

Dama: Environmental and Social Action Plan (ESAP), West Power Investments SRL

Action	Description	Completion Dates
PS 1/ESR1 - Assessment and Management of Environmental and Social Risks and Impacts		
1	West Power Investments SRL will revise the Environmental and Social (E&S) Policy to incorporate (i) commitments on climate-related risk and resilience (ii) prevention of gender-based violence and harassment (GBVH) (iii) explicit adoption of Rezolv's corporate Contract and Procurement Policy operationalizing the Partner (Supplier) Code of Conduct, ensuring that compliance with its labor requirements.	<i>Prior to Financial Close</i>
2	West Power Investments SRL will develop a Human Resources (HR) Policy covering the following (i) Non-discrimination, equal rights, equal pay; (ii) Prohibition of all forms of child labor and forced labor (iii) Workers' rights and obligations (including reference to the revised Partner (supplier) Code of Conduct) (iv) Freedom of association and right to collective bargaining (v) Informing workers about their rights, obligations, liabilities, and entitlements (vi) Working relationships and Terms of employment including recruitment, hours of work, overtime arrangements and overtime compensation, rights to refuse overtime request (vii) Contractor management (viii) Workers accommodation (ix) Occupational health and safety (x) Commitment to apply zero tolerance for any proven case of gender-based violence, workplace harassment and sexual exploitation and abuse (xi) Collective dismissals.	<i>Prior to Financial Close</i>
3	West Power Investments SRL will develop and implement the ESMS for the Project to include, but not limited to a) Reference to the revised E&S Policy and HR Policy b) All necessary plans and procedures to address mitigation measures identified in the ESIA and SLIP to be developed and executed, including criteria for assessing the past performance of potential Engineering, Procurement and Construction (EPC) contractors with regard to employment and occupational health and safety c) A change control procedure d) A procedure to include legal covenants for tenders and contracts, e) Procedures for subcontractor verification and auditing f) A permitting register for the Project listing all permits required for construction and operation g) A community grievance mechanism h) A C-ESMP, with fully completed sub-plans as follows, (i) a waste management plan (ii) a hazardous materials management plan (iii) a labor management plan, including influx management and local hiring policy and monitoring and evaluation principles (iv) occupational health & safety management plans (v) a worker accommodation plan (vi) a wastewater management plan (vii) a soil management plan (viii) a pollution prevention and control plan covering spill prevention, noise and air quality (ix) a resource efficiency management plan (x) a biodiversity management plan (BMP) and to include pre-construction surveys for targeted species (xi) a cultural heritage management plan (CHMP), including a chance find procedure (xii) a traffic management plan (xiii) an emergency preparedness and response plan (EPRP) (xiv) a security management plan i) A commitment to decommissioning phase management planning	<i>Prior to executing the primary supplier contracts</i>
4	West Power Investments SRL will establish an organogram clearly showing the key ESHS roles in construction and operation, including an ESG Manager, a Health & Safety Manager, a biodiversity specialist, a CLO and a suitably qualified Labor Compliance Officer to monitor all labor related issues including in the supply chain.	<i>(i) Prior to Financial Close</i> <i>(ii) Prior to Notice to Proceed (NTP)</i>

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5	<p>West Power Investments SRL will</p> <p>a) Require all primary contractors and suppliers to develop C-ESMPs, as part of their ESMS, and commensurate with their activities to include as a minimum (i) a waste management plan (ii) a hazardous materials management plan (iii) a labor management plan, including influx management and local hiring policy and monitoring and evaluation principles (iv) occupational health & safety management plans (v) a worker accommodation plan (vi) a wastewater management plan (vii) a soil management plan (viii) a pollution prevention and control plan covering spill prevention, noise and air quality (ix) a resource efficiency management plan (x) demonstrate their adherence to the biodiversity management plan (BMP) (xi) a cultural heritage management plan (CHMP), including a chance find procedure (xii) a traffic management plan (xiii) an emergency preparedness and response plan (EPRP) (xiv) a security management plan. All plans shall comply with the applicable National requirements, IFC Performance Standards, good international industry practice (GIIP), include relevant considerations due to the impacts of climate change, and include measurable performance indicators (KPIs) to track progress towards the defined objectives and targets.</p> <p>b) Require all primary O&M contractors to develop O-ESMPs, as part of their ESMS, and commensurate with their activities, covering the same suite of plans and principles as the C-ESMPs, but with the appropriate operational phase focus.</p>	<p><i>(i) Prior to the relevant primary contractor mobilizing on site</i></p> <p><i>(ii) Prior to COD</i></p>
6	<p>West Power Investments SRL will revise the existing Partner (supplier) Code of Conduct to explicitly include provisions on (i) prohibition of child labor with clearly defined minimum age for employment and minimum age for hazardous work (ii) a defined list or clear reference to prohibited hazardous tasks for underage workers (iii) prevention of gender-based violence, harassment, and abuse (including sexual harassment) (iv) and protection of workers' health and safety and prevention of harm to workers.</p>	<p><i>Prior to executing the primary supplier contracts</i></p>
7	<p>West Power Investments SRL will include in the tender documentation and all EPC Contractor's, BOP and HV electricals contractor, O&M, the balance of plant and HV electricals O&M contract and PV panel supplier contracts, a provision on full compliance with national legislation, applicable standards, IFC Performance Standards, EBRD Environmental and Social Requirements, the Rezolv Policies, the ESMS, the SCMP, and the revised version of Partner (supplier) Code of Conduct.</p> <p>West Power Investments SRL will require that these same requirements cascade to subcontractors through contracting provisions.</p>	<p><i>Prior to executing the primary supplier contracts</i></p>
8	<p>West Power Investments SRL will disclose a Public Consultation Report (PCR) summarizing the ESIA disclosure and consultation process, the feedback received, and how the Project has addressed or will address stakeholders' comments (or why certain suggestions cannot be adopted).</p>	<p><i>PCR disclosed prior to Financial Close</i></p>
9	<p>West Power Investments SRL will update the Stakeholder Engagement Plan (SEP) to document the ESIA disclosure and consultation process, the feedback received, and how the Project has addressed or will address stakeholders' comments.</p>	<p><i>Prior to Financial Close</i></p>
<p>PS 2/ESR2 – Labor and Working Conditions</p>		
10	<p>West Power Investments SRL will develop A Terms of Employment Handbook, including details of the Workers' Grievance Mechanism (WGM) which shall be finalized and disseminated to all workers, including sub-contractors. This will include specific protocols on prevention of gender-based violence and harassment (GBVH) and child protection and handling any associated grievances.</p>	<p><i>Prior to NTP</i></p>

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11	West Power Investments SRL will conduct a standalone labor and working conditions audits, as part of the E&S monitoring process. This will include a readiness audit prior to mobilization and a follow-up audit at the peak of construction. The audits shall assess compliance with national labor legislation, EBRD ESR2, and IFC Performance Standard 2. It shall include direct, contracted and subcontracted workers	<i>(i) Prior to mobilization. (ii) 2 months prior to peak of construction</i>
12	West Power Investments SRL will identify and engage a qualified partner to deliver periodic mandatory GBVH training, including a train-the-trainer component, to all workers, including contractors and subcontractors. This will include: <ul style="list-style-type: none"> • mandatory training and awareness-raising for the workforce on GBVH prevention and the new protocol/code of conduct (often done as part of induction and toolbox talks) • support for implementation of confidential grievance/reporting channels and response procedures for GBVH incidents, in line with EBRD/IFC requirements (e.g. multiple reporting pathways, survivor-centred support, non-retaliation). 	<i>Prior to mobilization.</i>
13	West Power Investments SRL will implement a Supply Chain Management Plan (SCMP) to include as a minimum (i) A risk assessment of labor and human rights risks across the supply chain, (ii) The tiers of the supply chain identified and mapped, including name, location, and subsector (iii) For PV modules, use the Bill of Materials (BoM) identifying the provenance of key components (silicon metal, polysilicon, wafers, ingots, cells and quartzite) and the legal entity names and addresses of manufacturing facilities (iv) A change control process whereby any changes to the supply chain shall be notified to the Sponsor without undue delay and supported by an updated BoM submitted for lender approval (v) An escalation procedure and corrective action requirements where non-compliance is identified (vi) A mechanism for regular reporting on supply-chain risk management, compliance and SCMP implementation, including updates on identified risks, audit findings (where applicable), and progress in addressing and closing any identified gaps (vii) Definition of the instances whereby the Sponsor will apply additional risk management measures to the supplier (such as any new information coming to light) and the circumstances in which an independent third-party labor audit and / or enhanced due diligence, would be undertaken, including defining specific measures to be implemented in cases where the mapping reveals potential exposure to forced labor, (viii) requirements for traceability protocols from solar suppliers down to polysilicon (and metal grade silicon where risks are identified) (ix) Chain-of-custody certification from suppliers where available The requirements of the SCMP will be cascaded to primary suppliers and the EPC contractor through contractual obligations, requiring alignment with its contents, the Project E&S Policy, the revised Partner (Supplier) Code of Conduct, IFC Performance Standards and ILO core labor conventions.	<i>Prior to executing the solar supplier contracts, and on-going monitoring as required</i>
PS 5/ESR5: Land Acquisition and Involuntary Resettlement		
14	West Power Investments SRL will conduct additional consultations with indirectly affected land users and road users who may experience indirect or temporary impacts (such as temporary access restrictions to fields) during disclosure and construction stages. Update the Livelihood Restoration Plan (LRP) accordingly to include the consultation findings, the agreed alternative access arrangements (routes), and reflect these in the Entitlement Matrix as applicable. The final LRP will be disclosed to all affected people and will include information on the project grievance mechanism so concerns regarding the land access and livelihood restoration process can be submitted. Implement the Livelihood Restoration Plan for the 400 kV grid connection works in accordance with EBRD ESR5 and IFC PS5. Use an avoidance-first	<i>Prior to NTP</i>

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	<p>approach to scheduling construction on agricultural land (e.g. carry out works after harvest where possible). If temporary land use restrictions or damage to assets (crops, grazing land) cannot be avoided, provide compensation at full replacement cost before starting work on each affected segment.</p>	
15	<p>West Power Investments SRL will monitor and verify the completion of livelihood restoration measures for all affected people through ongoing engagement and independent evaluation. Throughout construction (and into initial operation, as needed), engage with affected households to assess whether livelihoods are being restored and/or improved. The Lenders' Environmental and Social Consultant will review livelihood restoration progress in their regular monitoring reports and provide final verification of completion. If monitoring finds any household's access or income is not fully restored, implement additional measures, as required, and document in a corrective action plan (e.g. supplemental assistance or extended monitoring) until the LESC confirms livelihood restoration is achieved.</p>	<p><i>Throughout construction and post-construction until the LESC and Lenders confirm livelihoods are restored to Pre-Project levels or improved (prior to final disbursement)</i></p>
<p>PS 6/ESR6: Biodiversity Conservation and Sustainable Management of Living Natural Resources</p>		
16	<p>West Power Investments SRL will develop and implement an operation phase BMP, which will include a Habitat Restoration Program for Pannonic salt steppes and salt marshes habitat and associated priority biodiversity values. A qualified expert with international experience will be procured to develop the Habitat Restoration Program, which will, at the minimum, include (i) detailed habitat mapping, (ii) identification of impacts, (iii) recommendations for restoration measures and opportunities to maintain biodiversity on-site and (ii) a clear demonstration of how NNL will be achieved.</p>	<p><i>4 months prior to the start of operations</i></p>
17	<p>West Power Investments SRL will update the BAP to (i) Include the outcomes of the updated Critical Habitat Assessment (CHA), (ii) Incorporate a Biodiversity Monitoring and Evaluation Plan (BMEP) with indicators and thresholds for adaptive management, and (iii) demonstrate implementation of the ACAs and continued engagement with relevant stakeholders (e.g. competent authorities conservation organizations, etc.). The BAP will be implemented throughout the project lifecycle and updated periodically as the project progresses.</p>	<p><i>Prior to Financial Close</i></p>
18	<p>West Power Investments SRL will develop and implement a Biodiversity Offset Management Plan (BOMP) commensurate with the residual impacts resulting from the project and based on consultation with key stakeholders. The BOMP will be developed and implemented by qualified experts with international experience on offsets to (i) quantify residual impacts on Natural and Critical Habitat, (ii) define offset criteria and options, (iii) conduct an offset feasibility study (v) monitor implementation of offsets aiming to deliver measurable conservation outcomes, and (vi) include budgets for implementation and monitoring.</p>	<p><i>4 months prior to COD</i></p>
<p>PS8/ESR8: Cultural Heritage</p>		
19	<p>For known archaeological sites within the project footprint, West Power Investments SRL will conduct the required pre-construction field surveys or rescue excavations in coordination with the Arad County Directorate for Culture. Outcomes from all discussions and coordination efforts, and protective measures including fencing off and micro-siting to avoid impacts for heritage sites to be preserved in situ shall be included in the cultural heritage management plan (CHMP).</p>	<p><i>Prior to the relevant primary contractor mobilizing on site</i></p>