and Operational ESMSs) for both the construction and operational phases. Environmental monitoring should include national EIA requirements and monitoring requirements from other standards (covered in the Lenders ESIA). The Projects' E&amp;S monitoring plan will integrate the LALRP reporting requirements and will serve as compliance requirements for the EPC Contractor and O&amp;M Company.</p>	IFC PS 1; ADB SPS, SR1-2 EBRD PR 1	Project Companies	As part of the construction and operational phase ESMS	Construction and operational phase E&S monitoring plan	
Labour and Working Conditions						
2.1	<p><i>Human Resources Management System which incorporates the HR Policies and Plans</i> – Develop and implement a Human Resources (HR) and labour management system (HRMS) [parallel to the Construction ESMS] for construction and operations, to include:</p> <ul style="list-style-type: none"> <li>Human Resources Management Plan, including policies such Human Resource Policy, Recruitment Policy, Child &amp; Forced Labour Policy, Gender Based Violence and Harassment, and Equal Opportunity and Non-discrimination policy.</li> <li>Training Plan [see ESAP item 1.6 above].</li> </ul> <p>The HRMS will also include a Labour and Working Conditions Management Plan (LWCMP). Appropriate financial and human resourcing, implementation arrangements, monitoring and auditing system to implement the Projects' LWCMP, elements to</p>	National legislative requirements; IFC PS 2; ADB Social Protection Strategy (2001); ADB Gender and Development Policy (1998); EBRD PR 2	Project Companies EPC Contractor for construction  Project Companies O&M Company for Operation	Three months after signing  Prior to commissioning and ongoing throughout the lifetime of the project	LWCMP and HR Policies and associated procedures and templates in English, Uzbek and other languages as necessary, including a template worker contract compliant with the national laws and meeting the Lender requirements.	

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	<p>effectively manage contractor and subcontractor labour and working conditions risks. The LWCMP should include policies procedures covering:</p> <ul style="list-style-type: none"> <li>Human Resources Policy, translated into the language(s) spoken by the entire workforce and shared with all workers.</li> <li>Explicit prohibition of child and forced labour, or those under 18 years of age.</li> <li>Explicit prohibition of overtime to pregnant employees.</li> <li>To address child and forced labour risks, requirements for personal identification documents, document verification procedure, prohibiting withholding of any personal identification document or passport, clear clauses around entering and terminating work contracts.</li> <li>Labor and working terms and conditions compliant with the Uzbekistan Labour Code for all types of workers.</li> <li>Clear, and documented, information on the details of their employment, their rights and benefits for all types of workers;</li> <li>Specific provisions for managing migrant labour</li> <li>Allowing for collective bargaining;</li> <li>Ensuring non-discrimination and equal opportunities in employment, including a policy on equal pay to address wage discrimination based on gender;</li> <li>GBVH risk management provisions including dedicated GBVH training to all workers and contractors as part of project-level Training Plan;</li> <li>Whistleblowing policy, respect for the privacy of workers and confidentiality;</li> <li>A workers grievance mechanism;</li> <li>Provisions to prepare a retrenchment plan in line with national law and good industry practice should collective dismissals be anticipated for the Projects; and</li> <li>Disciplinary and incentive procedure to manage HSE performance;</li> </ul> <p>Create an HR database for all workers of the Projects, including those employed by EPC contractor, O&amp;M Company, and their subcontractors. Register relevant documentation as permissible under local laws such as work permits/visas, signed employment contracts, payments, health data (including pre-medical checks), qualifications/certifications, code of conduct acknowledgements, training records, and overtime consent.</p> <p>The system should verify terms of employment (salary, health checks, employment duration), employee age, and mandatory requirements before issuing access cards. Only workers with an access card can access the site and work on the Projects.</p> <p>Pre-employment medical checks must include differentiated more extensive health screening based on a pre-agreed set of indicators (such as age, health conditions, etc.) designed by a medical practitioner.</p> <p>Develop supplementary procedures, Code of Conduct, templates and other documentation to fulfil the requirements of the LWCMP, including the development of appropriate worker contract templates.</p> <p>Ensure the LWCMP requirements are cascaded to and implemented by EPC, O&amp;M contractors and their sub-contractors.</p> <p>The LWCMP will be a fundamental part of the Human Resources Management System (see above).</p> <p>Communicate HR policy (and supporting procedures) to all workers including contractors and subcontractors and maintain relevant communication records.</p>				Evidence of implementation.	
2.2	<i>Intermediary Labour Agencies [In case of use of labour intermediary agencies is identified]-</i>	National legislative requirements; IFC PS 2; ADB Social Protection Strategy	Project Companies and EPC	Prior to contract signing with intermediary agencies for recruitment of project	In case used, Project Companies to provide list of all intermediary agencies to be used by	

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	<p>Develop and use a 'screening' procedure for each intermediary agency to be used by EPC contractor/sub-contractors. At a minimum, to ensure that:</p> <ul style="list-style-type: none"> <li>Intermediary agencies and any labour brokers or other subcontracted entities they use, hold all relevant licenses and registrations required by host, destination and transit countries.</li> <li>Intermediary agency (and any labour broker or other subcontracted entity) is not associated with reputational risks by checking adverse media reports, as well as any pending or recent legal cases involving workers.</li> </ul> <p>Ensure that all tendering packages for intermediary agencies include the following details:</p> <ul style="list-style-type: none"> <li>Minimum requirements in relation to labour and working conditions, in line with national law, Project HR policy and requirements of the Lenders.</li> <li>Technical and organizational capacity required to implement these requirements (i.e., appropriately qualified personnel, adequate management systems and training).</li> <li>Policies and commitments relating to foreign migrant worker recruitment and broader human rights sustainability and procurement issues and risks.</li> <li>Foreign migrant worker recruitment agency selection criteria self-assessment questionnaire (SAQ) for completion by intermediary agencies.</li> <li>Selection procedure will include a minimum threshold to be reached in the above SAQ.</li> </ul> <p>Develop and implement a Foreign Worker Recruitment Agency Selection Audit Report and Corrective Action Plan (CAP) prior to any formal engagement with labour intermediary agencies. Fulfilment of the first CAP will be a pre-condition to signing a service agreement with any intermediary agency.</p> <p>Project Companies will identify the legal employer of all project workers (which may be the EPC contractor, sub-contractor or an intermediary agency), and ensure that the employer develops an accurate and comprehensive information package about the work and the working conditions (including wages and working hours) to be distributed to all migrant workers, in a language they understand, prior to their recruitment.</p> <p>Project Companies will ensure EPC contractor/subcontractor and selected intermediary agencies, if any, implement the strategy, process timelines, and recruitment methods through regular audits.</p>	(2001); EBRD PR 2		workforce	<p>EPC contractor and sub-contractors, as well as confirmation (and evidence, if requested) that they are compliant with all national and lender requirements.</p> <p>List of all migrant project workers, their nationality, the identity of their employer, and confirmation (and evidence if requested) that they hold required work permits.</p> <p>Foreign Worker Recruitment Agency Selection Audit Report and Corrective Action Plan (CAP) for migrant workers shared with Lenders prior to formal engagement with any agency.</p> <p>Recruitment plans and procedures of EPC and its sub-contractors, including KPIs for local employment.</p> <p>Internal labour audit reports for intermediary agencies.</p>	
2.3	<i>Project Workforce</i> – Project Companies to provide forecast details on the Project workforce, including labour breakdown, i.e. local/foreign, male/female, skilled/non-skilled for different stages of project (e.g. civil work/ solar PV installation / BESS installation vs transmission line construction, etc.)	National legislative requirements; IFC PS 2; ADB Social Protection Strategy (2001); ADB Gender and Development Policy (1998); EBRD PR 2	Project Company, supported by the EPC Contractor	Before signing	Project workforce labour breakdown/Hiring plan/Construction workforce forecast	
2.4	<i>Worker Accommodation Plan [Construction ESMS Component]</i> – Develop Workers' Accommodation Plan (WAP) based on assessment of the accommodation and welfare needs for the Project (including that for the OTLs). Ensure all project accommodation and welfare facilities (including of EPC, O&M and their subcontractors) meet Lender accommodation and welfare requirements, including design/selection of the workers' accommodation to meet the requirements of the IFC & EBRD Workers Accommodation: Processes and Standards in addition to gender relevant requirements and in terms of the EPC contract. As part of this action, include influx management line with the recommendations in the ESIA and incorporating detailed Projects' information, e.g. number and location of workers' accommodation, and any planned screening assessments and awareness	IFC PS 2; Social Protection Strategy (2001); ADB Gender and Development Policy (1998); EBRD PR 2	Project Companies, supported by the EPC Contractor	As part of the construction phase ESMS	Workers' accommodation plan including details of workers' accommodation and checklists against the requirements (and managing worker influx) Code of Conduct and evidence of	

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	<p>campaigns.</p> <p>The influx management plan will include (among other) impact on local community infrastructure, housing market, potential community conflict, misconduct of workers, any potential Gender Based Violence and Harassment (GBVH) risks and incidence of communicable diseases.</p> <p>A Code of Conduct should also be developed as part of the WAP and include expectations for the workers' behaviour when outside the work site and in the host communities.</p>				dissemination	
2.5	<p><i>Workers' Grievance Mechanism – [Construction and Operational Phase ESMS Component].</i> Project Companies to implement a formal Project-specific workers' grievance mechanism and disseminate it to all workers including contractors and subcontractors, and maintain relevant communication records and implementation records (i.e. training records, provision of grievance boxes and on-site).</p> <ul style="list-style-type: none"> <li>The grievance mechanism and training will be provided in the local language of the contractors and subcontractors.</li> <li>The grievance mechanism should allow for anonymous grievances; allow grievances to be raised in the language(s) of the workforce; and the existence and functioning of the grievance mechanism should be communicated to employees by a variety of channels.</li> <li>The grievance mechanism should have a specific stream to address GBVH.</li> </ul>	IFC PS 2; Social Protection Strategy (2001); ADB Gender and Development Policy (1998); EBRD PR 2	Project Companies EPC Contractor O&M Company	Prior to the start of the construction phase, then ongoing throughout the lifetime of the project	<p>Project grievance mechanism meeting Lender requirements for construction and operations.</p> <p>Up-to-date GRM tracker/ grievance log.</p> <p>Evidence of implementation.</p>	
2.6	<p><i>Supply Chain Management System –</i> Implement and maintain a Supply Chain Management System (SCMS) to identify, manage and remedy supply chain risks associated with labour exploitation, as well as any other environmental and human rights risks and impacts as specified in the ESMS and Supply Chain management Plan (SCMP). This includes the provided due diligence and management procedures for the sourcing of solar modules and solar components in accordance with Good International Practices. With respect to solar supply chains, the management system shall include (as already provided):</p> <ul style="list-style-type: none"> <li>Responsible Sourcing Policy; and disclosure of high-level policy statement on the Company website;</li> <li>Solar module supply chain mapping and risk assessment;</li> <li>specific measures to be implemented in case the mapping reveals potential exposure to forced or child labour;</li> <li>Inclusion of appropriate clauses in procurement notices and contracts with solar contractors and suppliers on labour risks and management thereof. This shall include 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. Self-declarations and codes of conduct as already shared by the solar module manufacturer and their core suppliers;</li> <li>Labour audits of module/panel manufacturer manufacturing facility as per the agreement during the production upon reason to believe that a breach of forced labour provisions has occurred;</li> <li>Requirements for traceability protocols from solar suppliers as per the provided Bill of Materials (BOM);</li> <li>When possible, requirements for solar suppliers to conduct (or provide) traceability audits of their supply chains;</li> <li>Document third-party verification of the origin of the BOM materials as listed in the BOM(s) and ensure compliance with the agreement;</li> <li>Implement a continuous monitoring and audit programme for high-risk 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.;</li> </ul>	IFC PS 2; EBRD PR2; Good International Practice; ADB SPS Prohibited Activities Investment List (PIAL), ADB Social Protection Strategy, EU Guidance on Due Diligence for EU Businesses to Address the Risk of Forced Labour in Their Operations and Supply Chains	Project Companies	<p>SCMS implemented during module procurement and manufacture</p> <p>Update required if there are changes in the PV module supply chain subject to the prior consent of the Lenders</p>	<p>Evidence of risk assessment conducted by ACWA for both core solar suppliers and EPC /sub-contractors to be involved in the projects by ACWA on labour/HSE and reputational issues prior to construction</p> <p>Updated evidence of implementation of supply chain management system (supply chain map, due diligence reports, risk assessment, contract clauses, labour audits reports, etc.) including in the event of changes in the supply chain.</p> <p>Evidence of an update if there are changes in the PV module supply chain.</p> <p>Updated verified BOM that has been agreed with the Lenders</p>	



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3.2	<p><i>Pollution Prevention and Control [Construction and Operation ESMS Component]</i> - Project Companies to require that the EPC Contractor and O&amp;M Company to develop plans to ensure pollution generated from the project construction including workers' accommodation and project-associated facilities, and operational activities are properly managed in accordance with Applicable Standards. The plans should include the details of pollutants to be generated, types, quantities, timelines, on-site management and offsite treatment and disposals/discharges. The following plans shall be developed:</p> <ul style="list-style-type: none"> <li>• Wastewater management plan</li> <li>• Waste and hazardous waste management plan</li> <li>• Hazardous materials management plan</li> <li>• Air pollution management plan</li> <li>• Noise and vibration management plan</li> </ul>	IFC PS 3; ADB SPS (2009) SR1: Environment, Policy Principle 9a Pollution Prevention, Resource Conservation, and Energy Efficiency; EBRD PR 3	Project Companies (working with the EPC Contractor and O&M Company)	<p>Three months after signing (construction)</p> <p>As part of the construction ESMS</p>	<p>Wastewater management plan</p> <p>Waste and hazardous waste management plan</p> <p>Hazardous materials management plan</p> <p>Air pollution management plan</p> <p>Noise and vibration management plan</p>	
3.3	<p><i>Greenhouse Gases (GHG)</i> – As part of design assess GHG emissions from the Projects, identify emission reduction measures. As part of design review, seek an alternative to the use of R134A as the refrigerant for the BESS units and use a refrigerant whose Global Warming Potential (GWP) is below 750 instead.</p> <p>Determine GHG emissions avoided as a result of the development of the Projects.</p> <p>Refer to the GHG Protocol as GIIP for GHG calculation method.</p>	<p>EBRD PR3</p> <p>ADB SPS 9</p> <p>IFC PS 3; ADB SPS (2009) SR1: Environment, Policy Principle 9a Pollution Prevention, Resource Conservation, and Energy Efficiency; EBRD PR 3; EU F-gas regulation</p>	Project Companies (working with the EPC Contractor and O&M Company)	<p>Design review of BESS refrigerant gases</p> <p>Methodology for GHG emissions avoided: No later than six months following financial close</p> <p>Reporting of GHG emissions avoided: As part of annual reporting to Lenders</p>	<p>Preconstruction: Submission of calculation prior to financial close.</p> <p>Yearly Reporting: As part of the annual reporting.</p>	
3.4	<p><i>Herbicides and Pesticides [Construction and Operation ESMS Component]</i> - Ban the use of herbicides or pesticides during the construction and operation period, in particular for vegetation control, excepting for small-scale pest control in accommodation and kitchens etc. (in which these will be selected, handled, stored and disposed of in line with the Lenders' E&amp;S requirements).</p>	<p>EBRD PR3</p> <p>ADB SPS 9</p> <p>IFC PS 3; ADB SPS (2009) SR1: Environment, Policy Principle 9a Pollution Prevention, Resource</p>	Project Companies (working with the EPC Contractor and O&M Company)	As part of the construction and then operational phase ESMS	No use of pesticides / herbicides for vegetation control. Restrictions on other pesticides included the EPC contractor/O&M contractor/sub-contractors' contracts.	
Health, Safety and Security						
4.1	<p><i>Occupational Health and Safety – [Construction and Operation ESMS Component].</i></p> <p>As part of the Projects' ESMS develop an occupational health &amp; safety management system with specific management procedures and plans for the construction and operational phases. This should be guided by ESIA's, ESMPs etc. and be consistent with good international industry practice and include the following elements:</p> <ul style="list-style-type: none"> <li>• Developing a strong "safety culture";</li> <li>• Roles and responsibilities;</li> <li>• Job Safety Assessments (JSAs);</li> <li>• Training and visitor orientation;</li> <li>• Identification of potential hazards and management/mitigation including design, testing, choice, substitution, installation, arrangement, organisation, use and maintenance of workplaces, working environment and work processes to eliminate sources of risk or minimize workers' exposure to them;</li> <li>• Work permitting / controls for hazardous activities (excavation, lifting, work at height, electrical works, confined spaces, etc), incorporating permit to work system &amp; lock-out tag-out (LOTO) procedure;</li> <li>• Work procedures, assessments, checklists, guidance etc.;</li> <li>• Personal protective equipment availability, maintenance and training;</li> </ul>	IFC PS 2; ADB SPS (2009) SR1: Environment, Policy Principle 10a Occupational Health and Safety; Social Protection Strategy	Project Companies, supported by the EPC Contractor (and for the operational phase the O&M Company)	As part of the construction and operational phase ESMS	Construction and operational phase occupational health and safety management plan and associated components	

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	<ul style="list-style-type: none"> <li>• Weather considerations;</li> <li>• Signage installed and constructed of a suitable durable material to include restricted area warnings; PPE requirements; site rules; location of emergency services; electrical warning / keep out; and maximum speed limits for on-site vehicles;</li> <li>• Personal protective equipment (PPE);</li> <li>• Equipment and machinery safety;</li> <li>• Chemical / hazardous materials management;</li> <li>• Minimisation, demarcation and protection of open cable trenches / excavations;</li> <li>• Designated areas for storage of materials;</li> <li>• Integrity of workplace structures;</li> <li>• First aid and emergency response;</li> <li>• Weather conditions;</li> <li>• Safety inspections;</li> <li>• Accident, incident and disease monitoring and reporting, as well as near miss and safe behaviour reporting;</li> <li>• Workers rules;</li> <li>• Site housekeeping;</li> <li>• Site security &amp; access control;</li> <li>• Welfare/social facilities;</li> <li>• Workers' accommodation management provisions; and</li> <li>• Implement specific initiatives to address occupational health and safety risks for female employees when at work.</li> </ul> <p>The scheduling of construction activities during the summer period should consider the activities required to be undertaken and a specific work schedule should be agreed during the hottest periods ( and integrate into the schedule measures such as changing of working hours to cooler times of the day and prioritising more strenuous/heat risk related activities at these times in addition to the implementation of frequent, short breaks during the workday and other measures to reduce heat stress).</p> <p>EPC Contractor to monitor heat-related incidents and ensure that workers in the hotter seasons are provided with shaded places to rest/eat, appropriate duration of breaks and with sufficient cold drinking water.</p>					
4.2	<p><i>Gender-Based Violence and Harassment</i> – Appoint and train GBVH focal points to address GBVH issues, including receiving and coordinating the response to GBVH complaints, and providing support to complainants in line with a survivor centred approach.</p> <p>Hold regular consultations with female employees regarding the risks of GBVH they face at work, and access to redress mechanisms</p> <p>Ensure that there is gender diversity in Internal Audit team (or GBVH grievance committee) and expertise to lead or participate in GBVH investigations including (e.g. legal, HR, operations, HSE) and provide targeted GBVH training for all staff who play a role in GBVH grievance handling (including HR, Internal Audit, managers, customer care).</p> <p>Appoint external expert advisor to provide support on policy roll-out, training, and investigations to GBVH focal points, HR and Internal Audit.</p> <p>Establish partnerships with civil society organisations (if possible) to participate in public awareness raising campaigns regarding GBVH in the workplace.</p> <p>Send immediate notification to the Lenders on GBVH complaints using the GBVH incident memo and support the GBVH incident review process as deemed necessary.</p>	IFC PS 2; Social Protection Strategy (2001); ADB Gender and Development Policy (1998); EBRD PR 2, PR 4	Project Companies	Within 6 months from signing; Implementation: ongoing throughout the lifetime of the project	GBVH focal points in place, external expert appointed, GBVH complaints notified to the Lenders	
4.3	<i>Traffic and Transportation [Construction ESMS Component]</i> – Project Companies working with the EPC Contractor (and subcontractors) to develop a traffic and transportation	IFC PS 4; ADB SPS (2009) SR1: Environment, Policy	Project Companies, supported by the EPC Contractor/sub-	As part of the operational phase ESMS	Traffic transportation and	

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	management plan (to be integrated into the construction ESMS) for the construction and operation phase (in line with the recommendations in the ESIA). This should consider routing, sensitive receptors, driver training, vehicle requirements, etc. and incorporate the findings of the traffic/transportation study as well as any feedback from engagement with the local authorities.	Principle 10	contractors		management plan	
4.4	<p><i>Emergency Preparedness and Response [Construction and Operation ESMS Component]</i> – An EPRP should be developed for the Projects. This should include both the construction phase, and in due course the operational phase. This should be developed in line with the Applicable Standards and the ESIA and consider:</p> <ul style="list-style-type: none"> <li>• Identification of potential emergencies based on hazard assessment;</li> <li>• Roles and responsibilities;</li> <li>• Human Resources i.e. need and availability for trained medical staff (doctor/nurse);</li> <li>• Development of procedures to respond to the identified emergency situations, including shutdown, pollution prevention, etc.;</li> <li>• Equipment required (e.g. alarms, firefighting equipment, spill response equipment, first aid facilities, transport, etc.);</li> <li>• Testing and inspection regimes for emergency equipment;</li> <li>• Muster points/evacuation routes;</li> <li>• Training required, including drills and overlap with external parties;</li> <li>• Identify communities and government agencies to be involved in emergency response and their roles;</li> <li>• Communication protocols and emergency contacts; and</li> <li>• Update and review cycle.</li> </ul>	IFC PS 1; IFC PS 4; ADB SPS, Requirement 1: Environment; ADB SPS (2009) SR1: Environment, Policy Principle 10b Community Health and Safety	Project Companies, supported by the EPC Contractor (and for the operational phase the O&M Company)	As part of the construction and operational phase ESMS	Construction and operational phase EPRPs	
4.5	<i>Security Arrangements [Construction and Operation ESMS Component]</i> – Security Management Plan for the construction and operational phases, that refers to available guidance, e.g. the Voluntary Principles on Security and Human Rights, IFC's Good Practice Handbook on the Use of Security Forces: Assessing and Managing Risks and Impacts, when developing the Security Management Plan.	IFC PS 4; ADB SPS (2009) SR1: Environment, Policy Principle 10	Project Companies, supported by the EPC Contractor (and for the operational phase the O&M Company)	As part of the construction and operational phase ESMS	Security management plan	
Land Acquisition, Restrictions on Land Use and Involuntary Resettlement						
5.1	<p><i>Final LALRPs</i> - Final version of the LALRPs prepared once all detailed design and census of affected households (AHs) has been completed in relation to other components of the Projects not captured in LALRPs v2.0. As part of the update of the LALRPs these must include the following:</p> <ol style="list-style-type: none"> <li>Updated data regarding the PAHs and the land acquisition footprint</li> <li>Updated schedule of compensation and LTP implementation</li> <li>Detailed description of the NEGU led LILO land acquisition and compensation process, and how the objectives of the LALRP will be applied, including appropriate monitoring and evaluation. A process of corrective action application will be clearly stated,</li> <li>Increased emphasis on communication with local and national authorities to ensure the full awareness of state-led land return legislation, processes and activities and changes thereto as related to the Projects (and mitigate premature displacement);</li> <li>Greater consideration for the local context (i.e. state-owned land and state-led land lease return process to acquire land for site development) and how this will impact PAPs and vulnerable groups and gaps between the release of land and payment of compensation; and</li> <li>Awareness and provision for non-titled land users and other PAPs who may not be able to produce documentary evidence of their economic dependence on the affected land (including full tax documentation).</li> </ol> <p><i>[This cross-references to the separate Social Compliance Audit (SCA) under CAP Item</i></p>	IFC PS 5; ADB SPS (2009) SR2: Involuntary Resettlement, EBRD PR5	ACWA Power, supported by external (EIA/ESIA) consultant, as required.	Once detailed designs for the OTLs are finalised and census completed, and prior to construction works commencing on the respective sections of the OTLs. Reviews of the final LALRPs	Updated LALRPs and approval by the Lenders	

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	<p>#1.</p> <p>Prior to implementation of any compensation or livelihood restoration activities detailed in the LALRPs, and document handover to the Project Companies, the LALRPs should be reviewed to ensure that the labelling, and counts of PAPs, PAHs, and Project-affected entities (including businesses and government entities) are accurately reflected.</p>					Commented [gi1]: would now be CAP item 3
5.2	<p><i>LALRP Consultation and Disclosure</i> - The compensation, transitional support and livelihood restoration initiatives proposed in the LALRPs will need to be disclosed to the project-affected communities (and any updates made) noting the transportation constraints survey and detailed access road design for the BESS site that will need to be finalised to confirm all livelihood impacts associated with the Projects and compensation required). All compensation (and transitional support) agreements will need to be signed off by the project-affected households.</p> <p>The Project Companies should conduct additional consultations with all Project Affected Persons (PAPs), including those not previously reached. These consultations should:</p> <ul style="list-style-type: none"> <li>Identify any unaddressed impacts from earlier engagement;</li> <li>Inform PAPs of their entitlements under the revised LALRPs;</li> <li>Ensure PAPs fully understand the GRM; and</li> <li>Incorporate findings into the final LALRPs.</li> </ul> <p><i>This cross-references to the separate SCA under CAP Item #2.</i></p> <p>The Project Companies early works contractor should conduct a precautionary review of their community engagement processes to clarify responsibilities, processes, timelines, and appropriate materials for community engagement, particularly with respect to the engagement of PAPs and entities that may experience displacement.</p> <p><i>This cross-references to the separate SCA under CAP Item #9.</i></p>	IFC PS 5; ADB SPS (2009) SR2: Involuntary Resettlement, EBRD PR5	ACWA Power, supported by external (EIA/ESIA) consultant, as required.	Following ADB approval of updated LALRPs. Review of community engagement process should take place throughout the lifetime of the project.	Documented evidence of additional PAP consultation activities Disclosure of compensation, transitional support, and livelihood restoration initiatives proposed in the LALRPs to PAPs. Updated community engagement plan (or stakeholder engagement plan for the purposes of the LALRPs)	Commented [gi2]: would now be CAP item 4
						Commented [gi3]: would now be CAP item 1
5.3	<p><i>Premature Displacement</i> – Compensation and entitlements implementation review. Evidence needs to be provided that all entitlements to affected households impacted by premature displacement as identified within the Social Compliance Audit have been paid prior to any loan drawdowns, to be reviewed and approved by lenders.</p>	IFC PS 5; ADB SPS (2009) SR2: Involuntary Resettlement, EBRD PR5	LESA as part of quarterly review.	Prior to loan drawdowns	LESA Quarterly report including Evidence of signed compensation packages.	Commented [gi4]: cross ref CAP item 6
5.4	<p><i>Pastural Land Compensation Calculation</i> - The Project Companies will obtain a written statement from the relevant competent authorities, stating that pastural land compensation will not be accurately calculable until December 2025 due to ongoing legislative changes. This statement should be attached as an annex to the LALRPs, and Sub-sections 3.1 and 6.3.3 of the LALRPs should be updated accordingly to reference this written statement – to ensure that the legal basis underpinning compensation valuation (and interim transitional payments) is made explicit. In the absence of such statement, the Project companies will obtain minutes of meetings in which the agreements are made, with such evidence likewise being attached to the LALRPs.</p> <p><i>This cross-references to the separate SCA under CAP Item #4.</i></p>	IFC PS 5; ADB SPS (2009) SR2: Involuntary Resettlement, EBRD PR5	ACWA Power, supported by external (EIA/ESIA) consultant, as required.	Updates to the LALRP are to be undertaken as a condition precedent (CP) to Project disbursement	Updated LALRPs	Commented [gi5]: would now be CAP item 2
5.5	<p><i>Grievance Redress Mechanism</i> - the Project Companies closely monitor the uptake of the GRM, to identify whether there are any issues relating to land acquisition/relinquishment</p>	IFC PS 5; ADB SPS (2009) SR2: Involuntary Resettlement, EBRD PR5	ACWA Power, supported by external (EIA/ESIA) consultant, as required.	Ongoing throughout the lifetime of the project.	Evidence of sensitisation of GRM and	

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	and/or involuntary resettlement that continue to be unaddressed via the established GRM. Project Company should conduct regular sensitisation in the local communities regarding the GRM to ensure awareness, access and transparency and ensure that the Project has a filing system in place to track all grievances received. Recognising there is an EPC contractor-established GRM harmonise with the Project Companies GRM and confirm that the EPC contractor GRM reports back to the Project Company GRM and logging systems. <i>This cross-references to the separate SCA under CAP Item #13.</i>				linkage/harmonisation with the EPC contractor GRM and Projects' GRM Evidence of filing system for grievances received Updated LALRPs	Commented [gi6]: would be CAP item 8
5.6	<i>Land Acquisition Adaptive Management Practices</i> - The Project Companies and the relevant consultants / contractors should incorporate adaptive management practices for the LALRPs throughout the course of the Projects, to account for future unanticipated involuntary resettlement impacts. The Sponsor (or a designated representative of the Sponsor) should: a) Provide a written notice to the Lenders of any unanticipated resettlement impacts that arise during construction or operation of the project that were not considered in the LALRPs, within 48 hours of such impacts being identified; and b) In the event of additional impacts arising where corrective actions and/or addendum to the LALRPs are required by Lenders, develop such addendum, update, disclose and consult on the revised LALRPs, followed by Lenders' approval. Addendums or updates to the LALRPs should be disclosed on lenders and project websites. <i>This cross-references to the separate SCA under CAP Item #11.</i>	IFC PS 5; ADB SPS (2009) SR2: Involuntary Resettlement, EBRD PR5	ACWA Power, supported by external (EIA/ESIA) consultant, as required.	Within three months of the Final IC.	Updated LALRPs with a section on management of unanticipated impacts	Commented [gi7]: would be CAP item 5
5.7	<i>Mid-term Audit of LALRP Implementation</i> – scope of work agreed with the Lenders and audit to be undertaken	IFC PS 5; ADB SPS (2009) SR2: Involuntary Resettlement, EBRD PR5	Independent E&S consultant	Timing prior to submission of updated LALRP with Phase 2 data	Completed mid-term audit	Commented [gi8]: cross ref CAP item 7
Biodiversity Conservation and Sustainable Management of Living Natural Resources						
6.1	<i>Avian Collision Mitigation and Monitoring</i> - Prepare an Avian Collision Mitigation and Monitoring Plan, including defined thresholds for adaptive management and offset implementation, prior to commencement of full construction. This plan must be aligned with the Biodiversity Action Plan and integrated into the CESMP for Lender review and approval.	IFC PS 6; ADB SPS SR1: Environment, Policy Principle 8b; EBRD PR 6	Project Companies	Finalised version prior to the start of stringing	Avian Collision Mitigation and Monitoring Plan	
6.2	<i>Biodiversity Management, Monitoring and Evaluation</i> - Prior to the operational phase, adapt the construction Biodiversity Management Plan (BMP) and Biodiversity Monitoring and Evaluation Program (BMEP) to develop an Operational Phase BMP and BMEP.  The BMEP developed for the operation phase will clearly identify monitoring actions to be taken, locations and responsibilities for undertaking each action, timelines/frequencies of actions, indicators, and thresholds for adaptive management. This plan will include at least 3 years of Post Construction Fatality Monitoring (PCFM) for bird collisions in line with established good practice and with independent expert oversight, for the full length of all overhead powerlines..	IFC PS 6; ADB SPS SR1: Environment, Policy Principle 8b; EBRD PR 6	Project Companies	Finalised versions before stringing (to be detailed for each line, with versions for each line)	Operations Phase Consolidated BMP and BMEP for each OTL	
6.3	<i>Bird Flight Diverters</i> - Install Bird Flight Diverters (BFDs) along the entire length of OTLs for the Projects (including the 350km-500kv line, the 2x70km OTL lines, and LILOs) using one of the two preferred BFD models (HawkEye and Saprem BAGTRF)	IFC PS 6; ADB SPS SR1: Environment, Policy Principle 8b; EBRD PR 6	Project Companies	BFDs installed within three weeks of powerline stringing on an ongoing basis	Confirmation of BFD selection and installation regime (and evidence of installation)	

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6.4	<i>Pre-construction/Construction Biodiversity Surveys</i> - As part of the implementation of BMP for construction phase, conduct pre-clearance/grading walkovers to also cover Critical Habitat-qualifying or PBF birds, with appropriate no-go buffers around any presence identified individuals	IFC PS 6; ADB SPS SR1: Environment, Policy Principle 8b; EBRD PR 6	Project Companies	Throughout the construction period as defined by the BMP/BMEP	Log of pre-clearance/grading walkovers	
6.5	<i>Biodiversity Management, Monitoring and Evaluation Requirements</i> - As the Consolidated BMP and BMEP includes a significant number of commitments, the Project Companies to ensure the flow through of these ESIA requirements to the EPC Contractor and O&M Company and provide adequate resources (personnel, budget, etc) to allow the effective implementation of the BMP and BMEP.	IFC PS 6; ADB SPS SR1: Environment, Policy Principle 8b; EBRD PR 6	Project Companies	Prior to the beginning of clearance or grading works	Budget allocation for implementation of BMP and BMEP	
6.6	<i>Implement the Biodiversity Action Plan</i> - As part of implementation (linked to action 6.1 above), the Projects will implement an offset, removing and/or undergrounding existing overhead powerlines to achieve net gain, to compensate for Great and Little Bustards mortality from collision. Based on the best precautionary information available, the scale of this offset is 100km. The undergrounding will be implemented progressively at a minimum of 10km/annum, until either 100km has been achieved, or PCFM results demonstrate that a smaller offset is sufficient.	IFC PS 6; ADB SPS SR1: Environment, Policy Principle 8b; EBRD PR 6	Project Companies	Starting year 1 of powerline stringing with ~10km per year of progressive undergrounding	Evidence of undergrounding in line with the agreed approach	
6.7	<i>Pre-Construction Survey Central Asian Tortoises</i> - Conduct a pre-construction spring survey for Central Asian Tortoises (CAT) by a qualified expert on the PV and BESS sites to confirm the presence of CAT within the footprint of the Projects and acquire the relevant approvals from the Ministry of Ecology, and their relevant requirements.	IFC PS 6; ADB SPS SR1: Environment, Policy Principle 8b; EBRD PR 6	Project Companies	Surveys and translocation in line with Ministry requirements	Survey reports, Chance Finds, and Ministry communications.	
Cultural Heritage						
8.1	<i>Assessment and Management of Impacts on Cultural Heritage</i> – Project Companies to obtain a permit from the resident Cultural Heritage Office, prior to the start of any construction works within land earmarked for the Project.  Project Companies to inform the Cultural Heritage Agency about the planned scope of works, including construction schedule and site coordinates, to determine the need for supervision by Government Archaeologist(s). It is noted that it would be up to the local authorities' discretion to appoint any representatives to supervise the construction of the Projects.	IFC PS 8; ADB SPS (2009) SR1: Environment, Policy Principle 11; EBRD PR 8.	Project Companies	Prior to the start of the construction phase	Clearance from the resident Cultural Heritage Office	
Information Disclosure and Stakeholder Engagement						
10.1	<i>Stakeholder Engagement</i> – Update the SEP for the Projects periodically to reflect the outcomes of the stakeholder engagement activities (i.e. in particular the national EIA public hearing outcomes). Further, conduct monitoring of the SEP' key performance indicators (KPIs) on a monthly basis which cover: <ul style="list-style-type: none"> <li>Number (per type) of grievances related to local community health, safety and security (injuries, damage, diseases, etc.) in addition to environmental and social;</li> <li>Number of cumulative grievances that are pending/unresolved;</li> <li>Number of grievances not resolved in (i) less than three months and (ii) six months;</li> <li>Average cumulative time for grievance resolution;</li> <li>Number of grievances received and resolved in regard to Sexual Exploitation and Abuse (SEA), SH and Gender-Based Violence and Harassment (GBVH); and</li> <li>Percentage of scheduled SEP activities implemented and reported to Lenders.</li> </ul>	IFC PS 1; ADB SPS, B. Policy Delivery Process, 53, Consultation and Participation; ADB's Access to Information Policy 2018; Environmental Safeguard, Policy Principle 5, 6; EBRD PR 10.	Project Companies	Ongoing throughout the lifetime of the project.	Updated SEP  SEP KPIs Monitoring Log	
10.2	<i>Information Disclosure</i> – Updated ESIA documents (i.e. ESIA report, NTS, SEP and LALRP) to be fully disclosed online, upon agreement with the Lenders. Hard copies of the NTS and ESIA documents to be made available in local languages (in addition to other disclosure requirements above e.g. associated with land acquisition)	IFC PS 1; Reference to ADB SPS (2009) SR1: Environmental Policy Principle 5; EBRD PR 10.	Project Companies	Prior to financial close	Evidence of disclosure	

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